



Anti-Bribery Compliance Policy

Applicability: All Employees, Agents, Consultants, Vendors and such other stakeholders, as may be included, from time to time.

PURPOSE:

A culture of integrity is essential for Kineco. Many of our customers choose to do business with us in part because they know they can trust us for doing things right. The purpose of this anti- corruption policy is to prevent bribery and corruption. It applies the Company and their employees, suppliers, contractors, consultants and/or any other parties with a business relationship with Kineco.

The Anti-Corruption Policy should be understood as something more than just an acknowledgment of the rules. It reflects a personal commitment to take responsibility for our actions and always to work with integrity.

Kineco's policy is to comply with all applicable anti-bribery laws, including but not limited to the India anti-corruption laws and all applicable local laws where Kineco operates, and to accurately reflect all transactions on Kineco's books and records. It is also Kineco's policy to require Intermediaries (e.g. those agents, consultants and business partners who work on Kineco's behalf) to comply with these same laws and practices.

SCOPE

The provisions of the Anti-Bribery Compliance Program Manual are applicable to all regions where Kineco operates and to all employees and representatives acting for or on behalf of Kineco wherever they may be located. Strict adherence to the policies articulated herein is required.

OVERVIEW

Certain activities related to Government elected officials, appointees, employees, and other representatives – such as providing gifts, political contributions, entertainment, travel-related benefits or facilitating payments - can violate anti- bribery laws around the world. In addition, bribery of non-governmental officials is illegal in many countries and also violates Kineco's Code of Business Conduct and Ethics ("Code of Conduct"). Kineco may also be liable under some circumstances for bribes or attempted bribes made or offered by third-party business partners who may be acting on Kineco's behalf.

Kineco Limited

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WHAT IT MEANS

Kineco requires that its employees and intermediaries acting on Kineco's behalf:

- not engage in acts or omissions that offer, authorize or give anyone a bribe, or create the impression that a bribe has been offered, authorized or given;
- take affirmative steps to prevent those doing business directly or indirectly with a Government official, or in any commercial context, on Kineco's behalf from engaging in bribery;
- always follow and use Kineco's mandatory due diligence process for Intermediaries, internal approval, financial reporting, and document retention requirements;
- carefully scrutinize activities of acquisition targets and joint venture partners and perform comprehensive due diligence to identify and address potential bribery issues;
- comply with all record keeping requirements and financial controls to enable Kineco to demonstrate its compliance with all applicable anti-bribery laws; and
- promptly report to the Company Secretary & Compliance Officer, any suspected violations of this policy by Kineco employees, Intermediaries or others doing business on Kineco's behalf.

WHAT TO AVOID

Kineco employees and Intermediaries shall avoid the following:

- directly or indirectly providing cash or anything of value to a government official or commercial customer to obtain an unfair business advantage or to obtain or retain business;
- accepting cash or anything of value from another person or entity seeking to do business with Kineco;
- authorizing or providing travel benefits, gifts, entertainment, or political or charitable contributions for the benefit of a foreign government official or commercial customer without the required due diligence assessment and/or Kineco internal approvals.
- entering into a consultant or sales agent agreement that will result in contacts with foreign government officials or commercial customers without conducting due diligence, obtaining the required internal business and legal approvals, retaining all due diligence documentation in accordance with the Kineco Anti-Bribery Compliance Program Manual and/or the Kineco Records Retention Policy, and accurately recording on Kineco's books and records all related payments.
- making or authorizing "grease" or facilitating payments.
- making any incomplete, false or inaccurate entries on Kineco's books and records.

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KINECO

No policy statement or procedure can address all possible situations or transactions explicitly. Where any situation or transaction arises that is not addressed in this Policy, or in any case of a suspected violation of this Policy or legal requirements, the employee should contact Company Secretary & Compliance Officer to determine appropriate steps to resolve the matter.

CONSEQUENCES OF VIOLATION OF POLICY

Kineco applies zero tolerance for any violations of this Policy. Violations by Kineco employees will result to disciplinary actions, such as dismissal, sanctions or legal actions. Kineco will stop all cooperation with any business partners, such as suppliers, contractors, that violate this Policy.

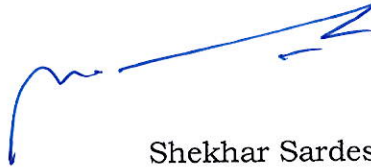
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CS & Compliance Officer

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Chairman & Managing Director

Date: 01.01.2025

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