



Anti-Bribery and Anti-Corruption (ABAC) Policy

Document Control Section

Document Name	Whistle Blower Policy
Abstract	The Anti-Bribery and Anti-Corruption emphasizes Cipla's zero tolerance approach to bribery and corruption. It guides us to act professionally, fairly and with utmost integrity.
Security Classification	Internal
Location	Mumbai, India

Authorization

Document Author	Document Owner	Reviewed By	Approved By
CFT for Code of Conduct	Chief Compliance Officer	Ethics Committee	Board of Directors

Review & Amendment Log

Version	Modification Date	Section	Amendment / Modification / Deletion	Brief Description of Change / Review

Table of Contents

1. Purpose.....	3
2. Governance	3
3. Scope and applicability	3
4. Policy Framework	3
5. Cipla Associate Responsibilities.....	Error! Bookmark not defined.
6. Books, Records and Internal Controls.....	7
7. Raising a concern and Protection	8
8. Exception(s).....	8
9. Glossary	9
10. Abbreviations	10
11. References	10
12. Annexures:.....	11
Annexure-01: Potential risk scenarios: "red flags"	11
Annexure -02: Declaration for Gifts, Business Entertainment and Hospitality	12

1. Purpose

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

2. Governance

- 2.1. Chief Compliance Officer 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.
- 2.2. Any changes to this Policy shall be tracked and documented for future reference and all changes shall be performed by the Chief Compliance Officer only after prior approval of the Global General Counsel, Global Chief Financial Officer and Global Chief People Officer.
- 2.3. Chief Compliance Officer shall monitor the effectiveness and review the implementation of the compliance principles set forth in this Policy, regularly considering its suitability, adequacy and effectiveness.
- 2.4. 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.
- 2.5. 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.

3. Scope and applicability

The principles set forth in this policy are applicable to all Associates¹ and Business Partners² across Cipla Entities³. It is therefore, the responsibility of all Associates and Business Partners to follow and adhere to all elements described in the Policy. In countries where there are more stringent applicable laws, regulations or industry codes, Cipla requires compliance with the most restrictive requirement and the principles set out in this Policy shall stand superseded in those specific countries.

4. Policy Framework

4.1. Bribe, Facilitation Payments or Kickbacks

- 4.1.1. Cipla prohibits all forms of bribery⁴ and corruption whether involving, but not limited to, Government Official⁵ or a private sector person or company and whether directly or indirectly.
- 4.1.2. Cipla 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.

4.1.3. 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 official¹, Healthcare Professionals⁶, 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 Cipla, or

¹ "Associates" as defined in the "Glossary" section on page 9.

² "Business Partners" as defined in the "Glossary" section on page 9.

³ "Cipla Entities" as defined in the "Glossary" section on page 9.

⁴ "Bribery" as defined in the "Glossary" section on page 9.

⁵ "Government Official" as defined in the "Glossary" section on page 9.

⁶ "Healthcare Professionals" as defined in the "Glossary" section on page 9.

- Intended as gratification for the recipient having made a decision or acted in a way that benefited Cipla.
 - 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.
- 4.1.4. Cipla (or any of its Associates) does not make or accept, Facilitation Payments⁷ or Kickbacks⁸ 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 Cipla.
- 4.1.5. If any Associate is asked to make a payment on behalf of Cipla, 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. In case of any suspicion, concern or query regarding a payment, raise these with the Chief Compliance Officer without delay or hesitation.
- 4.1.6. Following are few indicative examples of bribe which any Associate should refrain from exercising:
- Offering a bribe: You offer tickets to a potential client of a major sporting event, but only if they agree to do a business with us.
This would be an offence as you are making the offer to gain a commercial and contractual advantage. Cipla may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept our offer.
 - Receiving a bribe: An agent gives your nephew a job, but makes it clear that in return they expect you to use your influence in Cipla to ensure we continue to do business through them.
It is an offence for an agent to make such an offer. It would also be an offence for any Employee to accept the offer to gain a personal advantage.
- 4.1.7. Any "red flags" or potential "red flags" (illustratively as defined in Annexure 1) observed by any Associate should be notified to the Chief Compliance Officer as soon as possible. This should cover both actual or suspected conflict with the compliance principles, set forth in this policy.

