

## **PRABHAT DAIRY LIMITED**

### **BUSINESS ETHICS STANDARDS FOR BUSINESS PARTNERS**

Prabhat is committed to the highest ethical standards and to conduct business with the highest level of integrity. Prabhat Business Ethic Standards outlines the expected behaviours for all Prabhat Business Partners.

This policy is intended to prevent the unethical and improper practices by its suppliers, dealers, agents, contractors, purchasers and third parties having dealing with the Company (“Business Partners”) and provide opportunity to Business Partners to raise concerns in case they observe any unethical and improper practices in dealing with the Company with the assurance that they will be protected from reprisals or victimization for whistle blowing in good faith.

#### **1. BUSINESS ETHICS**

##### **1.1 Compliance with applicable laws**

Prabhat requires that all its Business Partners must comply with all applicable laws and regulations and shall compete fairly in the market place.

##### **1.2 No Improper Advantage**

Business Partners are strictly prohibited from directly or indirectly offering, demanding, giving any improper advantage or favour to / from the Company’s employees, agents, representatives in order to obtain or retain a business or to in return obtain other improper advantages. Offering or accepting any kind of gifts, bribes or other unusual or improper payments to / from the Company’s employees, agents, representatives to obtain or keep business or gain other improper advantage is unethical, illegal, and is strictly prohibited.

##### **1.3 Conflict of Interest**

Business Partners must disclose all potential conflicts of interest, including those in which they may have been placed unintentionally due to either business or personal relationships with the Company’s competitors, employees, business associates or other vendors.

##### **1.4 Unauthorized Lobbying and Facilitation Payment**

Business Partners shall not undertake any type of lobbying or other similar representative efforts including making any gifts, bribes or other unusual or improper payments, favours on the Company's behalf before any kind of government entity, official or body or representative without the express consent of the Company.

The Company does not authorize any Business Partner to make facilitation payments on the Company's behalf to speed up the performance of a function or activity. In case of doubt about a payment and suspect that it might be considered a facilitation payment, only make the payment if the official or third party can provide a formal receipt or written confirmation of its legality.

### **1.5 Confidentiality**

Business Partners shall not disclose confidential information of the Company to the third parties without being authorized to do so and make only proper and authorized use of such information.

## **2. COMPLIANCE AND REPORTING**

Each Business Partner is responsible to ensure that its representatives understand and comply with this Policy. If any Business Partner wish to report any concerns regarding ethical issues or violation of this Policy by other business partner, employees, agents or representatives of the Company, he may approach the Company through the following channels:

By Email: [cmd2prabhat@gmail.com](mailto:cmd2prabhat@gmail.com)

By Post / In person to: The Joint Managing Director

Prabhat Dairy Limited

121/2A, At Ranjankhol, Taluka Rahata, Dist. Ahmednagar - 413720

This policy requires a reporting Business Partner to reveal his/her identity and contact details to facilitate a proper investigation. Anonymous reporting may not be entertained as it is usually impractical to investigate a complaint which has been made anonymously.

## **3. INVESTIGATION**

Concerns reported will be explored appropriately to determine the facts and the parties involved, but consideration will be given to the seriousness of the issue raised, credibility of the concern and the likelihood of confirming the allegation. If initial enquiries indicate that the concern has no basis, or it is not a matter to be investigation pursued under this Policy, it may be dismissed.



All correspondence will be treated with the utmost confidence and will be shared only on a 'Need to Know' basis. No reprisal action against any Business Partner who in good faith reports any unethical issue or violation of this policy will be taken by the Company.