

SOLARA ACTIVE PHARMA SCIENCES LIMITED

ANTI BRIBERY & CORRUPTION POLICY

Document History		
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Policy Statement:

Solara Active Pharma Sciences Limited (referred here as Solara) is committed to conducting business with honesty, integrity, and fairness. This Anti-Bribery & Corruption Policy establishes principles and procedures that enforce zero tolerance toward bribery and corruption. It provides clear guidelines for ethical business practices and handling bribery or corruption cases with transparency and accountability.

Scope:

The policy is applicable to all stakeholders of Solara including:

1. Employees of Solara (all permanent employees employed full/Part time).
2. Board Members, Contractors, Consultants, Trainees and Service Providers.
3. Affiliates, stakeholders, and persons/entities contractually obligated globally.

Solara ensures compliance with all anti-bribery and corruption laws while implementing effective systems to counter unethical practices.

Objectives:

To uphold ethical standards, Solara commits to:

1. Maintaining zero tolerance toward bribery and corruption in all business dealings.
2. Ensuring all employees and associated parties act with integrity and comply with anti-corruption laws.
3. Establishing and monitoring clear procedures for addressing bribery and corruption incidents.

Definition:

Bribery: Offering, giving, receiving, or soliciting anything of value to improperly influence a decision or secure an advantage in business.

Anything of Value: Includes, but is not limited to, cash, gifts, entertainment, loans, political or charitable contributions, and personal favors.

Principles & Procedures:

1. Gifts
 - 1.1. Gifts must be modest, transparent, and compliant with company and recipient guidelines.
 - 1.2. Cash or cash equivalents are strictly prohibited.
 - 1.3. Gifts must be documented and align with proper business etiquette.
2. Entertainment & Hospitality
 - 2.1. Permitted if reasonable, customary, and compliant with local laws.
 - 2.2. All expenses must be documented with details on attendees and the business purpose.
3. Travel & Lodging
 - 3.1. Travel expenses must be business-related, reasonable, and pre-approved.
 - 3.2. Extravagant or unrelated expenses, such as cash per diems, are not allowed.
4. Employment/Internships
 - 4.1. Offers must follow regular recruitment processes. Special requests linked to government officials or business partners are prohibited unless disclosed and approved by HR.

5. Political Contributions & Charitable Donations

- 5.1. Contributions must be lawful, pre-approved by the Chairman, and unrelated to gaining business advantage.
- 5.2. Employees cannot make contributions on behalf of the company.

6. Third-Party Relationships

- 6.1. Employees must ensure third parties act ethically and comply with this policy.
- 6.2. Contracts must include anti-corruption clauses, and integrity reviews must be conducted.

Record Keeping & Internal Controls:

1. All expenditures must be accurately documented in financial records.
2. The CFO is responsible for ensuring compliance and transparent financial reporting.
3. Personal funds cannot be used to circumvent this policy.

Monitoring and Reporting:

1. Employees must report concerns or suspected violations through the Whistle-Blower Policy.
2. No adverse actions will be taken against employees reporting in good faith.
3. Retaliation concerns should be escalated to HR, with unresolved issues taken to the Chairman.

Review Mechanism:

The Anti-Bribery & Corruption Policy will be reviewed periodically to ensure compliance and effectiveness:

1. Monitoring and Reporting: Evaluate processes and address identified gaps.
2. Stakeholder Engagement: Gather inputs to enhance policy implementation.
3. Continuous Improvement: Make necessary adjustments to align with evolving standards.

Implementation Approach:

1. Employees must be informed, trained, and certified on this policy.
2. HR is responsible for communication and training on policy adherence.
3. Management reserves the right to amend or withdraw the policy without prior notice.

References:

- United Nations Convention Against Corruption (UNCAC)
- ISO 37001: Anti-Bribery Management Systems
- Applicable Local and International Anti-Bribery Laws
- Solara's Whistle-Blower Policy
- Industry Best Practices for Anti-Bribery & Corruption

Solara Management reserves the right to amend/ withdraw the policy at any time without assigning any reasons whatsoever. The utility and interpretation of this policy will be at the sole discretion of the HR Department.