



matrix pharma
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CODE OF BUSINESS CONDUCT AND ETHICS POLICY

Effective Date: 14 May 2025

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1. Applicability

Matrix Pharmacorp Private Limited and all its holding/subsidiary/associate/group companies/entities including Tianish Laboratories Private Limited hereinafter collectively will be referred to as (“Company/Matrix Pharma”).

This Code applies to all employees, whether permanent, temporary, or on contract, including those working directly or through contractors or as full-time consultants, as well as the members of the Board of Directors of Matrix Pharma

Matrix Pharma also expects its business partners—such as suppliers, service providers, agents, and channel partners (dealers, distributors, and others)—to uphold the principles outlined in this Code.

This Code serves as a framework for our daily business interactions, reflecting our commitment to ethical behaviour and corporate values. It emphasizes that the way we achieve business outcomes is just as important as the outcomes themselves. We strive to align our practices with nationally and internationally recognized principles and frameworks, including the United Nations Global Compact (UNGC), and International Labour Organization (ILO) Core Conventions

2. Honest and Ethical conduct and Fair dealing

- All Personnel should endeavour to deal honestly, ethically, and fairly with Matrix Pharma’s suppliers, distributors, customers, competitors, agents, independent contractors, consultants, and shareholders.
- Statements regarding Matrix Pharma’s products and services must not be untrue, misleading, deceptive, or fraudulent.
- All Personnel are prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.
- We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing other companies' proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited.



SITUATION

Saranya has just finished her presentation to a client, and after it, her colleague asks whether she has covered the specific conditions related to the transaction, particularly regarding regulatory or warranty aspects.

Although Saranya didn't directly address these conditions, the transaction could still be mildly effective without them being fully discussed.

Should Saranya admit that she didn't cover the details, or should she provide information now, even though it may not be crucial to the overall presentation? If she does share this information, might it jeopardize the transaction or the relationship with the client?



BEST APPROACH

She should be correct in the details of the case and not make any statements about products that could mislead or provide false information.

She should avoid making any untrue comments about the order to ensure the integrity of the sale. She should not misrepresent or provide fraudulent details regarding the products in the sale. All information shared must be truthful, without exaggeration or omission, to prevent any false impressions.

3. Privacy policy

Matrix Pharma is committed to protecting the privacy of all individuals with whom we do business, including pharma companies, customers, contractors, and others. This commitment extends to safeguarding personal data in accordance with applicable laws.

Personal Data- Refers to any information that can identify an individual, either directly or indirectly (e.g., name, date of birth, photograph, address, email address, social security number(Aadhaar number) PAN, etc.).

Data Protection Rights- Individuals have the right to control the collection, processing, use, disclosure, and storage of their personal data. This data must be handled fairly, for legitimate and specific purposes, and must not be kept longer than necessary for its intended purpose.

Global Privacy Governance- As data protection laws vary across countries, Matrix Pharma from time to time shall adhere to Global Privacy Governance and instructions

issued by respective countries for Fair Processing Notice, applicable to all our employees globally. We have also established intercompany agreements to ensure the proper collection, storage, transfer, and use of personal data.



SITUATION

Shobhit is working at Pharma. Sheela, a client involved in a charitable cause, asks him for the names and phone numbers of Matrix Pharma suppliers so she can seek donations for a medical project in poor areas. Although Shobhit has good intentions, he does not have the authority to share this information.



BEST APPROACH

No, he cannot disclose the supplier details for this cause or any other without approval from the Board of Directors. Even though Shobhit holds a senior position, sharing this information without consent is not allowed. He must consult with the proper authorities before providing any client or supplier details. The information is confidential, and Shobhit is obligated to protect it.

4. Protection of confidential information

Confidential and proprietary information generated and collected in the course of our business is a valuable asset for the company. Safeguarding this information is essential for our ongoing growth and competitive edge. All confidential and proprietary information must be kept strictly confidential unless the company authorizes disclosure.

