



FRAUD POLICY



Fraud Policy

This policy describes our approach to outlawing and preventing fraud. It makes reference to conduct that can be construed as deceitful and exhorts us to keep an eye out for any peculiar or dubious environments that could put us in danger of crime. We don't knowingly encourage or facilitate fraud on the part of others.

Introduction:

Fraudulent activity is unethical and illegal act. This fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against Fosgro Resources Pvt. Ltd.

This Fraud Policy sets out Fosgro's approach to prohibiting and preventing fraud in any manner.

Scope of Policy:

Any irregularity, or suspected irregularity, involving employees, directors, officers, shareholders, consultants, vendors, contractors, outside agencies conducting business with personnel from those agencies, and/or any other parties with a business relationship with Fosgro is covered by this policy (also called the Company).

Any necessary investigation will be carried out regardless of the alleged wrongdoer's tenure with the Company, position or title, or affiliation to it.

Our Commitment:

We do not intentionally engage in fraudulent behaviour or help or facilitate someone else to commit fraud.

Fraud is defined as the deliberate, fraudulent representation or concealment of a material truth with the goal to cause harm to another person. Each member of the management team will be knowledgeable about the kinds of irregularities that might take place in his or her specific area of accountability and vigilant for any signs of irregularity.

The following activities, amongst others, may constitute fraud:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the company
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company.

- Falsifying or duplicating expense claims and deliberately misrepresenting, concealing or not disclosing material facts relevant to a decision or transaction.
- Knowingly creating 'fake' contracts which do not reflect the true nature of the contractual relationship, such as contracts that we have no intention of performing, or contracts that do not accurately describe the intended transaction
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity

Consequences:

Our policies reflect what is significant to us and support our values and code of conduct. Fosgro takes policy violations seriously, and depending on how severe the breach is, the sanctions could vary from a warning to termination of employment.

Before any such action is taken, the designated representatives from the Human Resources Department, the Legal Department, and, if required, outside counsel, will evaluate and approve any recommendations to terminate an individual that come from an investigation.

Conflict of Interest Policy

This policy outlines our process for identifying, preventing, and disclosing potential conflicts of interest. We constantly behave in the best interests of the company and work to prevent real, imagined, or apparent conflicts.

Introduction:

Undisclosed or mismanaged conflicts of interest can harm our reputation, undermine trust in our internal controls, increase the possibility of corruption or bribery, erode stakeholder confidence in the objectivity of our decision-making, and result in poor quality services and products at exorbitant prices. Investigations, fees, and/or other sanctions for the business or individuals are further potential outcomes.

We always operate in Fosgro's best interests, work to avoid real or imagined conflicts of interest, and put policies in place to make sure that conflicts are handled properly.

This Conflict-of-Interest Policy sets out Fosgro's approach to:

- recognising and avoiding conflicts of interest; and
- declaring conflicts of interest.

Scope of Policy:

This policy is applicable to any personnel working for a Fosgro office or industrial asset that is directly or indirectly owned, controlled, or operated by Fosgro anywhere in the world, including employees, directors, and officers as well as contractors who are directly supervised by Fosgro.

Our Commitment:

Conflicts must be avoided wherever feasible. We consult Compliance if we are unsure whether a given circumstance constitutes a conflict.

Types of conflicts we must declare are:

- being a shareholder, an owner, or a director of a third party • a relationship, either personal or professional, with a third party.
- engaging in outside employment that will interfere with the performance of our duties at Fosgro or that could taint our objectivity, such as serving as a consultant, employee, director, officer, or manager for another business or organisation.
- collaborating with or considering hiring a relative or close personal relation (e.g., considering a job application from one of us or being in a position to influence aspects of the application, such as direct and indirect reporting relationships, pay, and promotion);
- offering, providing, or accepting gifts or entertainment to or from a third party while we are deciding whether to enter into an agreement or transaction;

- managing, directly or indirectly, a close personal relation

Changes to a previously declared conflict

Any updates to a conflict that we previously declared via the platform must be made in the same way. Any updates to our declaration must be made using the paper change to previously declared conflict of interest form and sent to Compliance if we are unable to use the platform. Compliance will then enter the update into the platform.

What happens once we declare?

Once a dispute has been declared, efforts will be taken to make sure it is handled properly. We can be forced to resign from a job or have our work hours limited (e.g. preventing us from taking part in decisions, joining meetings on the conflicting subject matter or receiving certain information).

