



# 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

## LCL Anti-Bribery and Anti-Fraud Policy

We strictly prohibit bribery, fraud and all other corrupt business practices at LCL. We expect employees at all times to obey the law and maintain high ethical standards as stated in "Doing the Right Thing, the LCL Way".

We will uphold laws relevant to countering fraud, bribery and corruption in all of the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices. Losses due to fraud, bribery and all other corrupt business practices can be more than just financial in nature; they can also cause damage to the company's reputation. The reputation of LCL for lawful and responsible business behaviour is of paramount importance.

### 1. Scope

This policy applies to all operations related to LCL. This policy is concerned with internal and external bribery, fraud and other corrupt business practices, committed by employees, temporary staff, agents, suppliers and contractors.

### 2. Policy

The purpose of this policy is to set out the responsibilities of the group in observing and upholding our position on bribery, fraud and other corrupt business practices.

To achieve this commitment, Lucid Colloids Ltd. will,

- develop and maintain effective controls to prevent bribery, fraud and other corrupt business practices.
- ensure that any suspected, alleged, attempted or actual instances of bribery, fraud or other corrupt business practices are investigated appropriately, regardless of the position held or length of service of any individual implicated.
- take appropriate disciplinary action in all cases where investigation has proven attempted or actual instances of bribery, fraud or other corrupt practices. All significant cases shall be reported to the group's General Counsel department who will report them in the appropriate manner; and,
- operate a lesson learnt process to review incidents, systems and procedures to prevent similar instances occurring and embed responsible business behaviours within LCL.

### 3. Bribery

LCL strictly prohibits:

- the offering, solicitation or the acceptance of any bribe, whether cash or other inducement (including so-called facilitation payments)
- to or from any person or company, wherever they are located in the world,
- and whether they are a private person or company or a public official or body by any individual employee, agent or other person or body acting on the group's behalf
- to gain any commercial, contractual or regulatory advantage for the group in a way which is unethical



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- or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

LCL recognizes that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the group or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded.

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- the use of any recognized fast-track process which is available to all on payment of a fee
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

We do not make direct or indirect donations to political parties. Donations to charity on behalf of the group must be made following our internal process and with the consent of the group's Strategy and Regulation department.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your most senior local manager before proceeding. If necessary, guidance should also be sought from either the group's MR.

#### 4. Fraud

There is no one definition of fraud but for practical purposes fraud may be described as the act of making false representation, or failure to disclose information, or abusing a position of trust, with the intent to make a gain or cause a loss or to expose another to the risk of loss.

Examples of frauds that may be perpetrated against LCL are, but not limited to the following.

- theft, misuse and misappropriation of LCL property, equipment, funds, materials, records or any other assets
- false accounting and/or making fraudulent statements financial or non-financial with a view to personal gain or gain of another (e.g. timesheets, expense claims, purchase orders, budgets, regulatory returns)
- any activity which involves the alteration, destruction, copying or manipulation of data for inappropriate purposes

Fraud may involve one individual or several people in collusion with each other who could be either from within or external to LCL.



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### 5. Reporting and Response

Any employee who discovers or suspects bribery or fraudulent activity should normally raise any concerns through their line manager. Alternatively, you may raise your concerns with any of the following group senior executives, General Manager, Director or Corporate MR, General Counsel.

However, it is recognized that individuals may feel inhibited in certain circumstances. In this case, employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage through our confidential and independent whistleblowing help lines. The numbers for the helplines can be found in the appendix to this policy. The confidential reporting lines are operated by Safe call - an independent company that specializes in handling concerns at work. Safe call will take details of your concern and send a report through to LCL to investigate. You can ask Safe call to keep your identity confidential.

Once a matter is reported it will be dealt with by the group's General Counsel and/or Director in line with LCL's Anti-Bribery and Anti-Fraud Response Plan. Taking advice from any appropriate authorities, they will be responsible for deciding the actions to be taken before, during and after any investigation.

The Whistleblowing Tel nos are - Tel - +912224158059  
+912224158060

### 6. Governance

The Executive Committee of the LCL Board provides regular oversight of this policy. The LCL Board reviews the policy on an annual basis.

### 7. Responsibilities

This policy applies to all individuals who are employed by, or carry out work on behalf of LCL, including employees, temporary staff, agents, suppliers and contractors

**All individuals identified within 7 above are responsible for,**

- understanding and acting in accordance with "Doing the Right Thing, the LCL Way" in obeying the law and maintaining high ethical standards.
- reporting any known or suspected instances of attempted or actual bribery, fraud or instances of other corrupt practices in the company in line with this policy.
- notifying the company at the earliest opportunity of the concern so that the issue can be investigated appropriately.
- co-operating with any investigation into any concern.

  
Mr. Uday Merchant  
Managing Director