All personnel are required to use Matrix Pharma's confidential information solely for business purposes and must ensure it remains confidential at all times. This responsibility also extends to confidential information from third parties that the company has received under confidentiality agreements.

Matrix Pharma employees shall not provide any company related information to media representatives or other outside parties without the prior written approval of the authorized official from corporate communications.



SITUATION

Ron likes to keep his résumé updated on professional networking websites, where recruiters can view his profile. Currently, he is working on the development of a new drug as part of the R&D team at Matrix Pharma. Is it acceptable for him to disclose, in his résumé, details about the innovation he is working on?



BEST APPROACH

No, it is not acceptable for Ron to disclose confidential information about the company on a public platform. Details about product development are highly confidential, and disclosing such information could negatively impact Matrix Pharma's competitive position in the industry.

Additionally, he should not disclose such information while attending job interviews, seminars, workshops, trade fairs and any informal professional gatherings.



SITUATION

Krish: Hello, what is up?

Bala: Doing great, thanks. How can I help you? Do you need anything?

Krish: No. In fact, I have some things I think you will need.

Bala: Really? What?

Krish: Well, I have the customer list from my employer. I also have the pricing structure, including schedules, which I think would be really helpful for you.

Bala: You took all these confidential files? Didn't you have a confidentiality obligation with your employer?

Krish: The thing is, I do not really see this as confidential information. I mean, it is work that I did, so I can decide what to do with it. I've always kept copies of my work.



BEST APPROACH

Were Krish's actions appropriate?

No, Krish must not disclose such information that is confidential. Doing so is in direct violation of the company's code of conduct.

5. Non-discrimination

Matrix Pharma regards the diversity of its personnel as an important asset. The company is firmly committed to provide equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind including but not limited to derogatory comments based on racial or ethnic characteristics.

Discrimination in employment is a violation of Matrix Pharma's policies. It is Matrix Pharma's policy to recruit, hire, promote, assign, compensate and train qualified persons without regard to race, colour, religion, sex, national, origin, ancestry, age, marital status, pregnancy, sexual orientation, or disability. We ensure that that all recruitment, compensation, promotion, and other employment decisions are made based on merit, qualifications, and business needs, and are free from bias or prejudice. Any personnel engaging in discrimination will be subject to disciplinary action up to and including termination of employment and / or be liable to indemnify the company for the loss incurred by the company.



SITUATION

During lunch break, **Rohan** makes comments which **Savita**, a close colleague, notices are uncomfortable for some colleagues who do not find these jokes funny. Savita asks Rohan to stop making such comments, but he totally disregards her request, continuing with his jokes and embarrassing the colleagues who find them unwelcome. Can Savita or anyone do anything more to correct this behaviour?



BEST APPROACH

Rohan cannot make inappropriate jokes or comments at work. Even if he didn't realize the impact at first, continuing to do so is a form of harassment or discrimination. The affected colleagues should report this behaviour to the relevant authorities, as it violates the company's Code of Conduct.

Matrix Pharma does not tolerate such behaviour and works to ensure a respectful environment for all employees. **Savita**, though not a manager, should report this issue to HR or the appropriate authorities.

6. Freedom of Association & Collective Bargaining

Matrix Pharma upholds the freedom of its employees to form associations, organize themselves, and participate in collective bargaining without facing any hindrance, threats, or reprisals. The company promotes transparent dialogue between staff and management to discuss and resolve issues related to the work environment, such as health and safety, remuneration, and employment terms.

7. Sexual Harassment

Any unwelcome sexual advance, request for sexual favour or other verbal, non-verbal or physical conduct of a sexual nature that creates an intimidating, hostile or offensive work environment will be considered as sexual harassment. Any Personnel engaging in sexual harassment will be subject to disciplinary action up to and including termination of employment and/or liable to indemnify the company for the loss incurred by the company.

Matrix encourages Personnel to share relevant information about actions that may either violate or have the potential to violate this Code, with the concerned superior(s) or report the same as per the provisions of the 'Policy on Prevention of sexual harassment at workplace.' Superiors need to be alert to any potential cases of intimidation or harassment and ensure that this situation is terminated as soon as possible.



