

Anti-Bribery and Anti-Corruption (ABAC) Policy

This document outlines Paviour Pharmaceuticals' commitment to ethical conduct and its zero-tolerance approach to bribery and corruption. It establishes standards for all employees, agents, and business partners to ensure full compliance with applicable laws and regulations.

1. Purpose

Paviour Pharmaceuticals ("Paviour" or "the Company") is committed to conducting all business with integrity, transparency, and in compliance with all applicable anti-bribery and anti-corruption ("ABAC") laws. This policy establishes Paviour's zero-tolerance stance on bribery and corruption and provides guidance on identifying, preventing, and reporting unethical or illegal conduct.

2. Governance

- The Compliance Officer will oversee the implementation and review of this policy and ensure periodic updates in line with changing laws or regulatory guidance.
- All modifications to this policy require approval from the Managing Director and Board of Directors.
- Violations of this policy may lead to disciplinary action, termination, and potential legal consequences for individuals or business partners.

3. Scope and Applicability

This policy applies to:

- All employees, officers, directors, and contractors of Paviour; and
- All third-party intermediaries, agents, consultants, vendors, and business partners acting on behalf of Paviour.

The policy applies globally to all Paviour operations, particularly those involving import, export, logistics, warehousing, distribution, and regulatory interactions.

If local laws are stricter than this policy, the more stringent standard shall apply.

4. Policy Framework

4.1 Prohibition of Bribery and Corruption

Paviour prohibits any form of bribe, kickback, or facilitation payment, whether offered or received, directly or indirectly.

Associates must never:

- Offer or give anything of value to influence a government official, healthcare professional, or business partner to gain an improper advantage;
- Solicit or accept anything of value that could influence their objectivity or business judgment.

4.2 Dealings with Government Officials and Regulators

All interactions with customs, port authorities, drug regulators, and inspection officials must be transparent, documented, and lawful.

No payments, gifts, or favors should be offered to expedite regulatory or customs processes.

Any requests for unofficial payments must be immediately reported to the Compliance Officer.

4.3 Gifts, Hospitality, and Entertainment

Gifts and hospitality may be exchanged only when they are modest, reasonable, and serve a legitimate business purpose.

All gifts or hospitality extended to or received from government officials require prior written approval from the Compliance Officer.

A Gift & Hospitality Declaration Form must be submitted for all such exchanges.

4.4 Business Partners and Third Parties

Paviour expects all agents, distributors, and logistics partners to adhere to the same ABAC standards. All third parties must undergo due diligence prior to engagement and include ABAC clauses in contracts.

4.5 Donations and Sponsorships

Charitable or community donations by Paviour must be legal, transparent, and properly documented. They must not be intended to secure business or regulatory advantage.

4.6 Record Keeping and Internal Controls

All transactions and payments must be recorded accurately and supported by documentation. False or incomplete records are strictly prohibited.

4.7 Extortion or Coercion

If a payment is demanded under threat to personal safety, it may be made only to safeguard life or security and must be reported immediately afterward.

5. Reporting and Protection

Employees are encouraged to report any suspected bribery or corruption through the Whistle-blower channel. Reports made in good faith will be protected from retaliation. The Company will investigate all allegations promptly and fairly.

6. Exceptions

No exceptions to this policy are permitted without written approval from the Compliance Officer and Managing Director.

7. Training and Awareness

Paviour will conduct regular ABAC training for employees, agents, and key business partners. All new hires must review and acknowledge this policy as part of onboarding.

8. Glossary

Bribery: Offering, promising, giving, soliciting, or accepting anything of value to improperly influence a decision or secure an advantage.

Facilitation Payment: Small unofficial payments to speed up routine actions by government officials. These are prohibited.

Kickback: Return of a portion of payment to a person who influenced the transaction.

Government Official: Any public officer, customs or regulatory official, or employee of a government-owned entity.

Business Partner: Any third party acting for or representing Paviour, including import agents, logistics providers, and distributors.

9. Enforcement

Failure to comply with this policy may result in disciplinary action, legal prosecution, and termination of third-party contracts.

10. Review and Updates

This policy shall be reviewed annually by the Compliance Officer and approved by the Board of Directors to ensure continued relevance and compliance with applicable laws.

11. References

1. Uniform Code for Pharmaceutical Marketing Practices UCPMP 2024
2. Bharatiya Nyaya Sanhita (BNS 2023) & Prevention of Corruption Act (PCA)