

## **MOREPEN LABORATORIES LIMITED**

CIN: L24231HP1984PLC006028

**Registered Office:** Village Morepen, Nalagarh Road, Near Baddi Distt. Solan, Himachal Pradesh – 173 205

Email: [plants@morepen.com](mailto:plants@morepen.com), Website: [www.morepen.com](http://www.morepen.com),

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*Document No.: ACAB-POL-001 | Rev Date: 01 Jan 2025 | Revision No.: 01*

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## **ANTI CORRUPTION ANTI BRIBERY AND ANTI MONEY LAUNDERING POLICY**

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**Purpose**

The purpose of this Policy is to affirm Morepen Laboratories Ltd’s unwavering commitment to conducting business with the highest level of integrity, transparency, and ethical standards. It establishes clear principles and rules to prevent all forms of bribery, corruption, and money laundering, ensuring compliance with applicable laws and regulations globally. This Policy serves as a guide for all Associates to uphold ethical behavior, protect the company’s reputation, and foster a culture of fairness and accountability in all business activities.

**Policy Statement - Anti-Corruption and Anti-Bribery Anti-Money Laundering**

At Morepen, we are committed to conducting our business with the highest standards of integrity and ethical conduct. Our Anti-Corruption and Anti-Bribery Policy underscores our zero-tolerance stance towards any form of corruption or bribery. This policy applies to all employees, officers, directors, contractors, consultants, and any other individuals or entities acting on behalf of the company.

We prohibit the offering, giving, receiving, or soliciting of any bribe, whether cash or other inducements, to or from any person or company, whether public or private, with the intention of gaining a commercial, contractual, regulatory, or personal advantage. Compliance with all applicable anti-corruption and anti-bribery laws, including the FERA, Anti Money Laundering, Foreign Corrupt Practices Act (FCPA) and Bribery Act etc, is mandatory.

Employees are required to report any concerns or suspicions regarding potential violations of this policy, without fear of retaliation. Any violations of this policy may result in severe disciplinary action, up to and including termination of employment, and potential legal consequences.

Morepen is dedicated to fostering a transparent, fair, and ethical business environment.

**Scope and Applicability**

This Policy applies to all Associates\*, including directors, officers, managers, and employees of MLL and its affiliates. It covers bribery, corruption, money laundering, and related ethical business conduct, but excludes conflicts of interest and passive bribery, which are regulated separately.

\*Associates means all individuals acting on behalf of the company.

		
<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
<b>Asstt. Manager - HR</b>	<b>Sr. Manager - HR</b>	<b>Director</b>

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**Principles and Rules**

**Basic Rules**

- Associates must never engage in bribery directly or through intermediaries such as agents, consultants, or business partners.
- Bribery is prohibited regardless of the recipient’s status (public or private).
- Always evaluate the legitimacy of any gift, hospitality, or benefit before proceeding. When in doubt, consult compliance or legal representatives.

**Money Laundering Prevention (AML)**

- Morepen strictly prohibits any involvement in money laundering or terrorist financing activities.
- Associates must comply with all relevant AML laws and regulations.
- All transactions must be conducted transparently, properly documented, and monitored for suspicious activity.
- Due diligence and risk assessments must be applied to business partners and transactions to detect and mitigate money laundering risks.
- Any suspicion of money laundering must be promptly reported to compliance teams or through the Speak Up process.

**Gifts, Hospitality, and Entertainment**

**Definitions**

Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include ‘courtesy gifts’, which are small gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).

Hospitality generally includes refreshments, meals, and accommodation. Entertainment generally includes attendance at plays, concerts, and sports events.

		
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**References : Principles & Practices for professionals (P3)**

- Must be modest, reasonable, and infrequent.
- Must never be intended to improperly influence a recipient.
- Gifts to Healthcare Professionals or their family members, cash, and cash equivalents are prohibited.
- Entertainment must be appropriate to business events only; extended or side trips payments are prohibited.
- Transparency and reputational considerations must guide all provisions of gifts or hospitality.

**Public Officials**

- Relationships must comply with all applicable rules and be fully transparent, documented, and accounted for.
- The definition of public officials includes government employees, international organization staff, political candidates, and certain medical personnel.

**Political Contributions and Lobbying**

- Political contributions are permitted only where lawful, transparent, budgeted, and pre-approved, without expectation of return.
- Lobbying activities must be honest and transparent, supporting informed policymaking without corrupt influence.

**Facilitation Payments**

- Strictly prohibited regardless of local law permissibility.

**Grants, Donations and Sponsorship**

**Principles and Rules**

MLL may provide funding or other support to external organizations. This includes grants, donations and sponsorships which are governed by the P3 Policy and P3 External Funding Guideline.

		
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### References

- Principles & practices for professionals (P3)
- Management Authorization Levels, also known as MALs

### Third Party Engagement

- Third parties can only be engaged if:
  - Legitimate business need exists
  - Pricing is at market value
  - Anti-bribery and AML due diligence clearance is obtained
  - Formal contracts are in place
- Engagements must never be used to secure improper advantage.

### New Business and Joint Ventures

- Comprehensive anti-bribery and AML due diligence required before any mergers, acquisitions, or joint ventures.
- Identified issues must be addressed with remediation plans.

### References

Code of Ethics  
 MLL Anti-Bribery Third Party Guideline

### Training and Awareness

- All Associates must complete required training on anti-bribery, anti-corruption, and anti-money laundering policies.
- Morepen Laboratories Ltd commits to achieving 100% coverage of all Associates completing anti-bribery, anti-corruption, and anti-money laundering training annually.
- Training completion will be monitored and reported regularly to ensure compliance with this target.

		
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### Reporting Potential Misconduct/Non-Retaliation

Any Associate with knowledge of suspected misconduct must report his or her suspicion promptly in accordance with the SpeakUp Office process.

Associates who report potential misconduct in good faith or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation.

### Breach of Policy

- Any violation can result in disciplinary action, up to termination and legal consequences.

### Responsibilities

- Managers must lead by example, implement this policy, and ensure incentive structures align.
- All Associates are responsible for adherence to these principles.
- The Ethics, Risk & Compliance team owns this policy and oversees implementation.

### REVISION HISTORY

Sr. No.	Effective Date	Details of Change	Reasons of Change
1.	01.01.25	Money Laundering and Document no. added	Money laundering and document no. was missing

		
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