



Anti-Bribery and Corruption Policy

GUIDELINES ON BUSINESS CONDUCT IN ORDER TO PREVENT BRIBERY AND CORRUPTION

Objectives

These Guidelines provide guidance on business ethics. They supplement the principles set out in the Code of Conduct to show that all Supack entities operate fairly, transparently and with integrity. The purpose is to ensure that Supack Industries Pvt. Ltd. complies fully with all applicable laws and operates to ethical standards wherever they conduct business.

Scope

These Guidelines apply to all employees of Supack. These Guidelines apply throughout the group irrespective of the country where business is conducted and/or a particular business unit is situated. The principles contained in these Guidelines must be applied in all countries, even if they are more stringent than local law. Where local laws are more stringent than these Guidelines, then they must also be complied with.

Everyone at Supack must show that all business is performed to the highest ethical standards and complies both with these Guidelines and all applicable laws.

Policy

No one at Supack will engage in any form of bribery.

A “bribe” is the promise of money, reward, favour or a benefit to a person or public official in order to influence the conduct or judgement of that person.

In particular, no Supack employee will

- Offer any bribe to any person or public official;
- Accept any bribe; and/ or
- Engage in any form of indirect bribery by offering or receiving any bribe through a 3rd party.

Compliance and Oversight

Senior Management (which means the Directors), of the company, are responsible for implementing these Guidelines and enforcing them. They must advise on and approve payments, gifts and expenses in accordance with these Guidelines.

Gifts and Entertainment

Gifts and entertainment must only be offered and accepted for conventional social and business purposes at a level appropriate to the status and seniority of those involved. The test when considering gifts and entertainment (whether giving or receiving them) is whether they



could be intended, or even be reasonably interpreted, as a reward or encouragement for a favour or for preferential treatment – if they could be, then they are not permitted under these Guidelines. Gifts must be given openly, unconditionally, must be of modest value and must comply with the expenses policy of the relevant business unit. Gifts and entertainment must never be offered or accepted to obtain or retain business or for reward or inducement. Any deviations from the Guidelines or the expenses policy of the business unit must be approved in advance in writing by Senior Management.

Potential consequences of failing to comply with these Guidelines

The potential consequences of not complying with these Guidelines include the following:

· **For Supack:**

- o Fines of an unlimited amount;
- o Repayment of any profits received;
- o Termination of contracts;
- o Prohibition from bidding for certain contracts, and
- o Reputational damage.

· **For You:**

- o Imprisonment – typically 5-10 year sentences;
- o Fines of an unlimited amount (which cannot be paid by the Company on behalf of the individual)
- o Detention, and
- o Disciplinary action.

Supack always gives its full support to anyone refusing to pay a bribe whatever the inconvenience, loss of business or extra costs involved for Supack. However, in all circumstances, you must not take any step which is likely to endanger either your or another person's safety.

Breaches or potential breaches of these Guidelines

All employees are encouraged to raise concerns about any actual or suspected cases of bribery and corruption at the earliest possible stage. Where anyone believes the Guidelines are not being complied with or they are being asked to carry out any act not in compliance with these Guidelines, 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 Supack HR or Supack's Head of Administration.

SUPACK INDUSTRIES PVT. LTD.



Date 01/01/2016