4.2. Government Officials (GO) and Potentially Influencing Government Officials⁹ (PIGO)

- 4.2.1. It is our responsibility to conduct operations and activities in compliance with applicable Anti-bribery and Anti-Corruption Laws, which prohibits improper/ unethical payments to Government Officials. Any payment or benefit conveyed to a GO must be fully transparent, properly documented, and accounted for.
- 4.2.2. Cipla imposes special requirements, including determination as to whether a Government Official is a PIGO³, and if so, additional evaluation and approvals are required. Additional data may also be needed when a transaction is proposed with a PIGO that has the ability to influence decisions to purchase any drug on a national/regional level or the inclusion of any drug within Government sponsored programs.
- 4.2.3. Examples of decisions made by PIGOs include, but are not limited to:
- approval of product registration or licenses or marketing authorizations,
 - approval of pricing or reimbursement of a product,
 - awarding public tenders for government sales or contracts,
 - including products within drug or product formularies or rotation schedules,
 - recommendations for any drug to be included in government sponsored programs, and

⁷ "Facilitation Payments" as defined in the "Glossary" section on page 10.

⁸ "Kickbacks" as defined in the "Glossary" section on page 10.

⁹ "Potentially Influencing Government Officials" as defined in the "Glossary" section on page 10.

- granting licenses or permits required to operate or conduct business (i.e., by regulatory agencies).

4.2.4 Any “red flags” or potential “red flags” (illustratively as defined in Annexure 1) observed by any Associate should be notified to the Chief Compliance Officer as soon as possible. This should cover both actual or suspected conflict with the compliance principles, set forth in this policy

4.3. **Dealing with cross-border transactions¹⁰ with GOs and Health Care Professionals (HCPs):**

When engaging in a cross-border transaction, unless otherwise specified in this Policy, Associates must ensure compliance with local laws in the GO/HCP's Home Country. The interaction or transaction also must be permitted in the initiating Associate's country and in the country where the interaction or transaction is reasonably expected to occur. If you have any questions, consult your local Legal and/or Chief Compliance Officer

Indicative Scenario - A:

One of the Cipla Entities is trying to obtain a drug-licence in a non-US country. The Regulatory affairs and Clinical trial teams, which are leading the discussions with the authority, consist of several U.S. & Non-U.S. employees. During one of the meeting, the official shows interest in Goa plant and expressed his desire to visit the plant during a week-long trip. He indicated that if Cipla can make his stay arrangements, he is willing to plan a trip and facilitate faster approvals.

The FCPA is a U.S. law that prohibits making, promising, offering or authorizing the making of a payment or providing anything of value to a foreign Government Official to improperly or corruptly influence that official to take any governmental act or decision to assist a company in obtaining or retaining business, or gaining an improper advantage. The FCPA also prohibits a company or person from using another company or individual to engage in such activities. Offering stay arrangement for a Government official on a holiday to ensure faster approvals violates the FCPA requirements.

Cipla Entities, Employees and Business Partners acting on Cipla's behalf must comply with the FCPA.

4.4. **Gifts, Hospitality and Entertainment**

4.4.1. Cipla acknowledges that exchange of nominal gifts and sharing of entertainment is customary in many parts of the world during national, cultural and religious occasions.

4.4.2. The giving or receipt of gifts by Associates is not prohibited, if following requirements are met:

- (a) No quid pro quo – There must always be a legitimate business purpose to support gifts related expenses. Customary gifts, meals, entertainment, travel or lodging may never be given or received in return for a favour/ favourable treatment or to refrain from doing something disadvantaging Cipla.
- (b) It complies with all applicable Anti-bribery and Anti-corruption laws;
- (c) It is given under the brand name of Cipla, and not in the name of any Associate;
- (d) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (e) Considering, the reason and nature of the gift, it is of an appropriate type and value and given at an appropriate time;
- (f) It is given openly, not secretly; and
- (g) Gifts should not be offered to, or accepted from, GO or representatives, or politicians or political parties without seeking an opinion of the Chief Compliance Officer.

