

ANTI-BRIBERY AND ANTI- CORRUPTION POLICY

OF


J.B. CHEMICALS & PHARMACEUTICALS LIMITED

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ANTI-BRIBERY and ANTI-CORRUPTION POLICY OF J.B. CHEMICALS & PHARMACEUTICALS LIMITED

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Prepared by:	Name	Designation	Date and signature	
Authorised by:	Name	Designation	Date and signature	
Ethics & Compliance committee				
Legal Head				
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1 Definitions:

Definition	Explanation
ABAC Laws	All laws and regulations applying to the Company, an associated person of the Company and / or buyer, prohibiting Bribery or some other form of corruption, including fraud, embezzlement or money laundering.
Board	The board of directors of the Company.
Bribery	An act of offering, giving or promising, accepting or soliciting a financial advantage or something of value in cash, kind or otherwise (or authorizing someone to offer, give, or promise or accept or solicit) in exchange for an act which is dishonest, illegal, and improper or a breach of trust, designed to influence the recipient in the exercise of their duty and to incline them to act contrary to accepted standards of honesty and integrity, to avail improper business advantage. Bribery also includes an attempt to do any of the foregoing. Bribery includes advantages provided directly, as well as indirectly through a Third Party in return for unfair business advantage.
Bribes	Offering, giving or promising, accepting or soliciting a financial advantage or something of value in cash, kind or otherwise (or authorizing someone to offer, give, or promise or accept or solicit) in exchange for an act which is dishonest, illegal, and improper or a breach of trust, designed to influence the recipient in the exercise of their duty and to incline them to act contrary to accepted standards of honesty and integrity, to avail improper business advantage.
Business Owner(s)	The specific employee with a business need to engage a Third Party and is accountable for managing the ongoing relationship with the Third Party and managing the risk associated with the Third Party
Code of Conduct	The Code of Conduct adopted by the Company from time to time.
Compliance Officer	An Employee appointed as per the requirements of the Ethics and Compliance charter of the Company and is responsible for overseeing JBCPL's compliance processes and for ensuring applicable laws and JBCPL Code of Conduct is communicated to, understood and observed by all Employees.
Director(s)	Directors appointed on the Board of the Company including executive, non-executive, independent and nominee directors
Employee(s)	Every employee of the Company, including regular employees, contractual employees and retainers.
Facilitation Payments	Payments to Government Officials to expedite the performance of duties of non-discretionary nature (performance of a routine duty or function which that official is required to perform in any case). These payments are intended to influence only the timing of or smoothing the Government Officials' actions (e.g., payments to expedite the issuance of a visa or clearing goods through customs), but not their outcome.



<p>Gift</p>	<p>A Gift means any payment, gratuity, gratification, present or advantage (pecuniary or not), offered or received in cash, kind or otherwise.</p> <p>In a business environment, “Gifts” cover items such as, but not limited to:</p> <ul style="list-style-type: none"> <li>• Presents, goods, equipment</li> <li>• Cash, payments, loans or advances or cash equivalents like gifts certificates, gift vouchers, shopping cards, etc.</li> <li>• Stocks, shares, equities</li> <li>• Free services, for instance insurance, tuition fees, repair or improvement works or any preferential treatment.</li> <li>• Transportation, promotional items or use of a giver’s time, materials and facilities.</li> <li>• Anything of value such as referral, internship, opportunity and other favorable treatment</li> </ul>
<p>Government Official(s)</p>	<p>Any person or people employed part/full time by the government or regional sub-division of the government, states, provinces, city, district, town, villages or by independent government agencies, state owned business or public (Government funded) institute. Officers and employees of government-owned companies, or companies substantially controlled by such governments, are also Government Official (including HCPs employed by or acting on behalf of hospitals, clinics or pharmacies that are operated or substantially controlled by the governments; or individuals who can influence a prescription or inclusion of products in a hospital formulary).</p> <p>Examples of Government Officials include:</p> <ul style="list-style-type: none"> <li>• Any individual who holds a legislative, administrative or judicial position of any kind, whether appointed or elected, for the country or state or other statutory authorities;</li> <li>• Any officer, employee or agent of a public international organization such as the World Health Organization or the United Nations;</li> <li>• Any officer, employee or agent of a political party or any person acting in an official capacity on behalf of a political party;</li> <li>• An employee or consultant or agent of a government-owned hospital or institution, including Healthcare Professionals, may be considered a Government Official;</li> <li>• An employee or consultant or agent acting in official capacity of a government department, government owned company or any other government agency (these shall include quasi-government bodies and corporations, etc.)</li> <li>• Any person defined as a government or public official under applicable local laws (including anti-bribery and corruption laws) and not already covered by any of the above;</li> <li>• Any employee or consultant or any person acting in official capacity for or on behalf of the above.</li> </ul>



