



# GLS Aluminum Industries Pvt. Ltd

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<b>TITLE: Anti-Corruption Policy</b>	DOC. NO.	<b>GLS/FOIL/MR/SOP/08</b>
	REV. NO.	00
	EFFECTIVE DATE	01/08/2025
	NEXT REVIEW DATE	31/07/2026
	SUPERSEDES	NIL

## Anti-Corruption Policy for GLS Aluminium Industries Pvt. Ltd.

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### 1. Purpose

This Anti-Corruption Policy aims to ensure that all employees, directors, officers, and stakeholders of GLS aluminum Industries Pvt. Ltd. conduct business with the highest level of integrity and in full compliance with applicable laws, regulations, and ethical standards. This policy aligns with the Global Reporting Initiative (GRI) standards and aims to prevent and address all forms of corruption within the company.

### 2. Scope

This policy applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders involved with GLS Aluminium Industries Pvt. Ltd. It covers all business activities, including interactions with government officials, customers, suppliers, and other third parties.

### 3. Core Principles

**Zero Tolerance:** GLS Aluminium Industries Pvt. Ltd. has a zero-tolerance policy towards all forms of corruption, including bribery, extortion, fraud, and money laundering.

**Transparency:** All business dealings must be conducted in a transparent manner, with accurate and honest reporting of financial transactions and other business activities.

**Accountability:** All employees and stakeholders are accountable for adhering to this policy and reporting any violations or suspicious activities.

### 4. Quantified Objectives

**Objective 1:** Achieve 100% compliance with anti-corruption training for all employees by the end of each fiscal year.



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**Objective 2:** Maintain zero incidents of reported and substantiated corruption cases annually.

**Objective 3:** Conduct a minimum of two internal audits per year specifically focused on anti-corruption compliance.

**Objective 4:** Ensure 100% of third-party suppliers and contractors acknowledge and commit to the anti-corruption policy by signing a declaration.

## 5. Prohibited Practices

**Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in a position of trust is strictly prohibited.

**Facilitation Payments:** Any payment made to expedite or secure the performance of a routine government action is prohibited.

**Gifts and Hospitality:** Offering or accepting gifts, hospitality, or other benefits that could influence, or be perceived to influence, business decisions is prohibited. Exceptions may be made for token gifts of nominal value, provided they are not intended to influence the recipient.

**Conflict of Interest:** Engaging in activities or relationships that create a conflict of interest, or the appearance of one, is prohibited. Employees must disclose any potential conflicts to management.

## 6. Responsibilities

**Board of Directors:** The Board is responsible for ensuring that the company's anti-corruption policies are implemented effectively and that a culture of integrity is promoted throughout the organization.

**Management:** Managers are responsible for enforcing this policy, conducting regular risk assessments, and ensuring that their teams are fully trained and compliant with anti-corruption measures.

**Compliance Officer:** The Compliance Officer is responsible for overseeing the anti-corruption program, conducting internal audits, and investigating any reports of suspected corruption.

**Employees:** All employees are responsible for understanding and complying with this policy, completing required training, and reporting any suspicious activities or violations.



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## 7. Training and Awareness

**Mandatory Training:** All employees, including directors and officers, must complete mandatory anti-corruption training annually. Training programs will cover the legal requirements, company policies, and reporting mechanisms.

**Ongoing Awareness:** Regular communication and updates on anti-corruption measures will be provided to all employees. This includes reminders of reporting obligations and the importance of maintaining integrity in all business dealings.

## 8. Risk Assessment and Monitoring

**Regular Risk Assessments:** The company will conduct regular risk assessments to identify potential areas of corruption risk within the organization. This includes assessing the risks associated with third-party relationships, high-risk markets, and specific business activities.

**Internal Audits:** The Compliance Officer will conduct at least two internal audits per year focused on anti-corruption compliance. These audits will evaluate the effectiveness of the company's controls and identify any areas for improvement.

**Third-Party Due Diligence:** All third-party suppliers, contractors, and business partners must undergo due diligence to assess their compliance with anti-corruption standards. Contracts will include clauses requiring adherence to this policy.

## 9. Reporting and Whistleblowing

**Reporting Mechanisms:** Employees and stakeholders are encouraged to report any suspected corruption or unethical behavior. Reports can be made anonymously through the company's whistleblowing hotline or directly to the Compliance Officer.

**Protection from Retaliation:** The company strictly prohibits retaliation against anyone who reports a violation of this policy in good faith. All reports will be treated confidentially and investigated thoroughly.



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### 10. Response to Violations

**Investigation:** All reported incidents of corruption will be promptly and thoroughly investigated by the Compliance Officer or an appointed investigation team.

**Disciplinary Action:** Employees found to have violated this policy will be subject to disciplinary action, which may include termination of employment, legal action, or other appropriate measures.

**Corrective Measures:** The company will implement corrective measures to address any identified weaknesses in its anti-corruption program and prevent future occurrences.

### 11. Review and Revision

**Regular Review:** This Anti-Corruption Policy will be reviewed annually or as needed to ensure it remains effective and up-to-date with legal requirements and best practices.

**Revision History:** Any changes or updates to this policy will be documented in the revision history, and all stakeholders will be informed of the changes.

**Prepared By:** Rajendra Moyal, Sustainability Head

**Reviewed By:** Rajendra Moyal, Management Representative

**Approved By:** Rajesh Singh, C.O.O.

#### Revision History:

Revision Number	Date	Description of Changes	Approved By
00	01-08-2025	Initial release of the Anti-Corruption Policy.	Rajesh Singh (C.O.O.)

