

SOLARA ACTIVE PHARMA SCIENCES LIMITED

ANTI COMPETITIVE POLICY

Document History		
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Policy Statement:

Solara Active Pharma Sciences Limited is committed to adhering to corporate governance principles and ensuring compliance with anti-competitive laws and fair-trade practices. This policy aims to foster fair and effective commercial competition while discouraging and addressing any anti-competitive behaviour. Employees and associated persons are expected to understand and act in the spirit of this policy to maintain market integrity and ethical business practices.

Scope:

The policy is applicable to all 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.

The policy applies to all agreements, formal or informal, verbal or written, including those conducted via emails, letters, or conversations

Objectives:

To promote fair competition and prevent anti-competitive practices, Solara commits to:

1. Prohibit anti-competitive agreements or conduct that distorts competition.
2. Ensure compliance with competition laws and regulations.
3. Foster awareness and vigilance against anti-competitive practices among all employees and stakeholders.

Definition:

Anti-Competitive Practice: Any activity by businesses that hinders competition, resulting in market distortion, higher prices, reduced service quality, or stifled innovation.

Collusion: Unethical collaboration among competitors to dominate a market or reduce competition.

Responsibilities:

The following stakeholders are accountable for adhering to this policy

1. Employees, including directors.
2. Employees of agencies engaged in Solara activities.
3. Contractors, vendors, and suppliers providing services or materials.
4. Any other persons/entities associated with Solara.

Actions constituting Anti-Competitive behaviour:

1. Price Fixing
 - 1.1. Employees must not discuss or agree with competitors on pricing, discounts, or fees for customers.

2. Market Sharing

- 2.1. Employees are prohibited from agreeing with competitors to divide markets, territories, or customers.

3. Information Sharing

- 3.1. Employees must avoid sharing sensitive information (e.g., prices, production, suppliers, customers) that may reduce competition.

4. Other Anti-Competitive Activities

- 4.1. Examples include collaborating to reduce production, restricting sales, or entering exclusive contracts that hinder competition.

Preventing Anti-Competitive Practices:

1. Regularly identify roles where competition laws are relevant and ensure employees are trained.
2. Mandatory online training on competition law for executive officers and key employees.
3. Investigate and address allegations of anti-competitive practices.
4. Terminate contracts with third parties found breaching this policy.

Monitoring and Reporting:

1. Employees are encouraged to report suspicions of anti-competitive practices through the Whistle-Blower Policy.
2. No adverse actions will be taken against employees reporting in good faith.
3. Retaliation concerns must be escalated to HR, CFO, or the Managing Director.

Implementation Approach:

1. All employees must acknowledge receipt of this policy, agree to abide by it, and report potential violations.
2. HR will facilitate training and communication to ensure compliance.

Administration and Review:

The Anti-Competitive Policy will be reviewed periodically to ensure compliance and effectiveness:

1. The Managing Director will oversee the administration and revision of this policy.
2. The policy will be reviewed periodically and revised as needed to align with regulatory and business developments.

References:

- Competition Act, 2002 (India)
- Applicable Local and International Competition Laws
- ISO 37001: Anti-Bribery Management Systems
- Solara's Whistle-Blower Policy

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.