

MITSU CHEM PLAST LIMITED

Reg. Off: 329, GALA COMPLEX, 3RD FLOOR, DIN DAYAL UPADHYAY MARG, MULUND
(W), MUMBAI – 400 080.

ANTI-BRIBERY & ANTI -CORRUPTION POLICY

Anti-Bribery & Anti -Corruption Policy

At Mitsui Chem Plast Limited (MCPL), we appreciate the importance of ethical behavior to our relations with stakeholders and we are proud of our high ethical standards. This policy sets out the responsibilities of MCPL people and MCPL business partners in preventing bribery and corruption.

Purpose:

This policy focus on Company's zero tolerance approach to bribery and corruption. The policy provides information and guidance on how to recognize and deal with bribery and corruption issues. To reinforce our intention and obligation to act honestly and ethically in all our business dealings.

Scope:

Employees, Employers, Contractors, consultants, suppliers or any other third-party intermediaries who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf & with us.

Policy Statement:

- Mitsui Chem Plast Limited, does not tolerate any form of bribery or corruption.
- You must not offer, pay, make, seek or accept a personal payment, gift or favor in return for favorable treatment or to gain any business advantage.
- You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.
- You must ensure people who work for and with you understand bribery and corruption is unacceptable.
- At MCPL we commit to implement this policy through the following principals and actions:

Procedure: It will be dealt with Whistle Blowing Procedure.

Communication:

We will communicate this policy and relevant guidance to employees across the MCPL, through our internal communication channels.

Training:

We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

Books and records:

We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.

Business relationships:

We will ensure that our business partners - including contractors, suppliers, agents, brokers and joint venture partners –are fit to do business with.

Supply chain:

We will address bribery and corruption risk in our supply chain including government officials by ensuring that payments made for goods and services are reasonable.

Conflicts of interest – Gifts and hospitality:

We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

Document Retention: All documents related to this Policy shall be kept in accordance with the Company's record.

Modification: The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.
