

Anti-Bribery and Anti-Corruption Policy
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Revision history

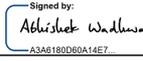
VERSION	DATE	AUTHOR	SUMMARY OF CHANGES
01	19 Apr 2022	HR Team	First Release
02	14 Sep 2022	HR Team	Reference of Local claim policy is added under 4.2.3 section
03	14 Aug 2023	Amrul Fikri	<ul style="list-style-type: none"> ● Updated details as per ISMS standards. ● Updated the owner of the document. ● Added Abhishek Wadhwa as the custodian of the document. ● The term "CHRO" was replaced with "HR Team" due to organizational structural changes. ● Mandatory Annual Refresher training details added under the process (section 6).
04	26 Aug 2024	Ambica Bhatnagar	<ul style="list-style-type: none"> ● Donations and Grants added ● Pharmaceutical Code of Practice and affiliated protocols, including Sponsorship added
05	16 June 2025	Jean Elfira	<ul style="list-style-type: none"> ● Section on Responsibility enhanced ● Section on Process structured
06	20 July 2025	Brent Denning and Swati Mahajan	<ul style="list-style-type: none"> ● Section on Pharmaceutical Code of Practice <ul style="list-style-type: none"> ○ Added applicability, notation on pharma membership, client-contract conflict management ○ Enhanced to include Best Practices for Setting Honorarium, Honorarium benchmarks for Thailand and Country level links to Pharmaceutical Guidelines and Code of Conduct. ● Chief Ethics Officer added as an Owner <i>CEC (Chief Ethics Counsellor title replaced with Chief Ethics Officer to maintain consistency across relevant policies)</i>
07	23 Feb 2026	Swati Mahajan	<ul style="list-style-type: none"> ● Section on Pharmaceutical Code of Practice segregated under HCP Interaction Policy ● Policy revised in accordance with complexity of regulations and nature of ABAC Risks ● Annexures added ● Distribution List revisited ● Revised training completion timeline for New Joiners to 30 working days

Distribution

NAME / Employee Groups	TITLE (for individuals only)
All Docquity Staff, Vendors, Contractors	

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Approval

NAME/Steering Group	POSITION (for individual only)	SIGNATURE / MoM	DATE
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Abhishek Wadhwa			21 Jul 2025
Brent Denning	Chief Ethics Officer & Regional Commercial SMO Lead		24-Feb-2026
Abhishek Wadhwa	COO		25-Feb-2026

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1. Objective

Docquity is committed to conducting its business with integrity, transparency, and accountability. Bribery and corruption undermine trust, distort markets, expose individuals and the Company to severe legal and reputational harm, and are strictly prohibited.

This Anti-Bribery and Anti-Corruption (ABAC) Policy establishes Docquity's zero-tolerance approach to bribery and corruption and sets out the non-negotiable standards of conduct applicable to all persons acting for or on behalf of the Company.

Violations of anti-bribery and anti-corruption laws may result in criminal prosecution, civil penalties, regulatory sanctions, loss of business privileges, and disciplinary action up to and including termination of employment.

2. Scope

This Policy applies to:

- All employees (permanent, fixed-term, interns, trainees)
- Directors and officers
- Consultants, contractors, agents, distributors, intermediaries
- Any third party acting for or on behalf of Docquity

This Policy applies to all business activities and jurisdictions in which Docquity operates or plans to operate. Where local laws, regulations, or industry codes impose stricter requirements, the most restrictive standard shall apply.

3. Core ABAC Principles

Docquity operates under the following fundamental principles:

- Zero Tolerance - Bribery and corruption in any form are prohibited.
- Legitimacy - All transactions must have a genuine, lawful business purpose.
- Transparency - All dealings must be open, properly documented, and auditable.
- Proportionality - Any permitted benefit must be reasonable and appropriate.
- Accountability - Individuals are personally responsible for compliance.

