



Natco Pharma Limited

Regd. Off. : 'NATCO HOUSE', Road No. 2, Banjara Hills, Hyderabad - 500034.
Telangana, INDIA. Tel : +91 40 23547532, Fax : +91 40 23548243
CIN : L24230TG1981PLC003201, www.natcopharma.co.in

Anti-Corruption/Anti-Bribery Policy

NATCO Pharma Limited (herein after referred to as "The Company," "We," "Us," "Our"), is committed towards conducting its business in accordance with the applicable laws, rules, and regulations and with the highest standards of business ethics, integrity, and transparency.

Purpose:

This policy is intended to provide guidance and help in recognizing and dealing with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability. All employees, contractors, suppliers, and relevant parties must agree to abide by the principles mentioned in this policy.

Scope and Applicability:

This policy shall be applicable to all the employees of Company, including contractors, suppliers, business partners, third parties, and associates across the business units. The Company expects all the personnel acting on behalf of NATCO Pharma Limited to comply with all the elements in this policy.

Compliance with Laws, Rules, and Regulations

All employees shall comply with all applicable laws, rules, and regulations.

Prohibited Conduct:

- a) Bribery: Employees must not offer, promise, give, request, or accept any bribes, kickbacks, or other improper payments or benefits to or from any person or entity, including government officials, customers, suppliers, and competitors, or on any portion of contract payments.
- b) Corruption: Engaging in any corrupt practices, including fraud, embezzlement, extortion, or money laundering, is strictly prohibited.
- c) Gifts and Hospitality: Receiving or offering or making any direct/indirect illegal payments, gifts, grants, donations, or any benefits / gratifications which are intended to obtain business or unethical favors, except nominal gifts which are customary in nature or associated with festivals is prohibited.
- d) Manipulation and Concealment: Taking unfair advantage of anyone through manipulation, concealment, abuse of confidential, proprietary or trade secret information, misrepresentation of material facts, or any other unfair dealing-practices is prohibited.

Mitigating Risks: Protocols for Assessment, Internal Controls, and Violation Reporting

Employees are encouraged to report any suspected violations of this policy promptly and confidentially to their supervisor, the Compliance Officer, or through the Company's anonymous reporting channels.



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To maintain highest standards, the Company has a Vigil Mechanism/ Whistle Blower Policy which serves as a mechanism for its employees to report genuine concerns about unethical behavior, actual or suspected fraud or violation of the Anti-Corruption and Anti-bribery policy without any consequential fear. For further details, please refer to the [Vigil Mechanism / Whistle Blower Policy](#).

If any employee knows of or suspects of a violation of applicable laws, rules or regulations or this policy, he/she must immediately report the same to the supervisor or any Designated Person/Committee thereof. While reporting the issue, the employee should provide the details of suspected violations with all known particulars relating to the issue. Based on the complaint/grievance received, efforts will be made to resolve such problems or concerns satisfactorily.

Violations of this policy will result in disciplinary action, against the concerned employee. The Company's Designated Committee/Person for this purpose shall determine appropriate action in response to violations of this policy.

Training and Awareness:

Regular training programs will be provided to educate employees and relevant stakeholders about their obligations under this policy and applicable anti-corruption and anti-bribery laws, regulations, and practices. All employees, officers, board members, and third parties working with the Company must be aware of this policy and adhere to the latest version of the policy.

Review:

This policy shall be reviewed annually and updated for its sustainability.

Date: 12/08/2024

Rajeev Nannapaneni
CEO & Vice Chairman