



Inspiring Human Belief
in a Healthier World

Policy On Sensitive Transactions

Sensitive transactions are usually in the nature of kickbacks, gifts of significant value, bribes or payoffs made to favorably influence some decision affecting a company's business or for the personal gain of an individual.

- All transactions should comply with applicable laws.
- Hetero's policy prohibits the company and its employees and agents from corruptly offering or giving anything of value to political party/government officials inside/outside the India or an official of a public international organisations.
- Sensitive transactions may be direct or indirect, for the purpose of influencing officials in their official capacity or in violation of their lawful duties or to secure any improper advantage in order to help the company obtain or retain business or direct business to any person.
- Hetero policy prohibits any employee or agent from making any payment or engaging in any transaction that is prohibited by the law.
- Establish the process necessary to deliver the results in accordance with the requirements and implement the process to ensure proper handling of sensitive transactions.
- Monitor and measure the process against the requirement and take actions to continually improve the system.

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1 September, 2022