4.4.3. The test to be applied is whether in all the circumstances the gifts, hospitality and entertainment is modest, desirable, reasonable, and not viewed as lavish regardless of actual monetary value and justifiable.

¹⁰ “Cross Border Transactions” as defined in the “Glossary” section on page 10.

- 4.4.4. Associates cannot accept any gifts in cash or kind, except owing to the customary or religious practices followed by any third party. Associates need to exercise professional judgment in identifying inappropriate, frequent or material gifts and entertainment and shall avoid the same to maintain integrity and independence.
- 4.4.5. This policy does not intend to prohibit normal and appropriate hospitality (offered and received) to or from third parties, only if Associates or personnel of the third party organisation offering the hospitality are in attendance. Hospitality limited to meals, drinks and other such sustenance may be offered without prior approval if it is reasonable and justifiable in all the circumstances, taking into account reason and nature, appropriate type, value, given at an appropriate time and not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- 4.4.6. Hospitality involving attendance at sporting events or private boxes at sporting events should not be offered or accepted without seeking prior opinion of the Chief Compliance Officer.
- 4.4.7. We recognise that in relation to gifts and hospitality referred to above, what is considered acceptable will vary from country to country and from region to region and what may be normal and acceptable in one country/region may not be in another. In countries where there are specific limits of monetary value prescribed under local law or policies defined, Associates should obtain prior approval from the business finance head and the business unit head. In countries where there are no specific limits of monetary value prescribed under local law or policies defined, Associates should obtain prior approval from the business finance head, the business unit head and the Chief Compliance Officer.
- 4.4.8. In case any Cipla Associate receives or offers a hospitality or gift, it should be declared via a written record for review by the Chief Compliance Officer. The information should be given to the Chief Compliance Officer in the form "Declaration for Gifts, Business Entertainment and Hospitality" appended as Annexure 02 to this Policy

Indicative scenario - B:

John, a Cipla sales representative, would like to provide the head of retail business with a gift at the start of Holiday season. What are some of the alternative John should look at?

- a) A Macy's gift card for USD 150
- b) Bottle of Moet & Chandon so that the client can raise a toast with her family
- c) An all paid trip to Grand Canyon for client and her spouse
- d) A personalized digital photo frame with Cipla branding

John should consider both, cost as well as appropriateness while choosing the gift. As per Cipla policy, gift card is considered cash equivalent and hence must not be provided as a gift. One should also be careful while providing gifts such as a bottle of champagne, as it may be deemed inappropriate in some cultures. A vacation trip is also violation of Cipla's policy and must be avoided.

A personalized digital photo frame with Cipla branding, with an appropriate value and corresponding approvals, may be considered in the above scenario.

Indicative scenario - C:

After successful completion of one year of supply, a client has offered John with VIP tickets to NBA play-offs. The client gets such tickets, as his firm sponsors the game and hence there is no monetary value of the tickets.

Should John accept the tickets?

Such tickets may not be of monetary value but may still be deemed desirable. Accepting such a gift would amount to violation of Cipla policy. John should politely decline such offer. He should also explain the reasons to the client to make sure that client does not feel offended and client does not make such offers in the future.

4.5. Extortion

- 4.5.1. When a payment is extorted by an imminent threat to the safety of an Associate or his/her family members, the demanded payment may be made. However, once the immediacy of the situation has been resolved, the payment must be reported to the Chief Compliance Officer, including information on the circumstances and amount of the payment. Any such payment always must be accurately and completely recorded in Cipla's books and records.
- 4.5.2. Cipla Personnel will not be in breach of this policy in respect of any payment made for reasons of personal safety and security. Where possible any such payment should only be made after consultation with Chief Compliance Officer. Where not possible, such payment should be reported subsequently.

