

**Archean Chemical Industries Limited**  
**Anti-Bribery and Anti-Corruption Policy**

**Archean Chemical Industries Limited** recognises and follows all applicable laws and regulations and respects lawful customs of the regions where we operate and transact. In India, under the provisions of Prevention of Corruption Act, 1988 (PCA), acceptance or attempted acceptance of any form of illegal gratification (i.e., anything of value other than a legal entitlement) by a public servant is a punishable offence. Companies Act, 2013 also has provisions to prevent corruption in corporate sector.

In addition to the Prevention of Corruption Act, 1988, the Indian Penal Code, 1860 ("IPC"), Prevention of Money Laundering, 2002, Central Vigilance Commission Act, 2003, Lokayukta Acts of various states shall also apply to offences relating to or resulting in corruption and bribery and resolutions available.

In conformity with that, we are committed to acting and building relationships based on integrity and fairness in all our dealings. Hence, **Archean Chemical Industries Limited** has adopted a "Zero Tolerance" approach to bribery and corruption.

## **1. Scope & Applicability**

This policy shall be applicable and binding on all employees, or any other person associated with **Archean Chemical Industries Limited** (hereinafter referred as "Company" and for the purposes of this document includes all employees and associates with subsidiaries and affiliate companies) and such other persons, including those acting on behalf of our Company, including directors, who in turn shall ensure that financial consultants, distributors, vendors, consultants, advisors, suppliers, contractors or other third parties engaged with **Archean Chemical Industries Limited** are aware of and adhere to these standards, across all locations.

The purpose of the policy is to safeguard and promote legitimate business throughout the organisation and to prevent and prohibit corruption, bribery and similar acts in connection with the organisation.

**Archean Chemical Industries Limited** will communicate the policy and practical procedures and its approach for the implementation of the policy to its employees and will publish this policy on its corporate website. Every employee is bound to comply with anti-bribery policy, as part of the Code of Conduct.

## **2. Anti-Bribery & Corruption**

Under no circumstances, any employee may offer, promise or grant anything of value to

- a) Government Official
- b) Any person, or members of their family
- c) A third party
- d) Charitable organization suggested by such a recipient
- e) Policyholders and prospective customers in the form of rebate or any other inducement;
- f) Or any other entity and/or individual, directly or indirectly related and having a conflict of interest with the employee.

for influencing the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with **Archean Chemical Industries Limited**.

### **3. Accepting Gifts and Entertainment**

In general, employees may not accept gifts or the conveyance of anything of value (including entertainment) from current or prospective clients of **Archean Chemical Industries Limited** and its financial consultants or agents, partners, vendors, any other entity, any other entity or individual, directly or indirectly related and having a conflict of interest with the employee.

Employees may never accept a gift under circumstances in which it could even appear to others that the business judgment may be compromised. Similarly, employees may not accept or allow a close family member to accept gifts, services, loans or preferential treatment from clients, agents or others in exchange for a past, current or future business relationship with **Archean Chemical Industries Limited**.

Cash gifts or their equivalent (e.g., gift cards or vouchers) may not be accepted under any circumstances. Non-cash gifts may be accepted when permitted under applicable law if they are (1) nominal in value (e.g. diaries, planners and similar stationery, inexpensive food items or any other items up to a maximum of approx. INR 5000); (2) appropriate, customary and reasonable meals and entertainment at which the giver is present, such as an occasional business meal or sporting event; or (3) appropriate, customary and reasonable gifts based on family or personal relationships, and clearly not meant to influence **Archean Chemical Industries Limited** business.

If employees have any questions about the appropriateness of accepting a gift, invitation, raffle or other prize, employee should disclose and discuss the matter with their manager prior to participation or acceptance.

### **4. Giving Gifts and Providing Entertainment**

In certain circumstances, giving gifts and providing entertainment may be seen as a conflict of interest by others, or in extreme cases, bribery. Appropriate gifts and entertainment may be offered to clients, by person authorized to do so, subject to the procedures applicable for **Archean Chemical Industries Limited**.

### **5. Responsibility**

As a part of engagement with **Archean Chemical Industries Limited** and as an ethical responsibility, all the stakeholders such as Board of Directors, senior management, managers and all other employees shall be responsible for the enforcement of and compliance with this policy on business conduct to ensure awareness and compliance.

Employees need to be alert about possible violations of this policy and report them to the HR. Employee must cooperate in any internal or external investigations of possible violations. If one is asked to make a payment on the Company's behalf, one should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. One should always ask for a receipt, which details the reason of the payment. If one has any suspicions, concerns or queries regarding a payment, one should raise these with the HR/ Legal/Compliance Officer, wherever possible, prior to taking any action.

## **6. Breach**

Violation of any of the orders, laws, rules and regulations under this policy may subject the employee to criminal or civil liability, including potential prosecution, fines and other penalties for improper conduct, as well as imprisonment or may result in corrective/ disciplinary action by **Archean Chemical Industries Limited**, including termination from the employment.

## **7. Review**

This policy shall be periodically reviewed and updated by the Human Resources Compliance team, if there are significant changes in the applicable regulations.

## **8. Channel for complaint:**

Complaint can be made by any employee or any other person associated with our Company and such other persons, including those acting on behalf of our Company and includes directors, financial consultants, vendors, consultants, advisors, suppliers, contractors or other third parties.

The complainant may send a communication through email or directly in writing through a letter to,

**The Compliance Officer**  
**Archean Chemical Industries Ltd**  
**No.2 North Crescent Road, T Nagar, Chennai-600017**