



**BRIBERY AND FACILITATION PAYMENT POLICY**


Effective Date: 11<sup>th</sup> January 2023

Version: 02

**BRIBERY AND FACILITATION  
PAYMENT POLICY**

of

**Marksans Pharma Limited**

Prepared by (Sign /Date)	Reviewed by (Sign /Date)	Approved by (Sign /Date)
 11/01/2023	 11/01/23	 18/01/2023



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### Introduction

This policy emphasizes Marksans zero tolerance approach to bribery and corruption. It establishes the principles with respect to applicable Anti-Bribery and Anti-Corruption laws. The policy provides information and guidance on how to recognize and deal with bribery and corruption issues. It guides us to act professionally, fairly and with utmost integrity in all our business dealings and relationships, wherever we operate.

### 1. Governance

- i. General Manager - HR shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time.
- ii. Any changes to this Policy shall be tracked and documented for future reference and all changes shall be performed by the General Manager – HR.
- iii. General Manager – HR shall monitor the effectiveness and review the implementation of the compliance principles set forth in this Policy, regularly considering its suitability, adequacy, and effectiveness.
- iv. Associates are responsible for the successful implementation of the principles set forth in this policy and should ensure they use it to disclose any suspected concern or wrongdoing.
- v. Any violation of this policy may have significant consequences, including potential prosecution, fines, and other penalties for improper conduct, as well as imprisonment and/or disciplinary action up to and including termination of the concerned.

### 2. Scope and Applicability

- i. The principles set forth in this policy are applicable to all Associates and Business Partners across Marksans Entities. It is, therefore, the responsibility of all Associates and Business Partners to follow and adhere to all elements described in the Policy.



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### 3. Policy Framework

#### 3.1. Bribe, Facilitation Payments or Kickbacks

- i. Marksans prohibits all forms of bribery and corruption whether involving, but not limited to, Government Official or a private sector person or company and whether directly or indirectly.
- ii. Marksans conducts its business lawfully and ethically and expects everyone associated with it to conduct its business with integrity regardless of the existence of any local customs or traditions that may question integrity.
- iii. No Associate shall ever directly or indirectly offer or pay, or authorize an offer or payment, of money or anything of value to a government official, Healthcare Professionals, or any other person or entity (including in the private sector), which is:
  - Intended to influence the judgment of the recipient in exercising his or her job responsibilities, or
  - Intended to secure preferential treatment or an improper advantage for Marksans, or
  - Intended as gratification for the recipient having decided or acted in a way that benefited Marksans.
  - Directly or indirectly request or accept any money or item of value, which is:
    - Intended to influence the judgment or conduct of an Associate in his or her job responsibilities, or
    - Intended as gratification for a decision or act in a way that benefits the person or entity giving the item of value.
- iv. Marksans (or any of its Associates) does not make or accept, Facilitation Payments or Kickbacks of any kind. All Associates must avoid any activity that may lead to or suggest that a Facilitation Payment or Kickback will be made or accepted by Marksans.
- v. If any Associate is asked to make a payment on behalf of Marksans, he/she should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Associate should always ask for a receipt that details the reason for the payment. If case of any suspicion, concern, or query regarding a payment, raise these with the General Manager – HR without delay or hesitation.