SITUATION

Maya has recently joined the company. Her manager keeps asking her to go out for dinner or lunch on non-working days, even though she has told him that she wants to keep the relationship strictly professional. Despite her repeated requests, the manager continues his behaviour, creating a hostile work environment. Maya is apprehensive about discussing the issue with her colleagues since she is new to the company.



BEST APPROACH

Yes, Maya should not tolerate such behaviour, as it is inappropriate and can be considered harassment. She should immediately report the situation to higher authorities, such as HR or a supervisor, as this behaviour may violate the company's Code of Conduct. Sexual harassment or any behaviour that makes an employee uncomfortable is unacceptable in the workplace. Maya has the right to a safe and respectful work environment, and the company should take action to address the issue.

8. Compliance with laws, rules and regulations

Adhering to the law, both in its letter and spirit, forms the basis of the company's ethical standards. In conducting business, all personnel must comply with the relevant laws, rules, and regulations in India and any other jurisdiction where the company operates.

While not all personnel are expected to know the specifics of these laws, it is important to have a basic understanding of the relevant local, state, and national regulations to recognize when to seek guidance from supervisors, managers, or other appropriate company representatives.

9. Fair Competition

Matrix Pharma is committed to competing in an ethical and lawful manner, prohibiting any actions that are anti-competitive or violate applicable competition or antitrust laws.

As Matrix Pharma's business expands globally, it may be subject to fair competition laws in various jurisdictions, and all personnel must comply with these regulations. Many countries have established laws to promote and protect fair competition, and Matrix is dedicated to fully adhering to these laws, both in their letter and spirit.

10. Conflict of Interest; Corporate Opportunities

A conflict of interest occurs when a personal interest conflicts, or appears to conflict, with the company's interests. It arises when personnel engage in activities or hold interests that impair their ability to perform their duties honestly, objectively, and effectively. All personnel must prioritize the company's best interests and avoid any activities or personal interests that may create a conflict of interest.

Corporate Opportunities

Personnel of the Company shall not exploit opportunities discovered through their position for personal gain. They must not use corporate information or property for personal purposes unless the use is disclosed in writing prior to use—directly to the CEO in the case of personnel, and to the Executive Director in the case of CEO. All such disclosures should be followed by prior approval before using corporate information or property.



SITUATION

Your spouse has an 8% ownership interest in a company that Matrix Pharma is considering for a potential partnership.

You are not directly involved in making decisions regarding the selection of this company. However, due to your spouse's interest in the company, do you need to report anything to Matrix before an agreement is signed?



BEST APPROACH

Yes, any such situation needs to be brought to the notice of your reporting manager and Compliance Officer



SITUATION

Ananya, an employee at Matrix Pharma, wants to invest in a company that produces an ingredient used in a Matrix Pharma product. Would this be a conflict of interest?



BEST APPROACH

This may or may not be a conflict of interest, depending on Ananya's position, her influence on purchase decisions, the amount of her investment, and the importance of the supplier to Matrix Pharma. Before investing, she must disclose this to her manager, who will advise her appropriately, keeping the best interests of the company in mind.



SITUATION

A close relative of a Director at Matrix Pharma is also bidding for a high-value tender to supply goods or services to the company. Does the Director need to inform the company before proceeding with the bid?



BEST APPROACH

Yes, the Director must disclose this situation. Given the high value of the proposed contract and the potential for a conflict of interest, it is essential to disclose any relationship that could interfere with the impartiality of the Procurement Department's decision-making process. To ensure that the company's interests are safeguarded and that the decision-making remains objective and independent, the Director should inform the relevant parties within the company, especially considering the long-term nature of the transaction and the potential impact on the company.

Conflicts of interest are prohibited as a matter of company policy. When in doubt about conflicts of interest – actual or perceived, one should always consult with the Head, Human Resources, or the Compliance Officer(s).

