



Anti-Bribery and Corruption Policy

Introduction

At Prism Industries Pvt Ltd, we are committed to maintaining the highest ethical standards in all our business dealings. As a global leader in the pharmaceutical industry, manufacturing products such as nicotine-based formulations, quinine, hyoscine, lumefantrine, and artemether, we recognize that our reputation for integrity is one of our most valuable assets. We also acknowledge the significant role that trust plays in our relationships with suppliers, customers, regulatory authorities, and other stakeholders.

In light of this, we have developed a comprehensive Anti-Bribery and Corruption Policy to ensure that our operations are free from any form of bribery, corruption, or unethical business practices. This policy applies to all employees, directors, contractors, agents, and third-party service providers engaged in activities on behalf of Prism Industries across all regions where we operate. Whether dealing with suppliers, customers, government officials, or any other business partners, we are steadfast in our commitment to conducting business fairly, transparently, and in compliance with all relevant legal and regulatory requirements.

Our Anti-Bribery and Corruption Policy is designed to provide a clear and consistent framework for preventing and addressing bribery and corruption risks in all aspects of our operations, including the manufacture and distribution of nicotine, quinine, hyoscine, lumefantrine, and artemether. This policy not only reinforces our legal obligations but also upholds the core values of integrity, accountability, and transparency that underpin our business operations.

Scope and Applicability

This policy applies to all employees, agents, contractors, suppliers, distributors, business partners, and anyone else who may be acting on behalf of Prism Industries Pvt Ltd, irrespective of their location or position. It covers all interactions with external parties, including customers, suppliers, governmental bodies, regulatory authorities, and any other stakeholders. This includes all business transactions related to nicotine, quinine, hyoscine, lumefantrine, and artemether, both domestically and internationally.

The policy is designed to cover all forms of bribery and corruption, including but not limited to: direct bribes, kickbacks, facilitation payments, improper gifts or hospitality, and any other unethical practices that may be used to improperly influence business decisions.

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Objectives of the Anti-Bribery and Corruption Policy

1. Prevent Bribery and Corruption

The primary objective of this policy is to prevent any form of bribery or corruption within our organization. Prism Industries will not tolerate bribery or corrupt behavior in any form, whether by employees, business partners, or third-party vendors.

2. Ensure Compliance with Legal and Regulatory Standards

This policy aims to ensure that Prism Industries complies with all relevant anti-bribery and anti-corruption laws and regulations in all jurisdictions where we operate, including international laws such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA).

3. Promote Ethical Business Practices

We are dedicated to promoting ethical business practices across all our operations, especially in the procurement and distribution processes for products like nicotine, quinine, hyoscine, lumefantrine, and artemether. This includes fostering transparency, accountability, and honesty in all dealings with suppliers, customers, and government authorities.

4. Establish Clear Guidelines for Reporting Violations

We aim to provide clear procedures for employees, contractors, and third-party partners to report any suspected violations of this policy. We strive to create an environment where individuals can raise concerns without fear of retaliation.

Key Principles of the Anti-Bribery and Corruption Policy

1. Prohibition of Bribery

Prism Industries has a strict zero-tolerance policy toward bribery in any form. We will not offer, give, request, or accept bribes or any form of improper payment or advantage, whether directly or indirectly, in connection with the manufacture, distribution, or sale of nicotine, quinine, hyoscine, lumefantrine, or artemether.

- **Offering Bribes:** It is prohibited to offer any form of bribe, including gifts, money, or services, to government officials, business partners, customers, suppliers, or other stakeholders to gain an unfair advantage or influence business decisions.
- **Receiving Bribes:** Employees and other representatives of Prism Industries are prohibited from accepting bribes or any form of improper benefit from third parties, regardless of the circumstances.



2. No Facilitation Payments

Facilitation payments are small payments made to secure or expedite the performance of routine government actions, such as issuing permits, processing visas, or other services. Prism Industries strictly prohibits facilitation payments, even if they are common in certain countries or industries. All business processes should be conducted without resorting to such payments.

