



ANTI-BRIBERY POLICY

Doc. No.	GCIQCS-GEN-03
Version	01
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1. Introduction:

Geo Chem (Shanghai) Quality Certification Company Limited (referred as GCIQCS) is the legal entity responsible for certification activities. This Policy and Public Statement refers to the mechanism followed by GCIQCS to give confidence to all interested parties that GCIQCS does not engage in bribery or corruption of any form, or in any countries where it performs their operations.

GCIQCS is structured and managed in a way to implement the antibribery policy as an integral part of code of ethics applicable to all Employees and Third Parties involved or linked with services of GCIQCS. All personnel of GCIQCS including its Top Managements, Staff and Subcontractors are required to understand Anti-Bribery Policy and sign Code of Ethics and Anti Bribery Zero Tolerance Policy Agreement.

2. Responsibility for Compliance of Policy:

This policy applies to all Employees, Subcontractors, and all committees working with GCIQCS.

GCIQCS employee who receives a demand for a bribe or find any breach related to bribery matter must report the matter immediately to Top Management for immediate Actions

It is the responsibility of all GCIQCS Employees, Subcontractors, and Impartial Committee Personnel to understand and comply with this Policy

3. Prohibition against bribes and improper payments.

GCIQCS Top Management Strictly Prohibits bribe in all forms, Either Gifts, Improper Payment, Hospitality or entertainments, i.e.

- GCIQCS does not pay or offer any form of improper incentive for the purpose of securing business for GCIQCS.
- GCIQCS does not engage the services of third parties to offer bribes, illicit commission on its behalf.
- GCIQCS does not use the services of, consultants, partners, joint-venture partners, or contractors in cases where it suspects that such partners may engage in corruption or other illicit trade practices GCIQCS employees managing the use of an intermediary are responsible for regularly monitoring their compliance with the Code.
- GCIQCS always perform Background checks (including media checks to highlight any previous unethical behavior) and diligence interviews before entering the business relationship
- Employee of GCIQCS will face legal consequences as per KSA Law if they accept “gifts and privilege promise thereof” for a function transpired during their activities. (including potentially having his or her employment contract terminated)
- Where GCIQCS Employees commencing work on behalf of GCIQCS, they need to sign the following:

- ✓ Code of Ethics (**GCIQCS-AGR-09**)



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- Where GCIQCS having subcontractor / Impartial committee or any external party commencing work on behalf of GCIQCS, they need to sign the following:
 - ✓ Code of Ethics (**GCIQCS-AGR-09**)
 - ✓ Anti-Bribery Zero Tolerance Policy Agreement (**GCIQCS-AGR-12**)

4. Breaches and reporting

- Breach of GCIQCS Anti Bribery Policy may result in disciplinary action for employees up to and including termination and/or referral to national law enforcement authorities.
- Breaches of GCIQCS Anti Bribery Policy could also subject the individual who committed the violation to civil or criminal penalties, including substantial fines and potentially lengthy imprisonment.
- For Business Partners, breach of this policy will lead to termination of the relationship.
- All Persons subject to this Policy are required promptly to report any instances of non-compliance with this Policy the reporting procedures are set out in Regulation **GCIQCS-SOP-03** “Management of Impartiality.”

Approved By:

MANISH KUMAR

CEO