



**PUNJAB CHEMICALS
AND CROP PROTECTION LTD.**

ANTI BRIBERY ANTI CORRUPTION POLICY

CIN NO.: L24231PB1975PLC047063

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This **Anti-Bribery and Anti-Corruption Policy (the ‘Policy’ or ‘ABAC Policy’)** provides a framework for ensuring compliance with legislations governing bribery and corruption globally.

Punjab Chemicals and Crop Protection Limited (**‘PCCPL’**) practises a **zero-tolerance** approach to bribery and corruption. PCCPL is committed to act with integrity. As part of this commitment, any form of bribery and corruption is not acceptable. We prefer foregoing business opportunities rather than paying a bribe or engaging in corrupt practices.

In each of the jurisdictions where we operate, Stakeholders are expected to follow the ABAC Policy or the applicable laws around bribery and corruption, whichever is stricter. No Stakeholder can waive compliance with the Policy.

This policy should be read in conjunction with the Code of Conduct and Whistle Blower Policy.

The purpose of this Policy is to set out responsibilities of Stakeholders and provide guidance on dealings that could pose threat of bribery and corruption, with government and non-government organisations and individuals. We are committed to act professionally and fairly in all our business dealings and in implementing effective systems to counter bribery and corruption in any form.

BRIBERY / CORRUPT PRACTICES

A. Engaging Third Parties:

PCCPL engages multiple third parties to act on its behalf, including vendors, dealers, liaison agents, consultants to interact with government authorities, etc. Every Stakeholder appointed to act on behalf of the Company must be selected on the basis of their commercial and technical expertise. Such stakeholders are prohibited from fulfilling any corrupt offer, request, demand or promise for payment to be made or received directly or through any third party.

B. Gifts, Hospitality and Business Promotion Expenses: Stakeholders shall not accept or offer gifts to any Government official or any private person. Employees may also attend and take others out for normal or customary business lunches, dinners and functions. These should however not impact or compromise objectivity and fairness of an employee to take Company decisions.

C. Political Contributions: We are committed to not supporting any specific political party or having any political affiliation. No contribution shall be made by Stakeholders on behalf of the Company either directly or indirectly to any political party or for any political purpose without the prior approval of the Board of Directors. No stakeholder shall use their job title or affiliation with the Company in connection with political activities.

D. Charitable Contributions and Sponsorships: PCCPL shall ensure that charitable contributions and sponsorships are not used as a vehicle for bribery or corruption. Also, we shall publicly disclose all our charitable contributions and sponsorships and

ensure that all such transactions are legal and ethical under local laws and practices. Stakeholders may make donations and charitable contributions in their personal capacity, provided they are legal and ethical and not used as schemes to conceal any bribery or other corrupt practice.

- E. **Facilitation Payments: PCCPL** prohibit facilitation or grease payments of any kind. It is also our policy that we work to ensure that our Stakeholders do not make facilitation payments on our behalf.
- F. **Kickbacks: PCCPL** prohibits kickbacks of any kind. It is also our policy that we work to ensure that our Stakeholders do not make kickbacks on our behalf.
- G. **Employing / Engaging Public Officials:** Any employment or engagement of former public officials or their relatives by the Company requires a thorough background check of the individual. In addition to the above, any such relationship requires pre-approval of the Chief Executive Officer. The prospective individual should adhere to the cooling-off period prescribed by applicable laws.

WHISTLE-BLOWER POLICY

Stakeholders who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. PCCPL shall not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical, or inappropriate behaviour. All reports shall be treated confidentially. For more information, please refer to the Whistle-blower Policy.

ENFORCEMENT OF POLICY

PCCPL's ABAC Policy shall be promoted and enforced consistently amongst Stakeholders with clear and consistent disciplinary consequences to anyone who violates the Policy. The Company reserves the right to terminate a contractual relationship with any Stakeholder if they breach this Policy. Failure to ensure compliance with this ABAC Policy could lead to serious consequences for Stakeholders, including but not limited to:

- Dismissal / termination of employment
- Termination of business relationship
- Reputational damage
- Reporting to regulatory authorities
- Conviction of offender under the applicable laws and regulations
- Personal criminal liability, including fines and / or imprisonment

COMMUNICATION OF POLICY

As part of the prevention, identification and detection of Anti-bribery and Anti-corruption issues, trainings and risk assessments shall be conducted. Training on this Policy shall form part of the induction process for new Employees at all levels working in areas that are susceptible to ABAC risk. Post joining and completion of the induction process, such new appointees must undergo the same trainings as scheduled for existing Employees. Existing Stakeholders at all levels, shall receive regular, relevant trainings on how to implement and adhere to this Policy throughout the term of their relationship with PCCPL. Stakeholders may be required to give an annual certification confirming their compliance with this Policy.