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Healthcare Organization (“HCO”)	A collective of institutions, people, resources and other stakeholders that deliver healthcare services to the target population. Examples include but are not limited to hospitals, nursing homes, clinics, assisted living facilities, etc.
Healthcare Professional (“HCP”)	Any member of the medical, dental, or nursing professions or any other person/institution or entity with the ability to prescribe, acquire, or influence the prescription or acquisition of JBCPL’s products and/or services at issue who in the course of his/her/its professional activities. Examples include, but are not limited to, physicians, physician assistants, nurses, researchers, etc.
Hospitality	"Hospitality means any form of amenity, entertainment, travelling or accommodation or invitation offered or received. In a business environment, “Hospitality” covers items such as but not limited to: <ul style="list-style-type: none"> <li>•Meals: breakfast, lunch, dinner, cocktails, receptions,</li> <li>•Hotel accommodation,</li> <li>•Travel and trips by car, air train or boat,</li> <li>•Seminars, conventions,</li> <li>•Invitations to sporting, cultural or social events like IPL matches, etc.</li> </ul>
Legitimate Business Purpose	Any expense incurred which is in connection with the business concerned in the ordinary course of business (not in a course of quid pro quo relationship or giving an appearance of a quid pro quo relationship).
Third Party(ies)	A collective term for agents, franchisees, intermediaries, vendors, suppliers, sub-contractors, resellers, contractors and agency staff, contract manufacturers, stockists, distributors, HCP, HCO and consultants with whom JBCPL may enter into agreement(s) for purchasing/selling directly or indirectly materials and/or services. This includes associates of the foregoing as well.



## 2 Purpose and Objective

J.B Chemicals & Pharmaceuticals Limited including domestic and international subsidiaries/ affiliates/ associates (“**JBCPL**” or “**Company**”) believes in conducting its business across all geographies in an ethical and transparent manner.

The Company has a zero-tolerance approach towards Bribery and corruption. The Anti-Bribery and Anti-Corruption Policy (“**ABAC Policy**” or “**Policy**”) is adopted by the Company to help and guide its officers, Board members, Directors and Employees to comply with all the applicable ABAC Laws<sup>1</sup> prohibiting giving and receiving Bribes from any person including officials in the private or public sector and the Company’s Third Parties, in relation to any business transaction of the Company.

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<sup>1</sup> Anti-Bribery and Anti-Corruption Laws

- The Prevention of Corruption Act, 1988
- The Prevention of Corruption (Amendment) Act, 2018
- The Prevention of Money Laundering Act, 2002
- The Foreign Contribution (Regulation) Act, 2010
- The Indian Penal Code, 1860
- Central Vigilance Commission Act, 2003
- Lok Ayukta Acts of various states
- UK Bribery Act, 2010 (“UKBA”)
- The Foreign Corrupt Practices Act 1977 of USA (“FCPA”)
- Any other applicable national, regional, provincial, state, municipal or local ABAC laws



### 3 Applicability

This Policy applies to all Employees and Directors of the Company at all levels and grades wherever they are working. This Policy covers engagements with Third Parties or other representatives anywhere in the world in relation to any business transaction of the Company. In each of the jurisdictions in which the Company operates, whosoever is engaged should follow this Policy or relevant local requirements, whichever is more stringent.

When the Company engages a Third Party, it shall be the duty of Business Owner(s) to apprise such Third Party of this Policy to ensure that such Third Party follows and abides by this Policy. Wherever written contract is made with such Third Party, the Company shall obtain a covenant and undertaking from such Third Party that it shall abide by this Policy in letter and spirit. For further details, please refer to the ***“Supplier Code of Conduct”***.

