



GLS POLY FILMS PVT. LIMITED.

VILLAGE –GURAWARA, DIST-REWARI -123035
HARYANA, INDIA.

Business Integrity and Ethics Policy

Scope: Applicable to all employees, contractors, suppliers, and business partners involved in the production and distribution of Biaxially Oriented PET (BOPET) films (Transparent, Metalized, Alox, Alu Alu bond, etc.) using our ABC (3-layered) extrusion process.

SR. NO	SITE	ADDRESS
1	GLS POLYFILMS PVT LTD.	VILLAGE –GURAWARA, DIST- REWARI -123035HARYANA, INDIA.

Policy Statement

GLS Poly Films Pvt Ltd is dedicated to conducting business with the highest standards of integrity and ethics, ensuring trust and accountability in all our operations. As a manufacturer of BOPET films, we recognize our responsibility to uphold fair practices, combat corruption, and promote transparency across our supply chain and stakeholder interactions. This policy aligns with international standards such as the United Nations Convention Against Corruption (UNCAC), the OECD Guidelines for Multinational Enterprises, and India's Prevention of Corruption Act, 1988.

1. Anti-Corruption and Bribery

Commitment: GLS Poly Films Pvt Ltd prohibits all forms of corruption, including bribery, extortion, and facilitation payments, in our business dealings.

Qualitative Objectives:

- Establish a zero-tolerance stance on bribery and corruption, ensuring compliance with legal and ethical standards.
- Provide clear guidelines for employees on acceptable and unacceptable interactions with government officials, suppliers, and customers.
- Implement a confidential whistleblowing mechanism to report suspected corrupt practices without fear of retaliation.

Quantitative Targets:

- Train 100% of employees on anti-corruption policies and procedures by December 31, 2026, with annual refreshers thereafter.
- Resolve 95% of reported corruption allegations within 45 days, tracked annually starting 2025.

2. Fair Competition

Commitment: GLS Poly Films Pvt Ltd competes fairly in the BOPET film market, adhering to antitrust and competition laws to foster a level playing field.



GLS POLY FILMS PVT. LIMITED.

VILLAGE –GURAWARA, DIST-REWARI -123035

HARYANA, INDIA.

Qualitative Objectives:

- Prohibit anti-competitive practices such as price-fixing, market allocation, or collusion with competitors.
- Educate sales and procurement teams on fair competition principles to ensure ethical negotiations with customers and suppliers.

Quantitative Targets:

- Conduct annual compliance training for 100% of sales and procurement staff by December 31, 2025, with ongoing sessions yearly.
- Achieve zero substantiated violations of competition laws by 2030, monitored through internal audits starting 2025.

3. Conflicts of Interest

Commitment: GLS Poly Films Pvt Ltd ensures that personal interests do not compromise business decisions, maintaining impartiality in all operations.

Qualitative Objectives:

- Require employees to disclose any potential conflicts of interest (e.g., family ties with suppliers or competitors) annually.
- Establish a review process to assess and mitigate identified conflicts in a transparent manner.

Quantitative Targets:

- Achieve 100% employee submission of conflict-of-interest declarations by December 31, 2025, tracked via HR records.
- Reduce unresolved conflict-of-interest cases to zero within 60 days of reporting, monitored annually from 2025.

4. Responsible Supply Chain Management

Commitment: GLS Poly Films Pvt Ltd promotes ethical practices throughout our supply chain, ensuring suppliers align with our integrity standards.

Qualitative Objectives:

- Integrate business ethics criteria into supplier selection and evaluation processes.
- Engage with suppliers to raise awareness of anti-corruption and fair labour practices, offering support to smaller vendors where needed.

Quantitative Targets:

- Assess 80% of Tier 1 suppliers (by procurement spend) for ethical compliance by December 31, 2028, compared to a 2025 baseline (e.g., 40%).



GLS POLY FILMS PVT. LIMITED.

VILLAGE –GURAWARA, DIST-REWARI -123035

HARYANA, INDIA.

- Increase supplier ethics training sessions by 25% by 2030, compared to 2025 (e.g., from 4 to 5 sessions annually).

5. Confidentiality and Data Protection

Commitment: GLS Poly Films Pvt Ltd safeguards sensitive business information and personal data, respecting privacy and intellectual property rights.

Qualitative Objectives:

- Protect proprietary information related to our ABC extrusion process and customer contracts through secure systems and protocols.
- Comply with India's Digital Personal Data Protection Act, 2023, and other relevant regulations to ensure employee and stakeholder privacy.

Quantitative Targets:

- Train 100% of employees handling sensitive data on confidentiality protocols by December 31, 2026.
- Reduce data breach incidents by 30% by 2030, compared to the 2024 baseline (e.g., from 5 to 3.5 incidents).

6. Transparency and Accountability

Commitment: GLS Poly Films Pvt Ltd fosters a culture of openness, ensuring stakeholders have confidence in our ethical governance.

Qualitative Objectives:

- Publish annual updates on our business ethics performance, including progress on targets and resolution of violations.
- Conduct regular internal audits to verify adherence to this policy across all departments.

Quantitative Targets:

- Conduct ethics audits covering 100% of operational units by December 31, 2027, with biennial reviews thereafter.
- Achieve a 20% increase in employee awareness of ethics policies by 2030, measured via surveys (e.g., from 70% to 84% awareness).

7. Community and Stakeholder Engagement

Commitment: GLS Poly Films Pvt Ltd upholds ethical interactions with external stakeholders, including the Gurawara community, to support mutual trust and respect.

Qualitative Objectives:

- Engage local stakeholders to address concerns about our operations (e.g., environmental impact of manufacturing).
- Avoid unethical practices such as undue influence or exploitation in community dealings.



GLS POLY FILMS PVT. LIMITED.

VILLAGE –GURAWARA, DIST-REWARI -123035

HARYANA, INDIA.

Quantitative Targets:

- Reduce stakeholder complaints related to ethical conduct by 25% by December 31, 2028, compared to 2024.
- Host at least 2 community engagement sessions annually starting 2025 to discuss business practices and gather feedback.

Implementation and Monitoring

- **Governance:** An Ethics and Compliance Committee, chaired by the Chief Financial Officer, will oversee policy execution, meeting quarterly to review progress and address issues.
- **Resources:** Allocate resources annually (starting 2025) for training, audits, and system upgrades to support ethical practices.
- **Monitoring:** Maintain a digital tracking system for ethics metrics (e.g., training completion, audit findings), updated monthly, with annual stakeholder reporting.
- **Corrective Actions:** Address policy violations within 60 days, with documented resolution plans and follow-up reviews.

Commitment

GLS Poly Ltd's leadership, from the Managing Director to department heads, commits to embedding integrity and ethics into our BOPET film manufacturing operations. This policy will be communicated to all employees and partners through onboarding, training, and visible workplace signage, ensuring alignment with our values of trust, fairness, and responsibility.

This policy aligns with SDGs 1, 3, 4, 5, 8, 10, 11, and 16, reflecting our holistic commitment to sustainability in Ethical Business Practices.

Approved By

SS Akhtar
Unit Head



Effective Date: 22.08.2023

Next Reviewed Date: 20.08.2025