



**Geochem Group Compliance Code 4th Edition  
2019**



## **GEO CHEM GROUP COMPLIANCE CODE**

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## Introduction

As a member of IFIA / TIC Council Geo-Chem group has chosen to adopt and implement a Compliance Code that enshrines the substance of the integrity that IFIA / TIC Council membership . This Geo-Chem Group compliance code is based on the IFIA/TIC Council Compliance code 4th Edition published in Dec 2018.

The Compliance Principles address technical and business professional conduct and ethics in relation to the following areas:

- Integrity
- Conflict of Interest
- Confidentiality and Data Protection
- Anti-bribery
- Fair Business Conduct
- Health and Safety
- Fair Labour

Geo-Chem Group implement and abide by this Compliance Code. This entails:

- A Compliance Programme throughout the Geo-Chem organisation
- Policies and procedures in accordance with this Code
- training of staff globally
- regular monitoring of compliance with this Code.

To ensure the effectiveness of their implementation, Geo-Chem Group submits their Compliance Programme to an annual independent examination by auditors and whose results are reported to IFIA / TIC Council

The result is a sound and verified basis for trust.

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## Geo-Chem Group Compliance Principles

### 1. Integrity

The Geo-Chem group shall operate in a professional, independent and impartial manner in all its activities. Geo-Chem Group shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures. Where approved test methods make provision for tolerances in results, the Geo-Chem Group shall ensure that such tolerances are not abused to alter the actual test findings.

The Geo-Chem group shall report data, test results and other material facts in good faith and shall not improperly change them, and shall only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.

### 2. Conflicts of Interest

Geo-Chem Group shall avoid conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services. Geo-Chem Group shall avoid conflicts of interest between its companies and/or branch engaged in different activities but which may be providing services to either the same client or each other. Geo-Chem Group shall ensure that its employees avoid conflicts of interest with the activities of Geo-Chem Group.

Geo Chem Group employees do not

- a) directly or through relatives, friends or intermediaries, acquire an interest in a supplier, a client or a competitor of the Member, except for the acquisition of shares of a client, supplier or competitor on a public stock exchange, and then only to an extent which does not grant significant influence over the affairs of the client, supplier or competitor and which does not make the employee unduly dependent on its financial fortunes;
- b) hold any position with a competitor or client;
- c) conduct any company business with any member of their family or with an individual or organisation with which they or their family is associated;
- d) employ a member of their family without approval of the Member's management

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### **3. Confidentiality and Data Protection**

Geo-Chem Group shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain. Processes are in place to adequately protect all information received from customer.

### **4. Anti-bribery**

Geo-Chem Group shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment. Geo-Chem Group shall prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, or employees of any such party, or government officials.

### **5. Fair Business Conduct**

Geo-Chem group shall conduct itself with the highest standards of business ethics and integrity, and shall not do anything which would bring its reputation, or the reputation of IFIA / TIC Council or the TIC industry, into disrepute.

### **6. Health and Safety**

Geo-Chem Group shall implement adequate training and procedures to protect the health and safety of employees, customers, and third parties and shall monitor incidents with the view of minimising risks in the course of business operations.

### **7. Fair Labour**

Geo-Chem Group is aware of its social responsibility for its employees and the people, communities and environments in which it works and shall respect human rights. Geo-Chem group follow all legal and human rights requirements of the country of operation.

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### Requirements for Implementation

Geo-Chem group is following the below requirements :

1. Committed itself to implement the Compliance Principles throughout its organisation through operation of a Compliance Programme which has been approved by IFIA / TIC Council.
2. Appoint a Compliance Committee and Compliance Officer on regional basis to oversee and manage the Compliance Programme.
3. Require all employees to comply with the Compliance Programme, train them accordingly and ensure their continuing understanding of the Compliance Programme.
4. Provide help lines for staff on regional basis and encourage the reporting of violations on a confidential basis and free from reprisal except in malicious cases.
5. Publicly disclose its Compliance Principles and facilitate enquiries, complaints and feedback.
6. Investigate and record all reported violations and apply corrective and disciplinary measures.
7. Protect the security of confidential business information.
8. Minimise health and safety risks in the workplace, monitor incidents, and put in place any necessary corrective measures.
9. Maintain accurate books and records which properly and fairly document all financial transactions.
10. Ensure that its Compliance Programme is applied to the extent appropriate to its business partners.
11. Monitor the effectiveness of its Programme through the use of annual management declarations and internal auditing.
12. Arrange for the effectiveness of the implementation of the Programme to be verified at least annually by a recognised independent external audit firm and meet the document submission requirements of IFIA / TIC Council (including the submission of the Agreed Upon Procedures report).

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## ANNEX A: Management Declaration

Confidential

Geo-Chem Group Compliance Programme

Management Declaration for the year ending ..... 20 ....

To: The compliance Officer

Name of Manager: ..... Job Title: .....

Locations and/or activities covered by this Declaration:.....

I ..... (*name of Manager*) do hereby declare that in implementation of ..... (*name of Member*)'s Compliance Programme for the year ending 20 ... in each of the locations and/or activities, as listed above, falling under my area of responsibility:

1. To the best of my knowledge I, and the members of staff reporting to me, have complied in all respects with the Compliance Programme
2. I have verified that the Compliance Programme has been distributed to each Employee who had not previously received them;
3. I have fully and completely reported to the Compliance Officer any violation or suspected violation of the Programme, including any solicitation or offer of any improper payment or advantage, which has come to my knowledge;
4. I have fully and completely implemented all corrective and disciplinary actions required by the Compliance Committee in respect of any violation of the Programme.

Place ..... Date .....

Signature .....