Indicative scenario – D:

Due to political unrest in a non-U.S. country, Cipla is experiencing a significant delay in the clearance of its product through customs due to no fault of Cipla. The delay is beginning to cause serious disruption to Cipla's supply chain in the market. During one of your daily follow-up calls with the customs bureau, the customs inspector suggests that he could resolve the matter and clear the product within 24 hours if Cipla were to provide him a small gift as a "tip."

What should you do?

Report the request to a Chief Compliance Officer. A payment, gift or other thing of value to a Government Official to secure or expedite routine non-discretionary governmental action is a facilitation payment. Cipla prohibits any Employee from offering or authorizing the offer of a facilitation payment. This request for a facilitation payment must be promptly reported to a Chief Compliance Officer who will work with you to decline the request.

4.6. Donations

Cipla may make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without seeking the prior opinion of the Chief Compliance Officer. Associates may, in their personal capacity, make donations that are legal and ethical under local laws and practices. It is recommended that all such donations or contributions are documented with a receipt.

4.7. Business Partners

- 4.7.1. We understand that various applicable anti-corruption and anti-bribery laws make Cipla Entities responsible for the acts of our Business Partners and others acting on our behalf. Therefore, no Business Partner, acting on behalf of Cipla may engage in any act that could be construed as bribery or corruption – whether using Cipla funds or their own personal funds or whether acting directly or through a middleman. Cipla expects all those acting on our behalf to abide by our standards of ethics and integrity and, where necessary and appropriate, to follow our procedures.
- 4.7.2. While engaging with Business Partners, Associates should ensure that they comply with Cipla's Anti-Bribery and Anti-Corruption Policy.
- 4.7.3. If any Associate becomes aware that Business Partner is engaged in bribery or corruption, that Associate should immediately report his/her concern following the procedure set out in our "Whistle-Blower Policy".

5. Books, Records and Internal Controls

- 5.1. Cipla is required to keep accurate books and records and to maintain internal controls to prevent and detect potential violations of our policies or of applicable laws. Internal controls are processes that monitor compliance with the company's policies. Cipla has appropriate controls to ensure that diligence is conducted, transactions properly approved, documentation received to support

expenses, and interactions handled as required by our policies. Cipla shall also use proactive reviews, audits and internal investigations to further monitor compliance and to identify any potential areas to enhance.

- 5.2. All Associates must ensure that all payments and transactions of the Cipla Entities, regardless of value, are recorded accurately with appropriate documentation. For example, in connection with every transaction, you must ensure that all required pre-approval forms, questionnaires, self-assessments, agreements with Business Partners and expense reports, with supporting documents, are maintained and recorded properly. These requirements also apply to every expense regulated by this policy, such as Gifts, meals, travel or other permitted expense.
- 5.3. Always err on the side of including more information about a transaction or an expense, rather than less. The goal is to ensure that the Cipla Entities' books, records and accounts accurately and fairly reflect our transactions in reasonable detail. Transparency and completeness in our records help demonstrate our compliance with this policy and with applicable laws and regulations. For example, submitting an expense voucher for a meal and failing to note that Government Officials attended the meal, may be viewed as creating an inaccurate corporate record. Creating a paper trail through emails or other documents after an expense was incurred to give the appearance that the expense was pre-approved also may be viewed as creating an inaccurate corporate record or falsifying documents.
- 5.4. If any Associate realizes that he/she mistakenly failed to provide complete information about a transaction or expense, he/she must escalate it to his/her Supervisor immediately. Trying to hide this mistake or falsifying of records should be avoided by Associates. It is best to be open and honest about the issue and work transparently with a Supervisor in trying to correct it properly in Cipla's books and records. If an Associate becomes aware that Cipla's books and records do not accurately reflect a transaction or expense, Associate must report this issue immediately.
- 5.5. Records and documents generated in connection with the principles set forth in this policy, including, but not limited to, any diligence files and contracting documents, must be maintained and stored for the period specified in the Data retention policy.

