



Lucid Colloids Limited

Registered & Corporate Office:

401A Navbharat Estates, Zakaria Bunder Road, Sewri West, Mumbai 400015, India.

Tel: +91-22-24158059 | Email: admin@lucidcolloids.com

Company Identification Number: U24311MH1996PLC099800

Business Ethics Policy

1. Introduction

Lucid Colloids Limited (referred to as 'Lucid,' 'We,' or 'Us') is committed to conducting business with our core ethical values i.e integrity, reliability, fairness, respect, and collaboration.

- Integrity: Upholding honesty and moral principles in all our actions and decisions.
- Reliability: Consistently fulfilling our commitments, fostering trust through dependability, accountability, and excellence.
- Fairness: Ensuring equitable treatment and transparency in all business operations and decisions.
- Respect: Embracing diversity, practicing non-discrimination, and fostering a respectful and inclusive work environment.
- Collaboration: Promoting teamwork, open communication, and a culture of mutual support to achieve shared goals.

This **Business Ethics Policy** is designed to foster a culture of honesty, transparency, and accountability while ensuring full compliance with applicable laws and regulations. It provides a clear framework for preventing and addressing unethical conduct across all areas of our operations.

2. Applicability

This policy serves as a comprehensive guide for all employees, contractors, suppliers, and other stakeholders, outlining the ethical principles and legal obligations that underpin our business practices. We expect all individuals associated with Lucid to adhere to these standards to maintain the integrity and trust that define our company.

3. Focus Areas

The **Business Ethics Policy** at Lucid Colloids Limited emphasizes several key areas essential for fostering an ethical and responsible business environment:

1. Anti-Corruption and Bribery:

We uphold a stringent zero-tolerance policy against corruption and bribery in all forms. This policy explicitly prohibits the offering, solicitation, or acceptance of bribes or improper payments at any level within the company, ensuring that the integrity of our business decisions remains uncompromised.

2. Conflict of Interest:

We recognize the importance of identifying and addressing conflicts of interest as a collective responsibility. Internal stakeholders must disclose any personal interests that could interfere with their professional duties, fostering an environment of transparency and ethical decision-making.



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3. Fraud Prevention:

We are committed to preventing and addressing fraudulent activities within our organization in line with Companies Act, 2013. We encourage a culture of vigilance, where internal stakeholders are empowered to report suspicious activities without fear of retaliation. Regular awareness sessions shall be conducted to ensure all staff understand the importance of fraud prevention and are familiar with the procedures for reporting any concerns.

4. Anti-Money Laundering:

We implement comprehensive measures to monitor transactions, conduct thorough due diligence, and report any suspicious activities promptly to prevent money laundering and related crimes. We also maintain robust record-keeping practices to ensure transparency and facilitate audits.

5. Anti-Competitive Practices

We actively promote fair competition in the marketplace and strictly prohibit any anti-competitive practices that may undermine market integrity. Our commitment to adhering to competition laws such as The Competition Act, 2002 is fundamental to our operations, ensuring that we engage in ethical business practices that foster a level playing field. Additionally, we implement internal mechanisms to monitor compliance and address any potential violations swiftly.

6. Confidentiality and Information Security

We prioritize the protection of sensitive and confidential information, acknowledging its vital importance to our operations and the trust our stakeholders place in us. We implement stringent access controls to restrict data exposure to authorized personnel only, utilizing encryption and secure storage methods to defend against unauthorized access and potential breaches. These measures provide us with the confidence to effectively mitigate risks associated with data breaches while upholding our commitment to protecting the privacy and integrity of the information we manage in line with applicable data protection laws and regulations. By fostering a culture of vigilance and responsibility, we ensure that our data protection practices remain robust and resilient in an evolving digital landscape.

4. Reporting Mechanism for Violations

Lucid's Whistleblower Policy offers a framework for reporting unethical or improper activities while ensuring protection against retaliation for those who make genuine disclosures. Employees and Directors can report concerns directly to the Chairman of the Audit Committee or the Ethics Counsellor. The policy guarantees confidentiality and protection against unfair treatment but disallows the abuse of the policy for personal gain. Investigations are conducted impartially, with results reported to the Board.



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5. Consequences of Non-Compliance

Non-compliance with our **Business Ethics Policy** can lead to serious repercussions for both individuals and the organization. Consequences of non-compliance may include:

Disciplinary Action: Employees found to be in violation of this policy may face disciplinary action, which can range from warnings to suspension or termination, depending on the severity of the violation.

Legal Consequences: Violations of laws and regulations may result in legal action against the individual or the company (external stakeholders), including fines, penalties, and potential criminal charges.

6. Review and Revisions

This policy will be reviewed annually by the Board, and any necessary revisions based on the Board's recommendations will be made to ensure its continued effectiveness.

Mr. Uday Merchant
Managing Director