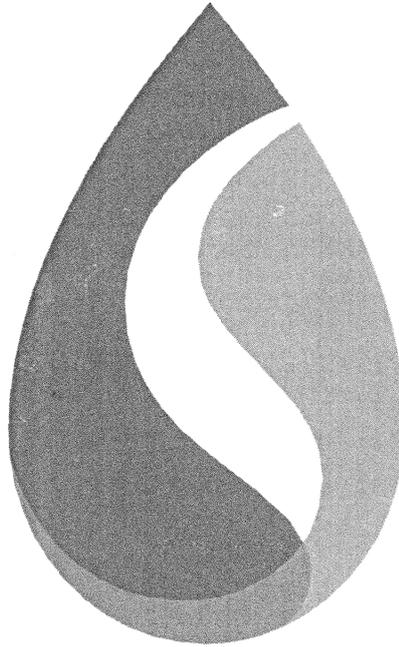




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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY		Effective Date	21-05-2024

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



SUVEN PHARMACEUTICALS LIMITED

202, A-Wing, Galaxy Towers, Plot No-1, Hyderabad Knowledge City, TSIC, Raidurg,
Serilingampally, Rangareddy District, Hyderabad.

	Name	Position	Date	Signature
Prepared by	Vedadri Narasimha Bharadwaj	Manager -Finance & Accounts	21-05-2024	<i>N.N. Bharadwaj</i>
Reviewed by	Srihari Babu Sadhu	AGM-Finance & Accounts	21-05-2024	<i>S. Srihari Babu</i>
Approved by	Himanshu Agarwal	Chief Financial Officer	21-05-2024	<i>[Signature]</i>

Version Supersedes	Reasons for Change
Version 00	<i>New Document</i>



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1. PURPOSE

This Policy is part of the Company’s Code of Business Conduct and Ethics. The purpose of this Anti-Bribery and Anti-Corruption Policy (ABAC Policy) is to establish and communicate the Company’s standards regarding anti-bribery and anti-corruption laws.

2. APPLICABILITY AND SCOPE

This Policy applies to all employees (full-time or part-time, contract employees and consultants), Officers and Board of Directors (collectively referred to as “Employees”) as well as third parties acting on behalf of Suven.

3. DEFINITIONS

Anything of Value means anything that could directly or indirectly constitute an advantage, quid pro-quo or inducement to the recipient, including but not limited to, cash or cash equivalents, services, employment offers, charitable donations, political contributions, gifts, hospitality, entertainment, travel, conference registration fee, subscriptions etc.

Bribery means offering, giving, receiving, soliciting or promising (or authorizing someone to offer, give, receive, solicit or promise) an improper benefit, inducement or quid pro-quo directly or indirectly, with the intention of influencing or rewarding the behavior of someone to obtain or retain a business advantage.

Books and Records means and includes accounts, invoices, correspondence, papers, CDs, tapes, memoranda and any other document or transcribed information of any kind.

Charitable Contributions means payments made for the benefit of the society, charitable, educational, social welfare and similar causes voluntarily without demand or expectation of any business or tangible return.

Entertainment generally includes invitations or tickets to social events including but not limited to plays, concerts, sports or entertainment events.

Facilitation Payments are small payments made to further routine governmental actions that involves non- discretionary acts. These payments are intended to influence the timing of a public official’s actions.



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Government Official / Public Official includes:

- a) Elected or appointed official, employee (full time or part time) or person acting on behalf of or representative of any government or government owned or government-controlled business enterprise.
- b) Officer or employee or person acting in official capacity for or on behalf of a public international organization (like United Nations, World Bank or International Monetary Fund etc).
- c) Holding an office of a political party; or a candidate for political office.
- d) Medical and scientific personnel including health care professionals, qualify as public officials when they work at a hospital, clinic, university or other similar facility owned or partially owned by a government.
- e) Any other person who is a public official according to applicable laws, regulations and industry codes.

Health Care Professional (“HCP”) means any person who in the course of his or her professional activities may prescribe, recommend, purchase, supply or administer medicines/drugs. This includes physicians, nurse practitioners, physician’s assistants, practicing pharmacists and their staff.

Hospitality includes refreshments, beverages, meals, travel and accommodation, and other directly related incidental expenses.

Political Contributions mean any contribution, financial or in kind to support a political cause or a political party, not limited to gifts of property or services, advertising or promotional activities, purchase of tickets to fundraising events and contributions to research organizations having close association with political parties.

The Third Party includes any natural person or legal entity with whom Suven interacts for obtaining goods or services e.g. suppliers, service providers, agents, consultants, distributors / stockiest or similarly situated persons.

4. POLICY DESCRIPTION

We always expect a high degree of honesty and integrity from its employees. Employees must understand the company’s value system, Code of Conduct, Business ethics, accountability etc.

Compliance with anti-bribery legislation is an ongoing responsibility of each individual Employee along with maintaining Ethics, transparency, and accountability.

We are committed to conducting the fair business with the highest standards of ethics and integrity; will not allow public or private bribery. One should not ignore the policy



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and each and every member of this organization is responsible for proper conduct and must use careful judgment at all times.

The company will not encourage Promising, offering or giving, as well as requesting, demanding or accepting, any improper payment or advantage (a bribe), whether directly or indirectly (such as through a third party) to or from any Public Servant, business partners, family member of a public official or of a business partner, agents, dealers, distributors, contractors, growers, consultants, logistic providers, custom brokers, management advisors, professional advisors or its firms, any other business associates. There are no substitutes to bribery.

Employees are encouraged to report any instances where they suspect that anyone acting for or on behalf of SPL may have engaged in conduct in violation of this policy. Such report may be submitted to their Line Manager or Compliance Officer. Employees who are not comfortable talking to their Line Manager or Compliance Officer, can report to whistle blower mechanism at wbm@suvенpharm.com

The company has zero tolerance levels for any victimization/retaliation against any Complainant.

Employees are expected to adhere to governance, procedures and practices that ensure ethical conduct at all levels and to avoid adopting the practices that are corrupt, abusive or anti-competitive to the Company.

Transparency in communication of information including financial matters shall be maintained that impact various stakeholders.

5. FACILITATION PAYMENTS

The company will not pay any facilitation payments or substitutes to facilitation payments for getting orders, tender information, procurement process, evading taxes/ duties/ penalties/ damages, etc.

6. DISCIPLINARY ACTION

Any violation in the Policy will lead to appropriate disciplinary action, including dismissal from employment or termination of contracts where warranted, and potentially legal sanctions.

7. ENFORCEMENT AND PENALTIES

Anti-bribery legislation provides for both criminal and civil enforcement.

8. PROCEDURES, AUDIT AND REGULAR REVIEW

We are committed to ensuring that employees are regularly trained, and that its compliance procedures generally are regularly audited and reviewed.



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9. CLARIFICATIONS, INTERPRETATION & AMENDMENT OF POLICY

Clarifications may be sought from the Corporate HR Dept. and/ or Location HR Dept. about this policy.

Contextual jurisprudence of the management will prevail in prudent application of the policy and its benefits.

Management at its sole discretion can rescind, amend, add to, delete or supersede any of the clauses mentioned herein, if it feels necessary to do so.

In the event of any dispute arising out of implementation of the Policy, management's decision will be final and binding upon all