6. Raising a concern and Protection

- 6.1. All Cipla Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Chief Compliance Officer. Concerns should be reported by following the procedure set out in "Whistle-Blower" policy.
- 6.2. An Associate who refuses to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Cipla aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 6.3. Cipla Entities will ensure that no one will suffer any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any Associate believes that he or she has suffered any such treatment, he or she should inform the Chief Compliance Officer immediately. If the matter is not remedied then Associate should raise it formally to the Chief Compliance Officer and or Human Resource Head.

7. Exception(s)

All exceptions to this policy must be approved by Chief Compliance Officer.

8. Glossary




Terms	Definition
Associates	Associates stands as a collective term for all individuals working at all the levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, volunteers, service providers, seconded staff, casual workers and agency staff, agents, or any other person associated with the Cipla Entities or their Associates, wherever located.
Business Partner	Business Partner is a collective term used for Consultants, vendors, contractors, agents, intermediaries, API manufacturers etc. and Associates of such third parties with whom Cipla Entities enters into contract(s).
Cipla Entities	Cipla Entities stands as a collective term for Cipla Ltd. and all its subsidiaries across the globe.
Bribery	"Bribery" means the offering, promising, giving, receiving, soliciting or accepting of a financial or other advantage, or any other thing of value, with the intention of influencing or rewarding the behaviour of a person in a position of trust to perform a public, commercial or legal function to obtain or retain a commercial advantage. Bribery includes any attempt to do any of the foregoing as well. Bribes are payments made in the form of money or anything else of value in return for a business favour or advantage.
Government Officials	Government Official means any of the following: (i) Official (elected, appointed, or career) or Associate of a federal, national, state, provincial, local, or municipal government (or federal) or any department, agency, or subdivision thereof; (ii) Officer or Associate of a federal-owned or controlled enterprise or an organisation (e.g., a Health Care Professional practicing at a federal-owned or -controlled hospital or clinic); (iii) Officer or Associate of a public international organisation (e.g., UN, World Bank, EU, WTO, NATO); (iv) Individual acting for or representing federal or any of the Organisations referred to above, even if he/she may not be an Associate of such federal or organisation; (v) In many countries, physicians who serve as consultants or scientists, participating in clinical trials, may be Associates of public institutions and thus considered Government Officials; (vi) HCPs who are employed by, teach at, or have privileges at a Government hospital or Public University are Government Officials even if they only work there part-time. (vii) Individual who is considered to be a Government Official under applicable local law. In many countries, particularly those in which the Government owns or controls many healthcare providers and pharmacies, virtually all HCPs may be considered Government Officials under the applicable Anti-bribery and Anti-Corruption Laws.; (viii) Candidate for political office; (ix) Official of a political party; and (x) Family member of any of the Government Officials described in this definition.
Healthcare Professionals	Health Care Professional means members of the medical, dental, pharmacy, and nursing professions and any other persons who, in the course of their professional activity, are qualified or permitted to prescribe, supply, administer, purchase, recommend, reimburse, pay for or acquire a medicine, or influence or authorize any of the foregoing. The term also includes health service managers and administrative or clinical support staff who provide support to HCPs, as well as any Associates of any entity that is owned by or comprised of HCPs. Examples of Health Care Professionals are physicians, nurses, medical assistants, pharmacists, paramedics, product formulary committee members, clinical investigators, and public and private hospital Associates.

