

## Statement of Policy

1.1. Chetan Meditech Pvt Ltd (“Biotek” or the “Company”), is committed to conducting business ethically and with the utmost integrity, which includes compliance with all relevant Indian laws and regulations against bribery and corruption.

1.2. Biotek has a zero-tolerance policy with respect to bribery and corruption everywhere that we do business. Biotek prohibits all forms of bribery or corrupt conduct, whether involving Government Officials or commercial (private) sector persons or companies, and whether direct or through a third party acting for or on Biotek’s behalf. Engaging in any type of bribery or corrupt conduct is never an acceptable business practice and will not be tolerated by Biotek.

1.3. Biotek Personnel shall act at all times with the utmost integrity and highest ethical standards in fulfilling all of their duties for Biotek, and not take any action that could compromise their judgment and/or the best interests of the Company. Accordingly, Biotek Personnel shall never request or accept any payment or anything of value that could influence, or could be perceived as influencing, the execution of their duties at Biotek. This includes accepting inappropriate gifts or hospitality, kickbacks, or investment opportunities from private individuals or entities conducting (or seeking to conduct) business with Biotek.

1.4. This Policy should be read in conjunction with Biotek’s Code of Conduct and Business Ethics (“Code of Conduct”) and related policies and procedures.

## Definitions

2.1. For purposes of this Policy, these terms have the following meanings:

2.1.1. “Bribery” is the offering, authorizing, promising, providing, requesting, accepting, or receiving of anything of value, either directly or indirectly, to or from an individual or company, in order to secure an improper advantage.

2.1.2. Not all bribes are payments of cash. A bribe can be made with “anything of value,” which includes, but is not limited to, money, business opportunities, preferential treatment or terms, confidential information, employment opportunities, favours, meals, travel, entertainment (such as tickets to a sporting event), gifts, political contributions, or charitable donations. Furthermore, to constitute an offense under one or more of the relevant laws and regulations against bribery and corruption, there need not be an actual exchange of something of value -- an offer or solicitation may be sufficient.

2.1.3. “Government Official” means:

i. Any officer or employee, appointed or elected, of a local, state, regional, or federal government, or any department, agency, ministry, or instrumentality of a government;

ii. Any physician or other health care professional (“HCP”) employed by a public hospital or clinic;

iii. Any individual who, although temporarily or without payment, holds a public position, employment, or function;

iv. Any officer or employee of a public international organization,

v. An individual acting in an official capacity for or on behalf of a government department, agency, ministry, instrumentality, or public international organization;

vi. A political party official, officer, or employee, or any candidate for political office;

vii. Any officer or employee of an entity owned or controlled by a government, as well as entities that perform a government function (e.g., air or sea transport, utility, energy, water, or power); or

viii. A member of a royal family, including one who may lack formal authority, but could otherwise be influential in advancing Biotek’s business interests, though, for example, partially owning or managing a state-owned or state-controlled entity.

Family members or close associates of any of the individuals listed above may also qualify as Government Officials if interactions with them are intended or have the effect of conferring anything of value on a Government Official. Any questions relating to whether an individual or an entity is a Government Official should be directed to Biotek's Legal department.

2.1.4. "Biotek Personnel" includes officers, directors, and full-time, part-time, temporary and contract employees of Biotek, as well as consultants and independent contractors providing services on behalf of Biotek.

### **Scope**

3.1. All Biotek Personnel are responsible for carefully reviewing, understanding, and abiding by this Policy at all times.

3.2. Biotek also expects all business partners that work with, for, or on behalf of the Company to abide by the same standards of ethical conduct and compliance set forth in this Policy.

### **Requirements**

4.1. Biotek Personnel shall never directly or indirectly offer or pay, or authorize an offer or payment, of money or anything of value, to a Government Official, HCP, or any other person or entity (including those in the commercial/private sector), which is:

4.1.1. Intended to corruptly influence the judgment of the recipient in exercising his or her job responsibilities;

4.1.2. Intended to corruptly secure preferential treatment or an improper advantage for Biotek, or;

4.1.3. Intended as gratitude for the recipient having made a decision or acted in a way that improperly benefited Biotek.

4.2. Biotek Personnel shall not directly or indirectly request or accept any money or anything of value that is:

4.2.1. Intended to corruptly influence the judgment or conduct of Biotek Personnel in his or her job responsibilities, or;

4.2.2. Intended as gratitude for having made a decision or acted in a way that improperly benefited the person or entity giving anything of value to Biotek Personnel.

4.3. All Biotek Personnel are expected to comply with relevant local laws related to anti-bribery and anti-corruption, and the laws of any other applicable jurisdictions in which we do business.

4.4. Biotek Personnel shall never engage a third party to do anything that would be prohibited by this Policy if undertaken by Biotek Personnel.

### **Interactions with Government Officials**

5.1. Bribery and corruption risks exist in our contacts and business relationships with individuals and entities in the commercial (private) sector as well as our interactions with Government Officials. As a medical device company, Biotek must be particularly sensitive, however, to bribery and corruption involving Government Officials. Biotek Personnel encounter Government Officials on a day-to-day basis in many parts of the business. Government entities can be customers in some instances, and the regulators of Biotek products and operations in others.

5.2. As defined above, the term "Government Official" is broadly interpreted as HCPs who are employed by, teach at, or have privileges with, a government hospital or public university—even if they only work there part-time. In many countries outside India., particularly those in which the government owns or controls many hospitals, clinics, and pharmacies, virtually all HCPs may be considered Government Officials.

