



**SRI KRISHNA PHARMACEUTICALS LIMITED**  
**C-4, IDA, UPPAL, HYDERABAD 500039**

<b>HUMAN RESOURCE POLICY</b>	Page 1 of 9
<b>Title: CODE OF BUSINESS CONDUCT AND ETHICS</b>	POL No.: COMPLIANCE/POLICY/001 Revision No.:003
<b>Effective Date:01.03.2023</b>	Next Review Date:28.02.2026

**1.0 GENERAL CODE OF CONDUCT:**

The Code of Business Conduct & Ethics sets forth legal & ethical standards that applies to all employees (full & part time) of Sri Krishna Pharmaceuticals Ltd (SKPL). The Code is not intended to be inclusive and does not cover every conceivable situation an employee may encounter. For that we place a high degree of trust in judgement and discretion of individual Employees, and it is for the Employee concerned to decide what is right, including sense of when it is proper to seek guidance from others on the appropriate course of conduct.

This Code is a general statement of expectations from individual and business conduct. It is not intended to and does not in any way constitute an employment contract or assurance of continued employment and does not create any legal rights in any Employee, client, supplier, competitor, shareholder or any other person or entity.

**1.1 Employees Responsibilities:**

The term "Employee" in this policy means, employee who are on regular SKPL rolls, contract employee who is on contractor payroll but working in SKPL, consultants who are in consultation with SKPL.

It is the responsibility of the employees to familiarize with the code of conduct, policies, and procedures of SKPL and ensure compliance of these standards. Employees are obliged to report any deviations or violations. Reporting of deviations will not lead to any retaliation of any kind, as long as the same is made in good faith.

**1.2 Compliance with Law:**

As our organization SKPL, strives to conduct business and comply with all applicable and local laws and regulations. Violation of law may subject individual and Company to various civil and criminal penalties and also it may lead to defamation of company. Therefore, it is advised that every employee should be familiarize with basic legal requirements that are applicable to his/her job. It is the responsibility of the employee to inform/intimate their managers in case of any clarifications, guidance or deviation.



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**1.3 Compliance at SKPL:**

Compliance is a shared responsibility between SKPL & Employees. Respective Functional Compliance Experts/Departmental Heads are responsible for ensuring compliance in their respective areas. They are responsible for implementing these principles, if necessary, through a more detailed manner in their team members.

**1.4 Data Privacy:**

We strongly believe in data privacy and data protection of all our stakeholders be it, customers, clients, suppliers, employees, and our organisation. Data Privacy is one of our Core values and it is non-negotiable.

**1.5 Non-Compete:**

Once the employee is exited from services of SKPL, he/she is discouraged from:

- (i) Directly or indirectly hire, engage or participate in any new effort or act to solicit or recruit any employee, associate, independent contractor of the company either on own behalf or on behalf of any other person entity, nor induce any employee or independent contractor associated with the company to terminate or breach contractual and / or employment obligation and / or any other relationship with the company.
- (ii) Hire, engage or participate in any effort or act to call on, solicit, take away or attempt to call on, whom the executive has called or with whom the executive has become acquainted during the term of the employment, as the indirect or in direct result of the employment with the company.
- (iii) Engage in , participate in , work for or solicit his/her services to any business entity in India with any business conducted which is same or identical or of competing nature with the projects or products the executive or which the executive has worked or details of which has been disclosed to the executive or which the executive has come across or had access to during the course of employment with the company or whose trade name resembles any trade name used by the company.





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**2.4 Protection of company's confidential information:**

Employees are responsible for protection of all confidential information such as nonpublic information, intellectual property, and trade secrets. Non- Public information's shall include but not limited to price sensitive information, trade secrets such as know.

how, formulae, manufacturing practices, procedures, developmental or research information, customer and client lists, financial data, major contracts, marketing information, sales strategies and plans of any kind. Employees are not authorized to share any confidential information to third party unless with the consultation and approval from Chairman/Managing Director (MD) consent. This obligation shall continue for all employees even after of cessation of employment.

