



ETHICAL GOVERNANCE POLICY

AMI LIFESCIENCES PVT LTD

Driven by Chemistry, Powered by People

INTEGRATED GOVERNANCE POLICY

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INTRODUCTION

Recognizing the importance of ethical conduct in shaping the future of business and society, Ami Lifesciences Pvt Ltd embraces a deep commitment to Ethical Governance as a cornerstone of our corporate ethos. We understand that ethical governance is not merely a compliance mandate but a fundamental aspect of responsible corporate behavior, crucial for sustainable growth and long-term stakeholder trust.

At Ami Lifesciences, our approach to Ethical Governance is embedded in our overarching Integrated Governance Policy. This policy underscores our dedication to maintaining the highest standards of integrity and accountability in all our business dealings. We are committed to addressing key governance issues including but not limited to Corruption, Anticompetitive Practices, and Responsible Information Management.

To combat these challenges effectively, we have adopted a proactive stance, implementing innovative measures that adhere to the principles of Anti-Corruption, Anti-Competitive Practice, and Information Security. Our strategies are designed to not only meet but exceed the current regulatory requirements, setting a new benchmark for ethical conduct in our industry.

SCOPE

This Policy is applicable to below mentioned locations and its applicable to all its employees, Customers, Suppliers, Partners, Contractors, Sub-contractors, and other Stakeholders who are directly and indirectly associated with the company:

Sr. No.	Site	Address
1	Ami Lifesciences Pvt Ltd [Corporate Office]	701 to 710, 7th Floor, 1038 Lilleria, Gotri-Sevasi Road, New Alkapuri, Vadodara, Gujarat – 390021
2	Ami Lifesciences Pvt Ltd [Manufacturing Unit]	Block No.82/B, ECP Road, At & Post. Karakhadi-391450 Taluka: Padra Dist.: Vadodara Gujarat, INDIA.
3	Ami Lifesciences Pvt Ltd [Marketing Office]	305, 3rd Floor, Nitco Biz Park, Rd Number 16U, Nehru Nagar, Wagle Industrial Estate, Thane West, Thane, Maharashtra 400604

POLICY STATEMENT

We pledge to maintain an unwavering commitment to ethical practices, ensuring fairness, honesty, and accountability in our dealings with all stakeholders, including employees, customers, suppliers, and the communities in which we operate. This commitment is reflected in our robust policies and procedures that govern corporate conduct, anti-corruption measures, fair competition, responsible information management, and stakeholder engagement.

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PRINCIPLES

Anti-Corruption (including Bribery, Fraud & Conflict of interest)

- **Zero Tolerance Policy:** We strictly prohibit any form of corruption, bribery, conflict of interest, fraud or unethical financial practices in all business operations.
- **Due Diligence and Transparency:** Rigorous due diligence is conducted in all transactions, especially those involving third parties, to ensure transparency and ethical conduct.
- **Training and Awareness:** Regular training programs are implemented to educate employees about anti-corruption laws and our internal policies, fostering a culture of integrity.
- **Monitoring and Enforcement:** Continuous monitoring and enforcement mechanisms are in place to detect and address any corrupt practices promptly and effectively.

Money Laundering

- We are committed to complying fully with all applicable Anti-Money Laundering laws in the conduct of our businesses. We shall comply with all applicable anti-money laundering, anti-fraud and anti-corruption laws, and we shall establish processes to check for and prevent any breaches of such laws".
- We conduct business only with reputable customers who are involved in legitimate business activities and whose funds are derived from legitimate sources. Our Company is also committed to cooperating with law enforcement and regulatory agencies enforcing anti-money laundering laws and regulations.
- It applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with our Company.

Anti-competitive Practices

- **Compliance with Competition Laws:** We adhere to all applicable antitrust and competition laws, ensuring our business practices promote fair competition.
- **Market Integrity:** We engage in business practices that support market integrity, avoiding actions that could be construed as market manipulation or unfair competition.
- **Employee Education:** Employees, especially in sales and marketing, are educated about the importance of upholding fair competition standards, competitor interaction.
- **Regular Audits and Assessments:** Conducting periodic audits and assessments to ensure compliance with anticompetitive practice laws and internal policies.

Information Security

- **Data Protection and Privacy:** We are committed to protecting the confidentiality, integrity, and availability of all data and information, adhering to the highest standards of data protection and privacy.
- **Cybersecurity Measures:** Implementing robust cybersecurity measures to safeguard against unauthorized access, data breaches, and cyber threats.

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- **Employee Training and Compliance:** Regular training on information security protocols and compliance requirements for all employees, especially those handling sensitive data.
- **Incident Response and Management:** Establishing a comprehensive incident response plan to manage and mitigate any data security incidents effectively.