For the Company’s operations outside India, the Company’s international subsidiaries/affiliates/associates shall observe accepted marketing practices recommended or stipulated by respective country laws and marketing practices. For instance, due reference shall be given to global and domestic laws, industry codes in South Africa, Russia and other geographies where business is conducted by subsidiaries/affiliates/associates.





## 4 Ethical Conduct

All Employees and Directors should endeavor to deal honestly, ethically and fairly with the Company's suppliers, distributors, customers, competitors, agents, independent contractors, consultants, HCPs, Government Official(s) and shareholders. All Employees and Directors are prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.

The Company prohibits anyone acting on its behalf or dealing with, including Directors, officers, Employees, Third Parties from making or accepting or requesting Bribe.

In case any such demand for a Bribe is received, individual should:

- Refuse to make such payment and informing that the same is not permissible as per the Company's policies.
- Report to the designated Compliance Officer regarding the demand for such payment.

Further, Employees and Directors shall communicate the Company's approach toward ethical conduct to the contractors, consultants, agents and such Third Parties, who may be dealing with the Government Officials on behalf of the Company, in order to ensure that no such payment is offered or made by them to such officials.

### Facilitating or Expediting payments

Company prohibits Facilitation Payments, or other benefits to, any Government Official or any other person made directly or indirectly to expedite routine government action. Few examples of Facilitation Payments may include:

- Payments to Government Officials for expediting licenses, permits, approvals and inspections, both at the time of setting up of unit and/or periodic statutory renewals.
- Payment made to a custom official to ensure the speedy completion of customs clearance procedures.

### Cash transactions

The most obvious form of corrupt payment or facilitating money laundering is usage of large amounts of cash. To help prevent and detect such payments, Employees and Directors should be watchful of any suspicious payments, which may include cash or the equivalent (when cheques are the norm); payments made from personal accounts instead of business accounts; and funds from financial institutions or Third Parties where there is no business connection. For further details on cash transactions, please refer to the "*Policy for usage of cash/petty cash*".



## 5 Gift and Hospitality Policy

Laws and customs of some countries permit the exchange of customary Gifts and Hospitality as an accepted business practice. The Company is committed to maintaining the highest standards of ethics and ensuring that any Gift and Hospitality received from or provided to current or prospective contractors, suppliers, customers, HCPs, Government Official(s) or any Third Party is compliant with all applicable ABAC laws since Gift and Hospitality can create a perception of conflict of interest that can undermine the integrity of our business relationships.

To ensure that Employees and Directors make objective, impartial and fair business decisions;

- Offering or receiving Gifts and Hospitality that might be perceived to improperly influence a business decision must be avoided.
- Gifts in the form of cash or cash equivalents (such as gift cards or gold or silver coins) must never be offered or received.
- One must never solicit a Gift or Hospitality.
- Gifts and Hospitality should not be lavish, excessive or untimely for the occasion.

Professional judgment must be exercised in identifying the appropriate nature of Gifts and Hospitality to ensure integrity and independence. It is important that Gifts and Hospitality are exchanged openly and transparently, properly recorded in the Company's books and records.

For further details on Gift and Hospitality please refer to the "*Gifts and Hospitality Policy*".



## 6 Conflict of Interest Policy

Conflict of interest occurs when a personal activity, relationship or business involvement interferes or appears to interfere with one's ability to fulfil his/her job responsibilities. A conflict of interest may also arise if an Employee, Directors or his family members takes such actions, receives undue benefits (in cash or in kind) which may affect the Employees' or Directors' objectivity to discharge his duties and responsibilities and is contrary to the interests of the Company.

To maintain and affirm objectivity and independence, Employees and Directors should observe professional skepticism and reject inappropriate pressure from external stakeholders to avoid conflicts of interest.

Relationships with family members, close friends, individuals and entities tend to influence our decisions. It is, therefore, incumbent upon all Employees and Directors to exercise due care and caution about business decisions involving personal relationships.

For further details on conflict of interest please refer to the "*Conflict of Interest Policy*".

### Employment

Employees and Directors shall not, among other things, exploit for their own personal gain, opportunities discovered through their employment and position with the Company, compete with JBCPL for business opportunities, accept simultaneous employment, participate or invest in activities and ventures which enhance or might enhance JBCPL's competitors.