Consequences:

Our policies reflect what is significant to us and support our values and code of conduct. Fosgro treats violations of our policies severely. Consequences may include a warning or even the termination of employment, depending on how serious the transgression was.

Oversight, Assessment and Review:

The Ethics & Compliance Office, as a unit of the Internal Audit, Ethics & Compliance Office and Risk Division, shall periodically, and at least on a yearly basis, review and assess all conflicts of interest existing in Fosgro in order to implement the necessary mechanisms designed to prevent any interferences with the objectivity, unbiased judgement and loyalty of Fosgro's employees in their decision-making responsibilities.

Workplace Health and Safety Policy

This policy outlines our ongoing obligations to our employees, their families, neighbourhood associations, and society at large. Additionally, it outlines the fundamental elements of our dedication to health and safety management everywhere we operate. The protection of the health and safety of our workers, community partners, suppliers, and anyone else who might be impacted by our actions is a high priority in everything we do.

Introduction:

Management is firmly committed to a policy enabling all work activities to be carried out safely, and with all possible measures taken to remove (or at least reduce) risks to the health, safety and welfare of workers, contractors, authorised visitors, and anyone else who may be affected by our operations.

This policy:

- shows the commitment of (your business name)'s management and workers to health and safety
- aims to remove or reduce the risks to the health, safety and welfare of all workers, contractors and visitors, and anyone else who may be affected by our business operations
- aims to ensure all work activities are done safely.

Our commitment:

Management (the supervisor and / or manager) is responsible for providing and maintaining:

- a safe working environment
 - safe systems of work
 - plant and substances in safe condition
 - facilities for the welfare of all workers
 - any information, instruction, training and supervision needed to make sure that all workers are safe from injury and risks to their health
- Consequences:**

Workers are responsible for:

- ensuring their own personal health and safety, and that of others in the workplace
 - complying with any reasonable directions (such as safe work procedures, wearing personal protective equipment) given by management for health and safety
- Application of this policy:**
- We seek the co-operation of all workers, customers and other persons. We encourage suggestions for realising our health and safety objectives to create a safe working environment with a zero accident rate.

- This policy applies to all business operations and functions, including those situations where workers are required to work off-site.
- Our goal is to provide a safe and healthy work environment that is free from workplace injury and illness. This will only be achieved through the participation, co-operation and commitment of everyone in the workplace.

Environmental Policy

This policy's goal is to encourage actions that will successfully execute environmentally friendly practises throughout our firm while minimising adverse impacts. Our goal is to be a pioneer performer while limiting ecological impact through ecological sustainability and sensible resource management in all of our global marketplaces.

Introduction:

This environmental policy promotes activities to achieve uniform environmentally responsible performance across our organisation and outlines the key components of our environmental management strategy to minimising impacts.

Global conglomerate Fosgro understands the need of managing environmental issues effectively for the success of our company. To reduce environmental impacts and take the lead in environmental stewardship, we will work to incorporate strong environmental practises throughout the Group's management and governance structures.

Our Commitment:

Every Fosgro company shall endeavour to:

- Progressively develop, implement, and maintain an internationally recognised environmental management system in our operations and new projects;
- Take initiatives to promote waste avoidance and recycling practises in accordance with international standards;
- Maintain positive legal compliance to environmental regulations and conform to the requirements of the Fosgro Group Sustainability Framework.
- Enhance environmental awareness through participation and consultation with employees and contractors by training and effective channels of communication;
- Encourage our contractors and suppliers to adopt the Fosgro Group environmental policies, principles, and practises and encourage appropriate environmental management across the supply and value chain;
- Constantly enhance environmental performance of current operations;
- Continually improve environmental performance of current and future products, services and infrastructure of the Aditya Birla Group's Companies; and
- Monitor, measure, report the progress, performance of environmental conservation and management initiatives in compliance with internationally recognized protocols and communicate approach and achievements to relevant stakeholders.
- We respect the rights, interests, traditional knowledge, cultural heritage, and ecosystem services of our local communities and Indigenous Peoples and seek to

consider these in our planning and operational practices. We review environmental risks and opportunities and integrate them into our planning, operating and business decisions.

- We support innovation and research programmes to improve energy efficiency, reduce carbon emissions and improve the resilience of our global assets to climate-related impacts. We promote and encourage low emission technologies, carbon capture and adaptation efforts.

Guiding Principles:

We will conduct our business in ways that will protect and preserve the environment while reducing our environmental footprint. This includes working with select suppliers and business partners that have a strong commitment to the running of sustainable operations and processes.

