



## **TTK HEALTHCARE LIMITED**

**Regd. Office: No.6, Cathedral Road, Chennai 600 086**

**CIN: L24231TN1958PLC003647 | Website: [www.ttkhealthcare.com](http://www.ttkhealthcare.com)**

# **POLICY ON ETHICS, BRIBERY & ANTI-CORRUPTION**

*[Effective from 1st April, 2022]*



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### **ETHICS, BRIBERY & ANTI-CORRUPTION POLICY**

#### **PREAMBLE**

TTK Healthcare Limited (the Company) is committed to high ethical standards, doing open and fair business, follow best practices of corporate governance and support the business reputation at the appropriate level.

#### **APPLICABILITY**

The Policy would be applicable to:

- All Third Party Manufacturing Units and Vendors of the Company,
- Representatives or any other persons, who may be acting on behalf of the Company.

This Policy shall be effective from April 01, 2022.

#### **OBJECTIVES**

The aims and objectives of the Policy are to inter alia:

- Encourage Third Party Manufacturing Units and Vendors to
  - act honourably and with integrity in all business dealings of the Company.
  - identify and address appropriately any potential conflicts of interest
  - recognize the duty of confidentiality to the Company's relationships and give it the highest importance
  - initiate steps to ensure that no financial or other inducements are offered or accepted by or on behalf of the Company.
- Encourage Third Party Manufacturing units and Vendors to be vigilant and to act diligently in good faith.
- Monitor and investigate instances of alleged corruption or bribery.
- Take action against any individual(s) involved in corruption or bribery.
- Minimize the risk of involvement of all Third Party Manufacturing Units and Vendors in corruption related activities;
- Form a common understanding with all stakeholders that the Company opposes bribery and corruption in any form;
- Provide advice, information and training on ethics to all our Third Party Manufacturing Units and Vendors at all levels and locations

#### **POLICY**

"Corrupt Practices" that will be considered - giving or receiving financial or other inducements, intermediation in giving or receiving financial or other inducements, malpractice, misuse of official authority, facilitation payments, illegal use of the position by a person to receive benefits in the form of money, property or other assets, services, and any rights to himself or to other persons or illegal provision of benefits or rights by other persons.

In view of the above, Third Party Manufacturing Units and Vendors of the Company are strictly prohibited, whether directly or indirectly, personally or through the mediation of third parties, to be involved in corrupt activities, offer,

give, promise, request and receive payments or make payments to simplify administrative, bureaucratic and other formalities in any form including cash, valuables, services or other benefits to any person or from any persons or organizations, including governments and local authorities, government officials, private companies and its representatives.

### **RESTRICTIVE / PROHIBITIVE PRACTICES**

Given below is an Illustrative List of acts /practices which are restricted / prohibited under the policy framework:

1. Dishonest misappropriation of property/money.
2. Criminal breach of trust.
3. Cheating.
4. Receiving or giving bribe.
5. Charity in order to obtain commercial advantages.
6. Participation / Contribution in / to Political Activities with a view to obtain an advantage or benefit.
7. Payment of any costs for government officers and their relatives (or in their interests) in order to obtain commercial advantages.
8. Acceptance / giving of Gifts over and above the extent and the manner as allowed hereunder:-

Gifts and representative expenses including the hospitality business / entertainment expenses which the Third Party Manufacturing Units and Vendors may provide on behalf of the Company to the individuals or organizations, or which the Third Party Manufacturing Units and Vendors may receive in connection with their work in the Company from other persons and organizations, must meet the following criteria:

- (a) to be directly related to the legitimate activity of the Company
- (b) to be reasonable, proportionate and not be a luxury;
- (c) not to be a hidden fee for the service, act, omission, conniving, protection, provision of rights, making of certain decision on transaction, agreement, license, permit, etc. or attempt to influence the recipient to indulge in any illegal or unethical activity;
- (d) not to create a reputational risk for the Company, Third Party Manufacturing Units, Vendors and other persons, in case of disclosure of information on gifts or representative expenses;
- (e) not to be in conflict with the principles and requirements of the Policy, the Code of Conduct and other internal documents of the Company and the applicable laws.

9. Any other unethical act or omission.

### **REPORTING OF VIOLATIONS**

All Third Party Manufacturing Units and Vendors are encouraged to raise concerns about any actual or suspected cases of bribery and corruption at the earliest possible stage. Where anyone believes the Guidelines are not being complied with or they are being asked to carry out any act not in compliance with these Guidelines, these concerns must be raised immediately with the respective Business / Functional Heads in TTK Healthcare Ltd. If the respective person is not the appropriate person, then the Third Party Manufacturing Units and Vendors concerns must be brought directly to the attention of the Wholetime Director & Secretary.

Third Party Manufacturing Units and Vendors may also report a suspected violation of these guidelines through the Company's Vigil Mechanism / Whistleblowing procedures.

**RESPONSIBILITY**

The Third Party Manufacturing Units and Vendors of the Company, regardless of their position, are personally responsible for compliance with the principles and requirements of the Policy, as well as the actions (inaction), against those who violate these principles and requirements.

**COMMUNICATION**

The Company's approach of anti-bribery and corruption to be communicated to all of them and as appropriate.

**AMENDMENTS**

The right to interpret/amend/modify this Policy vests absolutely with the Company.

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