



BSV
bringing life to life

Antitrust and Fair Competition Policy

OWNERS AND APPROVERS

Role	Name	Designation	Sign & Date
Owners	Anupama Pai	Head - Legal and Secretarial	-
Approvers	Board of Directors		21st April 2023

REVISION HISTORY

Version No.	Issue date	Date of revision	Change control no. for reference	Summary of changes (from the previous version to this version)

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ANTI-TRUST STATEMENT OF THE ORGANIZATION

At Bharat Serums and Vaccines Limited (hereafter referred to as 'BSV' or 'We' or 'company') our belief in 'Bringing life to life' is anchored to a passion that has made us preserve, protect, and enhance the quality of life.

BSV believes in succeeding in business ventures by dealing with integrity, ethics and without any unfair competitive means while dealing with suppliers, customers, or competitors. BSV aims to out-perform competition fairly and honestly. BSV prohibits all actions that are anti-competitive or otherwise contrary to applicable competition or antitrust laws.

OBJECTIVES

- The policy sets out an approach of BSV to demonstrate zero tolerance towards unfair means of competition not only within the organization but also in its dealing with suppliers, distributors and other competitors in the market.
- It will not only help to maintain professional decorum while participating in healthy competition but also guide us to adhere to our integrity in all our business dealings as well as relationships internally and externally.
- The policy will bring more clarity about do's and don'ts by all employees and personnel. Thus, it will bring fair, ethical and transparent conduct within the organization.
- Head Legal and Company Secretary shall be responsible for this policy and may conduct/organize any necessary training, if any, for employees for proper implementation and adherence.
- Changes and amendments to the policy shall be made and documented after prior approval of the Head Legal and Company Secretary.
- Periodic review and update of the policy may also be undertaken to ensure compliance with evolving legislative landscape and BSV's business philosophy. This policy will be reviewed at least once a year from the date of release.
- Every BSV employee & all personnel representing BSV are expected to adhere to all laws and BSV's policies, procedures, principles, and standards, including this Policy.

APPLICABILITY

- This policy applies to all employees, officers or any person working for BSV or on its behalf in any capacity at all locations, across the world, including but not limited to its subsidiaries out of India (hereafter referred to as 'BSV Personnel' or 'You').

DEALING WITH COMPETITORS

Prohibition on anti-competitive arrangements

- We promote interactions with competitors through trade associations, professional seminars, and any other industry groups as long as they are fair, ethical, and transparent and don't promote any anti-competitive arrangements.

Prohibition on sharing sensitive information

- BSV Personnel shall exercise caution at all times while dealing with competitors on any platform and shall not divulge any information or get involved in discussions related to pricing, bid amounts of winning contracts, terms and conditions of sale or any related sensitive information which may promote unfair trade practice and restrict the fair, free and open market.

Ethical sources of information

- All competitive information and/ or intelligence must only be collected through permitted legal and ethical means such as published news, press releases, and information available in the public domain. Any innovative research effort at BSV must not be influenced by discussions with competitors.

Restrictive practices

- Restricting the freedom of competitors by way of price-fixing, customer selection or terms and conditions of sale of products by direct or indirect means are some important elements of competition law that are prohibited under all circumstances.
- Any type of agreement or arrangement, written or oral, which adversely impacts fair and open competition, including but not limited to price-fixing, market sharing, resale price, exclusive supply/ distribution, bid-rigging or collusive tenders, boycott other enterprises, arrangement with competitors to influence the price of engagement is prohibited.

MERGERS AND ACQUISITIONS

- BSV encourages acquisition and/or mergers or any similar business arrangements, which create positive synergy like reduction of cost or promote efficiencies and so on.
- BSV discourages any acquisition of the asset, business or share or any other type of business combination if such acquisition or merger substantially restrains competition in the market. In all countries, anti-competitive law provides for enforcement and administrative powers to authorities to approve such business arrangements depending on thresholds ranging from revenue, the value of assets, market share and so on.
- Whether any proposed merger or acquisition will trigger prior approval from local authorities or not will depend on the facts and circumstances of each business arrangement and all BSV Personnel must consult the Head Legal and Company Secretary in the early stages of any such business arrangement.

REPORTING CHANNELS

- If you are aware of any unfair competition arrangement or if you suspect any unfair competition arrangement has occurred or may occur, then you must notify as per the provision of Whistle Blower & Vigil Mechanism Policy as soon as possible.
- In case any unauthorized news or information is received from any competitor then BSV Personnel must immediately report it to the Head Legal and Company Secretary.
- BSV hopes that this policy will enable all BSV Personnel to voice whistleblowing concerns openly. Completely anonymous disclosures are difficult to investigate. If you wish to raise concern confidentially then we will ensure to make every effort to keep your identity a secret and only reveal it where necessary to those involved in investigating the concern.

COMPLIANCE AND MONITORING

- All BSV Personnel shall ensure adherence to this Policy.
- Any violation of this policy or any other antitrust laws can carry severe criminal penalties and civil damages for BSV Personnel and/ or BSV.
- The company reserves all rights to initiate disciplinary actions up to and including termination of BSV Personnel involved in the breach.