

## RESPONSIBLE SALES & MARKETING POLICY

### 1. INTRODUCTION

Adherence to the principles of good Corporate Governance and conducting our affairs in a fair, ethical, transparent, and lawful manner is an integral part of GFL's core values.

This policy will be introduced and adopted across all establishments of GFL- Gujarat Fluorochemicals Limited, Gujarat Fluorochemicals GmbH, GFL GM Fluorspar, and GFL Americas LLC, hereinafter referred to as the Company. The basis for this policy document is GFL's commitment to Responsible Sales and Marketing which includes Social and Ethical responsibility of the company towards its customers, stakeholders, and environment. The Company as a responsible corporate citizen values integrity, honesty, transparency, and safety of its people and environment. This policy is in line with various sustainability standards, such as ISO 26000, Competition Act 2012, Ministry of Corporate Affairs- Government of India and UNGC.

The policy should be followed in the same manner as the Company Codes, and commitments to reflect our high standards, core values, and social responsibility commitment.

### 2. CONTEXT OF THE ORGANIZATION

#### 2.1 Understanding the organization and its context

Headquartered in Noida, India, GFL (Gujarat Fluorochemicals Limited), is a part of the INOX Group of Companies. The group has diversified business segments comprising Chemicals, Fluoropolymers, Cryogenic engineering, Entertainment, Industrial gases and Renewable energy. We leverage our competencies in Fluorine-based products through product innovation and customer partnerships in diverse end-use markets.

An ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and SA 8000:2014 certified organization, GFL is a leading producer of Fluoropolymers, Fluorospecialties, Refrigerants and Chemicals for applications in varied industries. GFL derives its strength from expertise in Fluorine Chemistry, vertical integration from natural minerals to Fluoropolymers and strong R & D, enabling it to provide one of the best quality products meeting all regulatory compliances, to our clientele globally.

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The year 1989 marked commencement of Company's commercial operations with India's largest Refrigerant manufacturing unit at Ranjitnagar, Gujarat, India. The site was further expanded to produce Fluorospeciality products catering to the growing demands in global agriculture and pharmaceutical industry. Foraying into new avenues in 2007, with one of the world's most integrated facilities at Dahej, Gujarat, India, GFL now has a diverse portfolio of Fluoropolymers comprising PTFE, PFA, FEP, FKM, PVDF and Fluoropolymer Additives.

With three manufacturing facilities in India, a captive Fluorspar mine in Morocco, offices and warehouses in Europe and USA, and a marketing network spread across the world, GFL is one of the established players in Fluoropolymers and Fluorospecialities markets.

Our Sustainability goals are interwoven with the way we do business all along our value chain. The company is signatory to the United Nations Global Compact (UNGC), Science Based Targets Initiative (SBTi), and is a member of the Indian Chemical Council (ICC). Our focus on Health, Safety and Environment is reflected in the wellbeing and safety of our people. All-inclusive efforts towards sustainability at various facets make us long-term partners for our customers across geographies.

Our future strategic roadmap will emphasize incorporation of Responsible Sales and Marketing as one of the crucial sustainability initiatives. By implementing Responsible Sales and Marketing Policy and complying with the standards does not absolve an organization from antitrust and competitive liabilities, however, it does provide assurance and evidence in the event of an investigation that the organization has taken all feasible steps to prevent the misconduct.

## **2.2 SCOPE AND APPLICABILITY**

This policy applies to all individuals working with the Company at all levels and grades, including directors, senior executives, officers, employees (permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, sponsors or any other person associated with Gujarat Fluorochemicals Limited, GFL Americas LLC, Gujarat Fluorochemicals GmbH, and GFL GM Morocco.

## **3. LEADERSHIP & COMMITMENT**

### **3.1 Governing Body**

GFL has a defined governing body headed by the CEO & COO. This body demonstrates leadership and commitment concerning the Responsible Sales and Marketing policy by:

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- a) Approving the organization's Responsible Sales and Marketing policy
- b) Ensuring that the organization's strategy and Responsible sales and Marketing system (RSMS) are aligned
- c) Receiving and reviewing information about the content and process of the organization's RSMS at scheduled intervals
- d) Allocating and assigning the required resources for the effective operation of RSMS
- e) Exercising supervision over implementation of the organization's RSMS by top management and its effectiveness.

