



GLS POLY FILMS PVT. LIMITED.

VILLAGE –GURAWARA, DIST-REWARI -123035
HARYANA, INDIA.

Anti-Bribery And Anti Corruption Policy





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1. Purpose

This Anti-Bribery and Anti-Corruption Policy (the "Policy") is designed to ensure that all employees and associated persons of [Company Name] (the "Company") act with integrity and in compliance with all applicable laws and regulations regarding bribery and corruption. The Company is committed to conducting its business in an ethical and lawful manner and expects all employees and associated persons to adhere to the highest standards of integrity and honesty.

2. Scope

This Policy applies to all employees, officers, directors, consultants, contractors, agents, and any other person or entity acting on behalf of the Company (collectively referred to as "Associated Persons"). This Policy also extends to all business activities conducted by the Company, including but not limited to marketing, sales, procurement, and interactions with government officials.

SR. NO	SITE	ADDRESS
1	GLS POLYFILMS PVT LTD.	VILLAGE –GURAWARA, DIST- REWARI -123035 HARYANA, INDIA.

3. Definitions

- **Bribery:** Offering, promising, giving, accepting, or soliciting anything of value to influence the actions or decisions of another person, whether in the public or private sector.
- **Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery or embezzlement.
- **Associated Persons:** Any person or entity that performs services for or on behalf of the Company, including employees, officers, directors, consultants, contractors, and agents.

4. Policy Statement

The Company is committed to:

- Conducting its business in a manner that is free from bribery and corruption.
- Ensuring that all Associated Persons understand and comply with this Policy.
- Implementing and maintaining adequate procedures to prevent bribery and corruption.
- Promoting a culture of integrity, transparency, and accountability.

5. Prohibited Conduct

5.1 Bribery

- **Giving or Offering Bribes:** No Associated Person shall offer, promise, or give any bribe or other improper advantage to any person, whether in the public or private sector.
- **Accepting Bribes:** No Associated Person shall accept or solicit any bribe or other improper advantage from any person.



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5.2 Facilitation Payments

- **Prohibition:** The Company strictly prohibits the payment of facilitation payments, which are small payments made to expedite or secure the performance of a routine governmental action.
- **Exception:** In exceptional circumstances where an Associated Person believes that a facilitation payment is necessary to protect the safety or liberty of an individual, the matter must be reported to the Company immediately.

5.3 Gifts, Hospitality, and Expenses

- **Gifts:** Gifts may be given or received only if they are reasonable, proportionate, and in compliance with local laws and customs. Gifts must not be intended to influence a decision or action.
- **Hospitality:** Hospitality may be provided or accepted only if it is reasonable, proportionate, and in compliance with local laws and customs. Hospitality must not be intended to influence a decision or action.
- **Expenses:** Expenses may be incurred or reimbursed only if they are reasonable, proportionate, and in compliance with local laws and customs. Expenses must not be intended to influence a decision or action.

6. Due Diligence

The Company will conduct due diligence on all Associated Persons to ensure that they are aware of and comply with this Policy. This includes:

- Conducting background checks on new employees and Associated Persons.
- Reviewing the integrity and reputation of potential business partners and suppliers.
- Monitoring and auditing compliance with this Policy.

7. Reporting and Investigation

7.1 Reporting

- **Reporting Channels:** Any Associated Person who suspects or becomes aware of any bribery or corruption must report it immediately to the Company's Compliance Officer or through the Company's whistleblowing hotline or email hr@glspolyfilms.com.
- **Confidentiality:** Reports will be treated confidentially to the extent possible.
- **Protection:** The Company will not tolerate any retaliation against any person who reports in good faith any suspected bribery or corruption.

7.2 Investigation

- **Investigation Process:** The Company will promptly investigate any reports of bribery or corruption.
- **Corrective Action:** If the investigation confirms a violation of this Policy, the Company will take appropriate corrective action, which may include disciplinary measures up to and including termination of employment or contract.



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8. Training and Awareness

The Company will provide regular training and awareness programs to ensure that all Associated Persons understand and comply with this Policy. This includes:

- Initial training for all new employees and Associated Persons.
- Regular refresher training for all employees and Associated Persons.
- Distribution of this Policy and any updates to all employees and Associated Persons.

9. Monitoring and Review

The Company will regularly monitor and review this Policy to ensure its effectiveness and compliance with applicable laws and regulations. This includes:

- Conducting periodic audits and reviews of compliance with this Policy.
- Updating this Policy as necessary to reflect changes in laws, regulations, and best practices.

10. Accountability

- **Compliance Officer:** The Company's Compliance Officer is responsible for overseeing the implementation and enforcement of this Policy.
- **Responsibility:** All Associated Persons are responsible for understanding and complying with this Policy.

11. Penalties for Non-Compliance

- **Disciplinary Action:** Any Associated Person who violates this Policy will be subject to disciplinary action, up to and including termination of employment or contract.
- **Legal Consequences:** Violations of this Policy may also result in legal consequences, including criminal prosecution and fines.

12. Policy Review

This Policy will be reviewed annually or as required by changes in laws, regulations, or best practices.

This policy aligns with SDGs 16 and 17, reflecting our holistic commitment to sustainability in Ethical Business Practices.

Approved By

Effective Date: 22.08.2023



SS Akhtar
Unit Head

Next Reviewed Date: 21.08.2025