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Sanzyme Biologics®

Est. 1969

Sanzyme Biologics Private Limited

Anti-Bribery and Anti-Corruption Policy

Purpose

In all aspects of its operations, Sanzyme Biologics Private Limited ("the company") is committed to upholding highest standards of moral behaviour and honesty. The purpose of this Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as the "Policy") is

- To promote and strengthen measures to prevent and combat corruption more efficiently and effectively
- To promote fight against corruption and bribery
- To promote integrity, accountability and proper management of the company affairs

Scope

The scope of this policy covers employees, contractors, suppliers, service providers, customers, consultants, agents, and other third-party representatives acting on behalf of Sanzyme of the company

Definitions

- **Bribery:** It is the act of offering, providing, receiving, or requesting something of value in order to sway the decisions of someone with a position of trust.
- **Corruption:** It is the misuse of authority for one's own benefit.
- **Facilitation Payments:** Tiny, informal funds transferred to assure or speed up the completion of a standard government task.
- **Gifts and Hospitality:** Anything of value, such as money, gift cards, merchandise, services, amusement, or other advantages.
- **Conflict of Interest:** When personal interests unjustly affect or seem to affect decisions made in the workplace.

Policy Statement

- **Prohibition of Bribery and Corruption**
Direct or indirect bribery and corruption are severely prohibited by the company. Employees are not allowed to take part in any activities that can be interpreted as corrupt or bribery.
- **Facilitation Payments**
Payments for facilitation are not accepted by the company. Employees must refrain from taking any actions that can be seen as supporting these payments.
- **Gifts and Hospitality**
Hospitality and gifts are only acceptable if they are:
 - Fair and reasonable
 - For justifiable commercial objectives,
 - In accordance with regional statutes and ordinances,
 - Open and accurately recorded.
 - Personnel must not offer or accept gifts or hospitality that could influence, or appear to influence, any business decision.
- **Political Contributions**
Employees are required to make sure that any political engagement is carried out in their individual capacities and not on the company's behalf.

- **Charitable Donations**
Donations to charities are permitted if they are morally and legally righteous and aren't utilized to hide bribery or corruption. Every donation needs to be clear, well-recorded, and duly approved by top management or his designee
- **Third-Party Relationships**
To ensure the company's commitment to anti-corruption and anti-bribery standards, the company should ensure due diligence before approving a third-party
- **Conflict of Interest**
Employees must stay out of circumstances where their own interests might collide with those of the company's interest. The Compliance Officer must be informed of any conflicts of interest, whether they are real or hypothetical.

Examples of Conflict of Interest

- **Financial Interests**
 - An employee is responsible for selecting vendors for company projects and chooses a supplier that is owned by a close family member, potentially securing better deals for the family member's business.
- **Personal Relationships**
 - A manager is in a relationship with an employee they directly supervise, which could affect their objectivity in performance reviews, salary negotiations, or disciplinary actions.
- **Secondary Employment**
 - An employee works part-time for a competitor, which may lead to divided loyalties or the sharing of proprietary information.
- **Gifts and Hospitality**
 - A staff member regularly accepts expensive gifts or lavish hospitality from a client who is currently bidding for a new contract, which could influence the staff member's decision-making process.
- **Use of Company Resources**
 - An employee uses company resources, such as equipment or information, for personal gain or to support a side business.
- **Procurement and Contracting**
 - A procurement officer steers a contract to a company in which they have a financial interest, or they manipulate the bidding process to favor a particular vendor.
- **Professional Services**
 - A lawyer represents a client in a business deal while also having a personal investment in the outcome of that deal.
- **Influence Peddling**
 - An employee uses their position to influence a decision that will benefit a friend's business.

Responsibilities

- **Board of Directors and Senior Management**
 - Assure this policy's efficient application and enforcement
 - Encourage the organization to have a compliance and integrity culture
 - Assign sufficient resources to the execution of this policy

- **Personnel**
 - Read, comprehend, and abide by this policy
 - Report any alleged or confirmed violations of this policy
 - Take part in anti-corruption and anti-bribery training programs
- **Compliance Officer**
 - Oversee the way this policy is being implemented
 - Make corruption risk assessments
 - Ensure employees receive direction and instruction
 - Examine any issues or violations that have been reported

Reporting and Compliance

- **Reporting Procedure:** Employees are urged to report any concerns or suspicions of corruption or bribery to the Compliance Officer, their immediate supervisor, or whistle blower hotline (whistleblowerofficer@sanzymebiologics.com)
- **Non-Retaliation:** The Company ensures that anyone who discloses a problem in good faith won't face any kind of reprisal.
- **Investigation:** A fast and comprehensive investigation will be conducted into all reported instances. Anyone found to be in breach of this policy shall face appropriate disciplinary action.

Training and Communication

To ensure that all personnel are aware of and comprehend anti-bribery and anti-corruption guidelines in practice, the company will regularly teach them all. The relevant stakeholders and all personnel will be informed about this policy.

Monitoring and Review

The company shall evaluate and amend this policy on a regular basis to consider modifications to laws, rules, and company procedures. The Compliance Officer is in charge and should ensure on how this policy is being implemented and informing the board of directors of any findings.

Record Keeping

The company shall keep thorough and accurate records of all dealings, outlays, and undertakings covered by this policy. Employees are responsible for making sure that all financial records accurately and transparently describe the nature of the transaction.

Consequences of Non-Compliance

Discipline up to and including termination of employment or contractual relationship may follow non-compliance with this policy. The company may also notify the relevant authorities about any illegal activity.