



SAPTAGIR CAMPHOR PRIVATE LIMITED

An ISO 9001:2015 Certified Company

BUSINESS ETHICAL POLICY

EMPLOYEES MUST READ AND UNDERSTAND THIS ETHICAL POLICY THOROUGHLY AND COMPLY WITH IT AT ALL TIMES.

BRIBERY

A bribe is a reward, advantage or benefit made in order to influence and/or secure an improper advantage. Kickbacks (i.e. the return (or receipt) of a percentage of monies received under a contract) are a form of bribe. A bribe can be made to induce a person to act in an improper way, to violate an official duty, or to secure an official act or decision. It can also be made to induce a person not to act in a particular way. It may be made directly or through an intermediary.

Some laws focus on prohibiting bribery of public officials, whereas others are far wider and prohibit bribes made to (or received by) any person in order to obtain an improper advantage, including in a business transaction.

In commercial dealings, a bribe may be employed to obtain, retain or direct a particular business advantage. It can include, for example, a gift or hospitality of significant value received from or given to a Contractor.

No SCPL employee will receive, offer or make directly or indirectly illegal payments (bribes).

Any demands received by SCPL for a bribe must be rejected and reported to the management.

The prohibition above also includes not utilising other techniques such as subcontracts, purchase orders or agency or consulting agreements to channel payments to any business partner, customer, supplier, to public officials, political parties, political figures, candidates for political office or another contracting party – including their relatives or business associates. This applies whether or not the person is a public official.

It can often be the case that bribes will involve a cash payment of some form. Any request for payments in cash or offer to make payments in cash raises a potential risk of corruption. Therefore in order to safeguard Tata Chemicals Europe employees from any appearance that payments may be corrupt cash payments should be strictly avoided.

Factory:

13.5 Kms, Gooty Road
B. Kothapalli, Anantapur-515731,
Andhra Pradesh, India
Phone: 08551-286490, 286491
Fax: 08551-286451

Corporate Office:

"Vaishnavi's Cynosure",
5th Floor, 5 (E&F) Units, Survey
No:18, Telecom Nagar, Gachibowli,
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Phone No: +91-40-29800591 / 29800791



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GIFTS AND HOSPITALITY

Gifts

Only business gifts of very small intrinsic value which are clearly advertising matter, for example, diaries and calendars and other low value corporate branded goods may be accepted or given.

Offers of other items, whatever the value, must not be given in any circumstances without prior written consent of the management.

If offered by a third party such items should be politely refused with an explanation of this Policy. Any such offer and refusal must be notified to the management. Gifts must never be solicited. Where unsolicited gifts are delivered to an employee from a supplier or other third party this must be notified immediately to the management. The management will determine whether they may be retained, or should be returned or given to the HR department who will arrange for them to be donated to charity.

Hospitality

Modest hospitality is an accepted part of commercial life and business relationships. However, offering or receiving of corporate hospitality is capable of amounting to a bribe under the Bribery Act.

To protect both SCPL and its employees from this risk, no employee shall accept or offer any corporate hospitality without the prior written consent of the management.

Such consent will not be given unless in the opinion of the management, the hospitality is reasonably related to a clear business purpose and is modest, and can in no reasonable way be construed to be likely to influence the making of a business and/or procurement decision. Examples of where such consent will not be given include:

- Hospitality offered during tenders or competitive bidding situations
- Hospitality offered by the Company where no Group employee is to be present
- Hospitality including cash or cash equivalent, such as casino chips or betting stakes
- Hospitality involving foreign public officials

Offers of high value, inappropriate or excessive hospitality should be politely refused with an explanation of this Policy and such offer and refusal should be notified promptly to the management. Hospitality must never be solicited.

Promotional Trips

One area where judgements about levels of hospitality and gifts can be very difficult is around promotional trips. No offers of promotional trips shall be made or accepted without the prior written consent of the management. It is recognised that hosting business partners

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at our premises to promote our products and visiting our suppliers and business partners are important parts of our business. However, in addition to the general policy on hospitality, in assessing whether a particular promotional trip is appropriate the management shall consider the following guidelines:

- All visits should have a legitimate business purpose and any reimbursement of expenses is limited to that aspect of the visit.
- The timing of any visit needs to be carefully considered to avoid any impression of undue influence and ensure there is an objective business reason for the visit.
- Any "side trips" or extras should be avoided.
- Daily allowances, cash advances or cash payments of any nature must not be made.
- Family members or persons not directly related to the relevant business project should not attend and if in any event they do attend, in no circumstances should their expenses be paid or reimbursed by SCPL or the organiser of the promotional trip.

FACILITATION PAYMENTS

A facilitating payment is a small payment, which is made solely to expedite or secure the performance of routine government actions, such as to:

- obtain licences, permits and other official documents to qualify to do business in a foreign country
- process governmental paper, such as visas and work orders
- provide police protection, mail services and inspection of goods or of contract performance
- provide telephone service, utilities, loading or unloading cargo and protecting goods from deterioration
- actions of a similar nature.

Some countries anti-bribery laws, permit certain facilitating payments; however the laws of many jurisdictions do not allow facilitating payments. SCPL employees are not permitted to make facilitating payments, even where they are allowable under local law. Any demands received by SCPL for a facilitating payment must be rejected and reported to immediately to management.

POLITICAL CONTRIBUTIONS AND SPONSORSHIPS

SCPL is not affiliated to any political party or organisation. SCPL will not make, or permit to be made on its behalf, any contributions (whether financial or otherwise) for political purposes or events. SCPL will also not permit employees to engage in political activities on its behalf.

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Employees are free to engage in political activities in their private capacity, including making donations to political parties. However, you should be aware of and raise with your line manager any proposed donation or activity in your private capacity that relates to a political party or governmental entity which is an existing or potential SCPL business partner.

SCPL and its employees shall not, unless mandated under applicable laws, offer or give any company funds or property as donation to any government agency or its representative, directly or through intermediaries, in order to obtain any favourable performance of official duties.

SCPL shall not support any specific political party or candidate for political office. The company's conduct shall preclude any activity that could be interpreted as mutual dependence/favour with any political body or person, and shall not offer or give any company funds or property as donations to any political party, candidate or campaign.

THIRD PARTIES

SCPL may be legally liable for the conduct of third parties, even if the at conduct is fraudulent. For example, if SCPL is working with third parties without taking steps to gain sufficient knowledge about them and their business practices.

It is therefore vital to ensure that when acting for, or with, SCPL, third parties conform to the Company's high standards of behaviour.

To be clear, if you are prohibited from doing something under this Policy, you are also prohibited from undertaking any of those actions through a third party.

REPORTING UNETHICAL, ILLEGAL OR SUSPICIOUS ACTIVITY

If any SCPL employee has knowledge or suspicion that a person has benefited or has sought to benefit from unethical conduct or any proceeds derived from any criminal offence (including bribery) the employee and SCPL may commit an offence if it does not report that knowledge or suspicion. As such any such knowledge or suspicion must be reported immediately.

This policy shall be reviewed for every three years or before based on the necessity for its suitability and updated as necessary.

Approved by

J.Vijaya Kumar
(Director)

Version: Jan 2020

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