



DECCAN GOLD

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POLICY DOCUMENT

DGML-BRSR-POL-06

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Effective From	April 27, 2026
Last Updated	April 27, 2026
Revision Number	01
Document Number	DGML-BRSR-POL-06
Location	Bangalore, Karnataka
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DECCAN GOLD MINES LIMITED

(CIN: L51900MH1984PLC034662)

Registered Office - 501, Ackruti Trade Center, Road No.7, MIDC, Andheri (East), Mumbai – 400 093, Maharashtra

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1.0 PURPOSE

This policy aims to establish a zero-tolerance approach towards bribery and corruption across all activities of Deccan Gold Mines Limited (“**Deccan Gold**”). It sets out guiding principles and expectations to ensure that all employees, vendors, consultants, and stakeholders conduct business ethically, transparently, and in full compliance with applicable laws and the principles of responsible governance.

2.0 SCOPE

This policy applies to all employees of Deccan Gold [permanent (full-time and part-time), probationary, contractual, and interns], including board members.

3.0 KEY DEFINITIONS

- ◆ **Bribery** refers to offering, promising, giving, accepting, or soliciting anything of value with the intent to influence a decision or action improperly.
- ◆ **Corruption** includes abuse of entrusted power for private gain.

4.0 GUIDING PRINCIPLES

- ◆ **Integrity First:** All decisions must be free from personal bias or external inducements.
- ◆ **No Facilitation Payments:** Deccan Gold prohibits all forms of facilitation payments, whether small or customary.
- ◆ **Due Diligence:** Business partners must be evaluated for reputation and compliance background before engagement.
- ◆ **Transparency in Dealings:** Financial and contractual transactions must be documented clearly and be auditable.

5.0 PROHIBITED CONDUCT

- ◆ Offering or accepting bribes, kickbacks, or gifts intended to influence outcomes.
- ◆ Concealing or falsifying accounting entries to disguise corrupt acts.
- ◆ Using third parties to circumvent anti-bribery rules.
- ◆ Intimidating or retaliating against whistle-blowers.

6.0 PERMISSIBLE ACTS

- ◆ Reasonable business hospitality and token gifts may be permitted under clear guidelines, only when not linked to undue influence.
- ◆ Donations and sponsorships must be reviewed and approved by the management, with proper documentation.

7.0 REPORTING AND REDRESSAL

- ◆ Deccan Gold encourages a confidential reporting of violations through the HR Representative or via the grievance redressal mechanism listed in the Grievance Redressal Policy of Deccan Gold.
- ◆ Reports will be reviewed by either party, with support from the Legal department if necessary.

8.0 ROLES AND RESPONSIBILITIES

- ◆ **Employees:** Expected to understand, acknowledge, and follow this policy.
- ◆ **Managers:** Ensure teams comply and escalate any suspected violations.
- ◆ **HR and Legal:** Own the implementation, training, and periodic review of this policy.



9.0 TRAINING AND COMMUNICATION

- ◆ Annual training will be provided to all relevant personnel.
- ◆ Vendors and third parties will be informed of Deccan Gold's anti-bribery stance through contractual clauses or formal communication.

10.0 ENFORCEMENT AND DISCIPLINARY ACTION

Violation of this policy may result in disciplinary actions, including termination of employment or contract, and potential legal consequences.

11.0 POLICY REVIEW AND UPDATES

The policy will be reviewed annually or upon significant regulatory changes. Updates, if any, will be communicated across all locations.