### 3.2 Top Management

The Management shall attend various meetings and provide evidence of its commitment to the development and implementation of the Antitrust and competitive management system for continuous improvement of Company's effectiveness. Management will demonstrate commitment and leadership in accordance with:

- a) Taking account of the effectiveness of the RSMS and review company objectives and functional objectives.
- b) Establishing policy and objectives, maintaining documented information, and furnishing them for ready reference to the employees, compatible with the strategic direction of the organization.
- c) Integration of RSMS requirements into the Organization's business processes and preparing process documents.
- d) Preparing process exhibits with risks and opportunities. Preparing company-level risk with the mitigation plan, given in risk template and monitored for implementation. Promoting awareness of the process approach and risk-based thinking.
- e) Ensuring that the resources needed for RSMS are available and discussed in formal/informal meetings.
- f) Communicating the importance of Effective System Management and of conforming to RSMS requirements during internal meetings and management review meetings.
- g) Ensuring that the RSMS achieves its intended results and verifying the same through internal audits and objective reviews.
- h) Engaging, directing, and supporting individuals to contribute to the effectiveness of the RSMS.
- i) Promoting improvement.
- j) Supporting other relevant management roles to demonstrate leadership as it applies to their areas of responsibility as identified in the job description of the Director, by encouraging the use of reporting procedures for suspected and actual breach of competition law.

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- k) Reporting to the governing body on the content and operation of the RSMS and of allegations of serious or systematic breach of competition law at the planned interval.
- l) Once in a six-month management review shall be conducted for review of the activities and shall be attended by Top Management.

#### 4.1 Advertising and Product representation principle

Our reputation as a responsible Company extends to the products and services we offer and how we represent them. Company employees, and any third party to which this Principle applies, must represent the company's products and services truthfully, fairly, accurately, and professionally across all sales, advertising, packaging, and promotional platforms. Every Business Unit is responsible for having a process to ensure an appropriate review of advertising and claims about its products and services.

- a) Apply this Principle to all express or implied claims in advertising, which includes product literature, labels, packaging, advertising copy, environmental claims, customer surveys and certifications, promotional materials, technical data sheets, product information sheets, user and maintenance manuals, videotapes, internet sites, social media, and the like.
- b) Always represent Company's products and services truthfully, fairly, accurately, and in a professional manner in emails, conversations, contracts, sales materials, advertising, packaging, promotions, and all other platforms of communications.
- c) Substantiate claims, as appropriate, through testing based on sound statistical and scientific principles, or approved through the company business unit's claims approval process.
- d) Do not overstate a product's performance.
- e) Do not make claims that have not been approved or appropriately substantiated.
- f) Follow the procedures required by the business unit for review and approval of advertising, taking written approval (if required) from marketing, R & D, technical service, clinical, quality, product responsibility, regulatory and toxicology, and Legal Affairs.
- g) Avoid advertising or claims inconsistent with the Company's corporate values.
- h) Do not engage in deceptive acts or practices or other unfair methods of competition.
- i) Do not make false or deceptive statements about Company products or services.
- j) Do not make false or deceptive comparisons of the Company and any competitors' products or services.
- k) Do not unfairly criticize or discredit a competitor or its products or services.
- l) Do not misrepresent the quality or effectiveness of a product or service.
- m) Do not present one's products or services as those of another, such as by simulating a competitor's packaging or trademarks.

#### 4.2 Product Sustainability

We strive to attain Product Sustainability by connecting our business practices and corporate responsibility opportunities to develop and deliver more sustainable and innovative offerings creating long-term value.

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- a) Foster a culture of corporate responsibility and sustainable chemistry within our Company
- b) Comply with applicable global regulatory requirements and voluntary commitments
- c) Provide role clarity for product sustainability activities
- d) Deliver proactive and predictive product risk assessments
- e) Identify and resolve product stewardship and regulatory incidents including processes to ensure appropriate escalation and rapid response
- f) Enhance cooperation and communications across our value chain

#### 4.3 Process

##### a) The mechanism to ensure accurate product information

- i. The marketing communication department manages the website and social media, including working with website developers, posting regular media updates. All social media updates and website content pertaining products and offerings is approved by the business heads to avoid misinformation or false claims.
- ii. Marketing communication team needs to take all the relevant product information from the R & D team and the marketing department for developing content for all marketing materials including brochures, newsletters, and mailers, followed by approvals from Business Heads and R& D team.

