

BUSINESS ETHICS POLICY

Shree Ganesh Remedies Limited



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SHREE GANESH REMEDIES LIMITED
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Ethics Policy

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ANTI-CORRUPTION POLICY

PURPOSE

- Our organization is committed to maintaining the highest standards of business ethics. This policy outlines our qualitative objectives and sets measurable targets to prevent corruption, conflicts of interest, fraud, money laundering, anti-competitive practices, and enhance information security.

OUR COMMITMENTS IMPLEMENTATION OF ANTI-CORRUPTION

MANAGEMENT SYSTEM:

- To guarantee that all employees complete the required training and awareness campaign by 2025 in order to emphasize the value of moral behavior, integrity in the workplace, and adherence to anti-corruption measures.
- Perform due diligence audits on anti-corruption and anti-bribery procedures for all SGRL facilities.
- Monitor and promptly address any reported incidences of corruption and bribery, which will be documented in the annual report's BRSR section.
- The Vigil system and whistleblower policy will govern the investigation and handling of the consequences.
- When stakeholders and employees disclose corruption in good faith, they will not face harassment or reprisals.
- Prohibit all forms of bribery: Workers are not allowed to propose, provide, or accept bribes, kickbacks, or other inducements in order to gain influence or economic advantages.
- Verify that all gift-related transactions, including inbound and outbound, adhere strictly to the Gift and Hospitality policy.
- The compliance officer must be notified right away of any suspicious transactions or activity. To guarantee that decisions are made impartially and, in the organization's, best interests, all conflicts will be handled in line with the conflict-of-interest policies of the organization.

- The implementation and enforcement of this policy will be supervised by a designated compliance officer.

CORRUPTION PREVENTION

- At SGRL, we recognize that corruption of any form undermines ethical standards, warps markets, and erodes stakeholder trust. We are committed to actively fighting corruption in all areas of our business operations, including interactions with public officials, private organizations, suppliers, partners, and other third parties.
- **Zero Tolerance Policy:** We remain steadfast in our opposition to payments for facilitation, corruption, and bribery.
- **Ethical Culture:** We stress that it is everyone's duty to maintain a robust culture of ethics and compliance across the whole organization.
- **Responsible Engagement:** All interactions with government organizations, commercial partners, and regulators must be conducted in an honest and ethical way.
- **Third-Party Integrity:** We promise to assess and engage with third parties based on their compliance with anti-corruption legislation and ethical business practices. In order to guarantee responsibility and advancement, we have established the following quantifiable goals:
- **Corruption Risk Assessments:** By 2030, Analyze the corruption risk in each business unit and operational site.
- **Training and Awareness:** By the end of 2027, all workers and contractors should have received anti-corruption training, with yearly refreshers required.
- **Third-Party Screening:** Prior to engagement, make sure that all new suppliers and high-risk third parties have undergone due diligence on corruption and integrity.
- **Policy Compliance Audits:** By 2026, all departments and regions should have finished their yearly compliance checks that address corruption threats.

IMPLEMENTATION MEASURES

To effectively prevent corruption, we will:

- To identify and stop corrupt activities, establish and update internal controls and procedures on a regular basis.

- Provide private avenues for employees and other parties to voice concerns without worrying about reprisals.
- Keep an eye on and evaluate high-risk transactions, such as sponsorships, gifts, hospitality, and charitable contributions.

QUANTITATIVE TARGETS

- All staff members received training: By the end of 2026, all staff members and pertinent contractors should get anti-bribery and corruption training, with yearly refresher courses to follow.
- Corruption risk assessments at every location: By 2030, carry out a corruption risk assessment at every operating location.
- **Supplier compliance assessments:** By 2027, make sure all Tier 1 suppliers have complied with a bribery risk assessment and signed our Code of Conduct.
- **Annual audits:** Conduct annual internal compliance audits in all business divisions to ensure that anti-bribery measures are being followed.

BUSINESS ETHICS POLICY

INTRODUCTION

- The company is dedicated to conducting its operations in compliance with the highest standards of corporate ethics as well as the relevant laws, rules, and regulations. In order for every employee to conduct themselves and lead on behalf of the company with professionalism, honesty, and integrity and to adhere to high moral and ethical standards, the company's executive management seeks to instill ethical behavior at all levels throughout the organization, making it a crucial component of the work culture.
- The company has established a Code of Conduct for its directors and senior management staff, and it periodically obtains their confirmations of the Code.
- Ensuring the greatest standards of moral behavior, openness, and responsibility when interacting with stakeholders is the goal of the policy.