11. Interaction with customers

Strict regulations govern not only our promotional activities but also our educational and commercial relationships with customers and pharma companies

All interactions with customers and pharma companies must comply with applicable laws, regulations, and Matrix Pharma's policies, which can be found on Policies Central.

General Principles for Interactions with customers-

- We must not provide any unlawful inducements to promote the sale or recommendation of our products.
- Strong customer relationships are built on integrity and trust. We strive to outcompete others through superior products, quality, manufacturing, and service—not through unethical business practices.
- Our relationships with customers and healthcare organizations must prioritize patient care and support the practice of medicine. These interactions should never encourage customers to prioritize personal interests over their organizations' or patients' well-being.
- We must never offer or accept improper payments, contributions, or transfers of value, either directly or indirectly, to influence business decisions.

Promotional Activities-

- All promotional activities and materials must comply with applicable laws, regulations, codes, and our marketing and advertising review policies. They must be truthful, accurate, not misleading, consistent with approved product labelling, and properly substantiated.
- Approval Process: All personnel involved in product marketing or promotion must familiarize themselves with the applicable standards for interacting with customers, as well as the policies and procedures for creating, reviewing, approving, and using promotional materials. The use of unapproved promotional materials is strictly prohibited.

12. Insider Trading

Personnel are barred from trading in the securities of other companies if they acquire material non-public information about those companies during their work at Matrix Pharma. This includes companies such as:

- Customers
- Suppliers
- Collaboration partners
- Any companies Matrix Pharma is currently doing business with or is considering doing business with.

It is irrelevant whether the material, non-public information is used as the basis for trading. Simply trading while in possession of such information violates company policy and could lead to legal consequences, including civil and criminal sanctions.

13. Financial Reporting

High standards of integrity are fundamental to Matrix Pharma's business practices. The company's financial reports should reflect not only high performance but also transparency and accountability. We are committed to consistently sharing and disclosing material information to our stakeholders, in accordance with statutory guidelines.

14. Protection and proper use of company assets

All personnel must prioritize protecting the company's assets, both physical and intangible, and ensure their efficient use. Theft, negligence, loss, and waste can directly impact the company's financial performance. Personnel are required to use the company's assets and services solely for legitimate business purposes and not for personal gain or the benefit of others.



SITUATION

Rajesh has been asked by his ex- colleague for some databases which they had worked on together when he was at Matrix. As the ex- colleague was involved in working on the database, can Rajesh share the database records with him?



BEST APPROACH

Rajesh has access to a proprietary database at Matrix Pharma. Every employee has a duty to keep confidential information safe and secure and must not share or disclose it to unauthorized parties, including colleagues or third parties, without proper authorization.

Rajesh cannot share confidential information from the database with unauthorized individuals or parties. All employees must safeguard proprietary information and ensure it is not disclosed without proper authorization.

15. Protection of Proprietary Information, Intellectual Property

Matrix Pharma is committed to safeguarding its proprietary information, intellectual property, and trade secrets, as well as any proprietary information entrusted to us by third parties.

Proprietary Information: Refers to any information learned, received, or developed during the course of employment that is not publicly available. This may include, but is not limited to:

- Strategic plans, financial plans, business plans
- Commercial and regulatory strategies, legal strategies
- Research and development data, sales, and marketing information.
- Manufacturing processes, financial details
- Information regarding our pipeline, products, facilities, customers, and workforce
- Regulatory audit reports, internal audit reports
- Employee compensation information
- Information security database, cyber security architecture and IT systems access codes

Value of Proprietary Information: Proprietary information is a valuable business asset. Its unauthorized use or disclosure can significantly harm the company's competitive position and give others an unfair advantage.

Protection and Confidentiality: Proprietary information, intellectual property, and trade secrets must never be used or disclosed without proper authorization and in accordance with applicable laws. We must ensure these assets are safeguarded by.

