



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

HR DEPARTMENT

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TITLE: Procedure for Political Contributions Disclosure

DOC. NO.

RFL/EHS/PR/107

REV. NO.

00

EFFECTIVE DATE

20/08/2024

REVIEW DATE

19/08/2025

SUPERSEDES

NIL

1. Purpose

To establish a systematic approach for managing and publicly disclosing financial and in-kind political contributions made by Raviraj Foils Ltd. to ensure transparency, accountability, and compliance with legal and ethical standards.

2. Scope

This procedure applies to all political contributions made directly or indirectly through intermediaries by Raviraj Foils Ltd. It encompasses financial and in-kind contributions across all jurisdictions where the company operates.

3. Definitions

- **Political Contribution:** Any financial or in-kind support provided to political parties, candidates, or causes, including monetary donations, goods, services, or sponsorships.
- **Intermediary:** Any third party acting on behalf of the company to facilitate political contributions.
- **Beneficiary:** The political party, candidate, or organization receiving the contribution.

4. Responsibilities

- **Compliance Officer:**
 - Oversee the implementation of this procedure.
 - Ensure all political contributions comply with legal and ethical standards.
- **Finance Department:**
 - Maintain detailed records of all political contributions.
 - Facilitate audits and ensure proper documentation.
- **Board of Directors:**
 - Approve political contributions exceeding specified thresholds.
 - Review and approve the annual disclosure report.
- **Public Relations Team:**
 - Ensure timely and accurate public disclosure of contributions.

PREPARED BY:	CHECKED BY:	APPROVED BY:
		
Safety Officer	Sr. EHS Officer	HR - Head
DATE: 20/08/2024	DATE: 20/8/2024	DATE: 20/08/2024

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5. Procedure

5.1 Approval of Political Contributions

1. Request Submission:

- Any department proposing a political contribution must submit a request form, detailing:
 - Beneficiary (party, candidate, or organization).
 - Nature and value of the contribution (financial or in-kind).
 - Purpose and alignment with company policies.

2. Compliance Review:

- The Compliance Officer will review the request to ensure it adheres to legal, ethical, and policy guidelines.

3. Approval Authority:

- Contributions below a pre-defined threshold are approved by the Compliance Officer and Finance Head.
- Contributions exceeding the threshold require approval from the Board of Directors.

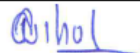
5.2 Documentation and Record-Keeping

1. Transaction Records:

- The Finance Department will maintain detailed records of all political contributions, including:
 - Beneficiary details.
 - Contribution value.
 - Purpose and supporting documentation.

2. Audit and Assurance:

- Contributions are audited as part of the annual financial audit.
- Ensure that contributions comply with regulatory requirements and internal policies.

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5.3 Public Disclosure

1. Preparation of Disclosure Report:

- Annually, the Compliance Officer, in collaboration with the Finance Department, will prepare a disclosure report, detailing:
 - Total value of political contributions made.
 - List of beneficiaries (parties, candidates, or organizations).
 - Nature of contributions (financial or in-kind).
 - Purpose and justification for each contribution.

2. Review and Approval:

- The draft disclosure report is reviewed by the Board of Directors.

3. Publication:

- Publish the approved report on the company's website and include it in the annual sustainability report.

5.4 Indirect Contributions Through Intermediaries

1. Intermediary Identification:

- Verify the credibility and compliance record of intermediaries before engagement.

2. Disclosure of Indirect Contributions:

- Clearly identify and disclose indirect contributions facilitated through intermediaries in the annual report.

5.5 Monitoring and Compliance

1. Regular Monitoring:

- The Compliance Officer will monitor political contributions for adherence to this procedure.

2. Non-Compliance:

- Report incidents of non-compliance to the Board of Directors and take corrective actions as necessary.

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6. Training

- Conduct annual training sessions for relevant employees on political contribution policies, legal requirements, and disclosure processes.

7. Reporting and Review

- The procedure will be reviewed annually or as required due to changes in regulations or company policies.

8. Revision History

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

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