3. Gifts, Hospitality, and Entertainment

While reasonable and modest gifts or hospitality may be offered in some business contexts, Prism Industries ensures that such gestures are never used as a means to influence business decisions. Gifts, hospitality, and entertainment should always be:

- Of nominal value
- Transparent and documented
- Not intended to create any sense of obligation or influence decisions
- In line with local laws and regulations

Employees should never accept or provide gifts or hospitality that could be perceived as an attempt to influence business outcomes in favor of one party over another.

4. Third-Party Vendors and Partners

Prism Industries recognizes the importance of conducting due diligence when working with third-party vendors, business partners, or agents. We are committed to ensuring that all third-party partners share our commitment to ethical business practices and comply with our Anti-Bribery and Corruption Policy.

- **Due Diligence:** Before entering into any contractual arrangement with a third-party supplier, distributor, or agent, we will conduct thorough background checks to ensure their compliance with applicable anti-bribery and anti-corruption laws and our internal policies.
- **Contracts and Agreements:** All contracts with third-party vendors must include anti-bribery and anti-corruption clauses that bind the vendor to adhere to this policy. Any suspected violations of the policy by third-party vendors will be subject to investigation and potential termination of the relationship.

5. Conflicts of Interest

Employees must avoid any personal or professional interests that may conflict with their duties to Prism Industries. This includes situations where personal relationships or financial interests could influence business decisions. Employees are required to disclose any potential conflicts of interest and are prohibited from using their position at the company for personal gain.

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6. Monitoring and Auditing

To ensure the effectiveness of this policy, Prism Industries will regularly monitor and audit its business activities and financial transactions. This includes reviewing financial records, contracts, and interactions with suppliers and business partners to identify any potential bribery or corruption risks.

7. Training and Awareness

All employees, contractors, and third-party agents will receive regular training on anti-bribery and anti-corruption practices. This includes guidance on recognizing bribery and corruption risks, understanding the legal and ethical implications of such practices, and knowing how to report suspected violations.

8. Reporting Violations

Employees, business partners, and other stakeholders are encouraged to report any suspected breaches of this policy or any concerns regarding unethical behavior. Reports can be made confidentially, and there will be no retaliation against those who report in good faith. Prism Industries has a whistleblowing system in place, which allows anonymous reporting of bribery or corruption violations.

- **Whistleblowing Procedure:** All employees and third-party partners have access to a confidential whistleblowing service. The service provides a safe environment for individuals to report suspicions of bribery, corruption, or unethical behavior.

Consequences of Violating the Anti-Bribery and Corruption Policy

1. Employee Consequences

Any employee found to be in violation of this policy will face disciplinary action, which may include termination of employment. In addition, employees may be subject to legal action and penalties, depending on the severity of the breach.

2. Third-Party Consequences

Any third-party partner or vendor found to be involved in bribery, corruption, or unethical business practices will have their contractual relationship with Prism Industries terminated immediately. Prism Industries reserves the right to take legal action if necessary to protect its interests.

3. Legal Consequences

Bribery and corruption are serious criminal offenses in many jurisdictions, and any involvement in such practices could result in significant legal and financial consequences, including fines and imprisonment. Prism Industries will cooperate fully with law enforcement authorities in any investigations related to bribery or corruption.



Roles and Responsibilities

1. Management

Management is responsible for leading by example and ensuring that this Anti-Bribery and Corruption Policy is effectively implemented throughout the company. They are also responsible for ensuring that adequate resources are allocated for training, monitoring, and auditing purposes.

2. Employees

All employees must adhere to the principles of this policy and are expected to act with integrity in all dealings with external parties. Employees must also report any breaches or concerns promptly.

3. Compliance Officer

Prism Industries designates a Compliance Officer to oversee the implementation of the policy, monitor compliance, and provide guidance on anti-bribery and anti-corruption matters.

Conclusion

Prism Industries Pvt Ltd is unwavering in its commitment to preventing bribery, corruption, and unethical business practices across all of its operations. We recognize the importance of conducting business with the utmost integrity and fairness, especially in the context of producing and distributing products such as nicotine, quinine, hyoscine, lumefantrine, and artemether. By adhering to this Anti-Bribery and Corruption Policy, we ensure that we maintain the highest standards of ethical conduct, build trust with our stakeholders, and comply with all applicable laws. We will continue to work diligently to uphold these principles and foster an environment where unethical behavior is not tolerated.

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