##### b) Quoting the Price

Before sending price quotations to the customers, all marketing teams need to take approval from their respective business heads.

#### 5.1 Antitrust and competitive Principle

Company is committed to engage in a fair and vigorous competition, in compliance with all antitrust and competition laws and regulations globally. Certain business activities, such as agreements between competitors that fix prices, always violate these laws and this principle. Many other business activities, such as certain restrictive supply or distribution agreements, or unfair use of a strong market position to harm competition, may violate these laws and this principle. Because antitrust and competition laws vary across countries and are complex, Company employees must consult their business unit's assigned legal counsel whenever their business activities are regulated by these laws.

- a) Do not propose or reach an agreement with competitors or potential competitors about prices, terms of sale, bidding, costs, profits, production, and volume. Do not even discuss or exchange information with competitors about these topics.
- b) Do not indulge in dividing the territories, customers and markets with the competitors
- c) Do not agree with competitors to stop doing business with certain customers or suppliers
- d) Do not discuss cost, profit, and margin with the competitors

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- e) Do not get involved in discussions or interactions with competitors that may create the appearance of improper agreement
- f) Do not make unfair use of strong market position to affect the competition
- g) Do not involve in restrictive supply and distribution agreement
- h) Be careful when interacting with competitors at events such as trade shows, trade association meetings, or similar events. Consult with your business head before participating in such organizations or events to identify risks and get necessary approvals.
- i) Consult with concerned authority before you consider any of the following arrangements
  - i. The exclusive sale or purchase arrangements
  - ii. Relations with or terminations of distributors
  - iii. Selective price discounting
  - iv. Bundling of goods or services
  - v. Restrictions on the resale of company products or services
- j) Failure to comply with the anti-competition laws could lead to civil penalties for the Company and the individual involved, significant business disruption and harm to company's business reputation. Violation of this will result in disciplinary action, including termination from employment.

## 5.2 Ensuring our Business is compliant with the competition laws

**Step 1:** Identify the key competition law compliance risks faced by our business. Some examples are:

- a) Any employee who has contact with our competitors at any industry events or otherwise
- b) Cases where a previous employee moved to a competition or joined from a competitor
- c) Any employee with an information about competitors' prices or business plans
- d) Entering into a long-term exclusive contract for 5 years or more

**Step 2:** Analyze and evaluate the risks, work out how serious the identified risks are. Rate them as low, medium, or high. In particular, businesses should consider assessing which employees are in the high-risk areas.

**Step 3:** Manage the risks, set up policies, procedures, and training to ensure that the risks you have identified do not occur, and find ways to detect and deal with them if they do. Appropriate action will depend on the risks identified and the likelihood occurrence of the risks. Core Commitment to compliance (from the top down) Senior management, especially the board, must demonstrate an unequivocal commitment to competition law compliance. Without this commitment, any competition law compliance efforts are unlikely to be successful.

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- a) Implementing a company-wide ethics policy to underpin a healthy culture concerning risk
- b) Making sure employees tell you if they are joining a trade association or attending events where they might be meeting with competitors.
- c) Implementing a system where all contact with competitors is logged
- d) Producing a checklist to help employees with decision-making, particularly when under pressure

**Step 4:** Monitor and review steps 1 to 3 and your commitment to the compliance on a regular basis, to ensure that your business has an effective compliance culture. Some businesses review their compliance efforts on an annual basis, others review less frequently. There may be occasions when you should consider a review outside the regular cycle, such as when taking over another business or if you are subject to a competition law investigation.

- Are we receiving adequate assurance that the measures put in place to manage this risk are effective?
- Are our assurance functions tasked to include this risk in their work and properly coordinated to ensure there are no gaps or overlaps?
- Has internal audit the necessary independence, objectivity, authority, and expertise, not only to assure on your risk management and compliance functions but also to assess your risk and control culture and the effectiveness of your speaking out (internal whistleblowing) mechanisms?

### **5.3 Respect and Protection of Intellectual Property Rights**

- **Acquiring, protecting, and utilizing intellectual property rights**
  1. Recognizing that intellectual property is an important company asset and a strength of the company, we shall properly maintain, manage, and protect our intellectual property rights while utilizing them effectively.
  2. Being conscious that our company products and technology are globally developed, we shall actively acquire intellectual property rights worldwide, such as patents that are results of advanced, creative Research and Development, and endeavor to protect our intellectual property rights through the entire global group.
  3. We shall assemble information concerning intellectual property rights generated from all Group companies, including overseas companies, as we strive to fully understand and utilize intellectual property rights management as a Group.
  4. We shall appropriately execute our rights in regards to infringement by third parties.
- **Respecting the intellectual property rights of other companies**
  5. When developing new products and technology, we shall confirm from a global standpoint that we are not infringing on the intellectual property rights of others.

