

Anti-Bribery and Anti-Corruption Policy

1) Introduction

Banka BioLoo Limited (“Company”) is committed to setting-up utmost standards of transparency and accountability in all its affairs. The Company strives to attain its mission through compliance of high legal and ethical standards. The Company does not tolerate any form of bribery, embezzlement, or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.

2) Purpose

The purpose of this policy is to set out the responsibilities of the Company and those individuals, acting on its behalf, in observing and upholding the Company’s position on bribery and corruption. Every individual or group of individuals, associated with the Company in any form, whether the staff members, the ad-hoc staff engaged in the program activities of the organization, the consultants, the contractors, the interns, the partner organisations, and any other party with a financial or trustee-beneficiary relationship with the Company, is expected to share this commitment. The basic objective of this statement is setting out the policy of the Company towards the prevention and identification of bribery and corruption, and certain procedures to be followed, if at all, any fraud is found or having an idea / impression of its existence.

3) Scope

This policy applies to the staff members, ad-hoc staff, advisers, consultants, suppliers, partners and Individuals, acting on behalf of the Company, irrespective of their location.

4) Statement

The Company will not engage in bribery or any form of unethical inducement or payment, including facilitation payments. All the Staff, Ad-hoc staff, advisers, consultants, suppliers, partners and Individuals, acting on behalf of the Company are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of the Company.

The Company expects its suppliers and partners to act with integrity and without thought or actions involving bribery and/or corruption, and will, where appropriate, include clauses to this effect in relevant contracts.

5) Prohibited Activities

It is prohibited, directly or indirectly, for any staff member or individual, acting on behalf of the Company to offer, give, request or accept any bribe (i.e. gift with mala-fide intention, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any person, or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

This policy requires employees and individuals acting on behalf of the Company:

- Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone;
- Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers;
- Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by the Company in the ordinary course of business;
- To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers;
- Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. The Company will not tolerate or condone such payments being made;
- To report any breaches of this policy's principles or standards or of any associated.

6) Criminal Offence (as defined in IPC)

- It is a criminal offence to:
 1. Offer a bribe
 2. Accept a bribe
 3. Fail to prevent a bribe (only applies to commercial organisations)
- Staff members, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of the Company should be made aware that if they are found guilty by a court, of committing bribery, embezzlement or fraudulence, an individual could face prosecution as per the norms of IPC (Indian Penal Code).

7) Gifts and Hospitality

The Company realises that giving and receiving of gifts and hospitality without any mala-

hide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery, and consequently, such actions are not considered a breach of this policy.

8) Raising a Concern

- If an employee or an individual acting on behalf of the Company is offered a bribe, or a bribe is solicited from them, they should not agree to it, unless their immediate safety is in jeopardy. Should this be the case, the employee or individual should, at first instance, contact the Unit/Centre In-charge as soon as one is able to. The employee or individual may be required to give a written account of the events to assist with any investigation. If any Unit/Centre In-charge is involved in such an act, the individual may contact Executive Officer for reporting the case, and likewise if the concerned Executive Officer is involved in such an act, the individual may directly contact the Director of the Company for reporting such case.
- Employees or individuals, acting on behalf of the Company, are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage. The employee or individual raising a concern can do so in confidence and without fear of reprisal. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against, in any way, as a result of reporting a concern in good faith.
- If any instance of bribery or corruption is identified; the Company management will take the remedial steps, immediately. The Company has its own system of investigating its staff members for violation of service conduct, including financial irregularities, corruption, fraud or embezzlement. If the charges are proved, the delinquent may be awarded penalties, depending on the gravity of misconduct.

These rules are based on the following principles:

- a) The right of The Company to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.
- b) At the same time, the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
- c) The emphasis of disciplinary action is on prevention, justice and rehabilitation.

9) **Review of this Policy**

In the interests of maintaining best practice, the contents of this Policy will be reviewed by the Board every three years.

10) **Reporting and Investigation**

- An individual can report at three levels, as indicated below:
 - Centre in-charge (CIC) / Executive Officer (EO) at primary level;
 - Director at secondary level, in case if the concerned Executive Officer (EO) and/or Centre In-charge is involved in such an act.

- Investigation:
 - Executive Council (EC) will form a committee to investigate;
 - Governing Body will have the discretion to form a committee to investigate, in such a case where any member(s) of the Executive Council is involved in the act.

This policy was adopted by the Board of Directors, in their meeting held on 27 July 2020.