**2.5 Authority to make business commitments:**

Authority to make business or financial commitments shall be done only by Chairman or Managing Director (MD) or by the concerned who would be designated from time to time in clear written delegation by Chairman/ MD.

**3.0 OUR COMMITMENT TO OUR BUSINESS PARTNERS:**

**3.1 Fair dealing with customers and suppliers:**

In dealing with business partners, employees are not expected to show any favor or preferences to any person or business. Employees should not let the interest of company influenced by personal or family interests.

SKPL is committed for free and fair competition and relies on high quality and competitiveness of its products. Employees are expected to conduct operations in accordance with these principles.

**3.2 Gifting and entertainment:**

SKPL discourages offer/receipt of gifts, entertainment, or payments by employees directly or indirectly from the parties conducting the business or seeking the business. It is the individual discretion to accept/offer in case of a courtesy and ensure that the gift is of minimal value (ex. calendar, diaries, greetings, or a lunch/dinner business meet).



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1.6 Talent poaching

The employee during their association with the company shall not directly / in directly take or refer colleagues of SKPL to his / her new company or any of his known company the employee who have exited SKPL from our company should not directly or indirectly poach the employees of the company to his / her new company or to any of his/her other known company also he should not help in talent poaching in any way.

**2.0 OUR COMMITMENT TO EACH OTHER AND TO SKPL:**

2.1 Working Environment:

SKPL provides a healthy working environment for all its employees irrespective of caste, Creed, religion, region & gender. Managers and supervisors should make all decisions relating to employment relationship including hiring, training, promotion, compensation, transfers, layoffs and team member relationship without regard to gender, age, religious creed sexual orientation, racial background, pregnancy, regional, political affiliation or any preconceived notion.

2.2 Employee Privacy:

SKPL collects and maintains all the personal information of employees for various purposes primarily relating to establishing and managing compensation & benefits employment relationships and human resource management. Generally, this information is kept confidential, and privacy is maintained However in certain exigencies/business requirement Personal information would be shared to other units and also to limited number of external parties for administration of benefits, business and legal purposes. Company reserves the right to search the personal items or information placed in the company premises or placed or sent through company information and communication systems.

2.3 Information and Communication Systems:

Employees are responsible to use the information and communication systems responsibly and appropriately, including adhering to the IT policies and procedures. The information and communication systems should not be used for: 1.) Unlawful activities, 2.) Visiting internet sites that contains sexual content, 3) Visiting restricted sites/Apps during working hours, 4.) Political/ Religious/ Commercial purposes that interfere with employment or obligations to the organization 5.) Sending unsolicited electronic messages (spam) 6.) Using the systems that is disabling the employee's productivity 7.) taking unauthorized copies or usage of unauthorized software.





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**3.3 Dealing with Government Officials:**

Employees must understand and strictly comply with any applicable anti bribery legislation. Employees must not offer/promise or authorize any payment of money or inducements or anything of value to Government officials for the purpose of influencing any act or decision.

**3.4 Government regulation for all our business:**

Employees should follow all the Government regulations pertaining to manufacturing, labelling, marketing and sale of its products.

**3.5 Government funded programs:**

Employees must comply with all laws and regulations that apply to providers of products and services under government funded programs.

**3.6 Government request for information and retention of records:**

Employees are expected to cooperate with reasonable requests for information from government agencies and regulators. Employees are advised to consult respective Functional Heads/ Chairman/ MD before responding to any non-routine requests. Employees must comply with record retention or preservation requirements as required by various statutory and compliance norms.

**3.7 Contributions to Political Parties:**

Any political contribution must be lawful and approved by the Chairman/ Managing Director. Approvals shall not be made for affiliation or for inducement.