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6. In the legal licensing of intellectual property rights from other companies, we shall observe the scope of use specified in the contract when using those property rights.

• **Prohibiting the copying of other companies' products**

7. In the interests of fair competition, we shall not imitate the products of any other companies during the development, manufacture, or sale of our products.

**6 Customer Complaint handling and feedback process**

- Customers can voice their requirements and concerns, call our attention to problems, and find quick routes to support. The company has effectively launched a Customer relationship management system that is salesforce. All marketing people are expected to update the customer feedback fairly on the salesforce so that customer queries can be resolved efficiently. The query raised by the customer will be resolved by the concerned product manager in the GFRC team.
- GFRC team/concern department team members will visit the customer to study and troubleshooting for onsite resolution of the complaint whenever required. The details of such visits to be re-added in complaint format.
- Based on the corrective and preventive action report (CAPA) from GFRC, the sales and marketing team will communicate to the customers.
- The Marketing/Sales team will take/provide feedback from customers against the corrective actions/feedback of complaints.
- The complaint will be considered as closed if no negative feedback (verbal/written) is received concerning complaint within one month
- Primary benefits by integrating customer feedback in salesforce
  - a) You add depth to your standard customer records.
  - b) You can cut down on duplicate data.
  - c) You can ask the right questions throughout the customer lifecycle.
  - d) You can correct bad customer experiences faster.
  - e) You can spot new customer trends.
  - f) You can create a culture of action.
- Sharing feedback organization-wide reinforces the fact that every team has an impact on customer experience. When they're clued in on what customers are saying, they can make better decisions, personalize customer interactions, and focus on initiatives that improve customer experience. Building a database of customer feedback is one of the best possible ways to keep sight of our primary goal: making customers happy.

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## 7 Customer Information security

It is Company policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, business partners, and others who share their personal information with us. Company will adhere to the following guidelines to the extent required by applicable laws:

### 7.1 Limitations on the collection, use, and disclosure of personal information.

- **Notice** – Company will provide timely and appropriate notice to individuals about its data collection practices.
- **Consent** – Company will collect, use, disclose and transfer personal information only with the individual's consent, which may be express or implied, depending on the sensitivity of the personal information, the individual's reasonable expectations and legal requirements.
- **Purpose limitation** – the company will collect personal information only for specific, limited purposes. The information we collect will be relevant, adequate, and not excessive for the purposes for which it is collected. The company will not process personal information in a manner inconsistent with the purposes for which it was originally collected unless the individual has subsequently consented to the new use of their personal information.
- **Direct marketing** - the company will not use personal information for direct marketing purposes without giving the individual an opportunity to "opt-out."
- **Transfers to third parties and other countries** - the company will take appropriate measures, by contract otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country
- **Quality** – the company will take commercially reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date.
- **Access** – Company will maintain procedures to give individuals reasonable access to their personal information and, when appropriate, the ability to correct or delete inaccurate or incomplete information.
- **Security** – Company will take commercially reasonable measures to protect personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.
- **Retention** - Company will not keep personal information for longer than necessary or permitted by law
- **Empowering Consumers:** The company provides consumers with the right to verify whether the organization has data relating to them and to challenge these data, as defined by law. If the challenge is successful, the data will be erased, rectified, completed or amended, as appropriate
- **Disclosure mechanism:** The company will disclose the identity and usual location of the person accountable for data protection in the organization, and hold this person accountable for complying with the above measures and applicable law.

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## 7.2 Accountability and enforcement.

- **Accountability** – the company will designate individuals within the company to be accountable for compliance with laws and related company policies.
- **Enforcement** – the company will provide internal controls for verifying compliance with laws and related Company policies and procedures.
- **Complaint process** – the company will provide a fair process for investigating and resolving complaints and communicate the process to the individuals.