The Company also prohibits the use of employment opportunities – whether permanent or temporary (including internship) – as a means to influence others to benefit the Company by acting improperly. Particular care must be taken where employment opportunities are extended to the following individuals to ensure there is no conflict of interest or an indication that the employment offer is motivated by an intention to get an undue business advantage.

- i. Affiliates of Government Officials
- ii. Former Government Officials in full time/part time employment
- iii. HCPs or Third Parties (or those closely associated with them)

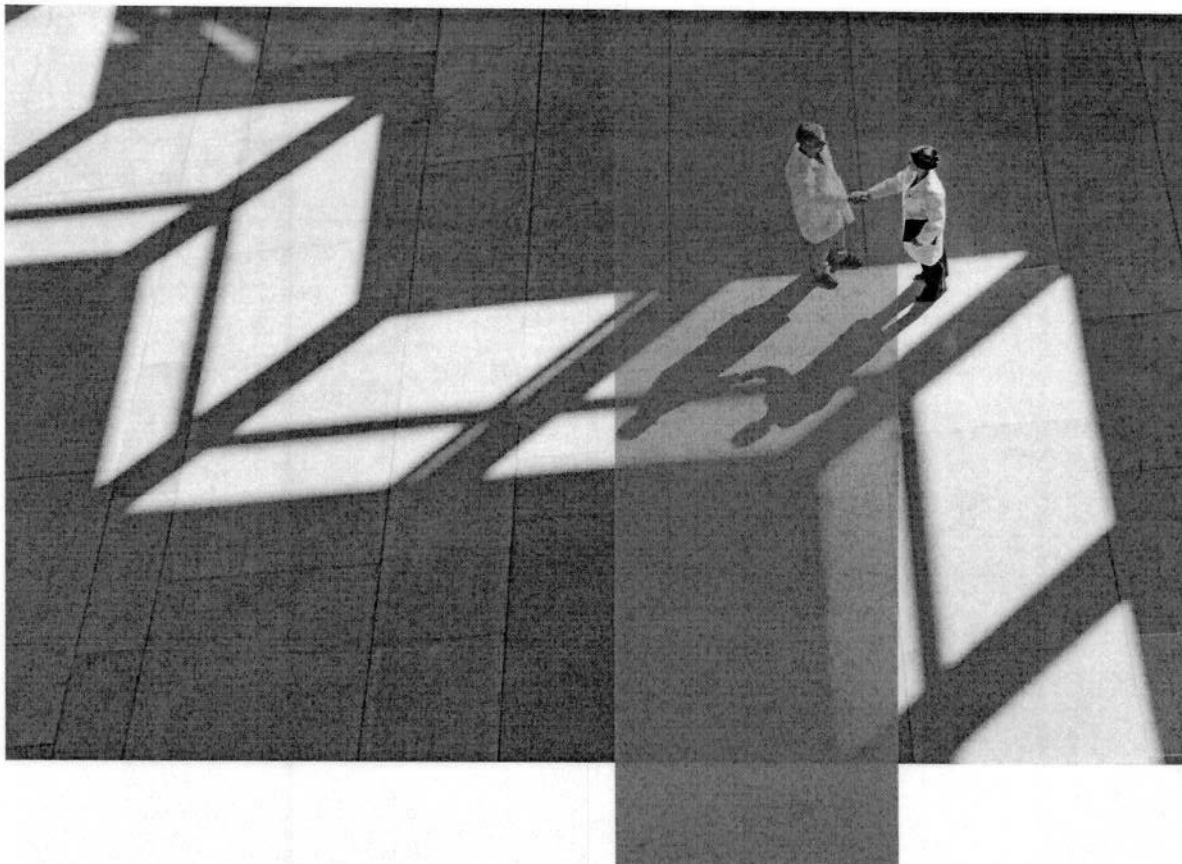
Conflicts of interest is prohibited as a matter of Company policy. When in doubt about conflicts of interest – actual or potential or perceived, one should always consult with the human resources department or the Compliance Officer.

Employees and Directors must also disclose their relationships during recruitment of family members/close personal friends or during appointment of a Third Party, Government Officials with whom the Employee and Director share a personal relationship.

