

ANTI-BRIBERY AND CORRUPTION POLICY

Adherence to good Corporate Governance and managing its affairs in a fair, honest, ethical, transparent and legal manner is an integral part of the philosophy of **All Indian Origin Chemists & Distributors Ltd.**, ("the Company").

Furtherance to its philosophy the Company formulates this Anti Bribery and Policy to ensure that no employee of the Company indulges in and associate with any act of bribery, extortion or corruption with any government officials or any person for or on behalf of the Company. This Anti-Bribery Policy is committed to conducting its business ethically and in compliance with the *Prevention of Corruption Act, 1988, Corporate Anti-Bribery Code, 2017* and other similar applicable Anti Bribery and Anti-Corruption Laws.

1. APPLICABILITY AND PURPOSE OF THIS POLICY

This Policy is designed to ensure that neither the Company, nor any of its Employees, Directors or Authorised Representatives indulge in Bribery in any of their actions taken for and behalf of the Company.

This Policy is designed to communicate the Company's commitment to counter corruption and to ensure that all employees and third-party representatives fully understand the scope and application of the Anti-Bribery and Corruption Laws.

This Policy apply to all Officers, Employees (hereinafter referred as to the "employees"), Agents, representatives, or other intermediaries acting on behalf of the Company. Each officer and employee or anyone acting on behalf of the Company has a personal responsibility and obligation to conduct Company's business activities ethically and in compliance with the law. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

2. COMPANY POLICY

The Company strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, including, but not limited to government officials. Improper payments prohibited by this policy includes, but is not limited to bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue advantage in order to influence official acts or decisions of that person or entity; or secure any improper advantage. Company





Personnel are also prohibited from providing or receiving gifts, meals, entertainment or anything of value to any person or entity in connection with Company business.

These payments should not be confused with reasonable and limited expenditures for business entertainment and other legitimate activities directly related to the conduct of Company's business.

The following are the Company Policy Rules on the giving and receiving of benefits: -

a) Facilitation Payments

Facilitation Payment means a payment made to government or private official, that acts as an incentive for the official to complete some action or process expeditiously to the benefit of the party making the payment.

This Policy strictly forbids the practice of providing such facilitations payments by any Company Personnel on behalf of the Company.

b) Donation to Charities

The Company believes in contributing to the communities in which it does business and permits reasonable donations to charities. However, the Company needs to be certain that donations to charities are not disguised illegal payments to government officials or others in violation of Anti-Corruption Laws.

c) Any other payment to obtain undue advantage

The Company prohibits any other payment made or offered to obtain an undue advantage in order to influence official acts or decisions of that person or entity; or secure any improper advantage.

3. THIRD PARTY

The Company recognizes that there are circumstances in which relationships with third parties such as agents and referral partners will be required or prudent from a commercial perspective.

Third parties can put the Company at risk if they do not follow ethical business practices. For that reason, the Company will develop procedures for conducting appropriate risk-based due diligence on third parties, and the implementation of appropriate steps to address any identified risks, to ensure compliance with the applicable anti-corruption laws. Associates must carefully follow the procedures that are established under this policy.



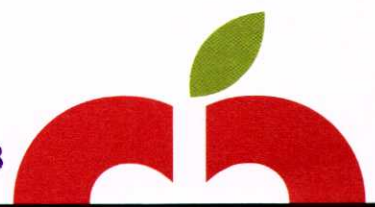
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4. DISCIPLINARY ACTION ON NON-COMPLIANCE

Violations of this Policy will not be tolerated. Any Company Personnel who violates this Policy will subject to disciplinary action, which may include termination of employment or relationship with the Company.

5. REPORTING OF VIOLATIONS

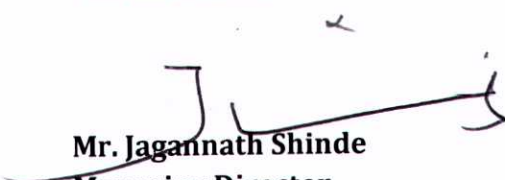
Any Company Personnel who are or become aware of/or suspect a violation of this Policy and/or the Anti-Bribery and Corruption laws are under an obligation to report the same to the Company. Violations or suspected violations should be reported by contacting any member of the Management and/or Human Resource (HR).

6. TRAINING, COMMUNICATION AND QUERIES

Dissemination of this policy for new joinees shall be carried out at the time of induction. This policy will also be shared with all existing employees and associates. Incase of any queries about this policy, any member of the Management or Human Resource (HR) should be contacted.

The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter.

For ALL INDIAN ORIGIN CHEMISTS & DISTRIBUTORS LTD.


Mr. Jagannath Shinde
Managing Director
DIN:01435827

