

Anti-Bribery and Anti-Corruption Policy Document

Polyhose upholds zero tolerance approach towards Anti-Bribery and Anti-Corruption and is committed to operating businesses conforming to the highest moral and ethical standards.
We do not tolerate bribery or corruption in any form.

Anti-Bribery and Anti-Corruption Policy

1. **Introduction:** Polyhose is committed to establishing the highest standards of transparency and accountability in all its operations. Polyhose strives to achieve its mission by adhering to high legal and ethical standards. Polyhose will not tolerate any form of bribery, embezzlement, or corruption and will enforce all laws prohibiting bribery, fraud, and corruption.
2. **Purpose:** The purpose of this policy is to outline Polyhose's and those acting on its behalf's responsibilities for adhering to and upholding Polyhose's stance on bribery and corruption. Every individual or group of individuals associated with Polyhose in any way, whether staff, ad hoc staff engaged in the organization's programmed activities, consultants, contractors, interns, partner organizations, or any other party with a financial or trustee-beneficiary relationship with Polyhose, is expected to share this commitment. The primary goal of this statement is to outline Polyhose's policy regarding the prevention and detection of bribery and corruption, as well as the specific procedures to be followed if any fraud is discovered or an idea / impression is formed.
3. **Scope:** This policy applies to the Employees, Contractors, Contract employees and Vendors. This Policy sets out the minimum standards to which all representatives of the Polyhose must always adhere to.
4. **Statement:**
 - i. Polyhose does not tolerate bribery or any other unethical inducement or payment, including facilitation payments and "kickbacks." All staff, ad hoc staff, advisers, consultants, suppliers, partners, and individuals acting on behalf of Polyhose are required to avoid any activities that could lead to or suggest a conflict of interest with Polyhose's activities.
 - ii. Polyhose expects its suppliers and partners to act with integrity and without bribery and/or corruption in their thoughts or actions and will include clauses to that effect in relevant contracts where appropriate.
5. **Prohibited Activities:**
 - i. It is prohibited, directly or indirectly, for any staff or individual acting on behalf of Polyhose to offer, give, request or accept any bribe (i.e. gifts with intentions, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for Polyhose, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
 - ii. This policy requires employees and individuals acting on behalf of Polyhose:
 - a. Not to offer, promise or make any bribe or unauthorized payment or inducement of any kind to anyone.

- b. Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers.
- c. Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorized by Polyhose in the ordinary course of business.
- d. To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers.
- e. Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. Polyhose will not tolerate such payments being made.
- f. To report any breaches of this policy's principles or standards or of any associated

6. Criminal Offence as per Law:

- i. It is a criminal offence to:
 - a. Offer a bribe
 - b. Accept a bribe
 - c. Fail to prevent a bribe
- ii. Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of Polyhose should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence an individual could face prosecution as per the law.

7. Gifts and Hospitality:

Polyhose recognizes that giving and receiving gifts and hospitality without any intentions, or in other words, where nothing is expected in return, aids in the formation of positive relationships with third parties where it is proportionate and properly recorded. (***Ref to Employee Code of Conduct on Gifts***)

8. Raising a Concern

- i. If an employee or an individual acting on Polyhose's behalf is offered or solicited a bribe, they should refuse unless their immediate safety is jeopardized. If this is the case, the employee or individual should contact the Unit/Centre In-Charge as soon as they are able to. To assist with any investigation, the employee or individual may be required to provide a written account of the events. If any Unit/Centre In-Charge is involved in such an act, the individual should contact the Executive Officer, and if the concerned Executive Officer is involved in such an act, the individual should contact the Director of Polyhose directly.

Employees or individuals acting on Polyhose's behalf are encouraged to report any instances of bribery or corruption as soon as possible. The employee or individual who raises a concern can do so anonymously and in confidence. fear of retaliation All reports are taken seriously and, where appropriate, investigated. No employee or individual will face discrimination as a result of reporting a legitimate concern.

If any bribery or corruption is discovered, Polyhose management will immediately take corrective action. Polyhose has its own system for investigating employees who violate service rules, such as financial irregularities, corruption, fraud, or embezzlement. If the charges are proven, the delinquent may face penalties based on the severity of the misconduct.

- ii. These rules are based on the following principles: -
 - a. The right of Polyhose to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and Antibribery policy.
 - b. At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
 - c. The emphasis of disciplinary action is on prevention, justice and rehabilitation.

9. **Review of this Policy:** In the interests of maintaining best practice, the contents of this Anti-bribery and Anti-Corruption Policy will be reviewed by HR every year.

10. Reporting and Investigation:

- o HR Manager & Plant Manager at primary level.
 - o Director at secondary level.
- ii. Investigation:
 - o As per the direction of Director, Antibribery committee will be formed to investigate.