



# *Divi's Laboratories Limited*

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## **Anti-Corruption Policy**

### **1. Introduction:**

Divi's is committed to conducting its business in an honest and ethical manner and in compliance with applicable laws and regulations including the Prevention of Corruption Act, 1988 and the Prevention of Money Laundering Act, 2002. In doing business anywhere in the world, no Divi's employee, officer or member of the Board of Directors shall directly or indirectly offer, pay, promise, authorize or receive any bribe, kickback or other illicit payment or benefit in violation of this Policy. Compliance with these laws protects Divi's and Divi's personnel from prosecution and damage to reputation. This Policy supplements the Divi's Code of Ethics and Business Conduct, which remains fully effective.

### **2. Scope and Compliance:**

This Policy is applicable to all Divi's employees, officers, managers and members of the Board of Directors and its purpose is to set out the responsibilities required to observe and uphold Divi's position on bribery and corruption. Failure to comply with this Policy may result in disciplinary action, including termination of employment.

### **3. Definitions:**

A. Bribery is the offer, promise, giving, demanding or acceptance of a payment, benefit or other advantage as an inducement for an action that is illegal, unethical or a breach of trust.

B. Corruption is the misuse of position for private gain: Acts of bribery or corruption are designed to influence an individual in the performance of his or her duty and incline them to act dishonestly.

C. Money Laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving banks or legitimate businesses.

D. Government Officials include any person holding an executive, legislative, judicial or administrative office.

E. Third Parties are persons or entities who are either doing business with or acting for or on behalf of Divi's anywhere in the world.



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### 4. Policy Statement:

4.1 General Policy: Divi's takes a zero-tolerance approach to bribery, corruption, and money laundering and is committed to acting professionally, fairly and with integrity in all its business activities and relationships and to operating and enforcing systems and policies to detect and deter bribery and money laundering. Divi's prohibits payments, offers or promises of payment, as well as giving, offering or promising of anything of value directly or indirectly to any representative of a customer, potential customer, Government Official, supplier, or other person or entity in connection with any Divi's transaction or business with such person or entity to assist Divi's in obtaining or retaining an improper business advantage, whether or not any benefit is received.

#### **Prohibited payments include (but are not limited to):**

Payments made with the intention of influencing others to obtain or secure an improper advantage;

- Gifts, hospitality or other non-monetary items that do not comply with Gift Policy stated in Section 4.2.
- Any gifts, hospitality or other non-monetary items that knowingly violate the policies of a customer, potential customer, Government Official, supplier, or other person or entity in connection with any Divi's transaction or business with such person or entity;
- Payments to influence any act or decision of a Government Official in his or her official capacity;
- Payments to induce a Government Official to perform or fail to perform any act;
- Payments to influence a Government Official to abuse his or her power for private gain;
- Payments inducing a Government Official to use his or her influence with a government or government instrumentality to affect or influence any act or decision of a government or instrumentality;
- Any political or charitable contribution.
- Requiring or encouraging any of the above payments to be made by a Third Party on behalf of Divi's.



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## 4.2 Gifts, Entertainment, & Hospitality

While dealing with gifts, entertainment or other hospitality to customers, potential customers, suppliers, or other persons connected to Divi's business or transactions to foster goodwill and enhance business relationships including the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions or other social gatherings, where they are appropriate in the circumstances and are in connection with matters related to Divi's business shall be handled as below.

### **Acceptable**

The following guidelines describe what is generally acceptable.

- Modest, occasional meals;
- Occasional attendance at ordinary sports, theater and other cultural events; and
- Gifts of nominal value that may promote Divi's business, such as items with Divi's logo.

Divi's conducts business in many jurisdictions across the globe. Gifts, entertainment and hospitality that may be modest, nominal and acceptable in one region may not be so in another. When employees are uncertain whether proposed gifts, entertainment or hospitality are modest, nominal and acceptable or not in a particular region, P&A Department Head should be consulted.

### **Unacceptable**

The following guidelines describe what is unacceptable with respect to the giving of gifts, entertainment and hospitality to customers, potential customers or other persons connected to Divi's business or transactions and are prohibited.

- A "quid pro quo" (offered for something in return);
- Gifts in the form of cash or cash equivalents (such as gift cards, vouchers, stock, etc.);
- Entertainment of an unsavory or potentially offensive nature; or
- Gifts, entertainment or other hospitality that are knowingly in violation of the recipient's employer's policies, guidelines or standards.



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## **5. Money Laundering:**

Money laundering is the illegal process of concealing the origins of money obtained illegally by passing it through a complex sequence of banking transfers or commercial transactions. The overall scheme of this process returns the money to the launderer in an indirect and obscure way. Divi's prohibits all forms of money laundering and maintains internal controls designed to ensure compliance with applicable anti-money laundering regulations.

## **6. Questions Regarding Anti-Corruption Policy:**

Questions about the Anti-Corruption Policy, its application or anti-corruption laws should be directed to Divi's Legal Department.

## **7. Reporting Mechanism:**

If any person has reason to believe that Divi's Anti-Corruption Policy has been violated in any way, he/she should promptly notify to Divi's Legal or P&A Department Head.

## **8. Compliance with Anti-corruption Policy:**

Violations of this Anti-corruption policy will result in disciplinary action, which may even include termination/ removal from the service of the Company. The Company's Board or any Committee/person designated by the Board for this purpose shall determine appropriate action in response to violations of this Policy.

## **9. Review of the policy:**

This Policy will be reviewed as and when required depending upon changes in Anti-Corruption and Bribery laws.

**Rev: 01**

**Date : 01/02/2022**

  
**Chief Executive Officer**