



サンザイム  
Sanzyme **Biologics**<sup>®</sup>

Est.1969

Pioneer in Probiotics



**CODE OF BUSINESS  
CONDUCT & ETHICS**



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## Message from our Chairman

Dear Colleagues,

As we strengthen our culture of compliance and responsibility within the pharmaceutical, food, feed and supplement sectors, upholding integrity and ethical conduct is key. Every decision we make shapes our reputation with patients, farmers, consumers and other stakeholders who rely on our science-backed solutions. Every action we take across departments and hierarchies shapes the reputation of our company and the trust placed in us by our stakeholders.

I am pleased to share with you our Code of Business Conduct and Ethics (COBE) that reflects the dynamic regulatory environment of our industry.

COBE is designed to support ethical decision-making, foster transparency, and ensure compliance with both local and international standards relevant to our industry. It is very crucial that you read, understand and embrace the principles outlined in COBE. I encourage you to consult your leadership teams with any questions on how to best align your day-to-day responsibilities whether in R&D, production, sales or field support with our shared values and industry-specific compliance expectations.

In our mission to deliver high-quality and innovative solutions, compliance remains a collective responsibility.

**Every compliant action we take today secures our future.**

**Jay Soman**

## Purpose — 1

The purpose of Code of Business Conduct and Ethics (herein referred to as “COBE”) is to provide a framework to foster a culture of compliance and ethical decision making within Sanzyme Biologics Private Limited (herein referred to as “Sanzyme”).

COBE provides guidance to all the employees, management, and directors on how to conduct themselves in a professional manner, ensuring their actions align with the company’s values and legal requirements. COBE sets a standard for behaviour that is expected from everyone in the company, regardless of their position or role.

No code or policy can anticipate every situation that may arise. Accordingly, COBE is intended to serve as a source of guiding principles for all.

## Our Role — 2

- Ensure our business activities are consistent and aligned with COBE
- Ensure compliance with all our policies and procedures
- Ensure compliance with applicable laws and regulations
- Ensure informed and ethical decisions are taken

## Applicability of COBE — 3

COBE applies to all employees and workers of Sanzyme (i.e. full-time, parttime, permanent, other than permanent, workers deployed through contractors).

It is expected that all our value chain partners (upstream and downstream) including all the contractors, vendors, distributors and supplier to adhere to the principles of COBE.

## Our Core Values at a Glance — 4

**Integrity:** We conduct our business with honesty and consistency, by always doing what's right, even when it's hard.

**Quality:** Excellence is non-negotiable. From R&D to delivery, we commit to the highest standards in every product and process. We are dedicated to producing superior products that enhance the well-being of our customers.

**Innovation:** We strive to lead with curiosity and creativity, continuously exploring new ideas and technologies that enhance the health and nutrition of both animals and people. Innovation fuels our growth and sharpens our competitive edge.

**Respect:** We treat all individuals with respect and value diversity within our workforce and community. Respect is foundational to a collaborative and inclusive workplace.

**Stewardship:** We lead responsibly to protect our resources, our reputation, and the well-being of the communities and animals we serve. We are committed to environmental sustainability and responsible stewardship of resources.



## How to report a concern 5

At Sanzyme Biologics, integrity means speaking up. We're committed to doing business ethically and legally and we count on every team member including our employees, contractors and suppliers to report their concerns without fear. If you see or suspect a violation of our COBE or any policies, we encourage you to raise it. We will back you. No retaliation, ever.

All employees, contractors or suppliers can report issues, concerns or behaviours that could harm Sanzyme at [compliance@sanzymebiologics.com](mailto:compliance@sanzymebiologics.com)



## Compliance with applicable Laws and Regulations 6

To uphold our responsibilities under COBE, we must adhere to all applicable laws and regulations governing our industry, including those related to health, safety and product quality.

Non-compliance with COBE may lead to disciplinary action up to and including termination and could result in legal consequences, in case to case basis.

## Conflicts of Interest 7

Employees and workers must avoid situations where personal interests could conflict with the interests of the company. Any potential conflicts should be disclosed immediately to your Manager and Compliance.

Conflicts of interest happens whenever personal interests affect or appear to affect our judgement or actions to make an impartial business decision for Sanzyme.

**Ex:** The engineering team is looking for a new supplier for an equipment. A friend of mine owns a company that is well-positioned to supply Sanzyme. May I engage with her?

**Ans:** No, you may not engage with her personally. But you may introduce your friend to a colleague in engineering team, who can treat her as any other possible supplier. You should not be involved in the decision-making process.





## Anti-Bribery and Anti-Corruption — 8

Direct or indirect bribery and corruption are severely prohibited by Sanzyme. Employees are not allowed to take part in any activities that can be interpreted as corrupt or bribery.

