

Clean Science and Technology Private Limited

Office: 503, 5th Floor, Pentagon Tower 4, Magarpatta City, Hadapsar, Pune - 411 013, MS, India
Tel: +91 20 26899953 Fax: +91 20 26898894, Email: sales@cleanscience.co.in Web: www.cleanscience.co.in
Factory Unit 1: Plot No. D-28, MIDC, Kurkumbh 413 802, Dist. Pune, MS, India
Factory Unit 2: Plot No. D-26/3, MIDC, Kurkumbh 413 802, Dist. Pune, MS, India

POLICY ON ANTI-BRIBERY & CORRUPTION POLICY

A. PREAMBLE

We, Clean Science and Technology Private Limited (hereinafter referred to as "CST") are committed to conduct our business in an honest and professional manner with the highest possible ethical standards and vigorously enforce our fair and honest business practices. CST believes in a zero-tolerance approach towards bribery, corrupt and unethical activities. We are also committed to act professionally, fairly and with integrity in all our business dealings and relationships in all areas of our business.

CST's long standing commitment is to adhere constantly to all laws relating to countering bribery and corruption in all the jurisdictions in which we operate, in addition to our own "Anti-Bribery & Corruption Policy". We remain bound by local, national and other applicable laws at every work place.

A. SCOPE AND APPLICABILITY

This policy applies to all directors, employees at all levels, vendors, associates and/or advisors etc. of the Company, including all its subsidiaries, affiliated companies and relevant third parties. In the context of this policy, the relevant third parties refer to any contractor, supplier, vendor, advisor, actual and potential client, customers, suppliers, business contacts, individual or organizations with whom CST deals in connection with its business or otherwise. It also refers to agents, advisors, joint ventures, government and public bodies, representatives and officials thereof to the extent permitted in law.

This policy applies in all the work places where CST has operations. Provisions of this policy are in addition to local customs, standards, laws or other local policies that are in place against bribery and corruption.

B. BRIBERY, CORRUPTION AND UNETHICAL PRACTICES.

Bribe is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe. It also includes an act of offering, giving, promising, asking, receiving, accepting, or soliciting something of value and not just money or of an advantage so as to include or influence an action or decision.

Bribe also includes any term defined in any provision of law or in any statute of local, state and central authorities against bribery and corruption. It is not limited to the act of offering a bribe. If an individual to whom provisions of this policy applies is found at the offering/receiving end of a bribe, he/she shall be guilty of breach of this policy apart from breach of statutory provisions.

C. GIFTS, INVITATIONS & HOSPITALITY

a) This policy also prohibits offering/receiving any type of gifts, hospitality and consideration from/to any individual, corporate or a third party who somehow deals commercially with CST so long as the giving/receiving of gift meets the following requirement: -



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- It is not made with the intention of influencing the party/person to whom it is being given, to obtain any reward or the retention of a business advantage or as an explicit or implicit exchange of favours or benefits in any form.
- It is given in the name of the company, not in an individual name. It is not in the form of cash/cash voucher.
- It is small in value and related to auspicious or special occasion and given/received openly.

b) As stated under " B. SCOPE AND APPLICABILITY" any one of his/her immediate family should not provide, solicit or accept gifts, favors, cash, kind, or any kind of benefit in any form from competitors, vendors, suppliers, customers or others that do business or intend to do business with CST.

D. ACCOUNTABILITY

a) Every Director, Employee at all levels, Vendor, Associate and/or Advisor who are related to CST shall be accountable for the prevention of any activity that could lead to, or imply, a breach of this Anti- Bribery & Corruption Policy of CST and shall make all reasonable efforts to avoid any kind of practice that may result in bribery, corruption and/or unethical practice under this policy or in applicable laws.

b) If any Director, Employee at all levels, Vendor, Associate and/or Advisor willfully ignores or turns a blind eye to any evidence of corruption or bribery within his/her department and/or around him/her, it will also be held against the person, even though such conduct may be "passive" i.e. the person may not have directly participated in that act.

E. CONTROL, AWARENESS & COMMUNICATION

a) The Human Resources Department shall be overall responsible for ensuring that this policy complies with CST's legal and ethical obligations, and that all those under its control comply with the provisions of this policy.

b) Managers of respective divisions have primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness; however, this will not absolve an individual from compliance of provisions of this policy and applicable laws. Head of HR Dept. shall be responsible for ensuring adequate and regular training regarding the policy from time to time. This training may also be extended to Intermediaries.

c) CST's approach of anti- bribery and corruption shall be communicated to all suppliers, contractors, vendors with them and as appropriate procedures.

F. MONITORING AND REVIEW

a) Head of HR Department will monitor the effectiveness and review the implementation of this policy, regularly, considering its suitability, adequacy and effectiveness. Any improvement identified will be made or brought to the attention of the management as soon as possible, for consideration.

b) CST shall keep accurate financial books and records, and also have in place a system to record, keep and preserve records for all financial transactions.



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c) Any individual upon noticing or suspecting any instance which is in violation of any provision of this policy is required to draw attention to the circumstances either to the Head of HR Dept. or the Managing Director of the Company.

e) All such matters will be dealt with in strict confidence and in accordance with this Policy/relevant legislation. CST will protect the legitimate interest of such individual bringing the matter to its notice as per guideline by the Director of the company.

G. BREACHES

The breaches of this policy any one which is stated under " B. SCOPE AND APPLICABILITY" shall be construed as misconduct or gross misconduct that could warrant strictly disciplinary action, including dismissal / termination / cessation of all types relationship or may be subject to the imposition of large fines/ penalties or delayed of payments as per the final decision by the Director in deserving cases.

H. EXCEPTIONS

Any exceptions to the norms laid down in this policy shall be at the discretion of the Directors or any appropriate authority delegated by them.

I. AMENDMENT OF THE POLICY

The Company may, from time to time, review and update its policy and procedures based on learnings. HR Dept. will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified for strengthening this policy will be made as soon as possible. Therefore, this document is subject to modification. Provisions of this policy are in addition to all applicable laws and in no way restrict, derogate or limit any provisions of law.

All queries and clarifications on this policy and procedures may be referred to the HR Department.



Name: Ashok Boob

Designation: Managing Director

Date: 31.10.2019

