



CHEMCON SPECIALITY CHEMICALS LIMITED

ETHICS, ANTI-BRIBERY & ANTI-CORRUPTION POLICY



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1. PREAMBLE

An Ethics, Anti-Bribery, and Anti-Corruption Policy is a set of guidelines and principles that an organization establishes to promote ethical behavior, prevent bribery, and combat corruption within its operations. Such a policy demonstrates a commitment to maintaining integrity, transparency, and accountability in business practices.

Chemcon Speciality Chemicals Limited (the Company) is committed to high ethical standards, doing open and fair business, follow best practices of corporate governance and support the business reputation at the appropriate level.

Bribery and corruption are criminal offences that can result in the imposition of fines and/or imprisonment, exclusion from tendering public contracts and damage to the reputation of the Company. The purpose of this policy is to set out our responsibilities and the responsibilities for those working for the Company, in observing and upholding the Company's position against bribery and corruption and to provide information and guidance to those working for the company on how to recognize red flags and deal with potential bribery and corruption.

This Policy is not intended and shall not apply to or prohibit legitimate business expenses, including promotional expenses, transactional expenses, payments to business partners, and other expenditures for legitimate purposes pertaining to the operations of the Company.

2. DEFINITIONS

"Bribe" or "Bribery" is a form of payment, often in the form of money, goods, services, or favors, given or offered to someone, typically a person in a position of power, authority, or influence, with the intention of influencing their actions, decisions, or behavior in a way that benefits the person offering the bribe. The goal of giving a bribe is usually to gain an unfair advantage, secure special treatment, or manipulate outcomes in one's favor.

Bribery is generally considered unethical and illegal because it undermines the principles of fairness, transparency, and impartiality in decision-making processes. It can occur in various contexts, such as business transactions, government interactions, politics, and personal relationships. Laws and regulations against bribery exist in most jurisdictions to deter and penalize individuals and organizations involved in such activities.

"Corruption" means using power or authority to do things that are unfair, illegal, or dishonest in order any willful conduct, usually by taking money, favors, or other advantages. It's like cheating or breaking the rules for personal gain that would violate the Anti-Corruption Laws. It's harmful because it can lead to unfairness, mistrust, and problems.

"Ethics" refers to the principles, values, and moral guidelines that shape how individuals and groups make decisions and conduct themselves. It involves distinguishing between right and wrong behavior and choosing actions that align with what is considered morally acceptable and just. The core idea of ethics revolves around doing what is right and honorable.

3. OBJECTIVE

The aims and objectives of the Policy are to:

- encourage employees and directors to act honorably and with integrity in all business dealings of the Company.
- promote a level playing field by discouraging unfair advantages gained through corrupt practices, thereby creating healthier market dynamics.



- initiate steps to ensure that no financial or other inducements are offered or accepted by or on behalf of the Company.
- encourage employees and Directors to be vigilant and to act diligently in good faith.
- monitor and investigate instances of alleged corruption.
- take action against any individual(s) involved in corruption.
- form a common understanding for all stakeholders that the Company opposes bribery and corruption in any form;
- Not to enter into any other unethical act or omission
- Safeguard the organization's reputation and brand by demonstrating a strong commitment to ethical conduct and by distancing the organization from corrupt practices.

4. APPLICABILITY

The Policy would be applicable to all individuals working for the Company at any location and at all levels and grades, including directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff of the Company, volunteers, interns, and others acting on the Company's behalf and instructions ("Company Personnel"), in the course of their engagement for or on behalf of the Company.

5. COMPREHENSIVE SCOPE

"Corrupt Practices" will be considered giving or receiving financial or other inducements, intermediation in giving or receiving financial or other inducements, malpractice, misuse of official authority, facilitation payments, illegal use of the official position by a person to receive benefits in the form of money, property or other assets, services, and any rights to himself or to other persons or illegal provision of benefits or rights by other persons.

In view of the above, the Directors and the employees of the Company are strictly prohibited, whether directly or indirectly, personally or through the mediation of third parties, to be involved in corrupt activities, offer, give, promise, request and receive payments or make payments to simplify administrative, bureaucratic and other formalities in any form including cash, valuables, services or other benefits to any person or from any persons or organizations, including governments and local authorities, government officials, private companies and its representatives.

6. REPORTING OF VIOLATIONS

Every person, to whom this policy applies to, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he/ she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be raised with their respective Manager or can write to the investor.relations@cscpl.com.



7. RESPONSIBILITY

The members of the Board of Directors, and employees of all functions of the Company, regardless of position and designation, are responsible for compliance with the principles and requirements of the Policy, who violate these principles and requirements.

8. REVIEW/ AMENDMENTS

The policy document shall be approved by Board. The policy document shall be periodically reviewed on a need basis and any amendments made therein shall approved by Board.

9. DISSEMINATION OF THE POLICY

The approved Policy shall be uploaded on the website of the Company at www.cscpl.com.