



**Pharmanza Herbal Pvt. Ltd.**  
Plot No 214, BorsadTarapur Road, Kaniya-388435

“Anti-Bribery and Corruption Policy” -  
Pharmanza Herbal Pvt. Ltd.

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	Verified By	Approved By
Signature		
Date	01/08/2023	01/08/2023
Name	Vinit Thakkar	Dr. Lal Hingorani
Designation	HR Manager	Technical Director



## 1. OVERVIEW

Pharmanza Herbal Pvt. Ltd. is committed to conducting its business with the highest ethical standards, integrity, and transparency. Bribery and corruption are detrimental to our values and our reputation. This Anti-Bribery and Corruption Policy outlines our commitment to prevent, detect, and address bribery and corruption in all our operations and relationships.

## 2. SCOPE

This Policy applies to all employees, directors, officers, contractors, agents, suppliers, and other business partners associated with Pharmanza Herbal Pvt. Ltd. It covers all aspects of our business activities, whether conducted domestically or internationally.

## 3. POLICY

Pharmanza Herbal Pvt. Ltd. prohibits any form of bribery or corruption in our operations. We are committed to:

**3.1. Zero Tolerance:** Pharmanza Herbal Pvt. Ltd. has a zero-tolerance approach to bribery and corruption in all its forms, whether involving public officials, private individuals, or organizations.

**3.2. Compliance with Laws:** We will comply with all applicable anti-bribery and corruption laws and regulations.

**3.3. Gifts and Hospitality:** We recognize that legitimate business gifts and hospitality are a customary part of building relationships. However, these should not be used as a cover for bribery. All gifts and hospitality must be transparent, reasonable, and within the bounds of local laws and industry standards.

**3.4. Political Contributions:** Pharmanza Herbal Pvt. Ltd. will not make political contributions, either directly or indirectly, to any political party, candidate, or public official in a manner that could be perceived as an attempt to influence improper conduct.

**3.5. Third-Party Due Diligence:** We will conduct due diligence on third parties, including suppliers, agents, and distributors, to ensure they adhere to similar anti-bribery and corruption principles.

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**3.6. Reporting and Whistleblowing:** We encourage all employees and stakeholders to report any suspected or actual breaches of this Policy. Pharmanza Herbal Pvt. Ltd. will protect whistleblowers and maintain confidentiality.

**3.7. Consequences:** Violation of this Policy will result in disciplinary action, which may include termination of employment or business relationships. Legal action may also be pursued against those involved in corruption or bribery.

**3.8. Corrupt Payments:** Pharmanza Herbal Pvt. Ltd. employees and any third party acting for or on behalf of Pharmanza Herbal Pvt. Ltd., shall not, directly or indirectly, promise, authorize, ratify or offer to make or make any "payments" of "anything of value" to any individual including a "government Official" for the improper purpose of influencing or inducing or as a reward for any act, omission or decision to secure an improper advantage or to improperly assist the company in obtaining or retaining business.

**3.9. Government Officials:** Although Pharmanza Herbal Pvt. Ltd.'s policy prohibits payments by Pharmanza Herbal Pvt. Ltd. or third parties acting for or on its behalf to any individual, private or public, as a "quid pro quo" for business, due to the existence of specific anticorruption laws in the countries where we operate, this policy is particularly applicable to "payments" of "anything of value", or at the request of, "government officials".

**3.10. Facilitating Payments:** for the avoidance of doubt, facilitating payments (otherwise known as "greasing payments" and defined as payments to an individual to secure or expedite the performance of a routine government action by government officials) are no exception to the general rule and therefore prohibited.

## 4. Responsibilities

**4.1. Senior Management:** Senior management is responsible for setting the tone from the top, establishing, and communicating anti-bribery and corruption policies, and providing necessary resources for their implementation.

**4.2. Employees and Associates:** All employees and associates are responsible for understanding and complying with this Policy and reporting any concerns or violations promptly.

## 5. Training and Awareness

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Pharmanza Herbal Pvt. Ltd. will provide training and awareness programs to employees and associates to ensure they understand the risks of bribery and corruption and their responsibilities under this Policy.

## 6. Monitoring and Review

The Company will periodically review and update this Policy to reflect changes in laws, regulations, and business practices. Continuous monitoring and assessment of its effectiveness will also be conducted.

## 7. Conclusion

Pharmanza Herbal Pvt. Ltd. is committed to conducting its business with the utmost integrity, transparency, and compliance with anti-bribery and corruption laws. This Policy reflects our determination to uphold these principles and protect our reputation as a responsible and ethical organization.

By adhering to this Policy, we ensure that Pharmanza Herbal Pvt. Ltd. remains a trusted partner, employer, and contributor to society.

## 8. Applicable

This scheme will be effective from 1<sup>st</sup> of August 2023.

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