

Anti Bribery and Anti Corruption Policy of BMM Ispat Limited

1. Objective:

BMM Ispat Limited (BMMIL) is committed to the highest standards of corporate governance in all its activities and processes. It is policy of company to conduct all its business activities with honesty, integrity and highest possible ethical standards.

2. Scope and applicability:

Anti Bribery and Anti Corruption policy applies to all employees including Directors, Independent Directors, Officers and Third Parties which includes customers, suppliers, consultants, intermediaries, representatives, agents, advisers, joint venture partners etc. This policy is applicable not only to persons who offer or pay bribe but also includes any person who:

- a. Approves or authorize such payments
- b. Covers up an illegal payment
- c. Knowingly cooperates in the payment of bribe or
- d. Suspects an illegal payment but turns a blind eye to it.

3. Meaning of key words:

- a. **Bribe:** A bribe is benefit, reward, inducement, payment, promised or given to any person in power in an effort to cause the person to take a particular action or gain an undue advantage. It is not just money but also includes gifts, inside information, favours, corporate hospitality, offering employment to a relative, reimbursement of personal expenses, donation etc.
- b. **Corruption:** Corruption includes wrongdoing on the part of an authority or those who are in power through illegal and unethical means.
- c. **Facilitation payments:** These are payments made to get or expedite a routine government action by government official.
- d. **Kickbacks:** These are payments made to organizations in return of undue advantage received.
- e. **Government Official:** Government Official includes any official or employee of a Central, State or local government or employee of government owned enterprise, government agency, government regulatory authority, public international organization or any person acting in official capacity on behalf of government.

4. Policy details:

- a. **Gifts:** The company regards the giving and receiving of the gifts, complimentaries, favours or entertainment as inherently compromising unless they are of a reasonable value (i.e. not extravagant) under the circumstances. This means that they do not influence or give the appearance of influencing the recipient and are not likely to be viewed as bribe, kickback or payoffs. Gifts of the money shall never be accepted or given. However, this policy do not prohibit receiving or giving of token gifts to improve image of company. Examples of token gifts are corporate calendars, pens, mugs, books, T-shirts, bouquet of flowers, dry fruits, sweets etc. of reasonable value. If gifts or hospitality is given or accepted which is more than token gifts in ordinary course of business, then approval of a) Mr

Anti Bribery and Anti Corruption Policy of BMM Ispat Limited

Rajendra Moondra, Whole Time Director, b) Mr Manish Vernekar, Associate Vice President and c) Mr Ganesh Hegde, Deputy General Manager are required in writing.

- b. **Facilitation payments:** No employee of BMMIL or any person action on behalf of BMMIL shall make or accept facilitation payments or kickbacks of any kind.
- c. **Donations:** As good corporate citizen, BMMIL is committed to support and sponsor social activities. However, these activities should be approved by Board of Directors.
- d. **Business relations with third parties:** BMMIL expects third parties to conduct their activities as per this policy. To maintain highest standards of integrity with respect to dealing with third parties, employees must:
 - i. Conduct due diligence enquiries before entering a commercial relationship with third parties.
 - ii. Brief third parties about this policy
 - iii. Ensure fees or commission paid are appropriate and justifiable.
 - iv. Withdraw from relationship if any third party fails to abide by this policy.

5. Expectations from employees:

The prevention, detection and reporting of bribery and other forms of corruption is responsibility of all those who are working with BMMIL. Employees should avoid any activity that may lead or suggest a breach of this policy. Employees are expected to report such instances directly to a) Mr Rajendra Moondra, Whole Time Director, b) Mr Manish Vernekar, Associate Vice President and c) Mr Ganesh Hegde, Deputy General Manager. If any employee is unsure whether a particular act constitutes bribery or corruption, they should raise the same a) Mr Rajendra Moondra, Whole Time Director, b) Mr Manish Vernekar, Associate Vice President and c) Mr Ganesh Hegde, Deputy General Manager.

6. Protection:

The employees who refuse to accept or give bribe or those who report another person's bribery or corrupt act will be safeguarded against victimization and discrimination as per Whistle Blower Policy of the company. Employees have direct access to a) Mr Rajendra Moondra, Whole Time Director, b) Mr Manish Vernekar, Associate Vice President and c) Mr Ganesh Hegde, Deputy General Manager. The matters reported by employees will be investigated as per procedure prescribed in Whistle Blower Policy.