

Oriental Aromatics

Anti-Bribery & Anti-Corruption Policy

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1. Purpose

OAL's policy is to conduct its business ethically and honestly. The Company has a zero-tolerance policy towards fraud, bribery, and corruption and is committed to acting ethically, fairly, and professionally in all business interactions and partnerships wherever it conducts business. OAL implements and upholds effective systems that prevent all forms of bribery, corruption, and fraud.

2. Scope and Applicability

This Policy applies to all OAL workers, officers, managers, Directors, and contractors. This document provides specific details on prohibiting bribery and corruption in the conduct of OAL's business activities and outlines the duties of each employee and Director in maintaining compliance with the Policy.

3. Definitions

- a) **Anything of Value:** Anything that has value to the recipient, regardless of its amount, whether it be tangible or intangible, including but not limited to money, gifts, hospitality, travel, employment, job offers, internships, debt forgiveness, donations to designated charities, and any other transfer of goods, services, or benefits to the recipient that are either tangible or intangible.
- b) **Bribery:** Giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment) as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:
gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
payments, whether by employees or business partners such as recruiters, labour service providers or consultants; and
other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.
- c) **Business Partner:** A business partner could be any agent, distributor, joint venture and equity investment partner, customs broker, consultant or any other third party authorized to act for or on behalf of OAL.
- d) **Corruption:** Corruption is the abuse of entrusted power or position for personal gain, typically involving bribery, fraud, embezzlement, or other unethical practices. It is dishonest and illegal behaviour where individuals in positions of authority or influence use their power to obtain improper benefits, divert resources, manipulate processes, or engage in illicit activities, all for personal or group gain.
- e) **Gift:** Any tangible thing of value given or received for free or at a reduced (non-market) cost.

- f) **Hospitality:** Any intangible thing of value given or received for free or at a reduced (non-market) cost, including:
Meals, including lunches, dinners, and refreshments;
All forms of entertainment, such as invitations to sporting events, theatre, cultural events, or OAL-sponsored events, including those for which tickets are provided; and
Externally paid-for attendance to professional events, such as conferences, tradeshow, training, etc., including any related travel and accommodation expenses.
- g) **OAL:** Oriental Aromatics Limited and its subsidiaries and affiliates and any company that is directly or indirectly wholly or majority-owned or otherwise controlled by it.
- h) **OAL Personnel:** Any employee, workers and directors of OAL.

4. Policy

The Policy outlines the Company's stance on bribery and corruption and sets clear expectations for employees, business partners, and contractors to follow.

OAL's Policy is to engage in business practices in full compliance with India's legislation governing corruption, including but not limited to the Prevention of Corruption Act, 1988, Foreign Contribution Regulation Act (FCRA), 2010, Lokpal and Lokayuktas Act, 2013, Prevention of Money Laundering Act, 2002, Central Vigilance Commission Act, 2003, Fugitive Economic Offenders Act, 2018 and Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015 together with all other anti-corruption and anti-bribery laws and regulations applicable to the Company's business operating states.

OAL does not tolerate any form of business corruption. This Policy prohibits bribes and other improper or unauthorized payments to any person, organization, or entity in exchange for kickbacks, benefits, or advantages, either directly or indirectly. Even if a bribe or other corrupt practice fails to achieve the desired result, this Policy may still be violated.

Regarding all aspects of OAL's business, employees are expected to adhere to this Policy in spirit and letter. Employees are expected to be aware of any potential violations of this Policy in any given circumstance.

5. Guidelines on the Policy:

OAL employees must never accept or offer to accept a bribe or facilitation payment from any individual, including a government official or business partner, with the intention of influencing the recipient's behaviour or viewpoint.

A bribe must never be requested or accepted by OAL employees. Additionally, OAL employees are prohibited from using a third party or agent on their behalf or on behalf of OAL to pay or receive bribes or perform any other act prohibited by this Policy.

Bribes can be of the forms including giving or receiving money, receiving kickbacks, gifts, hospitality, business or employment opportunities, entertainment, travel, special "favours," or anything of value for the improper purpose of:

- Having an effect on a decision;
- Getting or keeping business;

- Getting a business license or other permit;
- Influencing a government decision, inspection, or audit's outcome.

6. Disciplinary Action

Any OAL employee who violates the Anti-Bribery & Anti-Corruption Policy shall face disciplinary action that could end their employment or other relationship with the Company. Restitution may also be required, and individual personnel may be the subject of civil or criminal action.

Personnel must seek guidance from their manager or other personnel in a higher position if they are involved in or aware of a circumstance that they believe may violate this Policy or result in a violation.

7. Communication and Training

The basic laws, rules, and internal corporate results that pertain to each employee's area of responsibility are a requirement. Additionally, every manager must ensure that their staff adheres to the policy's provisions and is familiar with it. This is a mandatory requirement.

The requirement for training is regularly identified, and the appropriate training courses are held, in order to guarantee ongoing compliance with all compliance requirements.

All employees participate in scheduled, rolling training courses. These schedules cover a period of one to three years, depending on whether they are basic, specialized, or refresher training. Online courses and live on-site training are both available. Subsequent tests verify not only that a training course has been completed, but also that the material has been comprehended.

8. Governance and Whistle-Blowing:

The Executive Board is committed to supporting the implementation of this policy and programs and has assigned the secretarial team to implement the programme.

All employees are encouraged to raise concerns about any actual or suspected cases at the earliest possible stage.

When anyone believes this policy is not being complied with, these concerns must be raised immediately with the immediate superior. If the immediate superior is not the appropriate person, then the employee's concerns must be brought directly to the attention of the location Human Resource Manager and OAL's Compliance team.

9. Raise your concern:

Please get in touch with OAL's compliance team at cs@orientalaromatics.com if you think someone may have violated this policy.

OAL is committed to make complainants feel safe, respected, and protected when raising complaints. This promotes a culture of accountability and enables us to address issues promptly and effectively.

Retaliation, reprisal, or subsequent discrimination against anyone who raises a concern or reports possible misconduct is strictly prohibited at OAL. This includes protection against adverse employment actions, discrimination, harassment, or any form of negative repercussions as a result of raising a complaint.

OAL's compliance team will maintain strict confidentiality throughout the complaint handling process. Limit access to complaint-related information to only those individuals directly involved in the investigation and resolution.

In accordance with its internal procedures for investigations, OAL will conduct an investigation into alleged misconduct relating to this Policy. Any OAL employees who violated this policy may face disciplinary action, including termination from their employment.

Our Company reserves the right to vary and/or amend the terms of this Anti Bribery Policy from time to time.

By Order of the Board of Directors

Sd/-
Dharmil A. Bodani
Chairman and Managing Director
DIN: 00618333