To conduct and govern our Business with Ethics, Transparency and Accountability Further, as a part of the Policy Company shall

- Create the governance frameworks, protocols, and practices required to guarantee moral behavior at all levels and to encourage the value chain as a whole to embrace this idea.
- Ensure that information regarding its decisions that affect pertinent stakeholders is accessible.
- To refrain from abusive, dishonest, or anticompetitive behavior.
- Strive for open and honest communication with its stakeholders and guarantee information access about decisions that affect them.
- Accurately and promptly fulfill its obligations for financial and other required disclosures.
- Make sure that legitimate worries about wrongdoing or illegal activity can be raised through its Vigil Mechanism in a responsible and private way.
- Promote compliance with this policy among its business associates and other parties.
- Make sure that legitimate worries about wrongdoing or illegal activity can be responsibly and discreetly reported via its Vigil Mechanism.

To provide goods and services that assure safety and contribute to sustainability throughout their lifecycle

- Throughout its lifespan, which spans several stages from raw material procurement to product design and manufacture to customer delivery, the company incorporates safety and sustainability concepts into its operations and products. The company will always guarantee the safety of its products.
- The company will make an effort to achieve its objectives without sacrificing economic, social, or environmental considerations; this equilibrium should be maintained for the course of the products' life cycle. In parallel, the company will use different layers of quality control and checks to guarantee the quality of its products. The business will continue to be dedicated to giving its clients complete satisfaction in terms of quality, dependability, and delivery, as well as achieving quality leadership for all of its products.
- In addition to encouraging stakeholders and workers to lessen their environmental footprints, the company will work to keep its own footprints within the allowed bounds.

Further, as a part of the policy the Company shall

- Assure the product's safety and efficient use of resources over its entire lifecycle, from design to disposal, and make sure that all parties involved understand their roles;
- Ascertain that the concepts of labor practices, human rights, ethics, occupational health, safety, and the environment are incorporated into the procurement, manufacturing, and delivery of all goods and services.
- The policy will be posted on the company website and properly disseminated throughout the organization at all levels. The Managing Director will be in charge of making sure the policy is followed across the entire organization through the functional heads of each department. The Managing Director and Board of Directors will regularly monitor and assess compliance with the policy.

MONITORING

- Every year, policy will review and evaluate the company's performance in terms of business responsibility.

OBJECTIVES

- Commitment to prevent offering, promising, giving, accepting, or soliciting an advantage We operate with integrity, honesty, and openness in all of our business

dealings. We abstain from any corruption, bribery, and immorality.

Qualitative Objectives

- Encourage a culture of honesty and moral conduct
- Make sure conflicts of interest are disclosed in a transparent manner.
- To stop fraud, bolster internal controls.

Quantitative Targets

- All staff receive yearly anti-corruption training.
- Conflict of interest declarations are reviewed annually.
- Cut the number of fraud cases by 10% annually.
- Attain complete AML compliance.
- There have been no instances of anti-competitive conduct.

CONFLICT OF INTEREST POLICY

PURPOSE

- An organization's **conflict of interest policy** is a set of guidelines that establishes the standard operating procedure that must be followed if there is a conflict of interest for the organization or any of its members.

OBJECTIVE

- A conflict of interest policy aids the company in creating strong frameworks and protocols that can be used in the event that a conflict of interest is discovered. The following are the main goals of a finding situations that could result in conflicts of interest that pose a serious risk to the company's revenue or reputation; setting up suitable processes and systems to handle those conflicts; and making sure that these processes and systems are maintained in an effort to stop actual harm to the company's revenue interests or reputation from conflicts found.
- To establish transparent reporting procedures that identify the types of conflicts of interest and the individuals involved.

DEFINITION

- A conflict of interest arises when an individual has interests in many roles. When someone has a fiduciary duty to advance one interest while simultaneously pursuing another conflicting goal, this is known as interest in separate capacities.
- A conflict of interest arises when the competing interest is pursued over the fiduciary interest. To put it simply, a conflict of interest arises when an interested party participates in the decision-making process.
- When acting on behalf of the company, employees must always act fairly and openly and refrain from accepting hospitality or personal presents from those who are conducting business or wishing to do business with the company.
- The individual in question must promptly disclose any changes to their actual or prospective conflicts of interest and obtain management approval.

