

# Syngene's Anti-Bribery Anti-Corruption Statement

*From CFOs desk*



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*“Corruption is not only an impediment to sustainable growth but also a challenge to the credibility of an organization. Syngene values ethical behaviour and financial integrity. We are committed to the highest standards of compliance with respect to all national and international anti-bribery and anti-corruption laws.”*

## Syngene's Statement on Bribery and Corruption

What?	Who?	How?
<ul style="list-style-type: none"> <li>• Conducting our business in an honest and ethical manner.</li> <li>• Zero-tolerance to Bribery and Corruption.</li> </ul>	<p>All persons working for us or any Group Company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.</p>	<ul style="list-style-type: none"> <li>• We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.</li> <li>• We will not give, promise to give, or offer, a payment, gift, hospitality or other benefit with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.</li> <li>• We will not accept a payment, gift or hospitality from a third party that is lavish or is believed to have been offered with the expectation of a business advantage for them or anyone else in return.</li> <li>• We will not offer or accept a gift to or from government officials or representatives, or politicians or political parties.</li> <li>• We do not make, and will not accept, facilitation payments or “kickbacks” of any kind.</li> <li>• We will not threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this Statement.</li> <li>• We will not engage in any other activity that might lead to a breach of this Statement.</li> </ul>

As an organization driven by ethics and fairness, Syngene is committed to conducting its business activities in accordance with all applicable laws and regulations that prohibit bribery or corruption such as the Prevention of Corruption Act, 1988, U.S. Foreign Corrupt Practices Act (“FCPA”), and U.K. Bribery Act and all other anti-bribery laws of the countries where Syngene and its client operate. This prohibition against bribery and corruption is a cornerstone of Syngene’s commitment to conducting business in an ethical manner, which is one of the core values reflected in Syngene’s Code of Ethics and Business Conduct. Syngene expects all its employees and business partners to abide by this Anti-bribery Anti-corruption standards.

## What amounts to Bribery?

A bribe could involve any direct or indirect promise, offer, authorisation, or provision of anything of value, the offer or receipt of any kickback, loan, fee, commission, reward, or other advantage, including contributions or donations designed or stipulated to influence the recipient to act in the giver's favor. The purpose of a bribe is often to obtain, retain or "facilitate" business, where the person receiving the bribe is, or may be, in a position to provide that kind of business advantage to the party offering the bribe.

Bribery is a crime in most countries where Syngene and its clients operate. Financial penalties for such offences can be severe, including prison sentences for the person involved. The laws relating to bribery and corruption applies across the borders and Syngene including its suppliers performing services to its clients can jointly and individually be held liable for any such offences. Antibribery laws not only makes the act of paying or taking a bribe illegal, but also holds companies liable for failing to take steps to prevent bribery by those working on its behalf, like it's employees, subsidiaries, agents, contractors, suppliers and intermediaries.

### Thumb rule for determining if gifts and hospitality expenses are appropriate

- **Bona fide:** A gift or hospitality must be made for the right reason. It should be given clearly as an act of appreciation and for bona fide business purpose.
- **No obligation:** The activity will not create any obligation or expectation on the recipient.
- **No undue influence:** The expenditure will not be seen as intended for, or capable of, achieving undue influence in relation to a business transaction or public policy engagement.
- **Made openly:** It will not be performed in secret and be undocumented – if it is, then the purpose becomes questionable.
- **Legality:** It is compliant with relevant laws.
- **Accords with stakeholder perception:** The activity would not be viewed unfavorably by stakeholders were it made known to them.
- **Proportionate:** The value and nature of the expenditure is not disproportionate to the occasion.
- **Conforms to the recipient's rules:** The gift, hospitality or reimbursement of expenses will meet the rules or code of conduct of the recipient's organisation.
- **Infrequent:** The giving or receiving of gifts and hospitality is not overly frequent between the giver and the recipient.
- **Documented:** The expense will be fully documented including purpose, approvals given and value.

### When an offering of hospitality is considered as an offence?

Bona fide hospitality and promotional or other business expenditure, which seeks to promote our brand, to better present products and services, or to establish cordial relations, is recognized as an established and important part of doing business. Hospitality, entertainment, or other business expenses provided to business partners and customers for are permitted, as long as they are reasonable and proportionate.

However, any hospitality intended to influence the outcome of any business transaction will be considered as an offence under applicable antibribery and anti-corruption laws.

### When giving and receiving of gifts is considered bribery in disguise?

In many countries where Syngene does business there are generally accepted customs regarding the exchange of business gifts to strengthen business relationships. Syngene generally permits the giving and receiving of business gifts of nominal value that are customary business courtesies and are reasonable in value and frequency.

### Facilitation Payments

Facilitation payments deals with payments made to government officials, foreign official, political party or other administrative personnel to expedite or to secure governmental approvals". They are illegal under all laws on anti-bribery and anti-corruption and prohibited by Syngene Policy. No Syngene employee, agent or third party acting on Syngene's shall offer to make, or make, a facilitation payment.

## Protection

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If you believe that you have suffered or witnesses any such treatment, you should inform your manager or approach the ABAC Committee / Integrity Committee immediately.

## Not meeting these standards

- Any employee fails to comply with this standard will face disciplinary action per the ABAC policy.
- Any non-compliances to these standards by any other third-party business partners may result in termination of the relationship and Syngene may initiate appropriate legal proceedings.

## Your Responsibilities

- You must ensure that you read, understand and comply with this Statement.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Statement.
- You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a customer or potential customer offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption and examples are set out in our Anti-bribery Anti-corruption Policy.
- If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager or the legal team.
- Our zero-tolerance approach to Bribery and Corruption must be communicated to all vendors, suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate.
- Kindly read the full Policy on Anti-bribery and Anti-corruption.