- Ensuring that any recipient of such information signs a written confidentiality agreement approved by the Legal department before disclosure.
- Taking exceptional care during interactions at industry meetings and when engaging with representatives of competitors to avoid any unintended sharing of proprietary information

16. Anti-Bribery & Anti-Corruption

Matrix Pharma is dedicated to conducting business with the utmost integrity and in full compliance with all applicable anti-bribery and anti-corruption laws, including the Prevention of Corruption Act 1988 (India), U.S. Foreign Corrupt Practices Act (FCPA) and local anti-bribery laws in all the countries where we operate.

Company personnel are strictly prohibited from engaging in bribery or corruption under any circumstances. This includes offering, promising, making, accepting, soliciting, authorizing, or providing any payments, gifts, or anything of value—either directly or indirectly through third parties—to improperly influence or reward any action, decision, or inaction, or to obtain or retain business or secure an unfair business advantage.

This policy applies to both the bribery of government officials (foreign or domestic) and individuals or organizations in the private sector.

Bribes can take various forms, not just cash. Anything of value could potentially be deemed a bribe. Even offering or promising a prohibited payment, regardless of whether it is accepted or leads to the desired outcome, may constitute bribery. Similarly, such payments are considered bribes whether made directly to the recipient or through third parties.

Personnel must not authorize or permit payments to any agent or third party if they are aware or have reasonable suspicion that the third party will use the funds for bribery.

Matrix is committed to adhering to these laws and maintaining the highest standards of ethics, business transparency, and anti-corruption practices across all our operations. We prohibit bribery and corruption in any form.



SITUATION

Ravi is attending a medical conference where he is discussing a new drug developed by Matrix Pharma. The drug receives positive feedback from the medical community. However, towards the end of the conference, a regulator approaches Ravi, mentioning that a similar drug from a competitor is pending approval. The regulator offers Ravi the opportunity to expedite approval for Matrix Pharma's drug, in exchange for a specified sum of money. Should Ravi agree to the terms in order to secure a first-mover advantage for Matrix Pharma?



BEST APPROACH

No, Ravi should not agree to the regulator's terms. Matrix Pharma has a strict anti-bribery policy, and any attempt to expedite regulatory approval through bribery or unethical practices is unacceptable. Ravi must immediately inform the regulator that Matrix Pharma does not engage in bribery under any circumstances. Ravi should also report the incident to his manager and the **Compliance Department** to ensure that the company's policies are upheld and that no such deviations from regulations occur.

17. Anti-money laundering

Matrix Pharma is committed to complying with all laws that prohibit money laundering and the financing of illegal or illegitimate activities.

Money laundering refers to the process by which individuals or groups conceal the proceeds of illegal activities or attempt to make the sources of these illegal funds appear legitimate.



SITUATION

Amit, working in the Sales Department at Matrix Pharma, receives a very large order from an existing customer. This order seems highly inconsistent with the customer's usual purchasing pattern. When Amit asks the customer about the reason for the large order, the customer is reluctant to provide complete information. The customer is requesting multiple partial payments from various locations, which raises suspicions.

What should Amit do?



BEST APPROACH

Amit is justified in wanting to understand the reasons behind the large order. If Amit feels that the request for multiple partial payments from various parties and locations could potentially indicate money laundering activity, he must report it appropriately.

Additionally, relevant personnel must ensure that they know their business partners, conduct integrity assessments, and perform due diligence to understand their business practices. If Amit suspects the customer is attempting to disguise illegal activity, he must notify higher authorities immediately.

18. Gifts and gratuities

Matrix prohibits providing anything of value to a person with the intent of influencing that person's recommendations or purchases of healthcare products or services.

No gifts, meals, entertainment, or anything else of value may be directly or indirectly given by Matrix personnel to anyone in violation of applicable law. Providing gifts, meals or entertainment to customers is generally discouraged and, where allowed, must comply with applicable law and Matrix policies.

Matrix personnel may not solicit or request gifts, entertainment or other business courtesies from people or organizations doing business with Matrix.

Occasional, unsolicited gifts and business courtesies, such as meals and entertainment, are permissible if they are customary and common business courtesy; modest, based on local standards; and not excessive in value. In addition, local policies may require advance approval before accepting gifts or other business courtesies; ask your compliance representative for specific guidance.