**4.0 OUR COMMITMENT TO OUR STAKEHOLDERS:**

**4.1 Conflict of interest:**

"Conflict of interest will occur whenever the prospect of direct or indirect personal gain may influence or appear to influence employee's judgement or actions which could compromise the integrity, judgment or ability of the employee to fulfil his or her entrusted duty while discharging business actions for the company."

Conflict of interest will arise even while dealing with the Company employees, Contractors/ Suppliers/ Vendors or any third party. Conflict of interest may also arise when an employee's immediate family members act as an elected or nominated Government official or acts as a consultant or advisor to government agency or regulatory body. A few of conflict of interests & proposed resolution is enclosed at annex to this policy. However, in case of ambiguity the conflict can be resolved through reporting manager & HR.



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**4.2 Book keeping and records:**

Accurate business records will fulfill the obligation of SKPL to provide full, fair, timely and understandable financial and other disclosures to comply with applicable accounting principles, laws and regulations. Employees must record all the information honestly and accurately. Employees are forbidden in altering or destroying the documents or records in response to an investigation or other lawful requests.

**5.0 OUR COMMITMENT TO SOCIETY:**

**5.1 Environment, Health and Safety:**

Employees should work to promote environmental care, increase understanding of environmental issues and inculcate good environmental practices. Employees should comply with all legal requirements pertaining to environment SKPL is committed to all the Environment, Health and Safety aspects in which it operates and ensures the health and safety of its employees, contractors, visitors and community.

**5.2 External communication through direct Media or social Media:**

Employees are forbidden to communicate to media on behalf of the company. Only the designated management representatives are allowed or authorized to communicate to the media. Posting of any organizational information by employees on social sites is a willful violation of code of conduct and appropriate action would be taken against such cases. Employees are forbidden to post any information in social media platforms which could be detrimental to the reputation of the company.

**5.3 Speaking in Public forums:**

When employees speak in public forums on their personal views it should not leave any impression that it is representation of company's commitment or view. It is responsibility of employee to ensure that company's reputation is not at stake.

**6.0 REPORTING OF VIOLATION OF CODE OF CONDUCT:**

Non-compliance with this code may result in serious legal, safety, monetary and other similar consequences. Employees must be aware that failure to follow any legal requirement may result in penalization from regulatory agencies, judicial action, shut down of facilities or loss of company's reputation and loss of public trust.





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6.1 Disciplinary action would be initiated for

- Authorizing or participating in a violation
- Failing to report a violation or suspected violation.
- Refusing to cooperate with the investigation of a suspected violation.
- Retaliating against an individual who reported a suspected violation in good faith.

6.2 Duty to report and consequences:

Every employee has a duty to adhere to this code and all existing policies and procedures of SKPL and to report the suspected violations in accordance with the procedure stated in this code. We reiterate that this code not indented to be totally comprehensive, and the organization therefore relies on its employees to exercise discretion and engage ethical conduct consistent with this code.

Employees should report any violation or potential violation of this code to their supervisors or managers. Supervisors or managers are supposed to escalate such violations to management.

If employees are not comfortable in reporting to their managers or supervisors, they may report to their concerned HR Manager or directly inform Director/Managing Director/Chairman.

On the receipt of complaint, a committee shall be formed as advised by the Chairman/Managing Director and the case shall be investigated and corrective and preventive action shall be implemented.

During the process identity of complainant is kept confidential and he/she would not punish even if the compliant is proved wrong as the employee informed in the interest of the company.



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**7.0 MECHANISM TO CREATE AWARENESS ON THE CODE:**

All the employees are encouraged to read the document during the time of joining and also refresh the same on Two years and give their affirmation. Casual employees who do not understand English should be explained the contents of this policy by a nominated person who can communicate in the language they understand. An undertaking to that affect should be taken from casual employees and also the nominated translator. The sample format is enclosed at annex-C.

It is the responsibility of the Manager to educate their team members and take the consent of code.