Stakeholder Engagement

- **Open and Transparent Communication:** We believe in maintaining open, honest, and transparent communication with all our stakeholders.
- **Feedback and Dialogue:** Regularly engaging with stakeholders to solicit feedback, understand their concerns, and incorporate their insights into our business practices.
- **Reporting and Accountability:** Providing regular reports on our ethical governance practices, including updates on initiatives and progress towards goals.
- **Community Involvement and Social Responsibility:** Actively involving ourselves in community initiatives and social responsibility projects, demonstrating our commitment to societal well-being beyond our business operations.

OUR GOALS

1. Anti-Corruption, Bribery, Conflict of Interest and Fraud Prevention

Achieve a zero-tolerance environment for corruption, bribery, Conflict of interest and fraud.

2. Conflict of Interest Management

Ensure transparent management of conflicts of interest among employees and stakeholders.

3. Money Laundering Prevention

Establish effective anti-money laundering (AML) measures.

4. Anti-Competitive Practice Avoidance

Promote fair competition, free from anticompetitive practices. Educate the employees for competitor interaction.

5. Information Security and Data Protection

Safeguard sensitive data, ensuring the highest standards of information security.

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TARGETS

1. Anti-Corruption, Bribery, Conflict of Interest and Fraud Prevention

- Aim Zero in Anti-Corruption, Bribery, Conflict of Interest & Fraud Incidents.
- Whistleblower Reporting: Ensure that 100% reported cases of corruption, bribery, Conflict of interest or fraud are promptly investigated and resolved within established time frames.

2. Conflict of Interest Management

- Conflict Disclosure Rate: Achieve a 100% compliance rate for employee conflict of interest disclosures by the end of every year.
- Conflict Resolution: Establish a process to address conflicts of interest transparently and objectively, with a goal of resolution within 30 days.

3. Money Laundering Prevention

- AML Compliance: Achieve 100% compliance with Anti-Money Laundering (AML) regulations, including regular reporting to regulatory authorities.
- Suspicious Activity Reports (SARs): Ensure that 100% of employees are trained on Whistle Blower Policy to identify and report suspicious activities by 31st March 2028.

4. Anti-Competitive Practice Avoidance

- Antitrust Training: Ensure that 100% of employees are trained on Anti-Competitive Practice avoidance by 31st March 2028.
- Aim to Maintain zero Anti-Competitive Practice case.

5. Information Security and Data Protection

- Cybersecurity Training: Ensure that 100% of employees complete annual cybersecurity training to enhance awareness and readiness by 31st March 2028.
- Target Zero Numbers of confirmed information security incidents.
- ISO 27001 Information Security, cyber security and privacy protection shall be implemented by 31st March 2028.

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RESPONSIBILITY ALLOCATION

The designated members of Ami Lifesciences Pvt Ltd.'s Environment, Social, and Governance (ESG) committee, formed for the purpose of ensuring the effective implementation of sustainability practices within the company premises, are assigned the following responsibilities as outlined in this policy:

1. ESG Committee

Responsibility: Oversee and coordinate all aspects of Ethical Governance, including the development and implementation of policies, procedures, and compliance initiatives.

Specific Roles:

- **Chairperson:** Provides overall leadership and direction to the Stakeholders.
- **Compliance Officer:** Monitors and enforces compliance with ethical standards and regulations.
- **Legal Counsel:** Provides legal guidance and ensures policies align with applicable laws.
- **Chief Information Security Officer (CISO):** Oversees information security and data protection measures.
- **Chief Financial Officer (CFO):** Ensures compliance with financial regulations, anti-money laundering, and fraud prevention.
- **HR Director:** Manages conflict of interest disclosures and training initiatives.
- **Chief Audit Executive:** Conducts regular audits to evaluate adherence to ethical governance standards.

2. Departmental Heads

Responsibility: Implement and enforce Ethical Governance policies and procedures within their respective departments.

Specific Roles:

- **Finance Manager:** Ensures compliance with financial regulations, anti-money laundering, and fraud prevention within the finance department.
- **IT Manager:** Implements information security measures and safeguards data within the IT department.
- **Sales and Marketing Manager:** Ensures adherence to antitrust and anti-competitive practice regulations within the sales and marketing department.
- **HR Manager:** Manages conflict of interest disclosures and ensures employees complete required training.

3. Employees

Responsibility: Adhere to all Ethical Governance policies, participate in training programs, and promptly report any unethical behavior or violations.

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Specific Roles:

- Complete required training programs on topics related to ethical governance.
- Report any instances of corruption, fraud, conflicts of interest, anticompetitive practices, or information security breaches to the appropriate channels.