## 8 Sustainable consumption

Sustainable consumption is consumption of products and resources at rates consistent with sustainable development. The concept was promoted by Principle 8 of the Rio Declaration on Environment and Development, which states that to achieve sustainable development and a higher quality of life for all people, States should reduce and eliminate unsustainable patterns of production and consumption. The concept of sustainable consumption also encompasses a concern for animal welfare, respecting the physical integrity of animals, and avoiding cruelty.

To contribute to sustainable consumption, company, where appropriate, should:

- Promote effective education empowering consumers to understand the impacts of their choice's products and services on their well-being and the environment. Practical advice can be provided on how to modify consumption patterns and to make necessary changes.
- Offer consumers socially and environmentally beneficial products and services considering the full lifecycle, and reduce adverse impacts on society and the environment by:
  - i. Eliminating, where possible, or minimizing any negative health and environmental impact of products and services, and where less harmful and more efficient alternatives exist, providing the choice of products or services that have less adverse effects on the society and the environment.
  - ii. Designing products and packaging so that they can be easily used, reused, repaired, or recycled and, if possible, offering or suggesting recycling and disposal service

## 9.1. Responsible Sales and Marketing objectives and planning to achieve them

### Responsible Sales and Marketing Objectives

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Parameters	Annual Target
Total number and nature of confirmed incidents of breach of trust and competitive principle	Zero
Total number of confirmed incidents in which employees were dismissed or disciplined for falsely representing the company products	Zero
Fulfilling ethical compliance requirements imposed by a customer	100 %
Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations of responsible sales and marketing	Zero
Public legal cases regarding competition law brought against the organization or its employees during the reporting period and the outcomes of such cases	Zero

- a) From the company level objectives, the functional objectives shall be prepared and the respective personnel will monitor the status regularly in the monitoring sheet. The objectives shall be communicated to all concerned persons by the respective HODs which shall be updated annually based on the discussion in the management review meeting.
- b) Quantifiable Responsible Sales and Marketing Objectives shall be established based on this policy for the relevant functions and consistent with this policy. These quantifiable criteria shall be reviewed in the management review meeting for the Company's commitment to continual improvement.

**9.2** The objective management plan shall be prepared to achieve the Responsible sales and marketing objectives which shall include: Objectives; resources require; responsibility; timelines; and method of evaluation of results and who will impose sanctions or penalties.

## **10. SUPPORT**

### **10.1Resources**

The Company shall identify the resource requirements and provide timely resources in terms of qualified personnel, infrastructure, and automation system. The resource for the establishment, implementation, and maintenance of the Responsible sales and Marketing Management system as well as improving its effectiveness shall be provided. Adequacies of these resources shall be reviewed during Management Review, Internal Audit Results & Interested parties Complaint Review.

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The Ethics Line Coordinator shall consider the capabilities and constraints on existing internal resources. In cases in house resources are limited then services of external providers shall be taken.

#### **10.2 Competence**

- a) The Ethics Line Coordinator shall identify the competency of employees performing activities affecting Responsible sales and marketing based on performance review and shall provide necessary training and on the job training for the staff for upgrading the knowledge and achieve the necessary Competency. The skill matrix and competency matrix and training records shall be prepared as documented information. Also, during routine work due to the change in the area of work or any other reason the training needs shall be identified and provided.
- b) The Company shall ensure that the necessary competence has been achieved and appropriate records for the education, experience, training, and qualification are maintained as per our competency model.
- c) The new employee shall be trained properly in the identified area. The effectiveness of the training provided, and action taken shall be evaluated afterward. The competence and training shall also be evaluated and provided to the contract employees.

#### **10.3 Awareness and training**

- a) To ensure that all directors, officers, employees, consultants, and contractors of the Company are aware of the policy, a copy of the policy shall be provided to them and they shall be advised that the policy is available on the Company's website for their review. They shall also be informed whenever significant changes are made and a copy of this policy shall be provided to them and shall be educated about its importance.
- b) Training on this policy shall form a part of the induction process for all suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures, and government & public bodies (including their advisers, representatives and officials, politicians and political parties). All the existing employees and third parties shall receive relevant training on how to implement and adhere to this policy.
- c) At the time of joining, the organization shall provide Responsible Sales and Marketing awareness training and shall conduct the training on regular basis as appropriate to their roles, the risks of bribery to which they are exposed, and any changing circumstances. The Company shall maintain the training calendar and training report as a part of its documented information.