**8.0 ANNEXURE**

- 8.1 Conflict of Interests – Annexure -A.
- 8.2 Code of Conduct Affirmation form in English - Annexure-B.
- 8.3 Code of Conduct Affirmation form in Hindi and Telugu – Annexure-C





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**9.0 History of changes**

<b>Version No.</b>	<b>Effective date</b>	<b>Summary /History of changes</b>
Revision No.:001	16-05-2016	New Policy
Revision No.:002	01.03.2021	The following changes are carried out. <ul style="list-style-type: none"><li>• Point no. 2.2, 2.3, 4.0, 5.2 are modified.</li><li>• Point no. 7.0 is briefly elaborated and annexure -B is newly introduced.</li><li>• Editorial changes are done.</li></ul>
Revision No.:003	01-03-2023	<ul style="list-style-type: none"><li>• Point no 1.5 Non-compete clause newly added.</li><li>• Point no 1.6 Talent poaching clause newly added.</li></ul>

	<b>PREPARED BY</b>	<b>REVIEWED BY</b>	<b>APPROVED BY</b>
Sign & date			
Name	Col D N Srinivas (Retd.)	Pranesh Raj Mathur	V.V. Krishna Reddy
Designation	HEAD - HR	CFO	MANAGING DIRECTOR



**SRI KRISHNA PHARMACEUTICALS LIMITED**  
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**CONFLICTS OF INTERESTS**  
**(Annexure-A)**

**High Risk Conflicts of Interest that Associates Must Avoid or that Must be Removed**

<b>Type of conflict</b>	<b>What must be avoided or removed</b>
<b>Recommending Relatives for employment</b>	Employee must not <ul style="list-style-type: none"><li>• Recommend closely related persons for employment, in any unit/department of Sri Krishna Pharmaceutical Limited.</li><li>• Be involved in any hiring decision regarding closely related persons (including relatives/ friends)</li></ul>
<b>Outside engagements, including employment</b>	Employee must not have any kind of paid or unpaid engagement with <ul style="list-style-type: none"><li>• A SKPL business partner or competitor unless specifically assigned by Management.</li><li>• Any other person or company if that impacts the SKPL business Objectives.</li><li>• Any SKPL Employee/Employees viz lending/ barrowing/ any other business within or outside of the SKPL.</li></ul>
<b>Gifts, Favors, travel, entertainment</b>	Employee must not directly or indirectly solicit or accept from any SKPL business partner or competitor. <ul style="list-style-type: none"><li>• Cash or cash equivalents (e.g., stocks, gift certificates, discounts not based on a collective agreement, etc.); this includes actual and potential business partners or competitors.</li><li>• Gifts: if a gift is received nonetheless, it must be returned if it influences or could be perceived as influencing the Employee's business judgment</li><li>• Meals, travel, or entertainment, unless it predominantly meets a SKPL business purpose, is accompanied by a representative of the business providing it and does not influence (and cannot be perceived as influencing) the Associate's business judgment. Accepting entertainment of a non-ordinary, exceptional nature requires Manager approval</li></ul>
<b>Fees, commissions, services, other favors</b>	Employee must not directly or indirectly. <ul style="list-style-type: none"><li>• Solicit or receive a fee, commission, service, or other favor from any actual or potential SKPL business partner or competitor</li></ul>

Note: - For any guidance or clarification on the above, associate can contact HR Manager or his/her reporting Manager.





**Sri Krishna Pharma**  
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SRI KRISHNA PHARMACEUTICALS LIMITED  
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**CODE OF CONDUCT AFFIRMATION**  
(Reference Policy No: COMPLIANCE/POLICY/001)  
(Annexure-B)

To

Managing Director,

Sri Krishna Pharmaceuticals Limited,

C-4, IDA, Uppal, Hyderabad-500 039.

This is to acknowledge that I have received a copy of the Company's Code of Business Conduct and Ethics.

