

### Document Version Control Note

Name of Document	Code of Business Conduct & Ethics
Policy number	HR / Corp / Code of Business Conduct and Ethics / 006
Release Date Original Version	1 <sup>st</sup> June 2023

### Revision History

Version	Release Date	Reviewed Date	Change incorporated
1.0	1 <sup>st</sup> June 2023	31 <sup>st</sup> Dec 2023	-
2.0	1 <sup>st</sup> Jan 2024	31 <sup>st</sup> Dec 2024	-

## **Code of Business Conduct & Ethics (COBCE)**

### **1.0 Policy Brief & Purpose:**

To outline the appropriate behaviour employees are expected to follow in the workplace towards colleagues, supervisors and overall organisation.

### **2.0 Application of the Code:**

We at Sigachi recognize that our reputation is one of our most valuable assets and is founded largely on the behaviour of the people who represent us. This Code and the associated Operating Principles applies to all Directors, Employees, Contractors, and Consultants of the company. Compliance with this Code, our policies and the law are a condition of employment and will serve to enhance our reputation.

### **3.0 The Code :**

All Employees are required to :

- Abide by Sigachi Values, uphold the Business Principles and comply with all policies and procédures
- Uphold the principles of equal opportunity and embrace the diversity in our teams
- Maintain a work environment free of unlawful discrimination, harassment and bullying
- Perform their job in a safe, responsible and effective manner
- Obey the law and comply with the regulatory environment that applies to their job
- Respect and safeguard the property of the company, customers, fellow employees, suppliers and contractors
- Maintain the confidentiality of the company, customers and the information gained through work
- Perform duties at their best, taking into account skills, experience and qualifications
- Ensure that financial and other outside interests do not conflict with, or appear to conflict with the duties
- Not give or accept gifts, prizes or hospitality that compromise company values
- Report unethical, illegal or improper behaviour, including breaches of this Code of Business Conduct & Ethics

### **4.0 Operating Principles :**

- We at Sigachi conduct all activities ethically, in accordance with the law and its regulatory obligations
- We respect, consider and respond to the interests of all its stakeholders, and engage in a way that promotes genuine trust
- We take the security of our people, property and information seriously
- We value and respect human rights
- We respect the privacy of individuals and protect their personal information
- Our priority is to exceed the expectations of our customers by way of delivering a valuable and compassionate experience.

### **5.0 Solicitation and distribution**

Solicitation is any form of requesting money, support or participation in products, groups, organizations or causes which are unrelated to our company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

We don't allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- Seek support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- Ask colleagues to participate in employment-related activities or groups protected by law (e.g. trade unions.)

### **6.0 Human Rights & Labour Standards**

Sigachi's Labour & Human Rights policy emphasizes our commitment to basic human rights as a core component of how we conduct business and work with its employees. This directly ensures & supports our mission of producing the highest quality product and to provide social, environmental, health & safety and economic benefits to the people and communities in which we do business.

Sigachi is against all forms of exploitation of children and does not provide employment to individuals before they reach the legal age of 18 years. The company shall not support or adopt any employment using forced labour, bonded labour / debt bondage or human trafficking and shall take all appropriate measures to prevent any such employment in its operations and insists that its business partners and associates also ensure and uphold similar standards that abide by the governing laws in countries where they operate. Should violation of these principles become known to Sigachi and if not remediated, the company will take appropriate action, including discontinuation of the business relationship.

The working conditions & standards, social benefits, employee health & safety are of prime importance and always are in accordance with the local applicable laws.

### **7.0 Employee Health & Safety**

Sigachi strives to provide a safe workplace environment for all its employees by incorporating safe equipment and safe procedures at the workplace to ensure worker & overall safety. The EHS team exercises all measures pertaining to employee safety, healthy & safe surroundings with diligent processes and procedures for periodic maintenance & constant supervision to upkeep at the prescribed standards.

### **8.0 Environmental Health & Safety**

Sigachi shall always develop and adopt safe methods and practices for its operations and provide each employee with the necessary protective equipment to ensure that the job can be performed safely and shall carry out its operations in a manner consistent with good environmental practices, to minimize the impact of its activities on our natural resources. These practices shall be protective of our air, water, and land, and consistent with the requirements of governingbodies having jurisdiction over our business operations.