For further details on conflict of interest please refer to the "*Conflict of Interest Policy*".



## 7 Third Party Management



Employees and Directors are required to interact with various Third Parties to ensure the smooth operation of the Company's business. Payments made by the Third Parties that are or purported to be on behalf of the Company may be subject to the same liability as if the Company had itself made the payments. Hence, it is necessary that Employees and Directors dealing with Third Parties, either directly or indirectly should ensure that the Third Parties act with the same standards as the Company.

While engaging with a Third Party, the Company should enter into a contract and ensure that the Third Party agrees to comply with the provisions of this Policy, ABAC laws, right to audit, and strict adherence to contractual and compliance obligations.

For further details on Third Party management please refer to the ***“Third Party Management Policy”***.

All Third parties are required to comply with guidelines mentioned in the Supplier Code of Conduct and provide signed declaration and relevant disclosure. For further details, please refer to the ***“Supplier Code of Conduct”***



## 8 Interaction with Healthcare Professionals (HCPs)/ Healthcare Organizations (HCOs)

Employees, Directors of JBCPL and its representatives (acting on behalf) shall not offer anything of value (in cash or kind) to HCPs which is intended to have an inappropriate influence on the HCPs decision to prescribe, recommend, purchase, supply or administer JBCPL's products.

Similarly, HCPs engaged for consulting or other arrangements should not carry a perception of undue influence or an inducement to promote or advocate JBCPL's products.

All services and/or arrangements with HCPs and HCOs must carry a documented business need, written arrangement and appropriate approvals.

Appropriate conflict of interest disclosure should be sought from HCPs engaged for providing services to JBCPL. In case, the HCP is affiliated with healthcare institution and the provision of the consulting services is subject to professional and/or employment rules requiring approval by the professional organization and/or employer, the HCP shall obtain such approval prior to delivering said services and submit the same if requested by the Company. The no objection clause that "HCP would obtain & maintain the required NOC for engaging with JBCPL" shall be added in the written arrangement with the HCP.

Adequate documentation should be maintained to reflect the true nature of the interaction or event involving HCPs and HCOs including periodic monitoring of HCP and HCO interactions.

Any concern related to interactions with HCP, should be immediately brought to the notice of respective business heads and the Compliance Officer.

For further details refer to the "***Interaction with Healthcare Professionals/ Organizations Policy***".



## 9 Political Contributions, Charitable donations and Sponsorships

### Political contributions

Political contributions can take many forms, ranging from the direct provision of cash contributions to political campaigns, to the provision of material resources or services including personnel or labor, donations to political action groups or non-governmental organizations with a political agenda, or to funding of or purchase of seats at fund raisers or parties.

The Company prohibits making political contributions which impose a sense of obligation on the recipient or influence official action that provides an inappropriate business advantage to the Company or its affiliates. The Company permits political contributions subject to:

- A resolution passed by the Board at the Board meeting to that effect.
- Allowance and restrictions stipulated in applicable local and global laws.

The Company management shall annually report to the Board, details and quantum of political contributions made by the Company.

While making political contributions, the following must be observed:

- Political contributions shall avoid intent and appearance of impropriety.
- Political contributions should not be made in cash or to private accounts.
- No re-imbusement shall be provided for political contributions made by individual employees and Directors. Likewise, Third Parties should not be used to make legitimate political contributions.
- Receipts acknowledging payment shall be obtained from the recipient.
- All political contributions shall be timely and comprehensively accounted for in the books and records of the Company.

### Charitable donations

The Company must in all circumstances avoid charitable donations or sponsorships that might be a disguised mechanism for Bribes or other corrupt payments.

It is necessary to ensure that the: (a) charity is a legitimate charity incorporated under applicable law; (b) payment will not be diverted to or otherwise benefit the official or his or her relatives; (c) donation is transparent and will be properly recorded in the financial records; (d) arrangement complies with all applicable laws; (e) donation is not given in exchange for a favorable decision by the requestor; and (f) charitable donations are duly approved.

Donations shall not be made to specific entities or charities at the request of customers, governments (and Government Officials) or Third Parties which may result in improper business advantage to the Company or any Third Party.