#### **10.4 Communication**

The organization shall ensure internal and external communication between Functional Heads and various levels of employees regarding the processes of the Responsible sales and marketing management system and their effectiveness. Such communication related to RSMS shall include:

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- a) What it will communicate.
- b) When to communicate.
- c) With whom to communicate.
- d) How to communicate.
- e) Who communicates?
- f) the languages in which to communicate.

## **11. WHO IS RESPONSIBLE FOR THE POLICY?**

### **11.1 Ethics Committee**

If confronted with a request or demand for price-fixing with the competitor or other violation of this Policy, the complainant's demand must be immediately rejected and reported to the Company's Ethics Committee of the respective business comprising of the following incumbents:

1. Chief Executive Officer of the Business
2. Chief Finance Officer of the Business
3. Marketing Head as the case may be
4. Group Chief Finance Officer
5. Head — Group Corporate Human Resources
6. Company Secretary

The Company Secretary shall be the "Company Ethics Officer" and any three members of the above list and along with the Company Secretary shall form a quorum of the Ethics Committee. Similarly, if any employee or agent knows or believes that an improper gratification has been or shall be made, the employee or agent must also report such payment to the Ethics Committee or the Ethics Line Coordinator. The Company's policy is that no adverse employment action shall be taken against any person in retaliation for, honestly and in good faith, reporting a violation or suspected violation of Responsible Sales and Marketing Policy. If an employee encounters any difficulty making this refusal, he shall seek assistance from his Manager or seek advice from the Ethics Committee.

### **11.2 PROTECTION FOR WHISTLEBLOWING**

Those who refuse to breach trust and competition principle or those who raise concerns or report another's wrong-doing are sometimes worried about possible repercussions. The Company encourages openness and shall support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in price-fixing etc. or because of reporting their suspicion in good faith

Every person, to whom this policy applies to, is encouraged to raise their concern at the earliest possible stage.

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If any employee believes that he has suffered any such treatment, he has the authority to report such matter to the Company Ethics Committee. Similarly, if any third party believes that they have suffered any such treatment, they have the authority to report such matter to our Company Ethics Committee or/and to their Committee as deemed fit.

In case the third party has questions about whether a certain activity is permitted under the Third-Party Guidelines, they may raise it either to the Company employee with whom they are working with or to the Company's Ethics Committee who is available to answer questions and address such concerns. The company shall not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical, or inappropriate behavior. All reports shall be treated confidentially.

### 11.3 COMPLIANCE:

It is the responsibility of each of the employees and third parties to act with integrity and to ensure that they have read, understand, and comply with the policy. Besides, all employees shall be required to confirm that they have understood and complied with the policy annually.

All the employees are expected to sign a declaration at the time of Joining Declaration (as per Annexure-II) Violation/Breach of this policy or refusal to cooperate shall result in disciplinary action, up to and not limited to suspension, or termination of employment with the Company.

## 12 Monitoring, measurement, analysis, and evaluation

The operational control plan shall be prepared and implemented to identify measurement and monitoring activities needed to assure conformity and achieve improvement. This shall include parameters to be monitored and measured, methods, need, and use of applicable methodologies along with its monitoring and measurement details. Ethics Line Coordinator shall be responsible for monitoring the system. The Company has planned and implemented the monitoring, measurement, analysis, and improvement processes needed to evaluate the effectiveness and efficiency of the Responsible sales and marketing management system. The Company shall retain the documented information like functional objective monitoring sheet, Management review, and internal audits as evidence.

### 12.1 Internal audit

Audits shall be performed regularly and the interval between audits of any particular department shall not be greater than six months. Unscheduled audits may be carried out at the discretion of the management or Company Ethics Officer based on the requirement.

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An Internal audit of Responsible sales and marketing Management System shall be carried out at least once in 6 months to:

- a) Determine whether Responsible Sales and Marketing Management System
  - i. Shall conform to the planned arrangements for Responsible sales and marketing Management System and standard requirements,
  - ii. Shall be implemented and maintained per the requirements our Responsible sales and marketing Management System as given in this policy.

The Ethics Line Coordinator shall be responsible for the planning and implementation of the audit. The auditors, who are selected from within the company, shall however assist the responsible team. It shall be ensured that the auditors are independent of the specific activities or areas being audited by them and shall be provided for audit training. If the need arises, outside auditors can also be employed at the discretion of the Company Ethics Officer.