### **9.0 Information security**

Information being one of basic building block in Sigachi, the same way as employees, premises, and equipment, the protection of information systems against unauthorized access to or modification of information, whether in storage, processing, or transit, and against the denial of service to authorized users, including those measures necessary to detect, document, and counter such threats is of prime importance. While the non-disclosure agreement forms part of the appointment letter, every employee is further provided with training that further emphasizes the importance & consequences of any misuse of breach of organizational information.

### **10.0 Cyber security and digital devices**

The company's cybersecurity policy is crafted with clear guidelines aimed at protecting valuable data and technological infrastructure. In an era where dependence on technology is inevitable, vulnerabilities such as human errors, cyber-attacks, and system malfunctions have become increasingly prevalent, posing threats to our financial stability and company reputation.

Understanding the importance of cybersecurity, establishing robust safety measures, and providing comprehensive, yet easy-to-follow instructions to mitigate potential risks.

#### **Cell phone**

We allow use of cell phones at work. But we also want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.
- Avoid playing games on your phone or texting excessively.
- Don't use your phone for any reason while driving a company vehicle.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal or obscene material using our corporate internet connection.

Also, you must not use your phone in areas where cell phone use is explicitly prohibited (e.g. laboratories.)

#### **Internet usage**

Our corporate internet connection is primarily for business. But you can occasionally use our connection for personal purposes if they don't interfere with your job responsibilities. Also, we expect you to temporarily halt personal activities that slow down our internet connection (e.g. uploading photos) if you're asked to.

You must not use office internet connection to:

- Download or upload obscene, offensive, or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material, or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

### **11.0 Ethical Conduct**

Sigachi believes that ethical code of Business Conduct is a guide to principles created to assist practitioners in performing business in the right way and helps to reinforce the values stated in the mission and vision of the company. The Sigachi values – Integrity, Respect, Excellence & Resourcefulness provides guidance in upkeeping ethics as a discipline of what is morally good and bad, and right or wrong. Everybody who represents or is in business with sigachi directly or indirectly is bound by the principles outlined in the code. Employees, Suppliers, Freelancers, Contractors, and Consultants.

#### **Anti Bribery & Anti-Corruption**

Sigachi is committed to the prevention, deterrence and detection of fraud, bribery, and all other corrupt business practices. It is Sigachi's policy to conduct all its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its business practice, wherever it operates throughout the world, of not engaging in bribery or corruption.

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all employees. Employees are required to avoid any activity that might lead to or suggest a breach of this Policy.

Employees must notify his / her manager and the Management Committee via [mdoffice@sigachi.com](mailto:mdoffice@sigachi.com) as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred or may occur in the future.

Any employee who breaches this Policy would face disciplinary action, which could result in dismissal. We reserve our right to terminate our contractual relationship with you if you breach this policy. Any breach of this policy would also result in imposition of large fines/ imprisonment on the individual/ the Company or termination of contract with a Third Party.

#### **Prevention of Insider Trading**

At any point of time during the business operations, we may come across material information of confidential nature about Sigachi or other publicly traded companies, which may have a bearing on the market price of the company's publicly traded securities. It is, therefore, important to know that we are prohibited from trading in the securities

of the company or other publicly traded companies based on unpublished material information. We are also prohibited from passing information to others ('tipping') who then trade based on this material information before it is made publicly available to ordinary investors to gain an undue advantage. Insider trading is both unethical and unlawful and will be dealt with firmly.

#### Marketing Practices

We ensure a safe and proper use of our products, information provided to our stakeholders, customers and healthcare professionals on the packaging label, inserts, local prescribing information, or sales and advertising material must be in compliance with all applicable laws, standards and regulations that apply to our products, and supported by scientific evidence as relevant.

#### Corporate email

Email is essential to our work. You should use your company email primarily for work, but we allow some uses of your company email for personal reasons.

- **Work-related use.** You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.
- **Personal use.** You can use your email for personal reasons if you keep it safe and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download eBooks, guides and other safe content for your personal use.

#### Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable, or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our [*Security Specialists.*]

#### **12.0 Dress code:**

Our dress code policy outlines the company's expectations from employees regarding their appearance from a professional and safety point of view. Sigachi expects employees to dress appropriately in business attire. The company's guidelines are not meant to unreasonably restrict freedom of expression.

However, the way employees project themselves when they represent the company to clients, visitors or other external parties can have direct consequence on how it is perceived. Since our work environment gets frequent visits from customers & clients, professional business attire is essential for our reputation.

Therefore, one should be aware that appearance is an integral part of the company's culture, and any inappropriateness could damage its reputation. Sigachi provides uniform to all the employees once a year, for staff at HO, and twice a year for those at Factory.

