



Anti-Bribery and Anti-Corruption Policy

Objective and Applicability

The Anti-Bribery and Anti-Corruption Policy (hereinafter termed as "The Policy") of the Company "Dabur India Limited" explains our individual responsibility to comply with associated Laws/Acts/Enactments prohibiting all forms (cash and/or in-kind) of bribery and corruption. This Policy is complemented by our Code of Ethics and Conduct.

The Policy is applicable to all individuals working at all levels and grades, including Directors, Senior Executives, Senior Managers, Officers, Employees (whether permanent fixed term or temporary), Consultants, Contractors, Trainees, Interns, Secondees, Casuals, Agency staff, Agents, Business Partner, Service Provider, Professional Associate, third parties including those acting on behalf of the Company, joint venture in which the Company is a shareholder, subsidiaries and such other business associates partners acting on behalf of the Company in India.

Prohibition of Bribery:

Bribery here refers to receiving or offering any undue reward by or to any person whomsoever.

The below practices and any other forms of "Bribery" not mentioned here-in below are prohibited under the Policy:

- **Third Parties** are to be on-boarded through contractual payment agreements after adequate screening and due diligence to ensure that they always act on behalf of the Company with integrity and do not engage in bribery.
- **Gifts and Hospitality**- Giving or accepting gifts, discounts, favors or services from a current or potential customer, competitor, supplier, government bodies and third parties or their families is prohibited if that benefit is having the potential to influence a person's business decision. Company products, gifts in-kind which are given as customs and rituals appropriate for the occasion in the location; and not prohibited under local Laws, are exclusions under "Gift" here.
- **Political Donations** directly or indirectly to candidates or political parties include funds, gifts, loans, items of value, being given or made available to them which are prohibited by Law..
- **Charitable Contributions** are not permitted in exchange for any improper favour or benefit. However, transparent contributions with proper records and receipts from the charity having proper tax treatment are permitted.
- **Sponsorships** may be required to strengthen Company's brand image. Here, due care must be taken to avoid any perception of bribery and corruption, anti-trust or anti-competitive practices.

Conflict of Interest

It is our responsibility to avoid situations that create a real or perceived, direct, or indirect conflict between personal or family interests and those of the Company, as the same can damage Company's reputation, undermine the Company's commercial interests. We must disclose in a timely manner all potential conflicts of interest to the concerned ManCom members.

Prohibition of Corruption

Corruption is the act of a person who unlawfully and wrongly uses his/her chair to gain some benefits for himself/herself or for another person. The Company prohibits any form of corruption or kickbacks



Recording financial transactions

Financial integrity is paramount to Company's reputation and credibility. Thus, all sorts of financial transactions are to be recorded in Company's books of accounts which are certified by the Auditors. Audit Committee of the Company ensures adequate internal Control on the subject, as specifically covered under "Direct Touch" (Whistle Blower Policy).

Reporting Violations

Every Company personnel is encouraged to raise concerns about any bribery issue, suspicion of malpractice, any case of corrupt practice, any breach of this Policy or applicable law at the earliest possible stage. No personnel who in good faith reports a violation of the Policy shall suffer harassment, retaliation, or adverse employment consequences. The identity of the Whistle-blower shall be kept confidential to the extent possible and permitted under law.

If the person is unsure whether a particular act constitutes bribery or corruption or if the person has any other queries, these should be raised with Mr Biplab Bakshi, Executive Director – Human Resources or Mr A.K. Jain, Executive Vice President – Finance and Company Secretary.

Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action as per Company Rules, which might include warning, censure, withholding of increment, adverse comment in performance appraisal, up to and including termination of employment. If the breach of the Policy is by third party, the Company shall take appropriate legal actions as deemed fit in the circumstances, in the best interest of the Company to protect its reputation. In this case, the Company is at its liberty to take up the matter before any Competent Court.

Transparency and Disclosure

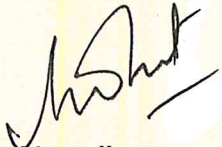
The serious concerns may be raised internally through the Company's Direct touch (Whistle Blower) Policy and the mechanism established under the same. Any queries, concerns, or complaints regarding bribery or corruption that are received by the designate officer should be reported to the Audit Committee which reports to the Board of Directors.

Training and Circulation

All personnel to whom this Policy is applicable must read and understand the same and ensure to abide by it in their day-to-day activities. It is the responsibility of the concerned ManCom, BU head and line managers for implementation of the Policy. This policy is to be acknowledged by all personnel of the Company during their joining process. Similarly, this policy is to be acknowledged by the third party while executing the contractual agreement with the Company. Time to time training refreshers may be envisaged as required.

Amendment to the Policy

The Company reserves the right to add/delete/amend any part(s) of this Policy with any changes in legislations, Company's Philosophy, vision, business plans or otherwise as deemed necessary.


Mohit Malhotra
Chief Executive Officer