



ANTI-CORRUPTION & ANTI BRIBERY POLICY

Document No: PCPL/POL/004/00

Page: 01/03

1. PURPOSE

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Organization's business is conducted in a socially responsible manner.

The Anti-Corruption Policy Piyanshu Chemicals Pvt. Ltd. has been developed in accordance with Code of Conduct, charters, policies, rules and regulations adopted by PCPL and in conformance with the legal and statutory framework of Anti-Corruption Legislation prevalent in India.

The Policy reflects the commitment of PCPL and its management for high ethical standards doing open and fair business for improving the organizational culture, following the best practices of corporate governance and enhancing the organizational reputation at appropriate levels.

Policy Statement

Corruption is the abuse of public or private office for personal gain. Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

Policy Objectives

- The objective of our anti-corruption and bribery policy is to put appropriate anti-corruption and bribery guidelines in place across all our operations and thus ensure zero violation of relevant laws and regulations.
- To initiate the steps to reduce the bribery and corruption risks to the business of the Organization by setting out clear guidelines.
- To encourage all employees to be vigilant and to act diligently in good faith.
- To monitor and investigate instances of alleged corruption.
- To take firm and vigorous action against any individual(s) involved in corruption.

Date Of Issue	Prepared By Swapn Dutta	Checked By Netai Mahalanabis	Approved By Anshu Kejriwal
03.04.2023			





ANTI-CORRUPTION & ANTI BRIBERY POLICY

Document No: PCPL/POL/004/00

Page: 02/ 03

- f) To minimize the risk of involvement of all employees and Directors in corruption related activities
- g) To form a common understanding for all stakeholders that PCPL prevents corruption in any form;
- h) To set responsibility for the employees of PCPL to know and comply with the principles and requirements of the Policy, the key rules of the applicable anti-corruption laws, as well as adequate procedures to prevent corruption.

Scope

This policy applies to all individuals working at all levels and grades, including Directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, business partners, and third-party representatives anywhere in the world, **or any other person associated with us, wherever located who may be acting on behalf of PCPL.**

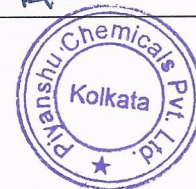
Principles

- 1) The Members of the Board of Directors, the Board members and Senior Managerial Personnel of PCPL should form the ethical standard of uncompromising attitude to all forms and demonstration of corruption at all levels setting the example by their own behavior.
- 2) PCPL openly expresses its zero tolerance to corruption; welcomes and encourages compliance with the principles and requirements of the Policy by all grantees and sub grantees, contractors, employees, associated parties/companies, its managerial bodies and other person.
- 3) In this policy, third party means any individual or organization as associate comes into contact with PCPL and includes any potential clients, customers, distributors, business contacts, government and public bodies including their respective representatives.

Coverage

- a) Bribes;
- b) Gifts and hospitality;
- c) Facilitation payments;

Date Of Issue	Prepared By Swapn Dutta	Checked By Netai Mahalanabis	Approved By Anshu Kejriwal
03.04.2023			





ANTI-CORRUPTION & ANTI BRIBERY POLICY

Document No: PCPL/POL/004/00

Page: 03/03

- d) Political contributions;
- e) Charitable contributions.
- f) Employees must not engage (give or take) in any form of bribery, either directly or
- g) We only make charitable donations that are legal and ethical under local laws and practices.

Exceptions

- a) We appreciate that the practice of giving business gifts varies between states and regions and what may be normal and acceptable in one region may not be in another.
- b) The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.
- c) As far as possible, it is strongly recommended that receipts of gifts are reported to your superior / admin department and have it formally recorded in organization records.

Internal Controls & Compliance

Monitoring

1) Compliance Measurement

- a) Compliance with Organization's policies is required. Compliance to this policy is verified through various methods, including but not limited to, reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner.
- b) It is the Organization's policy to maintain accurate, reasonably detailed records that fairly reflect its transactions and disposition of assets, regardless of whether the transactions are domestic or international. Therefore, Organization's Personnel are prohibited from making any false or misleading statements in Organization's books and records for any reason
- c) Regular audits would include a review of the Organization's books and records maintained by the Finance Department pertaining to the entertainment, gift, and travel expenditures by Personnel on behalf of the organization. As necessary, the regular audits would encompass records pertaining to social payments and donations to charities.
- d) Exceptions: Any exceptions to the Anti-Corruption and Bribery policy must be approved by the Director of the organization.
- e) Non-Compliance: Deviations or non-compliance with this policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions, up to and including termination, as allowed by local laws.

f) Ramifications of Misconduct.

Date Of Issue	Prepared By Swapn Dutta	Checked By Netai Mahalanabis	Approved By Anshu Kejriwal
03.04.2023			