We also respect and permit grooming styles, clothing and accessories that are dictated by religious beliefs, ethnicity, or disability.

### **13.0 Social media**

We want to provide practical advice to prevent careless use of social media in our workplace. We address two types of social media uses: using personal social media at work and representing our company through social media.

#### **Using personal social media at work**

You are permitted to access your personal accounts at work. But we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

- **Discipline yourself.** Avoid getting sidetracked by your social platforms.
- **Ensure others know that your personal account or statements don't represent our company.** For example, use a disclaimer such as "opinions are my own."
- **Avoid sharing intellectual property (e.g. trademarks) or confidential information.** Ask your manager or PR first before you share company news that's not officially announced.
- **Avoid any defamatory, offensive, or derogatory content.** You may violate our company's anti-harassment policy if you direct such content towards colleagues, clients, or partners.

#### **Representing our company through social media**

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite, and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism, and fair use.
- Coordinate with our [PR/Marketing department] when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

### **14.0 Conflict of interest**

When you are experiencing a conflict of interest, your personal goals are no longer aligned with your responsibilities towards us. For example, owning stocks of one of our competitors is a conflict of interest.

In other cases, you may be faced with an ethical issue. For example, accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behaviour, you will lose your job and may face legal trouble.

For this reason, conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Follow our policies and always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your manager or HR and we will try to help you resolve it.

### **15.0 Employee relationships**

We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines, and we ask you to always behave professionally.

### **16.0 Employment of relatives**

Everyone in our company should be hired, recognized, or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest, so we will place some restrictions on hiring employees' relatives.

To our company, a "relative" is someone who is related by blood or marriage within the third degree to an employee. This includes: parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children and adopted children.

As an employee, you can refer your relatives to work with our company. Here are our only restrictions:

- *[You must not be involved in a supervisory/reporting relationship with a relative.]*
- *[You cannot be transferred, promoted, or hired inside a reporting relationship with a relative.]*
- *[You cannot be part of a hiring committee, when your relative is interviewed for that position.]*

If you become related to a manager or direct report after you both become employed by our company, we may have to *[transfer one of you.]*

### **17.0 Workplace visitors**

If you intend to invite a visitor to our office for business purpose, please inform our *[reception/ gate/ front-office]* of your visitor's arrival. Visitors should sign in and show identification. They will receive passes / badges and will be asked to return them to *[reception/ gate/ front-office]* once their visit is complete.

When you have office visitors, you also have responsibilities. You should:

- Always ensure their entry only to the common / designated lobby area and not to the work area/shop floor



- Keep your visitors away from areas where there are dangerous machines, chemicals, confidential records or sensitive equipment.
- Prevent your visitors from proselytizing your colleagues, gathering donations or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, [front office employees/ security guards] will notify you so you may collect it.

### **18.0 Communication & Orientation**

The training to create awareness on the COBCE is conducted for all the Business Leaders, HoD's and employees across the locations. Also, constant communication as a refresher to create awareness is done through various channels to reach the employees and enable constant reiteration.

### **19.0 The Governance**



It is the basic responsibility of the Business Leaders & HoD's at the first level to demonstrate Sigachi values and ensure they are demonstrated by all the employees in alignment with Sigachi's Code of Business Conduct & Ethics.

The HoD's and the process owners will meet on a quarterly basis to assess & review the mechanisms to mitigate the risk related to COBCE violations and ensure overall adherence to COBCE, at all locations. Also, on an ongoing basis they will discuss to execute and implement necessary actions / processes for betterment & continuous improvement.

We maintain the principles of natural justice and hence in case of any breach of COBCE, it is internally reviewed and addressed accordingly. Also, maintain a record log of all the incidents & relevant information to stay compliant. In case of a breach that is complex involving any of the HoD's & process owners, an independent 3<sup>rd</sup> party would investigate and arrive at a conclusion.

### **20.0 Disciplinary Action :**

Any violation of the Code, may result in appropriate disciplinary action including the possible termination from employment with the Company. Nothing in this Code restricts the Company from taking any disciplinary action on any matters pertaining to the conduct of a Covered Person, whether or not expressly set forth in the Code.

<b>Effective Date</b>		<b>Next Review Date</b>	
01 <sup>st</sup> January 2024		31 <sup>st</sup> December 2024	
<b>Authored by</b>	<b>Reviewed by</b>	<b>Approved by</b>	
Annapurna Carchalla 	Subramanian Ananthanarayanan 	Amit Raj Sinha 