### Sponsorships

Sponsorships are closely allied to the various types of community / business activities undertaken by the Company. Any sponsorship must be for Legitimate Business Purpose or charitable



objectives without any element of quid pro quo. Any such sponsorship must be transparent, duly approved, properly documented.

Any sponsorships made or offered on behalf of the Company must:

- i. Comply with this Policy and ABAC laws.
- ii. Not have a conflict of interest with the Company.
- iii. Must be duly approved.
- iv. Ensure that all documentation (including invoices and receipts) are properly recorded.

For further details on sponsorships, refer to the *'Interactions with Healthcare Professionals /Organizations Policy'*

The respective business functions shall be responsible for conducting due diligence on the Third Party to ensure that the recipient of any donation or sponsorship is legitimate and, in the case of a charity that the sponsorship was expensed or accounted for in an appropriate manner

For further details on due diligence procedures, refer to the *"Third Party Management Policy"*



## 10 Economic Sanctions

All Employees, Directors and Third Parties (when acting on behalf of the Company) have to comply with applicable local laws and laws of other relevant countries relating to sanctions that are, or may be, of potential relevance including those Sanctions Laws administered, enacted or enforced from time to time by the United States (“US”) (including without limitation the Department of Treasury, Office of Foreign Assets Control (“OFAC”)), the United Nations (“UN”), the European Union (“EU”) and enforced by its member states, Her Majesty’s Treasury (“HM Treasury”)<sup>2</sup> or other similar governmental bodies with regulatory authority over the Company (collectively, “Sanctions Laws”).

Specifically, no Employee, Directors or Third Party (when acting on behalf of the Company) is permitted to (directly or indirectly) without prior approval from Legal head:

- Engage in any business or dealings with sanctioned countries, sanctioned entities/organizations (subject to appropriate license or authorization), sanctioned individuals listed as a sanctions target by UK, UN, EU, or U.S. legislation; or
- Facilitate business transactions or dealings with third parties that involve sanctioned countries, sanctioned entities/organizations (subject to appropriate license or authorization), sanctioned individuals listed as a sanctions target by UK, UN, EU, or U.S. legislation

The Company shall perform screening designed to identify whether any parties to the transaction may be subject to sanctions restrictions to avoid prohibited activities and transactions.

Screening is mandatory before proceeding with the proposed activity or transaction. Based on information provided from the Business Units, Company shall screen the individuals and entities involved in the transactions with the company to determine if they are listed as a sanctions target by UK, UN, EU, or U.S. legislation. Company shall also screen to see if any of these third parties are controlled by or owned 50 percent or more by sanctioned entities/organizations and or sanctioned individuals. Screening results will determine whether the Company may proceed with the proposed activity or transaction.

Company Personnel should not assume a transaction is permissible pursuant to an exception or license without first consulting with Legal head for any questions related to applicability of sanctions.

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<sup>2</sup> HM Treasury has primary responsibility for administering, implementing, and enforcing the United Kingdom (UK) financial sanctions regime.





## 11 Books and Records and Internal Controls

The Company is committed to conduct business with integrity. Employees and Directors shall abide by all applicable ABAC laws, including the U.S. Foreign Corrupt Practices Act (“US FCPA”), UK Bribery Act, 2010 (“UKBA”) and the local laws in each country where the Company undertakes business. These laws prohibit Bribery of Government Officials, and with regard to the US FCPA in particular, mandate that companies establish and maintain accurate books and records and sufficient internal controls.

Any “off-the record” payments and any form of fraudulent accounting or falsification of books and records to conceal or layer any Bribe are prohibited.

Employees, Directors and those acting on behalf of the Company such as Third Parties have an obligation to report all transactions accurately and ensure no payments are made based on false documentation. Adequate documents related to expenditure incurred including receipt, reason for expenditure, proof of payment, proof of delivery of service or goods, approvals, agreements etc. should be maintained. The documentation should reflect the true nature of transactions undertaken by those acting on behalf of JBCPL with vendors, suppliers, etc., especially for transactions overseas (cross-border transactions) and in high ABAC risk geographies/countries.

The Company must maintain an effective system of internal control and monitoring of its transactions. It is the responsibility of each individual to be knowledgeable of control procedures and ensure its compliance. The Company shall record transactions as necessary for preparation of financial statements in conformity with generally accepted accounting principles.

