

DOCUMENT DETAILS

Document Number	SLSL/HR/2024/29
Document Name	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY
Department	Corporate HR
Category	HR POLICIES
Version No	00
Effective Date	23/Dec/2024
Next Review Date	22/Dec/2029

SIGNATURES

ROLE	NAME	DESIGNATION	DEPARTMENT	DATE&TIME
PREPARED BY	Sandhya Gottam	Assistant Manager	Corporate HR	17/Dec/2024 12:23
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ELECTRONIC SIGNATURE PAGE

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I. PURPOSE:

The purpose of this policy is to promote ethical behavior and prevent corruption and bribery across our operations across the world.

II. SCOPE:

This policy is applicable to all employees including contract employees and Business partners including Suppliers, Vendors, contractors, agents, NGOs, third-party representatives and their employees, casual employees, workers.

III. POLICY & PROCEDURE

Sai Life Sciences is committed to conduct its business with integrity and transparency. We strictly prohibit any form of bribery or corruption in all interactions, both internally and with third parties, including government officials, healthcare providers, and suppliers.

Prohibited activities:

- 1. Bribery:** Offering, giving, or receiving any item of value to influence the actions of another party in an unethical or illegal manner. Kickbacks, Payment, illegal gratification.
- 2. Corruption:** Abuse of entrusted power for private gain, typically involving bribery.
- 3. Facilitation Payments:** Making a payment in return for business favors or advantages.
- 4. Fraud:** Furnishing false information or acting in a manner prejudicial to the interest of company or money laundering.
- 5. Conflict of interest:** Theft fraud or dishonesty in connection with business or property of the company.
- 6. Gift and Entertainment:** No gifts, entertainment, or other courtesies should be provided to any party where it might influence their decision-making in Favor of SAI. Exceptions require prior approval from the Compliance Officer and must be documented.
- 7. Charitable Contributions and Sponsorships:** Any charitable contributions or sponsorships must be approved and must not be used to gain a business advantage.

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Due Diligence for Third Parties

All third-party vendors, agents, and partners must undergo thorough due diligence. They must commit to Code of conduct following anti-bribery and anti-corruption standards consistent with this policy.

Record-Keeping

All transactions and expenses, including those related to third-party vendors or government officials, must be recorded accurately. Documentation should reflect true and fair details to prevent any misleading information.

Reporting Concerns

Employees are encouraged to report any suspicious activity or breaches of this policy through abac@sailife.com. Reports shall be made anonymously, and We ensure protection against retaliation for all whistleblowers as per our Whistle blower policy.

Violations and Disciplinary Action: Any violation of this policy will result in disciplinary action as per code of conduct, which may include termination of employment or contractual agreements and legal action, if applicable.

IV. POWER TO AMEND

The company reserves the right to amend the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at sole discretion of the Management.

-----End of the Policy-----