Internal Auditors shall be responsible to execute audit as per plan and verify the effectiveness of the implementation of Responsible sales and marketing management policy

The internal audit shall be scheduled in the Company based on the status and importance of the activity to be audited and the previous audit results. Ethics Line Coordinator prepares the audit plan covering the scope, schedule, and other details. The audit plan shall be prepared and circulated before 1 week of audit execution to ensure the availability of respective HODs and auditors.

## 12.2 Audit Report and Follow-Up

The Auditor shall prepare a non-conformity report on completion of the audit and the non-conformity shall be brought to the notice of auditee

Audit findings shall be documented and used as the main formal means of resolving problems and deficiencies detected in the Responsible Sales and Marketing Management System.

The respective HOD shall close the non-conformity within a maximum of 45 days'. The copies of such NCR reports shall be given to the auditee and after taking timely corrective action on NC reports, it shall be verified to close the Non-Conformity. After verification of actions taken; the audit findings shall be closed. During the next audit, the implementation and effectiveness of the corrective action taken on NCR's shall be reviewed and documented.

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All the audit findings and verification of audit results shall be reported to the top management and governing body for the review and evaluation of the system and shall also be discussed in the management review meetings. The audit plan/schedule, audit nonconformity reports, and clause wise audit checklist shall be maintained as evidence of the implementation of the audit program and the audit results.

### **12.3 External Audit**

The Quality Management System (QMS) of our company conforms to ISO 9001. It adopts a risk-based ("preventive") approach to quality that covers a wide range of topics, including our top management commitment to quality, our customer focus, the adequacy of our resources, employee competence, process management (for production, service delivery and relevant administrative and support processes), quality planning, design of the products and services it provides, review of incoming orders, purchasing, the appropriate monitoring and measurement of its processes, products, and services needed to ensure conformity, our processes to resolve customer complaints, corrective actions, and a requirement to drive improvement.

#### **Assessment:**

The assessment is done by a third-party assessment system - Intertek Certification Limited.

Assessment is conducted to verify conformity to ISO 9001 requirements. The hired third party then issues a certificate to the Company describing the scope of its QMS and confirming that it conforms to ISO 9001. The certificate is valid for 3 years after which the assessment is redone.

### **13 What to do if things go wrong:**

If our customers are dissatisfied with specific products or services we provide, we request them to bring this to our attention. Typically, this can be done through technical and/or commercial communication channels that have been established.

#### **Management review**

##### **13.1 Top Management Review**

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The Responsible Sales and Marketing Management system shall be established and systematically reviewed for its continuing suitability and effectiveness in confirming the standard requirements in our Company. The review shall include implementation of this policy and objectives to identify any area, which requires improvement and evaluate the need for changes for the effective functioning of the system.

This review shall be carried out at least once in six months by Company Ethics Officer by holding Management Review Meetings, which shall be attended by Ethics Line Coordinator, Ethics Committee Team members, and all Functional Heads.

### 13.2 Management review inputs

The agenda, time, and date of management review meeting shall be circulated to all HODs and Ethics Committee members to attend the management review meeting with supporting documents related to agenda points to discuss in the meeting. Inputs to management review shall include current performance and improvement opportunities related to the items listed as under:

- a) The status of actions from previous management reviews.
- b) Changes in external and internal issues relevant to RSMS.
- c) Information on the performance and effectiveness of RSMS, including trends in:
- d) Nonconformities and corrective actions; Monitoring and measurement results; Audit results; Investigations; Nature and extent of the breach of competition law risks faced by the organization
- e) Effectiveness of actions to address risks.
- f) Opportunities for continual improvement of the Responsible sales and Marketing management system

### 13.3 Management review outputs

Based on the management review process, an action plan shall be prepared for the improvement and in case of changes required in the Responsible sales and Marketing Management System.

The above output shall be documented as evidence in the MRM as actions Planned in the management review meeting. It shall be the responsibility of the Ethics Line Coordinator to prepare the minutes of the management review meeting covering details of the discussion held, Action planned and the responsible person to complete the planned actions. The Company Ethics Officer shall report the summary of the results of the top management review to the governing body.

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## **14 IMPROVEMENT ACTIONS:**

### **14.1 Nonconformity and corrective action**

The company shall establish the system for identification, documentation, evaluation, segregation, and disposition of non- conformity including audit results and customer complaints. The concerned persons shall be informed of the disposal of non-conformity.

