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|  Lee Pharma Limited | LEE PHARMA LIMITED | | |
| | Reg Office: SY. No. : 257 & 258/1, Door No : 11-6/56-C, Opp : IDPL Factory, Moosapet, Balanagar (Post), Hyderabad – 500 037, India | | |
| | TITLE: Policy on Anti-Corruption and Anti-Bribery | | |
| | Policy No: LPHRGNP-18-00 | Effective Date: 01-04-2025 Review Date: 31-03-2027 | Page 1 of 4 |

1. Introduction

This document specifies the Anti-Corruption and Anti-Bribery for Lee Pharma. The company's objective is to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery, corruption and are committed to act professionally, fairly and with integrity in all our business dealings and relationships.

All stakeholders representing Lee Pharma or acting on our behalf are prohibited from engaging in any bribery or potential bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties. If any stakeholder suspects or becomes aware of any potential bribery involving the Company, it is the duty of that associate to report their suspicion or awareness to Lee Pharma Limited.

Bribery is a serious criminal offence in countries in which the Company operates. Bribery offences can result in the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage.

We therefore take our legal responsibilities very seriously. In the event of any conflict between the provisions of this policy and any other statutory enactments / rules, the provisions of such statutory enactments / rules shall prevail over this Policy.

2. Objective

The objective of this policy is to:

- Set out our responsibilities to comply with laws against bribery and corruption;
- Provide guidance on how to recognize and deal with bribery and corruption issues.

The Company will undertake a periodic bribery and corruption risk assessment across its business to understand the potential risks and ensure it has adequate measures in place for an identified risk. The risk assessment will be documented and periodically reviewed, and the appropriate committee of the Board of Directors of the Company is updated on yearly basis.


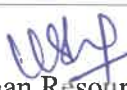
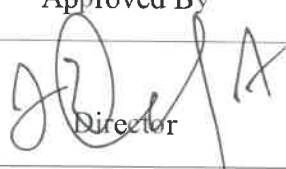
3. Scope

The policy is applicable to:

- Both executive and non-executive Directors of the company
- All associates of the company on permanent and contract role
- Third party - suppliers, distributors, business contacts, agents, advisors, business associates, current and potential customers and others acting on the Company's behalf.

4. Definition of Bribery

Bribery refers to offering, promising, or receiving any benefit—such as gifts, hospitality, money, or favors—to influence someone to act dishonestly, unlawfully, or in breach of trust or duty in their

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|  Human Resources |  Human Resources |  Director |



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professional or public role. It also includes enabling or allowing others, including third parties, to engage in such conduct.

It is not acceptable to:

- Offering or promising any benefit to a government official to speed up or reward an action is prohibited.
- Accepting money from a third party with the knowledge or suspicion that it's meant to gain a business advantage is not allowed.
- Encouraging someone else to engage in bribery or any prohibited act under this policy is unacceptable.
- Retaliating against anyone who refuses to participate in bribery or who reports concerns is strictly forbidden.
- Giving or receiving gifts that may violate this policy or applicable laws is not permitted.
- Participating in any conduct that could lead to a breach of this policy is prohibited.

5. Gifts and Hospitality

Business hospitality is allowed if it is modest, appropriate, and aimed at promoting company goodwill or relationships. All gifts and hospitality must be approved by management and anything involving government officials must be cleared by legal.

Associates must not offer or accept gifts or hospitality meant to improperly influence decisions or create a sense of obligation. Gifts should be occasional, and culturally appropriate. Cash or equivalents, unethical gifts, or personal payments that tend to bypass policy are strictly prohibited.

Unsolicited low-value promotional items may be accepted if unconditional. If unsure, associates must consult their manager and record the gift.


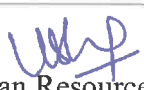

The company will maintain procedures to ensure compliance with anti-bribery and ethical standards.

6. Facilitation Payments and Kickbacks

Lee Pharma strictly prohibits giving or receiving facilitation payments or kickbacks. These are unofficial payments made to speed up routine tasks or secure business favors. Associates must avoid any actions that could lead to such payments. Before making any payment on behalf of the company, ensure it's legitimate, necessary, and proportionate to the goods or services provided.

7. Lobbying

An attempt to influence legislation directly or indirectly through interaction with the government official may be considered as lobbying. Any meetings with government should be conducted in compliance with the applicable laws.

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8. Donations

Lee Pharma may make donations only if they are ethical, transparent, and comply with this policy and applicable Indian laws. All donations must be properly approved by senior management and accurately recorded to ensure accountability and compliance with anti-bribery standards.

9. Sponsorships

The company may extend sponsorship only for a legitimate purpose to a bona fide recipient and in compliance with this policy and applicable laws. All sponsorships must be approved by the senior management.

10. Third Parties

Third parties can put the Company at risk if they do not follow ethical business practices. For that reason, the Company will develop procedures for conducting appropriate risk-based due diligence on third parties, and the implementation of appropriate steps to address any identified risks, to ensure compliance with applicable anti-corruption laws. Associates must carefully follow the procedures that are established under this policy.

11. Responsibilities of Associates


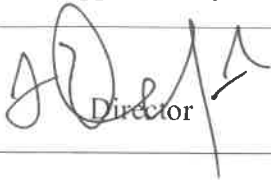
All associates must read, understand, and always follow this policy. Any suspected or actual breach such as being offered a gift to gain business advantage must be reported immediately to the reporting manager or HR. Failure to report or deliberate non-compliance may lead to disciplinary action, including termination. Preventing and reporting corruption is everyone's responsibility.


12. Record Keeping

Lee Pharma will maintain accurate financial records and internal controls to justify all payments to and from third parties. Associates must document and report all gifts and hospitality, and submit expense claims with clear business reasons, following company policy. No off-the-books records are allowed under any circumstances.

13. Raising a Concern or Complaint

Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with your reporting manager or consult HR team. Concerns should be reported by following the procedure set out in the Whistleblower Policy.

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14. Protection


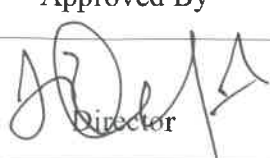
Lee Pharma supports associates who report concerns or refuse to engage in bribery, ensuring they face no retaliation. Genuine concerns raised in good faith even if mistaken are protected. If any associate experiences unfair treatment for reporting, they should inform their manager or HR and escalate through the Whistleblower Policy if needed.

15. Training and Communication

This policy will be shared with all new joiners during induction and circulated to existing associates. Regular training will be provided to ensure understanding and compliance. Associates should contact their reporting manager for any clarifications. Lee Pharma’s zero-tolerance approach to bribery must also be clearly communicated to all third parties at the start of any business relationship, and a copy of the policy should be shared wherever possible.

16. Monitoring and Review

The regional HR Head will regularly review and assess the effectiveness of this policy, making improvements as needed. Internal controls will be audited to ensure they prevent bribery and corruption. All associates are responsible for supporting this policy and must report any suspected risks or violations.

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