No gifts or entertainment may be accepted that would likely or potentially result in an expectation or belief of the creation of a personal obligation, or that could be perceived as influencing your judgment or decision.

Matrix personnel who are in a position to influence or make procurement decisions must be especially cautious about the receipt of gifts that might affect, or appear to affect, their procurement decisions.



SITUATION

Mary Grace, Head of Procurement, receives a nominal gift from a vendor at the beginning of the year, which she accepted. However, she is now getting frequent gifts from the same vendor. What should Mary Grace do?

Is it wrong to accept the gift the first time?



BEST APPROACH

As per company policy, Mary Grace should stop accepting frequent gifts from the vendor. While the first gift may have been acceptable, repeated gifts could create a perception of bias. She should disclose the situation to compliance and avoid any appearance of conflict of interest.



SITUATION

Bala, working in the marketing division of Matrix Pharma, has just returned from attending a vendor meeting. He is incredibly happy because he received two tickets to Sunday's cricket match.

Krish: Hello Bala, how was the meeting?

Bala: It was great... met a lot of people. How have you been?

Krish: It's been a hectic week! In fact, I am waiting for the weekend!

Bala: I can't agree more! Guess what, I've got 2 tickets for Sunday's Cricket match! Wanna join in?

Krish: Wow, how did you get those?

Bala: Well, the vendor gave me those! I heard those are going for more than 3000 Rs!

Krish: Lucky you! But I think isn't it against our company policy?

Bala: I think so that it's only applicable for big gifts like a holiday trip or something. And this policy only affects senior levels. This gift is just a general gift from a vendor who appreciates my work!

Were Bala's actions appropriate even if he is not making any commitment to the vendor in return?



BEST APPROACH

As per Company Policy Bala's actions were inappropriate. Accepting high-value gifts like cricket tickets could potentially create influence. Matrix Pharma's policy discourages accepting gifts from vendors, especially if they might influence decisions. Bala should have declined the tickets, disclosed them to compliance, and followed company policies requiring approval for such gifts.

19. Health, safety, and drug & alcohol use

Matrix Pharma is dedicated to ensuring a safe and healthy work environment for all employees. Each employee is responsible for upholding this environment by following safety and health guidelines, promptly reporting accidents, injuries, and unsafe conditions, and ensuring that equipment and practices are safe.

Violence and threatening behaviour are strictly prohibited.

Employees are expected to report to work in a condition that enables them to perform their duties effectively, free from the influence of prohibited drugs, alcohol, or any other harmful substances. The use or misuse of drugs, alcohol, or medication during working hours or while conducting company business is strictly prohibited.



SITUATION

Vimala has recently joined Matrix Pharma's safety department and has been entrusted with reducing unnecessary overhead costs. She has been successful in cutting down costs in the past six months.

However, during periodic visits to various departments, she notices that safety measures such as alarms and sprinklers are not being maintained according to company policy.

Additionally, safety drills have been cancelled to accommodate business activities, which is a violation of safety protocols.

What should Vimala do?




BEST APPROACH

Employees of Matrix Pharma must adhere to safety regulations to ensure the well-being of themselves and their coworkers. It is imperative to report safety violations immediately, even if it might affect business operations. Unsafe working conditions can lead to serious harm.

Vimala should report the safety violations to her manager or the relevant authorities and seek corrective action. It is essential that these issues are addressed to maintain a safe working environment for all employees. Matrix Pharma has a zero-tolerance policy for safety violations and encourages employees to speak up without fear of retaliation.

20. Human rights & Labour rights

Matrix Pharma is committed to respecting and promoting internationally recognized human rights across all aspects of our operations, in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Core Conventions.



We strive to identify, prevent, and mitigate adverse human rights impacts through appropriate human rights due diligence processes. This includes regularly assessing potential human rights risks related to our operations, supply chains, and business relationships.

Matrix Pharma also commits to ensuring that we are not complicit —directly or indirectly — in any human rights abuses, and we will take corrective action or disengage from relationships that do not align with our values.

