



RAVIRAJ FOILS LIMITED. EHS PROCEDURE

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TITLE: Anti-Money Laundering (AML) Policy	DOC. NO.	RFL/EHS/PR/46
	REV. NO.	00
	EFFECTIVE DATE	20/08/2024
	REVIEW DATE	19/08/2025
	SUPERSEDES	NIL

1. Purpose

The purpose of this Anti-Money Laundering (AML) Policy is to establish a framework for detecting, preventing, and reporting money laundering activities within Raviraj Foils Ltd. This policy aligns with the Global Reporting Initiative (GRI) standards and complies with applicable laws and regulations, ensuring that the company is not used as a vehicle for money laundering or terrorist financing.

2. Scope

This policy applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders associated with Raviraj Foils Ltd. It covers all business activities, including financial transactions, partnerships, and interactions with customers and third parties.

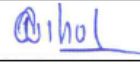
3. Definition of Money Laundering

Money laundering is defined as the process of concealing or disguising the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. It also includes activities related to terrorist financing, where funds are used to support terrorist activities.

4. Core Principles

Compliance with Laws: Raviraj Foils Ltd. is committed to complying with all applicable AML laws and regulations, both domestically and internationally.

Due Diligence: The company will conduct thorough due diligence on customers, suppliers, and business partners to prevent money laundering activities.

PREPARED BY:	CHECKED BY:	APPROVED BY:
		
Safety Officer	Sr. EHS Officer	HR - Head
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Transparency: All financial transactions must be conducted in a transparent manner, with accurate and honest reporting to ensure compliance with AML regulations.

5. Quantified Objectives

Objective 1: Achieve 100% completion of AML training for all employees, directors, and officers annually.

Objective 2: Ensure 100% of high-risk transactions are reviewed and reported in accordance with AML regulations.

Objective 3: Conduct at least two internal audits per year focused on AML compliance.

Objective 4: Ensure 100% of third-party suppliers and contractors acknowledge and commit to the AML Policy by signing a declaration.

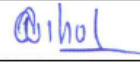
6. Prohibited Practices

Acceptance of Illegitimate Funds: The company will not accept funds from illegal sources or engage in transactions that involve the proceeds of crime.

Structuring Transactions: Any attempt to structure transactions to evade reporting requirements, such as splitting large transactions into smaller ones, is strictly prohibited.

Use of Shell Companies: The use of shell companies or other entities designed to obscure the true ownership or purpose of funds is prohibited.

Terrorist Financing: Engaging in or facilitating transactions that support terrorist activities is strictly prohibited.

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7. Responsibilities

Board of Directors: The Board is responsible for ensuring that the company's AML program is effectively implemented and that a culture of compliance is promoted throughout the organization.

Management: Managers are responsible for enforcing this policy, conducting risk assessments, and ensuring that their teams are fully trained and compliant with AML regulations.

Compliance Officer: The Compliance Officer is responsible for overseeing the AML program, conducting internal audits, monitoring high-risk transactions, and ensuring compliance with reporting obligations.

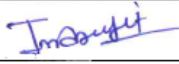
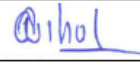
Employees: All employees are responsible for understanding and complying with this policy, completing required training, and reporting any suspicious activities or violations.

8. Training and Awareness

Mandatory Training: All employees, directors, and officers must complete mandatory AML training annually. Training programs will cover relevant laws, the identification of suspicious activities, and the procedures for reporting such activities.

Ongoing Communication: The company will provide ongoing communication and updates on AML regulations, ensuring that all stakeholders are aware of their obligations and the procedures for compliance.

9. AML Risk Assessment and Monitoring

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Regular Risk Assessments: The company will conduct regular AML risk assessments to identify potential areas of vulnerability. This includes evaluating customer profiles, transaction patterns, and third-party relationships.

Internal Audits: The Compliance Officer will conduct at least two internal audits per year focused on AML compliance. These audits will evaluate the effectiveness of the company's controls and identify any areas for improvement.

Transaction Monitoring: All financial transactions will be monitored for suspicious activities. High-risk transactions will be reviewed in detail and reported to the relevant authorities as required by law.

10. Reporting and Whistleblowing

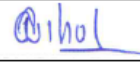
Reporting Mechanisms: Employees and stakeholders are encouraged to report any suspicious activities or potential money laundering schemes. Reports can be made anonymously through the company's whistleblowing hotline or directly to the Compliance Officer.

Protection from Retaliation: The company strictly prohibits retaliation against anyone who reports a violation of this policy in good faith. All reports will be treated confidentially and investigated thoroughly.

11. Response to Money Laundering Activities

Investigation: All reported incidents of suspected money laundering will be promptly and thoroughly investigated by the Compliance Officer or an appointed investigation team.

Disciplinary Action: Employees found to have participated in or facilitated money laundering activities will be subject to disciplinary action, which may include termination of employment, legal action, or other appropriate measures.

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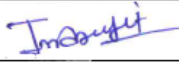
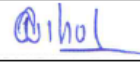
Corrective Measures: The company will implement corrective measures to address any identified weaknesses in its AML program and prevent future occurrences.

12. Review and Revision

Regular Review: This Anti-Money Laundering Policy will be reviewed annually or as needed to ensure it remains effective and up-to-date with legal requirements and best practices.

Revision History: Any changes or updates to this policy will be documented in the revision history, and all stakeholders will be informed of the changes.

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

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