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Possible conflict Situations	Recommendation
Operating a business either during or after business hours	Not Allowed
Providing competitors with consultancy services	Not allowed
Taking a commission for work done for the business	Not Allowed
recommending applicants for interviews and participating on the same candidate's interview panel	Not allowed
Person with him you have a close relationship with that works in the same industry as us	Declaration to be made
trading goods and chemicals that are identical to ours	Not allowed
Trading stocks	Allowed in time bound manner
Presents for Traders or Suppliers	Only Edible items are allowed

- If an employee has any questions or concerns about whether a particular situation could put them in a conflict of interest not covered by the examples above, they must speak with the appropriate authority.

Note: Employees are empowered to anonymously report any violations of the aforementioned policy they notice at work, and we guarantee that no retaliatory action will be taken against them.

FRAUD PREVENTION AND DETECTION POLICY

POLICY STATEMENT

- Our stance on fraud is zero-tolerance. Discipline up to and including termination and legal action will be taken against any stakeholder or employee involved in fraudulent activities.

EXAMPLES OF FRAUD

- Misrepresentation of operational or financial data; theft or misappropriation of assets; and kickbacks, bribery, or procurement fraud.
- Document falsification or forgery.
- Insider trading or improper use of private data.

RESPONSIBILITIES

- **Workers:** Report suspicions, adhere to internal rules, and remain vigilant about fraud threats.
- **Managers:** Verify audit results, enforce compliance, and make sure fraud protection measures are in place.
- **Compliance & Audit Team:** Keep up-to-date fraud detection instruments, carry out inquiries, and report findings to management.
- **Leadership:** Encourage an ethical, open, and accountable culture.

PROCEDURES

- **Fraud Reporting:** Through the whistleblower route, staff members can anonymously report suspected fraud.
- **Investigation:** Reports will be reviewed and looked into in confidence by the Compliance and Audit teams.
- **Action:** Discipline and legal escalation will follow confirmed cases.
- **Monitoring:** Regular audits and reviews will keep tabs on issues and suggest ways to strengthen controls.

OBJECTIVES

1. Organizational Commitment

Qualitative Objective: To obtain an advantage, act openly and denounce unlawful activity.

Quantitative Target: There is no room for verified fraud cases.

2. Training & Awareness

Qualitative Objective: Increase employee awareness of fraud by providing continual training.

Quantitative Target: Train 100% of employees on fraud prevention topics by 2030.

3. Fraud Detection Systems

Qualitative Objective: Put in place robust monitoring and internal control systems.

Quantitative Target: Every year, evaluate the risk of fraud in every area.

Incident Reporting

MONITORING & REVIEW

- The Annual Business Ethics and Compliance Report includes training completion and fraud event information, as well as an annual evaluation of this policy.

ANTI MONEY LAUNDERING POLICY

COMMITMENT

- Preventing the concealment of the source, ownership, or destination of cash gained unlawfully or dishonestly is a top priority for our organization. We will not permit the use of business operations or corporate resources for money laundering or similar purposes. We follow all relevant anti-money laundering and anti-terrorist financing laws, putting in place stringent internal controls, due diligence, and reporting protocols to guarantee that every transaction is lawful, open, and moral.

QUALITATIVE OBJECTIVES

- Make a commitment to never assist in or participate in money laundering.
- Preserve complete openness in company dealings and financial activities.
- Apply comprehensive risk assessment and Know Your Customer (KYC) procedures to all clients and partners.

QUANTITATIVE TARGET

- By 2030, all staff members should be fully informed on anti-money laundering laws, hazards, and reporting procedures.

KEY ACTIONS

- Frequent AML awareness training sessions for staff members.
- Required due diligence inspections on vendors and customers.
- Ongoing financial activity audits and monitoring.
- A safe and private way to report transactions that seem suspicious.

INFORMATION SECURITY POLICY

PURPOSE

COMMITMENT TO INFORMATION SECURITY

- We are dedicated to putting in place and keeping up a strong information security management system (ISMS) that is founded on best practices and international standards. To protect information assets, this involves organizational, procedural, and technical controls.

KEY INFORMATION SECURITY PRINCIPLES

- **Confidentiality:** ensuring that only individuals with permission can access information.
- **Integrity:** preserving the completeness and correctness of data and processing techniques.
- **Availability:** ensuring that systems and information are accessible to authorized users as needed.

