

Anti-Bribery and Anti-Corruption Policy

(effective from January 21, 2022)

We are committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. We are bound by various laws, including anti-bribery laws like the UK Bribery Act, 2010 and Foreign Corrupt Practices Act. Company is committed to upholding laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. The policy forbids employees and associated persons from offering or accepting bribes in any form – monetary or otherwise.

This Policy is applicable to employees and business partners of company.

"Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust."

POLICY TERMS FOR EMPLOYEES

The UK Bribery Act ("UKBA") prohibits company and its associated persons

- From offering, promising or giving any financial or other advantage to bring about the improper performance by another person of a relevant function or activity,
- To influence a foreign public official in performance of his or her official functions with an intention to obtain or retain business or an advantage in the conduct of business.
- Receipt of bribe is also covered by the act and is an offence under it. Stated more concisely the UKBA prohibits payment and receipt of bribes directly or indirectly through associated person.
- Employees shall not offer or provide an undue monetary or Facilitation payments, other advantage to any person or persons, including public officials, customers or employees, any associated persons, in violation of laws and the officials' legal duties in order to obtain or retain business.
- Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials, customers or employees, and thereby circumvent the Company's policies regarding bribery and corruption.

GIFTS AND ENTERTAINMENT

Gifts

As part of our overriding philosophy and good governance, Hindustan Zinc Ltd (the Company) discourages all its team members from receiving gifts except those of insignificant commercial value. Team members include all employees/retainers/advisors etc of the company and all its subsidiaries.

Individuals should make every effort to refuse or return gifts having commercial value. Under exceptional circumstances if gifts are to be accepted then the same should be reported to the immediate superior and deposited with the Company Secretary. Perishable gift items cannot be carried home. It has to be consumed in office with your other office staff. Company Secretary should circulate details of such gifts to the Company CEO/ COO, Unit Head on desired intervals.

Amrinder



Hindustan Zinc Limited

Registered Office : Yashad Bhawan, Udaipur (Rajasthan) - 313 004

T +91-294 660 4000-02 F +91294-2427739 www.hzindia.com

CIN : L27204RJ1966PLC001208

Offering gifts is a legitimate contribution to building good business relationships. It is important, however, that gifts never unduly influence business decision making or cause others to perceive an undue influence.

- It is prohibited to offer loans, cash or personal cheques, gifts that may be illegal (anything offered to a government official in breach of local or international bribery laws) and gifts of an inappropriate nature. The test to be applied while giving gifts is whether they could be intended, or even be reasonably interpreted, as a reward or encouragement or inducement for a favour or for preferential treatment. If the answer is yes, the gift is prohibited.
- Never personally pay for a gift in order to avoid complying with entity's code of conduct
- Never offer gifts from any entity involved in a bid or tender with entity.

Entertainment

Bona fide hospitality and promotional, or other business expenditure which seeks to improve the image of a commercial organisation, better to present products and services, or establish cordial relations, is recognised as an established and important part of doing business.

It is your responsibility to use good judgement in this area. As a general rule, you may give or receive entertainment to or from customers or suppliers only if the entertainment would not be viewed as an inducement to or reward for any particular business decision. Entertainment expenses should be properly accounted for on expense reports.

POLITICAL CONTRIBUTION

No funds or assets of the Company may be contributed to any political party or organisation or to any individual who either holds public office or is a candidate for public office except where such a contribution is permitted by applicable law and has been authorised by the Chairman or the Board of Directors or shareholders as the case may be.

POLICY TERMS FOR Business Partners

- The **Business Partners** shall not, directly or through intermediaries, take any recourse to any unethical behaviour (implicit or explicit), or offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private, including with any employee of HZL.
- **Business Partners** shall not offer or accept bribe or use other means of obtaining undue or improper advantage, offer or accept any kickbacks, and shall not take any actions to violate or cause its business partners to violate any applicable anti-bribery laws and regulations including the Foreign Corrupt Practices Act of USA (FCPA), Bribery Act of United Kingdom and Prevention of Corruption Act of India.
- **Business Partners** shall not take any advantage of any family/ social/ political connections to obtain favourable treatment or for the advancement of business or obtaining any favours. Merit shall be the sole attribute of association with HZL.
- **Business Partners** shall not enter into a financial or any other relationship with a HZL employee that creates any actual or potential conflict of interest for HZL.
- The **Business Partners** is expected to report to HZL any situation where an employee or professional under contract with HZL may have an interest of any kind in their business or any kind of economic ties with them.

Arvind Mishra



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- **Business Partners** shall not offer any gift, hospitality or entertainment for the purpose of obtaining any advantage, order or undue favour.
- Unfair Trade Practices: Business Partners shall desist from any unfair or anti-competitive trade practices.

WHISTLE BLOWING POLICY

A Whistleblowing Policy has been adopted by the Audit Committee of the Company to govern the receipt, retention, and treatment of complaints and to protect the confidential, anonymous reporting of the same. These policies and procedures apply to and are available to all employees of the Company, its subsidiaries and all external stakeholders.

Complaints can also be sent to the designated E-Mail ID: hzi.whistleblower@vedanta.co.in

Dedicated hotline number (000-800-100-1681) as well as web-based reporting platform <http://www.vedanta.ethicspoint.com>

Key Definitions

Employees: We refer to all persons covered by this Code, including directors, officers and employees, as 'employees'.

Business partners: 'Business partners here refers to suppliers/ service providers/ vendors/ traders / agents/ consultants/ contractors/ joint venture partners/ customers/ third parties including their employees, agents and other representatives, who have a business relationship with and provide, sale/ purchase, seek to sale/ purchase, any kinds of goods or services to HZL or any of its subsidiaries, affiliates, divisions.

Public Official: A 'public official' includes anyone, whether elected or appointed, who performs public functions in any branch of national, local or municipal government anywhere in the world. It includes officials holding a legislative, administrative or judicial position of any kind. It also covers a person who exercises a public function, such as professionals working for public health agencies and officers in state owned enterprises.

Facilitation payments: Facilitation payments are small or minor payments made to secure or speed up routine legal government actions. Facilitation payments are bribes and prohibited under the law.

Associated Persons: Associated Persons means anyone who is engaged or paid to represent the company and includes agents, representatives, intermediaries, introducers, sponsors, consultants, contractors and advisers or anyone else who acts on behalf of the organization whose ability to represent such entity is established or implied by the terms of their arrangement.



(Arun Misra)
CEO & Whole-time Director

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