



AVIK PHARMACEUTICAL LIMITED

A-1/7 & A-1/8, 1st Phase, GIDC Vapi - 396 195. Dist.-Valsad, Gujarat State, India

Phone : (0260) 2401593, E-mail: avikpharma@avikpharma.com

CIN : U99999MH1979PLC021711

Conflict of Interest Policy

PURPOSE:

This policy is designed to provide guidance to conduct business with professionalism, integrity, honesty, moral and ethical standards.

The purpose of this Policy is to establish the principles to identify and manage actual or observed Conflicts of Interest and prevent them from harming the Company. The interests of the Company and those of its associates must be aligned in order to avoid situations that could harm our business or organizational culture. Policy lays the principles for undertaking business transactions with undivided loyalty and without any personal conflicts.

The employee conflict of interest policy aims to outline rules and principles regarding conflict of interest. It also provides responsibilities of the employees and the company in investigating and resolving such differences.

SCOPE:

This Policy applies to all Associates, Board Members, employee, contractors, consultants, trainees, our Company members, group companies and persons or entities contractually obligated of Avik Pharma.

DEFINITION:

“Conflicts of interest” means Conflicts of interest may arise where an Associate places his or her personal interests before the interests of Avik. Such personal interests may exist or appear to exist due to a relationship with an individual(s) or entity(s) which can influence or appear to influence the objectivity or efficiency while undertaking assigned responsibilities.

“Associate”: means any person who is employed or has a work relationship with the Company or any of its companies.

TYPES OF CONFLICT OF INTEREST:

1. Actual conflict of interest:

There is a real conflict between an employee or Director’s public duties and private interests.



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2. Potential conflict of interest:

An employee or Director has private interests that could conflict with their public duties. This refers to circumstances where it is likely that a conflict may arise in future and steps should be taken now to mitigate that future risk.

3. Perceived conflict of interest:

Public or a third party could form the view that an employee or Director's private interests could improperly influence their decisions or actions, now or in the future.

ACTIVITIES CONSTITUTING CONFLICT OF INTEREST:

Activities that constitute conflict of interest in an organization are as follows:

- Hiring, promoting or otherwise providing special treatment in the workplace to a family Member or close friend.
- Employees using their knowledge of Company finances or their access to funds to benefit Themselves over the objectives of the business.
- Acting as consultants in any form to any government, regulatory body or industry association, which can influence the Company's business.
- Accepting expensive gifts, frequent or high-value entertainment or meals, donations from a client, vendor or another person having a relationship with business.
- Conducting business as a representative of the Company, with an entity in which you hold a financial or commercial interest, or are affiliated to.
- An ownership or investment interest in any entity with which the Company has a transaction or arrangement.
- A compensation arrangement with the Company or with any entity or individual with which the Company has a transaction or arrangement.
- A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Company is negotiating a transaction or arrangement.
- Contributing to a charitable cause/fund in order to maintain a business relationship.
- Improper use of your position at the Company or of Company's information to achieve a Personal interest or indirect gain.



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OBLIGATION TO DISCLOSE:

Policy includes that employee or agent of the company discloses any conflict of interest. It failure to disclose can result in disciplinary action of employment.

REPORTING OF VIOLATIONS:

All those covered under the conflict of interest policy must comply with this policy and report any concern or information that they may have in relation to the violation of the said policy. All Concerns will be kept confidential and proper investigation will be conducted.

Any violation of the conflict of interest policy will not be permitted, and may lead to conducting investigations, or taking disciplinary actions including termination of employment. Reporting procedure of a conflict of interest has to go through the compliance officer, Human Resources (HR) department and then the management.

DOCUMENTATION:

Company shall have a conflict of interest register to record the identified conflicts of interest. The purpose of the register is to maintain a record of all conflicts of interest that arise or may arise in connection to the activities that Company engages in. Register shall be kept confidential with access only on a need-to-know basis. Registers shall be reviewed annually.

MONITORING:

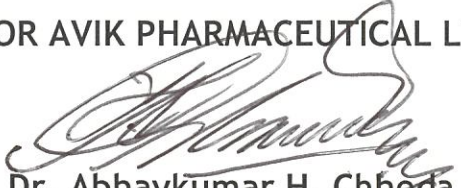
The register will be reviewed quarterly by Management. The Board Secretary will oversee the quarterly of the register.

DISCIPLINARY ACTION:

Breach of this policy may result in disciplinary action or wrong action.

Date: 12/09/2024.

FOR AVIK PHARMACEUTICAL LTD



Dr. Abhaykumar H. Chheda

(President- Operation)