We uphold and expect our business partners to uphold the following human rights principles:

- Safe and healthy working conditions
- Prohibition of child and forced labour
- Freedom of association and collective bargaining
- Equal treatment and non-discrimination
- Fair wages that meet or exceed legal minimums, and a living wage where feasible

We maintain accessible and confidential grievance mechanisms, including whistleblower channels, allowing employees and stakeholders to raise human rights concerns without fear of retaliation. Where human rights impacts are found, we are committed to remediating them transparently and effectively.

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21. Environment Protection

Matrix Pharma is committed to complying with all applicable environmental legislation and other environmental requirements to which we subscribe, and to the continual improvement of the environmental management system to enhance environmental performance.

- The company is committed to the protection of the environment, and also aims for the efficient and sustainable use of natural resources wherever feasible.
- The company is dedicated to minimizing its contribution to climate change, in line with the scale of action deemed necessary by scientific consensus.
- The company requires its suppliers and contractors to meet the standards outlined in the Code of Conduct and other environmental requirements.

22. Quality & Safety of our products

Matrix Pharma is dedicated to maintaining the highest standards of product quality and safety. Our focus on quality directly impacts our reputation and is central to helping people live healthier lives worldwide. Our customers trust that every product we make will be of the highest quality.



As a pharmaceutical manufacturer, we adhere to Good Manufacturing Practices (GMP), Good Laboratory Practices (GLP), and other industry regulations to ensure the quality of our products.

All Matrix Pharma employees should report any adverse events related to our products to the Quality department as soon as they are aware of the event.

23. Whistle blower

The Company is committed to maintaining the highest standards of integrity, transparency, and accountability in all its dealings. In line with this commitment, the Company has established a dedicated Whistleblower Policy to provide a secure and confidential channel for directors, employees, and other stakeholders to report concerns regarding unethical behavior, misconduct, or violations of the Company's policies.

All whistleblowing matters shall be governed by the procedures outlined in the Whistleblower Policy, which provides detailed guidance on how to raise concerns, the process for investigation, and protections against retaliation.

Employees and stakeholders are encouraged to refer to this policy for any whistleblowing-related issues to ensure proper handling and confidentiality.

24. Employee Awareness and Training

Matrix Pharma is committed to maintaining the highest standards of ethics and regulatory compliance. Every employee plays a crucial role in upholding these principles, and therefore, mandatory training(s) on ethics and compliance are provided to all employees.

This training provides employees with the knowledge needed to navigate ethical dilemmas, adhere to company policies, and comply with relevant laws. It strengthens our culture of integrity and helps safeguard the organization from potential risks.

The company also conducts annual refresher courses to reinforce key principles, ensure ongoing awareness, and update employees on evolving regulations and ethical standards.

25. Reporting potential violations

Matrix provides several ways to report concerns to Compliance, including online, by telephone, mail, or email. To access the reporting portal, hotline numbers, or email options, visit the Compliance section on the internal Matrix platform or refer to the compliance poster at your workplace.

You can either choose to remain anonymous or provide your identity while reporting. All reports would be treated seriously & will be reviewed and investigated according to company policy.

26. Accountability for adherence to the code

As employees of Matrix Pharma, we all share the responsibility for maintaining a strong culture of compliance. We must understand and follow the principles outlined in this code to ensure ethical behaviour across the organization.

To achieve this, every employee must:

- **Know and Follow Policies:** Be familiar with applicable laws and company policies and follow them consistently.
- **Seek Guidance:** Ask for help when unclear about legal or ethical issues.
- **Take Responsibility:** Hold ourselves and each other accountable for our actions.
- **Raise Concerns:** Report any improper conduct or compliance issues and act when necessary.
- **Periodic Certification:** Every matrix employee must periodically (every year) certify that they have read the code and they, to the best of their knowledge and belief understand, have complied with and will continue to comply with the code, applicable law and company policies.

Matrix Pharma at its sole discretion may take disciplinary action up to and including termination of employment against anyone for violating code of conduct, applicable laws or company policies.