OBJECTIVES & TARGETS

Qualitative Objectives

- Make a commitment to the prudent gathering, management, and preservation of private information belonging to third parties.
- Encourage a culture that prioritizes security by raising staff awareness and providing training.
- Ascertain that all IT systems and business procedures incorporate security by default and by design.

Quantitative Targets

- By 2030, evaluate the risks associated with IT security for all operational sites.
- Ensure that every year, all staff members finish cybersecurity training.
- Conduct yearly security assessments of third-party vendors for all important providers.
- React within 24 hours to all security incidents that are reported.

SECURITY MEASURES

SGRL implements the following measures to protect information assets:

- **Access Control:** User identification, role-based access, and least privilege enforcement.

- **Data Encryption:** utilizing industry-standard methods to encrypt data both in transit and at rest.
- **Incident Response:** formal procedure for handling, documenting, and looking into security events.
- **Security Audits:** routine audits, both internal and external, to evaluate the efficacy of controls.
- **Vendor Risk Management:** monitoring and due diligence on third-party data processors

ROLES AND RESPONSIBILITIES

- **All Employees:** accountable for reporting such events or breaches and adhering to security procedures.
- **IT Department:** guarantees the implementation, oversight, and updating of technical controls.

MONITORING & REVIEW

- This policy will be reviewed every year or whenever there are notable changes to the risk landscape, business operations, or regulatory environment. The efficacy of the policy will be evaluated using incident reports, audit logs, and security reports.

POLICY COMPLIANCE

- Discipline up to and including contract or employment termination may follow violations of this policy. In compliance with legal requirements, breaches involving third-party data may be notified to the appropriate authorities.

WHISTLE-BLOWER POLICY

SCOPE

- **Shree Ganesh Remedies Limited** adheres to the greatest levels of professionalism, honesty, integrity, and ethical behavior because it believes that business activities and operations should be conducted fairly and openly.
- A system for employees and directors to report concerns about unethical behavior, real or suspected fraud, or violations of the business's code of conduct or ethics policy must be established by every listed company, according to the Companies Act of 2013, its rules, and the Listing Regulations.
- Surveillance mechanisms serve as corporate governance tools that prohibit and discourage fraudulent activities in addition to assisting in the detection of fraud in firms.

POLICY PROFILE

- To encourage staff members and directors to report unethical behavior, malpractice, wrongdoing, fraud, violations of the company's principles and values, and legal infractions committed by any of the company's workers or directors without fear of reprisal.

DEFINITIONS

Below are definitions for some of the important terminology used in this policy:

- **Code of Conduct:** Refers to the Ethics and Conduct Code for Directors and Senior Management Staff.
- **Audit Committee:** Refers to the Audit Committee established by the Company's Board of Directors in compliance and its implementing regulations, as well as the Listing Regulations that the Stock Exchanges have entered into.
- **Employee :** Means every employee of the Company (including outsourced, temporary and on contract)
- **Investigators:** mean those personnel authorised, appointed/ consulted by Head of HR.
- **Protected disclosure:** Any communication made in good faith that reveals or provides proof of unethical or inappropriate behavior is referred to as "protected disclosure."

APPLICABILITY

- Under the policy, any employee or director of the company may make Protected Disclosures about matters pertaining to the company.
- Any alleged infraction of any legislation pertaining to the business. anything deemed to be against the company's code of conduct.
- Insider trading, bribery, and any infractions related to accounting or financial reporting Frauds in procurement.
- The falsification of company documents and data.
- Unauthorized use of the company's assets, including people and property.
- An act of sexual harassment, discrimination, fraud, or misuse of power. The list above serves as an example and is not meant to be all-inclusive.

PROCEDURE

- All activities or protected disclosures must be notified to the head of human resources (HR) via email or by completing an application in the required format.
- Within 15 days of learning about or seeing evidence of a violation, reporting must be completed.
- A whistleblower may submit their application to the chairman directly by email or by writing it if they feel that the head of human resources (HR) has not taken any action or offered any support.

DISQUALIFICATION

- As stated here, it shall be made sure that legitimate whistleblowers receive total protection from any form of unjust punishment; but, any misuse of this protection will result in disciplinary action.
- Whistleblowers who make any Protected Disclosures that are later determined to be malicious or mala fide, or who make three or more Protected Disclosures that are later determined to be frivolous, baseless, or reported in a manner other than in good faith, will not be eligible to report any more Protected Disclosures under this Policy.
- Protection under this Policy does not entitle a whistleblower to protection from disciplinary action resulting from false or bogus allegations made by a whistleblower knowing that they

are false or bogus or with mala fide intent.

