


Zydus Wellness Limited

**Anti-Bribery and Anti-Corruption
Policy**

	Internal Policy	Effective Date: November 6, 2023
Title: Anti-Bribery and Anti-Corruption Policy		Issued By: Sr. Vice President – Human Resources

Our Commitment:

The Anti-Bribery and Anti-Corruption Policy (hereinafter termed as "The Policy") of the Company Zydus Wellness explains our individual responsibility to comply with associated Laws/Acts/Enactments prohibiting all forms (cash and/or in-kind) of bribery and corruption. This Policy is complemented by our Zydus Business Conduct Policy.

The Policy is applicable to all individuals working at all levels and grades, including Directors, Employees (whether permanent fixed term or temporary), Consultants, Contractors, Trainees, Interns, Secondees, Casuals, Agency staff, Agents, Business Partner, Service Provider, Professional Associate, third parties including those acting on behalf of the Company, subsidiaries and such other business associates partners acting on behalf of the Company.

Prohibition of Bribery:

A bribe for purpose of this policy is any money, goods, services, or other thing of value offered or given with the intent to gain any improper advantage for the organisation. No person should assume that the Corporation's interest ever requires otherwise.

Prohibition of Corruption:

Corruption is the act of a person who unlawfully and wrongly uses his/her chair to gain some benefit for himself/herself or for another person. The Company prohibits any form of corruption or kickbacks.

Recording financial transactions:

Financial integrity is paramount to Company's reputation and credibility. Thus, all sorts of financial transactions are to be recoded in Company's books of accounts which are certified by the Auditors. Audit Committee of the Company ensures adequate internal Control.

Policy Implementation:

Governance: All person to whom this policy is applicable must read and understand the same and ensure to abide by it in their day-to-day activities. It is responsibility of the concern BU head and in line managers for implementation of this policy. This policy is to be acknowledged by all personnel of the Company during their joining process. Similarly. This policy is to be acknowledged by the third party while executing the contractual agreement with the Company. Time to time training refreshers may be envisaged as required, Human Resource (HR) team along with every individuals is entrusted with implementation of policies and commitments. It is the responsibly of HR to:



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- Drive policy awareness.
- Training and Circulation.
- Ensure that any breaches are investigated, and corrective serious actions taken and
- Compliance to law where applicable.

No Retaliation Policy:

Zydus does not tolerate retaliation for asking questions or raising good-faith concerns of possible violations of this policy.

Review and Revision:

This policy shall be reviewed annually and any revision, if done will be on the basis of annual review and benchmarking process to ensure its relevance and effectiveness.

Issued by:

Mr. Shantanu Das
Sr. Vice President – Human Resources

Approved by:

Mr. Tarun Arora
Whole Time Director & Chief Executive Officer