

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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### **Policy Statement**

BDR Pharmaceuticals Intl. Pvt. Ltd is committed to ensure high ethical standards, doing open and fair business and follow best practices of corporate governance.

### **Objectives**

The objectives of the Policy are to inter alia to encourage employees and directors to:

- Act honourably and with integrity in all business dealings of the Company.
- Identify and address appropriately any potential conflicts of interest.
- Maintain the confidentiality to the Company's relationships and give it the highest importance
- Initiate steps to ensure that no financial or other inducements are offered or accepted by or on behalf of the Company.
- Encourage employees and Directors to be vigilant and to act diligently in good faith.
- Monitor and investigate instances of alleged corruption.
- Take stringent action against any individual(s) involved in corruption.
- Minimize the risk of involvement of all employees and Directors in corruption related activities;
- Form a common understanding for all stakeholders that the Company opposes bribery and corruption in any form;

### **Application:**

The Policy would be applicable to:

- All Directors and Employees of the Company and its subsidiaries and
- Partners and Representatives or any other persons/individuals, who may be acting on behalf of the Company.

"Corrupt Practices" constitutes an act of giving or receiving financial or other inducements, intermediation in giving or receiving financial or other inducements, malpractice, misuse of official authority, facilitation payments, illegal use of the official position by a person to receive benefits in the form of money, property or other assets, services, and any rights to himself or to other persons or illegal provision of benefits or rights by other persons.

In view of the above, the Directors and the employees of the Company are strictly prohibited, whether directly or indirectly, personally or through the mediation of third parties, to be involved in corrupt activities, offer, give, promise, request and receive payments or make payments to simplify administrative, bureaucratic and other formalities in any form including cash, valuables, Services or other benefits to any person or from any persons or organizations, including governments and local authorities, government officials, private companies and its representatives.

### **Restrictive/Prohibitive Practices:**

Given below is an illustrative List of acts /practices which are restricted / prohibited under the policy framework:

- Dishonest misappropriation of property/money.
- Criminal breach of trust.
- Cheating.
- Receiving or giving bribe.
- Charity in order to obtain commercial advantages.
- Participation/Contribution in/to Political Activities.
- Payment of any costs for government officers and their relatives (or in their interests) in order to obtain commercial advantages.
- Acceptance /giving of illegitimate gifts.
- Any other unethical act or omission.

### **Reporting of violations:**

All employees are encouraged to raise concerns about any actual or suspected cases of bribery and corruption at the earliest possible stage. Where anyone believes the Guidelines are not being complied with or they are being asked to carry out any act not in compliance with these Guidelines, these concerns must be raised immediately with the immediate superior. If the immediate superior is not the appropriate person, then the employee's concerns must be brought directly to the attention of the Location heads or the Head of Human Resources or Directors of the Company.

### **Responsibility:**

The members of the Board of Directors, and all employees of the Company, regardless of their position and designation, are personally responsible for compliance with the principles and requirements of the Policy, as well as the actions (inaction) of their subordinates, who violate these principles and requirements.

### **Communication:**

The Company's approach of anti- bribery and corruption to be communicated to all suppliers, contractors, agents and business and other partners at the outset of the Company's relationship with them and as appropriate thereafter.

### **Amendments:**

The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.