To drive toward this ambition, we will adhere to applicable legal requirements relating to the environment everywhere we do business. In addition, our environmental efforts include the following key areas, and are defined by our long-term aspirational goals:

Each Fosgro Group Company shall sign up to this policy or develop an equivalent that shall be implemented throughout its operations. This policy will be reviewed periodically for its suitability and updated as necessary.

Consequences:

Our policies reflect what is significant to us and support our values and code of conduct. Fosgro treats violations of our rules severely. Consequences may include a warning or even the termination of employment, depending on how serious the transgression was.

Equality of Opportunity Policy

This policy defines our approach to ensuring equitable opportunity for advancement within the FosGro family through fair, unbiased, and effective methods. We are committed to creating a space where everyone can reach their full potential and to making it easier for people to look for job possibilities.

Introduction:

Opportunity equality is not only the ethical thing to do, but it also makes good commercial sense. It makes it possible for Fosgro to find, keep, nurture, and inspire the best personnel to drive company success wherever we are active.

An indistinct explanation of the organization's position on unfair treatment is provided in the policy, together with instructions on how employees should be treated at work and how violations of these rules will be handled.

Equality of opportunity means establishing a workplace where every person can achieve their full potential, where HR practices are based on fairness and solid foundations, where there are no barriers to opportunities in employment, development and career progression for any employee due to unlawful or unethical decisions and where people feel safe to speak up when things may appear to be inappropriate.

Our Commitment and Application:

This policy applies to all employees, directors, and officers working for a Fosgro office or industrial asset directly or indirectly controlled or operated by Fosgro worldwide.

With 'Respect for Diversity' being one of our core values, Fosgro been committed to being an equal opportunity employer. The same is reinforced by our Corporate Business Principles and our Code of Business conduct.

Providing equal opportunity to our employees regardless of race, colour, religion, sex, sexual orientation, gender identity or expression, family status, pregnancy, age, national origin or ancestry, disability status, union affiliation, political belief or other characteristic protected by law is or amin agenda.

We respect our employees' right to the freedom of association and the right to collective bargaining and foster transparent and collaborative labour relations.

We use hiring and recruitment procedures that ensure everyone has an equal opportunity to pursue employment opportunities while abiding by local laws and customs. In accordance with regional standards, we offer our employees fair and equitable working conditions. In order to recruit, retain, and develop the best talent, we implement and oversee performance-based assessment procedures for hiring, selection, development, promotion, and appointments. We are dedicated to creating a workplace with high performance standards that is fair and equal for all employees.

We adhere to the idea that equal remuneration should be given for equally valuable and worthwhile work.

Roles and Responsibilities:

Employee Responsibilities

All Fosgro India employees have the following responsibilities:

To comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of the Company.

Responsibilities of Managers and supervisors

Managers and supervisors have the following additional responsibilities:

To take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.

Human Resources Responsibilities

Human Resources representatives have the following additional responsibilities:

To provide advice and address grievances relating to the employment of persons with disabilities and/or any other complaints regarding discrimination in any other form against any job applicant/employee.

Consequences and Termination:

Fosgro treats violations of our policies and code severely. The severity of the violation will determine the consequences, which may range from a warning to termination of employment. There can also be civil or criminal culpability in some circumstances.

Inside Information & Securities Dealing Policy

This policy describes how we use, handle, and share insider information. We appropriately manage inside information and refrain from trading stocks while it is in the midst of it.

Introduction:

Market manipulation compromises the integrity of the financial system and undermines public trust in securities and derivatives. By requiring information disclosure and outlawing insider trading, numerous laws, rules, and regulations are in place to safeguard the openness and integrity of markets.

While in possession of inside information, we appropriately manage it, develop it, and avoid trading in securities. Failure to manage and use inside information in accordance with applicable laws could harm our reputation and result in audits, fines, or other sanctions for the business or specific employees.

The Fosgro approach to the usage, handling, and disclosure of inside information is outlined in this inside information and securities dealing policy.

Our Commitment and Application:

This policy is applicable to any personnel working for a Fosgro office or industrial asset that is directly or indirectly owned, controlled, or operated by Fosgro anywhere in the world, including employees, directors, and officers as well as contractors who are directly supervised by Fosgro.

We might have access to inside knowledge about a different publicly traded firm (such an investment made by the Fosgro Group or one of its subsidiaries, a partner in a joint venture, a client, or a supplier, for instance).