No employee shall offer, promise, authorize or provide a payment or benefit that is intended to improperly influence a government official or any other person, including commercial entities and individuals, in exercising their responsibilities.

## Work Environment and Safety — 9

Sanzyme, is committed to provide a safe, respectful and inclusive workplace for all the employees. We provide a workplace free from harassment, discrimination and any form of abuse.

We are committed to maintaining a supportive and collaborative work environment where all our employees work together to fulfil our goals.

## Protection of Company Assets — 10

Our assets consist of real estate and equipment, IT systems (such as laptops, mobile phones, data cards and other electronic devices), intellectual property (patents, trademarks and brands) and confidential information (know-how, formulations, business plans and supplier or customer details), among other things.

We are all responsible for using and protecting Sanzyme assets wisely and with care and ensure that it is not misused, damaged or lost.

Sanzyme reserves the right to search, on a reasonable suspicion, personal items or to access any file, information, data or other items located on or in Company property.

Email and voicemail systems and content on them are supplied for business use only and are considered potential company records and the property of Sanzyme.



# PROTECTION



## Data Privacy 11

Sanzyme is committed to responsible use of Personal Information (PI) or Sensitive Personal Information (SPI) in our business processes and setting of the appropriate standards to achieve this purpose. We respect the privacy of our employees, customers, suppliers and business partners.

Information relating to employees, customers, vendors, suppliers or any other business partner obtained through employment or engagement with Sanzyme must only be used for legitimate business purposes and proper performance of the relevant officer's or employee's duties. It must be handled securely while collecting, processing, storing or transferring the same. Sanzyme expects the same adherence from business partners acting on its behalf.

## Environment, Health and Safety 12

We are dedicated to producing our products in an environmentally responsible manner, minimizing our ecological footprint and promoting sustainability.

Sanzyme is committed to contribute to the protection of Environment, Health and Safety by:

- Enhancing awareness, skill and competence of our employees and others to accept individual responsibility for health and safety at work.
- Enhancing the awareness of our employees and others to accept individual responsibility for protection of our environment.
- Complying with relevant Environment, Safety and Health legislations.
- Conserving natural resources like water, fuel and energy.
- Preventing incidents with adverse impact on the environment within company premises.
- Promoting greening of the environment in and around the complex.



- Preventing incidents and accidents in the company premises.
- Providing and maintaining safe facilities, operations and working conditions.
- Improving the Environmental Management System to enhance the overall environmental performance.
- Strive for the constant improvement in safety of the employees and environment.

## Product Safety and Quality

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**Dr. Raunak Soman** on Quality of the Product

At Sanzyme we are committed to provide high quality, safe and effective products that meet or exceed our customer expectations by adhering to both quality standards as well as regulatory requirements.

Sanzyme is committed to operate and maintain our manufacturing facilities and equipment in a manner that is suitable for the intended use & follows Good Manufacturing Practices.

We conduct our operations under properly controlled and monitored conditions, assuring the identity, strength, quality, purity, and appropriate packaging of our products. We operate a comprehensive and robust Quality Management System, designed to ensure the production and supply of quality products.



## Business Practices

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**Dhruv Soman** on Business Practices

At Sanzyme, we remain committed to ethical business practices. Our business practices are not merely operational procedures, they reflect our values, culture and responsibility to every stakeholder we serve.

## External Communication

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To preserve and maintain the integrity of communications, no employee, other than the Board of Directors and those designated from time to time as spokespersons by the Board, may discuss matters involving Sanzyme, employees or any other business partner with any member of the news media.



## Stakeholder Engagement — 16

At Sanzyme, we are dedicated to upholding the highest standards of integrity and ethics in all aspects of our business. In alignment with this commitment, we require all third parties involved in our value chain to adhere to the same principles and comply fully with applicable Anti-Bribery and Anti-Corruption Laws.

Prior to entering any business relationship, we conduct comprehensive due diligence to evaluate the third party's integrity, reputation and commitment to ethical business practices.

## Training and Education — 17

Compliance to develop and oversee training programs to educate employees and workers about COBE and ethical decision-making in line with their respective roles and responsibilities.

HR should ensure that new hires receive training on COBE as part of their on boarding process.



## Monitoring and Compliance — 18

### Compliance is responsible to:

- Monitor and implement COBE across the company.
- Conduct periodic assessments of the company's ethical culture and the effectiveness of COBE.
- Ensure that COBE is accessible to all employees and workers throughout the company.
- Oversee the investigation of reported violations of COBE and ensure that investigations are conducted fairly, confidentially and in a timely manner.
- Maintain records of all reported cases, investigations and outcomes to ensure accountability and transparency.

## Enforcement and Discipline — 19

Failure to follow COBE may result in disciplinary action up to and including termination of employment

## Reporting to the Board — 20

The implementation status of COBE and report on investigations conducted under COBE will be regularly shared with the Board of Directors.

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