### **Facilitation Payments and Duress**

6.1. A facilitation payment is a nominal, unofficial payment to a Government Official for the purpose of securing or expediting the performance of a routine, non-discretionary governmental action. Such payments are illegal in most countries (although there is a limited exception under the FCPA). Biotek prohibits Biotek Personnel from offering,

authorizing, or making any such facilitation payment (directly or indirectly). All requests or demands for facilitation payments or bribes must be reported to a member of Biotek's Legal department.

6.2. In the event a payment is solicited under duress in a situation involving an imminent threat to the health, safety, or welfare of Biotek Personnel, a facilitation payment may be provided. Once the immediacy of the situation has been resolved, however, the payment must be reported to a member of Biotek's Legal department, including information on the circumstances and amount of the payment. For example, if a Biotek Personnel is crossing a border from one country to another country and detained by Governmental Officials who insist on "fee" for being allowed to cross the border, any such payment must be accurately and transparently recorded in Biotek's books and records.

### **Third Parties and Other Business Partners**

7.1 Biotek has a responsibility to ensure that all those with which it conducts business (including agents, consultants, advisors, representatives, suppliers, and other third parties) understand Biotek's zero tolerance policy against bribery and corruption. Biotek expects those it does business with to act according to the same high ethical standards that it holds for itself. A business partner must never be engaged to do something that would be prohibited by this Policy if undertaken by Biotek Personnel.

7.2. Biotek Personnel should be aware that individuals soliciting bribes will often seek to involve intermediary companies to disguise the true recipient and purpose of the payment.

7.3. We require that reasonable due diligence be conducted before retaining business partners and monitoring their activities afterward. The amount of due diligence and monitoring must be proportional to the risk of corrupt activities occurring in the geographic region, industry, or specific project in question.

7.4. Biotek has a Due Diligence Procedure, which shall be followed before engaging any business partner or distributor.

7.5. Appropriate anti-corruption clauses must be included in all of Biotek's business partner contracts. Biotek's business partners must commit to fully comply with all applicable anti-corruption laws and the principles set out in this Policy.

7.6. As business partners can sometimes be used to create "slush funds" from which bribes may be paid, care must be taken to ensure that all business partners are only paid a commercially reasonable fee for legitimate goods or services that are provided to Biotek. Payments should only be made with sufficient support that the goods or services have actually been rendered. All payments to business partners should be accurately recorded in Biotek's books and records indicating the nature of the goods or services provided to Biotek and what the business partner was paid.

7.7. Any and all discounts granted to distributors or customers should be made transparently and in accordance with Biotek's relevant discount policies and procedures and local rules and regulations, as applicable.

### **Other Guidance, Donations, Gifts, Hospitality and the Giving of Other Things of Value**

8.1. Due to anti-corruption and related risks associated with providing anything of value to Government Officials and others, Biotek has developed other relevant policies and procedures that must be followed in particular circumstances.

### **Books and Records and Internal Controls**

9.1. It is Biotek's policy to keep books and records that accurately, transparently, and fairly reflect the Company's transactions in reasonable detail, and to maintain a system of internal controls designed to prevent and detect potential violations of Biotek's policies or of applicable laws. No false or artificial entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately.

9.2. All expenses incurred by Biotek Personnel shall be supported by a detailed description of activities and the actual, valid receipts or invoices reflecting amounts incurred. The knowing submission or acceptance of false receipts and/or invoices is strictly prohibited.

## **Compliance with this Policy**

10.1. If you have any questions about this Policy or what the Policy or the relevant laws and regulations require of you, please contact Biotek's Legal department.

10.2. Any violation of this Policy or related procedures by Biotek Personnel may have significant consequences for them and Biotek, including potential prosecution, fines, and other penalties, as well as imprisonment and/or disciplinary action -- up to and including employment termination, consistent with local laws.

10.3. Violations of the principles set out in this Policy by Biotek business partners may result in termination of the business relationship with Biotek, among other legal actions and potential consequences.

## **Reporting Violations**

11.1. Biotek Personnel who know of, or reasonably believe there has been, or imminently will be, a violation of this Policy and/or related procedures, or any applicable anti-corruption laws and/or regulations, must report that information immediately to the Legal department.

11.2. Biotek Personnel will be protected from retaliation for reporting concerns in good faith, as provided in Biotek's Code of Conduct and the Company's Reporting and Responding to Compliance Issues Policy. Biotek does not tolerate any act of retaliation against Biotek Personnel who report potential or actual violations of Biotek's policies or of applicable law in good faith.

11.3. For more information on reporting compliance issues and Biotek's response please see Biotek's Reporting and Responding to Compliance Issues Policy.

## **Auditing and Monitoring**

12.1. This Policy, together with supporting documentation and records required by it, is subject to periodic auditing and monitoring.

## **How to Report**

13.1. Biotek Personnel may report any concerns through an anonymous and confidential email to [info@biotekortho.com](mailto:info@biotekortho.com). Biotek Personnel may also make confidential reports to his/her supervisor, HR or the Compliance Officer.

## **Summary and Exceptions**

14.1. This Policy is intended as a general reference guide, and it does not describe all applicable law or Company policies or procedures, or give full details on any individual law, policy, or procedure, or address any and all potential situations that Biotek Personnel may find themselves in.

14.2. Biotek reserves the right to modify, revise, or alter any this Policy and any related procedure at its sole discretion. This Policy is not a contract or legal document and is intended for informational use only. If you have questions about this document, please contact Biotek's Legal department.

14.3. Any exceptions to the requirements of this Policy must be approved by Biotek's Compliance Officer.