When we have access to a publicly traded company's inside knowledge, we do not trade in its securities. Except in situations where disclosure is postponed to protect the legitimate interests of the Fosgro Group and when the information can remain confidential, Fosgro always makes inside information about the Fosgro Group available to the markets as soon as practicable. We must make sure that the information is correct and comprehensive before disclosing it to the market.

We also employ protocols for locating and controlling insider information. We implement safeguards to stop any unauthorised disclosure by anyone entrusted with inside information when disclosure is postponed in accordance with the law.

Consequences:

Fosgro has a zero-tolerance policy against retaliation against anybody who speaks up about behaviour they think to be unethical, unlawful, or not in line with our Code of Conduct and standards, even if the complaint is unfounded and so long as they haven't submitted a false report with intent.

Fosgro takes violations of our policies and code of conduct seriously. The severity of the violation will determine the consequences, which may range from a warning to termination of employment. There can also be civil or criminal liability in some circumstances.

Supplier Code of Conduct Policy

FosGro is committed to improving daily living by obtaining the materials needed to develop, maintain, and improve the environment in an ethical manner. We are committed to applying sustainable procurement standards when managing our relationships with suppliers and when making choices regarding our products and supply chains. We aim to deliver lasting value and potential for all of our stakeholders, including our vendors and the regions and countries where we conduct business.

Introduction:

It shall cover Our Values:

We Stand For Every decision we make is based on our values.

- I. Safety
Safety is never compromised. When it's unsafe, we stop working and watch out for one another.
- II. Sincerity
When communicating, we are open and truthful. By exchanging knowledge, fostering conversation, and soliciting criticism, we push ourselves to become better.
- III. Simplesness
We are productive and concentrate on what matters. We steer clear of pointless complication and seek out practical, straightforward answers.
- IV. Integrity
We possess the courage to uphold morality even in the face of difficulty. We follow through on our commitments and show each other respect and fairness.
- V. Entrepreneurialism
We embrace fresh ideas and change easily. We are constantly searching for new methods to add value and develop safer and better working practises.
- VI. Responsibility
We accept accountability for our deeds. To learn what people want from us, we converse with them and listen to them. We make an effort to enhance our social, economic, and environmental performance.

The goal of Fosgro is to properly source the goods that improve daily life. We are a leader in mining and other industries' internet commerce. By being involved in the commodities supply chain at every point, we fulfil our purpose. Our geographic, product, and activity diversity maximises the value we generate for our company and its wide range of stakeholders. In order to fulfil our commitment to ethical sourcing, our suppliers are essential partners.

How we work with our Suppliers and Vendors?

Our suppliers must respect our values of safety, honesty, responsibility, openness, simplicity, and entrepreneurship as outlined in the Fosgro Code of Conduct and our Responsible Sourcing Policy. We also expect them to share our commitment to ethical, safe, and responsible business practises. Our interactions with our suppliers are important to us.

This means that:

- we take care to only work with suppliers who share our dedication to ethical business practises and conduct;
- we treat our suppliers with respect;
- we collaborate with our suppliers to help them understand our expectations;
- we are fair, open, and transparent in our dealings with them (while still protecting the nature of commercially sensitive information); and
- we don't ask our suppliers to operate in a way that puts them, or their workforce, at risk.

Who is required to follow the Code?

When collaborating with Fosgro, we expect our suppliers to adhere to this Supplier Code of Conduct. Furthermore, we support our suppliers' efforts to establish standards for their own suppliers that are consistent with our supplier code of conduct.

Additionally, we work to give back to the areas in which we operate by helping small companies and creating job opportunities. Our procurement strategies are established locally to take into account the various operating circumstances. In the context of these procurement strategies, we collaborate with regional suppliers to clarify our requirements and improve knowledge of our expectations.

Compliance with laws

When collaborating with Fosgro, we expect our suppliers to adhere to this Supplier Code of Conduct. All applicable laws, including those governing labour rights, workplace health and safety, environmental protection, product safety, bribery and corruption, sanctions and trade controls, money laundering, competition, data protection and privacy, and the facilitation of criminal tax evasion, must be complied with by suppliers.

Communities:

We expect that all of our suppliers uphold the human rights of the people living in the communities in which they operate, including any areas where they may conduct business in communities that host Fosgro. Maintaining civil dialogue, respectful relationships and open lines of communication with regional stakeholders are part of this.

Consequences:

Fosgro takes violations of our policies and code of conduct seriously. The severity of the violation will determine the consequences, which may range from a warning to termination of employment. There can also be civil or criminal liability in some circumstances.



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