I Understand that company is committed to a work environment free of discrimination, retaliation or harassment of employees who have reported violation or potential violation of Code of Business Conduct and Ethics to company.

I certify that I will not in violation of any of the principles set forth of in the Code of Business Conduct and Ethics nor I am aware of any such violations.

I further agree that if I have any concerns that are related to a violation or potential of the Code of Business Conduct and Ethics, I will immediately report the same to my supervisor or the Manager.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Employee Code: \_\_\_\_\_

Designation: \_\_\_\_\_

Unit: \_\_\_\_\_

Date: \_\_\_\_\_

**Sri Krishna Pharmaceuticals Limited**

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**Tel :** +91 40 2720 1101-02/2720 0103-04/2720 4471-72

**Fax :** +91 40 2720 4470

**Email :** skg@srikrishnapharma.com

**Unit-I**

**Factory :** C-4, Industrial Area, Uppal Khalsa (V), Uppal (M), Medchal-Malkajgiri (Dist.), Hyderabad - 500 039, Telangana, India.

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**Fax :** +91 40 2720 4470

website : www.srikrishnapharma.com

CIN No. : U24230 TG1974 PLC001790



I \_\_\_\_\_ (NAME), \_\_\_\_\_ (E CODE),  
\_\_\_\_\_ (DESIGNATION), \_\_\_\_\_ (DEPARTMENT) here by  
certify that I have read out the following policies and explained them in **TELEGU/ HINDI** to  
\_\_\_\_\_ in the language that he understand. He is has become well  
aware of the provisions of these policies.

- a).
- b).
- c).
- d).

(Signature)

Date: \_\_\_\_\_

**अंडरटेकिंग**

मैं \_\_\_\_\_ (NAME), \_\_\_\_\_ (E CODE),  
\_\_\_\_\_ (DESIGNATION), \_\_\_\_\_ (DEPARTMENT) यह प्रमाणित  
करता हूँ कि उपर्युक्त नीतियाँ को मुझे **हिन्दी** मे समझाया गया है और मैंने इन नीतियों के सभी प्रावधानों को समझ लिया  
है। मैं यहां एक वचन दे रहा हूँ कि मैं निम्नलिखित नीतियों के प्रावधानों का पालन करूंगा।

- a).
- b).
- c).
- d).

(हस्ताक्षर)

तारीख: \_\_\_\_\_

गवाह:

- 1)
- २)

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**Sri Krishna Pharma**  
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(ANNEXURE- C)

**SRI KRISHNA PHARMACEUTICALS LIMITED**

I \_\_\_\_\_ (NAME), \_\_\_\_\_ (E CODE),  
\_\_\_\_\_ (DESIGNATION), \_\_\_\_\_ (DEPARTMENT) here by  
certify that I have read out the following policies and explained them in **TELEGU/ HINDI** to  
\_\_\_\_\_ in the language that he understand. He is has become well  
aware of the provisions of these policies.

- a).
- b).
- c).
- d).

(Signature)

Date: \_\_\_\_\_

**అంగీకార పత్రం**

నేను \_\_\_\_\_ (పేరు) \_\_\_\_\_ (ఉద్యోగి కోడ్) \_\_\_\_\_ (హోదా) \_\_\_\_\_ (విభాగం) పైన పేర్కొన్న విధానాలు నాకు తెలుగు (నాకు అర్థమయ్యే భాష) లో వివరించబడ్డాయి మరియు ఈ విధానాల యొక్క అన్ని నిబంధనలను నేను అర్థం చేసుకున్నాను, మరియు ఈ కింది విధానాల నిబంధనలకు నేను ఎల్లప్పుడూ కట్టుబడి ఉంటానని ఖామీ ఇస్తున్నాను.

- b).
- c).
- d).

(సంతకం)

తేదీ: \_\_\_\_\_

సాక్షులు:

- 1).
- 2).

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