CONFIDENTIALITY

- Given the justifiable requirements of the law and the investigation, the identity of a Subject and the Whistle Blower shall be kept as secret as practicable.

INVESTIGATION

- Upon receiving an application from a whistleblower, Head of HR will assign investigators based on the application's nature and justification.
- Investigators must follow a procedure for gathering and analyzing facts. When functioning within the parameters of their investigation, investigators will obtain their authority and access privileges from HR.
- Technical and other resources may be consulted as needed to support the investigation. Every investigator must be impartial and independent, both in reality and in perception.
- To ensure compliance with applicable legislation, any reports made under this policy will be quickly and suitably investigated, and any information shared during the investigation will be kept private, unless it is required to carry out the investigation and take corrective action.
- It is the responsibility of all employees of the Company, including the Subject, to assist in the investigation of any reported infractions. Discipline, including termination of employment, may result from willfully giving false information during an investigation or from refusing to cooperate with one.

NON-RETALIATION

- A whistleblower will not be treated unfairly just because they reported a protected disclosure in good faith under this policy. Reports of such victimization or retaliation will be taken carefully by the company. If a whistleblower reports a violation or assists in the investigation of a reasonably suspected violation, there will be appropriate disciplinary action taken against the responsible party, which may include termination of employment. Retaliation against reporting whistleblowers may also result in legal, criminal, and administrative sanctions for anyone employed by or associated with the company.
- All employees participating in the aforementioned investigation will be afforded the same level of protection as the whistleblower.

MODIFICATION

- The policy may be changed at any time and without prior notice by the Shree Ganesh Remedies Limited Board of Directors. Among other things, modifications could be required to keep the company in conformity with rules or to make room for organizational changes.

IMPLEMENTATION MEASURES:

- **Training:** Mandatory onboarding and annual refresher training on ethics, corruption, AML, and data protection.
- **Due Diligence:** Risk-based screening of suppliers, agents, and contractors.
- **Audits:** Annual internal and external audits of ethics controls.
- **Whistleblower Mechanism:** Confidential, non-retaliatory reporting channels.
- **Incident Response:** Formal procedures for investigating and remediating violations.

POLICY REVIEW:

This policy is reviewed annually or upon significant changes in operations, regulations, or risk landscape. Updates are communicated to all stakeholders.

Governance & Accountability

- Head of HR: Oversees policy implementation, grievance resolution, and compliance.
- Sustainability & Compliance Committee: Monitors labor, human rights, and community engagement.
- Management Review: Policy reviewed annually and updated based on performance, stakeholder feedback, and regulatory changes.

Implementation

- Grievance Mechanism: Confidential, non-retaliatory channels for employees and external stakeholders (grievance box, email: contact@shreeganeshremedies.com).
- Training: Mandatory onboarding and annual refreshers on all policy areas.
- Audits: Internal and third-party audits to verify compliance.
- Community Engagement: Annual stakeholder consultations in surrounding villages.

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CONSOLIDATED TARGETS

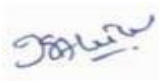
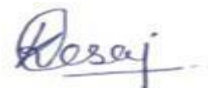
Objective	Target	Deadline
100% employee training on ethics, anti-corruption, AML, and information security	Annual refresher	By Dec 2025
Conflict of interest declarations reviewed	Annually	Starting FY 2025
Verified fraud cases	Zero	Ongoing
AML compliance	100%	By 2026
Anti-competitive conduct	Zero incidents	Ongoing
IT security risk assessments	All sites	By 2030
Third-party due diligence	All high-risk vendors	By 2026

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10. REVISION HISTORY & SIGNATURES:

Revision No.	Revision Date	Approved By	Date Approved
00	20/10/2023	Kajal Desai	20/10/2023
01	13/01/2025	Kajal Desai	13/01/2025

	Prepared By:	Reviewed By:	Approved By:
Name	Harsh Bhatti	Kinjal Doshi	Kajal Desai
Designation	Jr. HR Executive	Sr. HR Executive	HR Head
Sign			
Date	13/01/2025	13/01/2025	13/01/2025