For further details refer to the policy on “*Books and records and internal controls*”.



## 12 Compliance with this Policy and Laws

Every person to whom this Policy is applicable is not only obliged to observe this Policy but also Anti-Bribery legislation, regulations, codes of the place where the business of any transaction is conducted.

Any violation of this Policy may seriously affect the Company and its reputation and brand value. Any violation of this Policy will be dealt strictly and failure to adhere to the Policy may result in disciplinary action including suspension or termination or removal in the case of an Employee or Director; or termination of business relations in the case of a Third Party.

Further the consequences of activities in violation of ABAC laws and other applicable laws can be severe, including significant civil and/or criminal penalties, with the possibility of lengthy terms of imprisonment at home or abroad.

The Company and its shareholders in such circumstances may also be required to pay major civil or criminal penalties, even where such activities are common within the country or jurisdiction in question. Further, the Company will not reimburse any fines/ penalties levied on account of the above.

## 13 Reporting of violations

The Company has multiple means through which misconduct can be reported. Any individual (including Third Parties) who violates this Policy or any applicable ABAC law or sanctions law or knows of any such violation by any other individual, may, report the violation immediately through any of the channel of reporting mentioned in Whistle Blower Policy.

For further details refer to "*Whistle Blower Policy*"



## 14 Training and Communication

All Employees, officers, Board members, key managerial personnel, Directors, and Third Parties working with the Company must be aware of the principles of this Policy and comply with the latest available version of the Policy. This can be achieved through multiple approaches such as training, periodic communication, etc.

All Employees shall participate in mandatory annual trainings on the requirements and obligations of this Policy, including with respect to anti-corruption and trade sanctions.

All Employees, Directors and Third Parties must receive and review a copy of the ABAC Policy. All Employees and Directors must, declare in writing annually their compliance with the ABAC Policy. Refer to **Appendix A** for Employee or Director declaration. Further, to the extent possible Third Parties shall also endeavor to complete such Anti-Bribery and Anti-Corruption declaration periodically.

All Employees and Directors, specifically working in areas regarded as most vulnerable to Bribery or corruption or whose responsibilities involve foreign operations (such as Employees, Directors interacting with Government Officials) shall undergo annual ABAC trainings which shall be conducted on a regular basis by the Company.

## 15 Exception management

Any exception (other than the exceptions specified in the specific policies) to this Policy will require a written approval from the Compliance Officer along with detailed explanation for seeking the exception. However, such exception shall not be contrary to applicable ABAC laws.

## 16 Review and revision

This policy shall be reviewed and revised as and when deemed necessary by the Company.



## Appendix A - Employee or Director Anti-Bribery and Anti-Corruption Policy and Conflict of Interest declaration

I, the undersigned, (Name, designation and Employee ID) hereby declare that

- I have received, read and understood the meaning and scope of the Anti-Bribery and Anti-Corruption Policy (“**Policy**”) in detail. I hereby declare that I have complied with the Policy and I hereby undertake to respect its requirements in the future.
- I also declare that neither am I aware of nor have I witnessed any act that could be considered to be an act of fraud or bribe or corruption.
- I hereby acknowledge that I am fully aware of my obligation to report any potential violation of the Policy through any of the channel of reporting mentioned in Whistle Blower Policy
- I hereby acknowledge that I am fully aware of my obligation as required by Conflict of Interests Policy to report any personal interests that conflicts / potentially conflicts with the interests of the Company or my duties as an Employee / Director of the Company. I have complied with the Conflict of Interests Policy and I hereby undertake to respect its requirements in the future.
- Should I have any questions regarding the ABAC Policy or Conflict of Interests Policy or find any deviations or violations, I will contact the Compliance Officer immediately.

I understand that failure to comply with the Policy, the US FCPA, UK Bribery Act, and any other applicable Anti-Bribery and Anti-Corruption laws may result in disciplinary action including immediate termination and prosecution, with penalties including fines and/or imprisonment.

Comments:

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Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Designation: \_\_\_\_\_  
Department: \_\_\_\_\_  
Location: \_\_\_\_\_  
Date: \_\_\_\_\_