If a non-conformity is identified, then the Company shall take appropriate action regarding the consequences of the non- conformity. The details of non-conformity and concession accepted by the Company Ethics Officer, end-user, or other body as applicable shall be reported and retain documented information. The Documented information on the nature of non- conformities and any subsequent actions taken, including concessions obtained shall be maintained.

### **14.2 Corrective action**

The corrective action planning shall include the evaluation of the significance of problems affecting the Responsible sales and marketing Management system. The major or repetitive non-conformities shall be identified for taking corrective action in the areas as defined below:

- a) The Functional Head shall review the non-conformities (including customer complaints) as identified in their areas and analyse it.
- b) The root cause of non-conformities shall be identified in the areas like man, management (system) and money (Resources).
- c) Considering the evaluation and aspects like costs of non-conformance, vs. action taken, random failure, customer satisfaction, etc. need for action shall be evaluated to ensure that non-conformities do not recur. For non-conformities of minor nature or random failure shall be recorded in Responsible Sales and Marketing Objectives form and no CAR is raised. After analysis of the non-conformities or deficiencies for major or repetitive problems, the need for corrective action shall be taken.
- d) Based on root cause analysis corrective action to be taken shall be determined. If it is applicable for other department then CAR form shall be forwarded to the concerned function. Necessary corrective action shall be implemented.
- e) The results of action taken shall be recorded in CAR form and compared for results in non-conformity v/s results after the action is taken. If it is found unsatisfactory then the whole process shall be repeated.

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After completion of corrective action, the form shall be forwarded to Company Ethics Officer for review of the corrective action taken. The effectiveness of the corrective action shall be reviewed to check the adequacy of such measures. The summary of the effectiveness of corrective action shall be discussed and reviewed in the management review meeting.

14.2.1 The HOD shall maintain documented information on nonconformity identified and the subsequent action taken in a nonconformity register. The respective HOD/Ethics Line Coordinator shall take corrective action and maintain records of corrective action taken in Corrective action reports including the result of the action taken.

### 14.3 Continual improvement


The process shall be laid down for the follow up of the process for continual improvement of the Responsible Sales and Marketing Management System. The HOD/Ethics Line Coordinator shall take the necessary action for continuous improvement in the suitability, adequacy, and effectiveness of the RSMS.

The continual improvement of RSMSS shall be facilitated through the use of this policy, objectives, and audit results, analysis of data, corrective action and output of management review to determine need or opportunities which are identified as a part of continual improvement.

### 15 POWER TO AMEND

- Any amendment in this policy shall be approved by the CEO (Chief Executive officer) & COO (Chief Operating Officer)
- The management shall have the overriding right to withdraw and/or amend the guideline at its discretion as it deems fit from time to time. The decision of the management shall be final and binding.

This Policy applies to all the Marketing and the Sales activity of the company.

  
Satish Kakade  
Chief Executive Officer

  
Prashant Ogale  
Chief Operating Officer

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## Annexure I - Glossary

Annexure – I		Glossary of Terms
S. No.	Abbreviation	For
1.	Governing Body	Board of Directors/ Managing Director/Director
2.	Top Management	Chief Executive Officer/Chief Operating Officer/ Chief Financial Officer/ Executive President/President/Senior Vice President/Vice President
3.	Functional Heads	Marketing Head, Purchase Head, Quality Head, Production Head, Stores Head, Human Resource Head, Projects Head, Business Development Head, and respective processes
4.	RSMS	Responsible Sales and Marketing Management System
5.	NCR	Non-Conformity Report
6.	CAR	Corrective Action Report
7.	SOP	Standard Operating Procedure
8.	HOD	Head of department/functional heads
9.	MRM	Management Review Meeting



**Annexure III – Declaration by the Employee**

To,  
The Company Ethics Officer

**DECLARATION: RESPONSIBLE SALES AND MARKETING DECLARATION**

I, Mr./Ms.....Employee Code (if applicable) ..... on behalf of .....confirm that I have gone through the Guideline on Responsible sales and Marketing of Gujarat Fluorochemicals Limited and having understood the same I declare that our Company will not engage in any activity, practice or conduct which are in contravention of the clauses of the Guidelines, including but not limited to the Competition Act 2012, or any equivalent local law that our company is subjected to.

In case of any violation or intended violation by any party, I will report immediately the same to you.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Designation of Signatory with Company Seal

\_\_\_\_\_  
Date