



ANTI BRIBERY AND ANTI CORRUPTION POLICY

Policy No:	Glochem/HR/POL-0013	Version No	01
Department:	HUMAN RESOURCE		

Introduction

Glochem is committed to conducting its business with the highest ethical standards. This Anti-Bribery and Anti-Corruption Policy (the "Policy") sets out Glochem's position on bribery and corruption and outlines the procedures to be followed by Glochem's directors, officers, employees, and agents (collectively, "Personnel").

Policy Statement

Glochem prohibits Personnel from engaging in any form of bribery or corruption, whether directly or indirectly. This includes:

- Offering, promising, giving, authorizing, soliciting, or accepting any undue advantage, such as money, gifts, hospitality, or any other benefit, to influence a business decision.
- Making improper payments to government officials, politicians, or any other third party to obtain an advantage in business dealings.
- Engaging in any activity that could create a perception that Glochem is involved in bribery or corruption.

Procedures

Personnel are required to:

- Familiarize themselves with this Policy and comply with its provisions.
- Avoid any situations that could give rise to a conflict of interest.
- Disclose any gifts or hospitality received from business partners that could be perceived as an inducement.
- Not offer or accept bribes or any other undue advantage.
- Report any suspected violations of this Policy to their supervisor, management, or the company's designated ethics hotline.

Gifts and Hospitality

Personnel may offer or accept gifts or hospitality in the ordinary course of business, provided that the value is reasonable and does not create a conflict of interest or a perception of impropriety.

The following guidelines apply to gifts and hospitality:

- The value of the gift or hospitality should be modest and not designed to influence a business decision.
- The gift or hospitality should be publicly disclosable.
- The frequency of gifts or hospitality should be reasonable.

Facilitation Payments

Facilitation payments, also known as grease payments, are small payments made to expedite routine government actions such as obtaining permits, licenses, or processing documents. Glochem strictly prohibits facilitation payments.

Record Keeping

Personnel must maintain accurate records of all gifts and hospitality offered or received in the course of business. These records should include the date, nature, value, and purpose of the gift or hospitality.

Training

Glochem will provide periodic training to Personnel on this Policy and on anti-bribery and anti-corruption laws and regulations.

Reporting Violations

Personnel are encouraged to report any suspected violations of this Policy to their supervisor, management, or the company's designated ethics hotline. All reports will be treated confidentially and investigated promptly. Glochem will not tolerate retaliation against any Personnel who reports a suspected violation in good faith.

Disciplinary Action

Violations of this Policy will be subject to disciplinary action, up to and including termination of employment.

Compliance with Laws and Regulations

This Policy is intended to comply with all applicable laws and regulations relating to anti-bribery and anti-corruption, including the Foreign Corrupt Practices Act of the United States and the Bribery Act of the United Kingdom.

Review and Update

This Policy will be reviewed and updated periodically to reflect any changes in laws, regulations, or Glochem's business practices.

Contact Information

For any questions about this Policy, please contact Glochem's HR department or email direct to management at whistleblower@Glochemindia.com