



**THE RAMCO CEMENTS LIMITED**

**ANTI-BRIBERY**

**&**

**ANTI-CORRUPTION POLICY**

**2025**



## ANTI-BRIBERY & ANTI-CORRUPTION POLICY

### 1. OBJECTIVE

THE RAMCO CEMENTS LIMITED (TRCL) is dedicated to operating its business with a strong emphasis on integrity, ethics, and transparency. The company adheres to high ethical standards aimed at effectively monitoring, detecting and preventing the occurrence of corruption, bribe and fraudulence. TRCL strictly forbids any actions involving offer, promise, provision, authorization, request, or acceptance of any form of bribe, kickback, illegal payment, or delivery of unauthorized goods and services, whether directly or indirectly, to or from any individual, organization, or government official in exchange for favours (or) benefits. This policy specifies the necessary measures that employees should follow to prevent any potential association with money laundering, as well as any activities related to bribery, facilitation payments, or corruption.

### 2. DEFINITIONS

**Bribery** refers to offering, promising, giving, accepting or soliciting an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can be money, gifts, loans, fees, rewards or other advantages.

**Corruption** refers to the unethical or improper use of authority and influence for personal benefit. This misconduct can extend beyond individual interests, often resulting in advantages for larger entities, including political parties, corporations, or specific groups.

### 3. SCOPE

#### 3.1 APPLICABILITY

This Policy applies to all employees across various levels and grades, encompassing senior management personnel, permanent and temporary employees, workers, consultants, contractors, interns & trainees, and any other individuals affiliated with the Company, including those representing the Company.

#### 3.2 BRIBES

Employees shall not engage in any form of bribery, either directly or indirectly through third parties (agents/distributors).

TRCL employees are expressly forbidden from engaging in any actions that involve offering, promising, granting, authorizing, demanding, or accepting any form of promise, bribe, kickback, illegal gratuity, payment, facilitation payment, or any other illicit goods and services, regardless of their value. This prohibition applies to interactions with any individual, organization, or government representative, whether directly or indirectly.

### **3.3 GIFTS AND HOSPITALITY**

All employees, along with their immediate family members, are prohibited from accepting or offering any gifts or favours of any kind from suppliers, vendors, dealers, contractors, customers, competitors, or any business associates.

Offering or providing any gifts, including cash, hospitality, or entertainment, in exchange for any favour or the promise of a favour that could benefit TRCL is strictly forbidden, regardless of the situation, to any Government Official or private individual.

### **3.4 POLITICAL CONTRIBUTIONS**

TRCL is dedicated to maintaining political neutrality and to avoid participating in activities that support any political parties, coalitions, individuals, or candidates at the local, regional, or national levels. Political contributions, if any, can only be considered by the company's Board of Directors in accordance with applicable laws

Any employee who makes political contribution in his / her personal interest must ensure that it is not presented as a contribution made on behalf of the Company.

## **4. RAISING CONCERN**

Every individual covered by this policy are strongly advised to express their concerns regarding potential bribery or suspicions of misconduct as soon as possible. In cases where there is uncertainty about whether a specific action qualifies as bribery or corruption, or if there are any other inquiries, these should be directed to the appropriate Manager and/or the corporate ombudsman through [whistleblower@ramcocements.co.in](mailto:whistleblower@ramcocements.co.in) (or) the Chairperson of the Audit Committee.

It is the responsibility of each individual to promptly notify their respective Managers and the corporate ombudsman at [whistleblower@ramcocements.co.in](mailto:whistleblower@ramcocements.co.in). Individual must decline any payments to or from third parties, clearly articulating our policy that prohibits such transactions. Employees are also encouraged to refer to the Whistle-blower Policy of the Company and report any suspected malpractice to the contacts specified in the policy.

## **5. VIOLATION**

Any breach of this policy will be regarded as a violation of the Company's code of conduct, and the Management will take necessary actions in response to such infractions. Concerns related to this policy should be directed to the Chairperson of the Audit Committee.

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