ANNEXURE

Frequently Asked Questions (FAQ's)



➤ **What is the applicability of the Code of Conduct?**

The Code of Conduct applies to all employees of Matrix Pharma, including permanent, temporary, and contract employees, as well as board members. It also extends to the company's business partners, such as suppliers, service providers, agents, and channel partners.

➤ **What does honest and ethical conduct mean at Matrix Pharma?**

Honest and ethical conduct means treating everyone with fairness and transparency in all business dealings. It involves avoiding deceptive practices, ensuring integrity in all interactions, and fostering trust with suppliers, customers, and competitors alike.

➤ **What are Matrix Pharma's expectations regarding privacy?**

Matrix Pharma is committed to safeguarding the privacy of individuals the company interacts with, including employees, contractors, and customers. Personal data should be managed responsibly, in accordance with applicable privacy laws and the company's policies.

➤ **What is considered confidential information at Matrix Pharma?**

Confidential information includes non-public business details such as strategic plans, research data, financial information, and proprietary knowledge. This information must be protected and used solely for company-related purposes.

➤ **What is Matrix Pharma's stance on discrimination?**

Matrix Pharma is dedicated to promoting a workplace free from discrimination, regardless of race, gender, religion, age, sexual orientation, or disability. The company enforces equal opportunity in hiring, promotions, and all employment practices.

➤ **What constitutes sexual harassment at Matrix Pharma?**

Sexual harassment includes any one or more of the following unwelcome acts or behavior, whether directly or by implication: physical contact and advances; a demand or request for sexual favors; making sexually colored remarks; showing pornography; or any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature. Additionally, sexual harassment may involve circumstances such as an implied or explicit promise of preferential treatment in employment; an implied or explicit threat of detrimental treatment in employment; an implied or explicit threat about present or future employment status; interference with work

or creating an intimidating, offensive, or hostile work environment; or humiliating treatment likely to affect health or safety.

➤ **What is Matrix Pharma's policy on compliance with laws?**

Employees must comply with all applicable local and international laws, regulations, and rules that govern the company's operations. While detailed knowledge of every law is not required, employees should be aware of the relevant ones and seek guidance when necessary.

➤ **What are the rules regarding conflicts of interest?**

Employees should avoid situations where their personal interests may conflict with the company's best interests. In case of a conflict, they must disclose it and refrain from any actions that could impair their judgment or undermine the company's integrity.

➤ **What should employees know about interacting with customers?**

All interactions with customers must adhere to legal and ethical standards. Employees should never offer improper inducements or financial incentives to influence decisions about Matrix Pharma's products or services.

➤ **What is insider trading and is it allowed at Matrix Pharma?**

Insider trading occurs when confidential or non-public information is used to buy or sell securities. Matrix Pharma has a strict policy against insider trading, of those of other organizations that employees may learn about through their work.

➤ **How does Matrix Pharma ensure accurate financial reporting?**

The company is committed to maintaining transparency in its financial reporting, ensuring that all disclosures are accurate, complete, and in line with applicable accounting principles and regulations.

➤ **What are the rules about accepting gifts or gratuities?**

Employees are prohibited from accepting gifts, loans, or favors from third parties that could influence business decisions. Any gift or business entertainment must be modest, transparent, and cannot create an obligation.

➤ **What is Matrix Pharma's stance on bribery and corruption?**

The company has a strict anti-bribery and anti-corruption policy. Offering or accepting bribes, kickbacks, or any form of improper payment is not allowed and will result in disciplinary action.

➤ **What is Matrix Pharma's policy on drug and alcohol use in the workplace?**

Matrix Pharma expects employees to report to work in a condition that allows them to perform their duties safely. The use of drugs, alcohol, or any other substances that impair work performance is prohibited.

➤ **How can employees report unethical behaviour or violations of the Code of Conduct?**

Employees are encouraged to report any concerns related to unethical behaviour, fraud, or policy violations. The company provides whistleblower channels to ensure such concerns are addressed impartially, and retaliation against those who report in good faith is strictly prohibited.