4. Whistleblower Reporting System

Responsibility: Provide a secure and anonymous channel for employees and stakeholders to report unethical behavior.

Specific Roles:

- Maintain a system for receiving and documenting whistleblower reports.
- Ensure that reported cases are promptly investigated and resolved following established procedures.

5. External Auditors and Regulators

Responsibility: Conduct audits and investigations to assess the company's compliance with ethical governance standards.

Specific Roles:

- Audit the company's financial records, information security practices, and adherence to anti-corruption, antitrust, and other regulations.
- Provide feedback and recommendations for improvement.

GUIDELINES

1. Employees

- All employees must act with honesty, integrity, and transparency in all business interactions.
- Avoid engaging in any form of corrupt practices, including accepting or offering bribes.
- Report any unethical behavior, conflicts of interest, or policy violations promptly. Strictly adhere to the Ethical Governance policy, including anti-corruption, antitrust, dataprotection, and conflict of interest provisions.
- Seek guidance from the compliance department if uncertain about policy compliance in specific situations.
- Employees are encouraged to report any suspected policy violations or unethical behavior through the confidential whistleblower reporting channels.
- No retaliation will be tolerated against employees who make legitimate reports.
- Complete mandatory training on ethical governance topics and stay updated on policy changes and updates.

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2. Management and Department Heads

- Set a strong example of ethical behavior and promote ethical conduct within their teams.
- Foster an environment where employees feel comfortable reporting concerns or violations.
- Ensure that all team members are aware of and understand the policy's requirements.
- Monitor and enforce policy adherence within their respective departments.
- Address conflicts of interest, ethical concerns, or policy violations within their teams promptly and impartially.
- Seek guidance from the compliance department when handling complex issues.
- Ensure that employees under their supervision complete mandatory training on ethical governance topics.

3. Suppliers

- Suppliers are expected to conduct their business with Ami Lifesciences Pvt Ltd with honesty, integrity, and adherence to ethical standards.
- Avoid engaging in any corrupt practices, including bribery or kickbacks.
- Suppliers must comply with Ami Lifesciences Pvt Ltd's Ethical Governance policy and any specific ethical requirements outlined in contracts or agreements.
- Suppliers are encouraged to report any unethical behavior, including violations of the Ethical Governance policy, through the designated reporting channels.

4. Customers

- Customers are expected to engage in fair and ethical business practices when dealing with Ami Lifesciences Pvt Ltd. Avoid requesting or accepting any unethical favors or benefits.
- Customers must adhere to any ethical requirements outlined in contracts, agreements, or terms of service with our company. Customers are encouraged to report any unethical behavior or concerns related to our products or services through the designated reporting channels.

REVIEW MECHANISM

The Policy will undergo regular reviews to assess its relevance and effectiveness. The review

frequency is as follows:

- **Every 03 Years Review:** A comprehensive review of the policy will be conducted during a period of 03 Years.

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- **Ad Hoc Reviews:** Ad hoc reviews may be initiated in response to significant changes in regulations, emerging sustainability risks, or feedback from stakeholders.
- 1. **Data Collection:** Relevant data on Ethical practices, policy compliance, and sustainability performance will be collected from internal sources, various internal/external audit reports, stakeholder feedback and employees survey.
- 2. **Assessment:** The collected data will be assessed to evaluate the policy's effectiveness in achieving its objectives. Key performance indicators (KPIs) will be analyzed to gauge progress.
- 3. **Feedback:** Feedback from employees, suppliers, customers, and other stakeholders will be considered during the review process. Input will be gathered through surveys, interviews, and engagement forums.
- 4. **Legal and Regulatory Compliance:** The policy will be assessed for alignment with evolving Ethical Governance regulations and standards.
- 5. **Identification of Gaps and Opportunities:** Any gaps in policy implementation or emerging opportunities for improvement will be identified.
- 6. **Policy Updates:** Based on the assessment, identified gaps, stakeholder feedback, and regulatory changes, updates and revisions to the Ethical Governance Policy will be proposed.
- 7. **Approval:** Proposed updates will undergo an internal approval process involving key stakeholders, including the Sustainability Committee and senior management.
- 8. **Communication:** Once approved, the updated policy will be communicated to all relevant stakeholders, including employees, suppliers, customers and partners.
- 9. **Implementation:** The revised policy will be implemented, and stakeholders will be educated on any changes to ensure smooth compliance.
- 10. **Monitoring:** Ongoing monitoring and assessment of policy implementation will continue to track progress and address emerging issues.

APPROVED BY:



DIRECTOR

NEXT REVIEW DATE: 01.05.2026

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