



# ANTI - BRIBERY POLICY

## **Dodla Dairy Limited**

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## 1. Objective

The objective of this Policy is to set out responsibilities of all the employees, stakeholders, etc., and provide guidance on dealings that could pose the threat of bribery and corruption, with individuals, government and non-government organizations. The Company is committed to act professionally and fairly in all our business dealings and in implementing effective systems to counter bribery and corruption in any form.

## 2. SCOPE

This Anti-Bribery Policy (the '**Policy**') provides a framework for ensuring compliance with legislations governing bribery globally. Dodla Dairy Limited ('**Company**') practices a zero-tolerance approach to bribery. Dodla Dairy Limited is committed to act with honesty and integrity. As part of this commitment, any form of bribery is not acceptable. In each of the locations where we operate, employees and stakeholders are expected to follow this Policy and the applicable laws regarding bribery. No Stakeholder can waive off from complying with this Policy. This policy should be read in conjunction with the Code of Conduct and Whistle Blower Policy.

## 3. Applicability

This policy applies to all categories of employees of the Company, including permanent, temporary, trainees, and employees on contract basis working at various locations. It also extends to business stakeholders viz., customers, vendors, consultants, distributors, visitors, etc., who are dealing with our employees in the course of business activities. The Policy coverage is not only limited to geographical locations viz. Company's plants/ CCs/ Sales offices / Corporate office but also includes all such places or locations where the acts like entering contracts and business agreements to maintain the smooth flow of business.

## 4. PROHIBITION OF BRIBE

All the employees, stakeholders, or any person engaged with business activities shall not offer, give, solicit or receive bribes or kickbacks and must act fairly and adhere to this Policy.



**4.1 Statutory Bodies:** All Personnel associated with the Company must not make, offer, promise or authorize the payment or transfer of anything of value, directly or indirectly, to a government official for the purpose of influencing official action or inaction, inducing an unlawful act, or to secure an improper advantage.

**4.2 Facilitation Payments or Kickbacks:** All Facilitation Payments and kickbacks are corrupt payments, and any such payment in the course of our Company's business is strictly forbidden. All Personnel associated with the Company must not offer or make a payment or provide other things of value to any person, whether or not a government official, for the purpose of inducing some improper action by the recipient or gaining an improper advantage. All personnel must not ask for or receive such payments. This includes personal payments or other things of value made or received in exchange for the awarding of business.

**4.3 Third Parties:** Anti-corruption laws prohibit corrupt payments made directly by the Company and also indirectly through an agent or other intermediary such as a consultant acting on our behalf. It is unlawful to make a payment of anything of value to any agent or other intermediary if there is reason to believe that any portion of the payment will be offered, given, or promised to anyone else, for wrongful gain.

Accordingly, this Policy applies to activities conducted with or through an agent, consultant, joint venture or other business partner. All personnel who manage, supervise, or oversee the activities of third parties working with the Company should ensure that such persons or entities understand and fully comply with this Policy. The most important step we can take to protect ourselves from liability for improper payments made by third parties is to choose carefully our partners, including agents and consultants, and monitor their conduct.

**4.4 Gifts, Hospitality and Entertainment:** The Company and other persons associated with the Company shall not accept or offer gifts to any Government official or any private person. Refer the Code of Conduct for detailed guidelines/ exceptions.

**4.5 Charitable Contributions and Sponsorships:** The Company ensures that charitable contributions and sponsorships are not used as a vehicle for bribery or corruption. Also, the Company publicly discloses all its charitable contributions and sponsorships



and ensure that all such transactions are legal and ethical under local laws and practices.

## **5. MODE AND MANNER OF REPORTING SUSPECTED PRACTICES**

**5.1** Any employee in our organization or any third party is encouraged to raise concerns about any bribery issue or suspicion of malpractice or any case of corrupt practice or any breach of this Policy or applicable law at the earliest possible time. If he/she is unsure whether a particular act constitutes bribery or corruption or if he/she has any other queries, those should be raised with the respective reporting manager and the Compliance Officer at the following email address [cs@dodladairy.com](mailto:cs@dodladairy.com)/  
[hr@dodladairy.com](mailto:hr@dodladairy.com).

**5.2** No person who in good faith, reports a violation of this Policy shall suffer harassment, retaliation, or adverse employment consequences/ business relations with the Company.

## **6. RESPONSIBILITY AND PENALTIES**

**6.1** The Company takes the subject of corruption and bribery very seriously. Any violation of this Policy will be regarded as a serious matter and shall result in disciplinary action, including termination, in consistent with the applicable laws and terms of employment.

**6.2** Bribery is a criminal offense. The defaulting person will be accountable whether she/he pays bribe or authorizes, assists, or conspires with someone else to violate this Policy or an anticorruption/anti-bribery law. Punishments for violating the laws mentioned above towards defaulting person may include imprisonment, probation, and monetary fines shall be at their own risk.

**6.3** In case of violations of this policy, the Compliance Officer/ Administrative Manager who shall take appropriate steps such as:

- a) Assigning an Investigation Team: Experts with business knowledge and bribery laws may be appointed to investigate a complaint.
- b) Conducting an Investigation: Every investigation relating to a suspected violation of this Policy shall be investigated by the Compliance Officer / Administrative Manager together with other members assigned under sub-clause (a) above. The



objective of such an investigation would be to determine the facts, through enquiry with concerned participants and/or review of documents. Such an investigation team will make a written demand for information, records etc. from the defaulting person during the process of enquiry. Each Person shall co-operate with the investigation team and promptly respond to all requests for information. The report prepared by the investigations team, shall be kept confidential and shall be shared only with only senior management.

- c) Corrective Action: If necessary, corrective actions shall be recommended or suggested to appropriate managers, officers and employees for implementation.
- d) Penalties: The Compliance Officer/ Administrative Manager shall, after considering inputs, if any, from the senior management take appropriate disciplinary action, including suspension and termination of service of the defaulting person. All internal investigations shall follow principles of natural justice and shall ensure that the defaulting person is provided with an opportunity to make his/her case before the investigation team.

## **7. PERIODIC REVIEW AND EVALUATION**

The senior management team will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. The Company reserves the right to amend the terms of this Policy from time to time.

## **8. RECORD-KEEPING**

Dodla Dairy Limited books and records shall be fair and accurate and reasonably detailed. We shall keep financial records and have appropriate internal controls in place, which shall evidence the business reason for making payments to third parties. All accounts, invoices, memoranda, documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, shall be prepared and maintained with strict accuracy and completeness. No accounts shall be kept off-book to facilitate or conceal improper payments.