Facilitation Payments	Facilitation payments are unofficial payments made to secure or expedite a routine government action by a government official.
Kickbacks	Kickbacks are typically payments made in return for a business favour or advantage.
Potentially Influencing Government Official ("PIGO")	A Potentially Influencing Government Official ("PIGO") is an individual who is either: a) connected to a Key Decision Making Entity ("KDME") as a member of its management or governance body, as an Associate, or as a consultant, or b) in a position where he or she could make a decision that will significantly impact Cipla's business, other than, if applicable, merely as a practicing HCP.
Cross Border Transactions	Cross-border transactions are any interactions or transactions involving a Government Official or HCP where: <input type="checkbox"/> An Associate is in a country other than the home country of the Government Official or HCP, or <input type="checkbox"/> The interaction or transaction is reasonably expected to occur in a country other than the home country of the Government Official or HCP.

9. Abbreviations

Acronym	Full form
FCPA	Foreign Corrupt Practices Act
GOs	Government Officials
HCPs	Health Care Professionals
KDMEs	Key Decision Making Entities
PIGO	Potentially Influencing Government Official

10. References

Sr. No.	Reference	Document / Link
1	A Resource Guide to the U.S. Foreign Corrupt Practices Act by the Criminal Division of the U.S. Department of Justice and the Enforcement Division of the U.S. Securities and Exchange Commission	 FCPA ABAC Guide
2	UK Bribery Act Guidance Note	 UK Bribery Act Guidance Note
3	India's Prevention of Corruption Act, 1988 Guide	 India's PCA 1988 Guide

11. Annexures:

Annexure-01: Potential risk scenarios: “red flags”

The following is a list of possible red flags that may arise during the course of employment or association of Associates or Business Partners with the Cipla Entities and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If any Associate or Business Partner encounter any of these red flags while working with the Cipla Entities, they must report them promptly using the procedure set out in our “Whistle Blower Policy”:

- a) You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- b) You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with government officials or officials involved in the pharmaceutical licence application process;
- c) A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- d) A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- e) A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business;
- f) A third-party requests and unexpected additional fee or commission to “facilitate” a service;
- g) A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiation or provision of services
- h) A third-party request that a payment is made to “overlook” potential legal violations;
- i) A third-party request that you provide employment or some other advantage to a friend or relative;
- j) You receive an invoice from a third party that appears to be non-standard or customised;
- k) A third party insists on the use of side letters or refuses to put terms agreed in writing;
- l) You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- m) A third-party request or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- n) You are offered an unusually generous gift or offered lavish hospitality by a third party;
- o) A doctor employed by a government owned hospital or university requests a payment to provide a glowing report of the medicine you are applying to have licensed;
- p) A foreign government official suggests a contribution should be made to his favourite charitable organisation and in return he would be able to influence the decision-making process for licence approvals; or
- q) A doctor suggests that he may be able to promote the use of pharmaceutical products for which Cipla has applied for a licence in his hospital in return for a favour.

Annexure -02: Declaration for Gifts, Business Entertainment and Hospitality

I understand that if I have been offered any gift, entertainment or hospitality or if I am offering any entertainment or hospitality by/to a business partner or any other entity doing or seeking to do business with Cipla, it is my obligation to make this declaration.

Whether the gift is being Offered Received

Description of Gift/Hospitality _____

Date on which the gift was/is planned to be exchanged _____

Name of the person and organisation with whom the gift/hospitality is exchanged _____

Business relations (or potential relationship) of the person/organisation with Cipla _____

Purpose for which the gift/hospitality was exchanged _____

I further declare that to the best of my knowledge these gifts or services have a value of approx. _____ *[insert amount in figures, words and mention the currency of payment]*

Additional details of the Gift, Entertainment or Hospitality services are as follows,

The above details include the business justification for the gift/hospitality, the current location of the gift (in case of gifts received) and any other information Cipla may require to make an assessment.

I have attached with this declaration any supporting documentation for

1. The value of the gift/hospitality.
2. The purpose for which the gift or hospitality is exchanged
3. Business justification of the gift or hospitality services
4. Any other relevant documentation that Cipla may require to make an assessment on this matter

I acknowledge that the information provide by me is true to the best of my knowledge.

Name: _____ Employee ID: _____

Department: _____ Designation: _____

Signature: _____

Place: _____

Date: _____