4. Definitions

4.1. Bribery

Any offering, promising, giving, authorizing, soliciting, or accepting of a Thing of Value, directly or indirectly, to improperly influence the actions, decisions, or conduct of a person in a position of trust or authority to obtain or retain a business or other improper advantage.

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4.2. **Fraud**

Wrongful, deceitful, or criminal behavior intended to result in financial or personal gain or causing loss to another

4.3. **Corruption**

The abuse of entrusted power for private gain, including bribery, fraud, kickbacks, facilitation payments (also sometimes called “speed” or “grease” payments), or any dishonest or unethical conduct.

4.4. **Things of Value**

Anything of value, whether monetary or non-monetary, including but not limited to cash, gifts, meals, travel, accommodation, entertainment, employment opportunities, consulting fees, discounts, debt forgiveness, donations, favors, or services.

4.5. **Government Official**

Any officer or employee of a government, ministry, department, agency, regulator, court, public international organization, state-owned or state-controlled enterprise, political party, party official, or candidate for public office.

This includes healthcare professionals employed by public hospitals or government-funded institutions.

4.6. **Chief Ethics Officer** is the process owner for Business Ethics under Docquity Code of Conduct. This role shall be responsible for addressing any anti-bribery and anti-corruption complaints. The Chief Ethics Officer will be appointed by the Co-Founders, and if required can be supported by an Audit committee, which will be decided by the Chief Ethics Officer and the Co-Founders.

The details of the Chief Ethics Officer and of the Co-Founders who will also be responsible for Business Ethics under the Docquity Code of Conduct are:

- Chief Ethics Officer - Brent Denning; brent@docquity.com
- Co - Founders:
 - Amit Vithal; amit@docquity.com
 - Indranil Roychowdhury; indranil@docquity.com
 - Abhishek Wadhwa; a.wadhwa@docquity.com

4.7. **Employee**

All members of the Docquity staff, including contractual employees and the directors in the employment of the Company.

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4.8. Healthcare Professional

Members of the medical, dental, pharmacy, nursing professions in any of the countries that Docquity has operations or plans to enter.

4.9. Facilitation Payments

An unofficial payment made to secure or expedite routine action by a government/customer official or healthcare professional. These are prohibited, regardless of local custom.

4.10. Kickbacks

It is a form of corruption, where illegal payments (including cash, gifts, or other valuable items) intended as compensation for preferential treatment or any other type of improper service are received. Often associated with white-collar crime, kickbacks carry significant legal consequences including imprisonment, financial penalties, and civil liability.

4.11. Third Party

Any individual or entity that performs services for or on behalf of Docquity, including agents, consultants, distributors, vendors, event organizers, or lobbyists.

4.12. No quid pro quo

Nothing of value may be given, offered, or received in exchange for a favor, decision, action, or business advantage – which means that a gift, hospitality, payment, or any benefit must not be given, offered, requested, or accepted with the expectation of receiving, influencing, or rewarding any business decision, regulatory action, recommendation, or preferential treatment.

5. Responsibility

- ❖ The Founders as executive leadership
 - Promote a culture of integrity and zero tolerance for bribery and corruption.
 - Endorse company-wide communication on ethics and compliance.
- ❖ The Chief Ethics Officer & HR to
 - Ensure adequate resourcing and visibility of the ABAC program.
 - Develop, implement, and maintain the ABAC policy, procedures, and controls.
 - Provide training and awareness on ABAC issues across the organization and address any queries and concerns.
 - Support investigations involving employee misconduct related to bribery or corruption and help enforce disciplinary measures for ABAC violations.

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❖ Business Unit Heads

- Ensure day-to-day adherence to ABAC policy within their departments.
- Monitor high-risk activities (e.g., gifts, travel, hospitality, government interactions).
- Escalate any suspected violations or concerns.
- Support staff in identifying and managing ABAC risks in operations.

❖ Finance Function

- Ensure that financial records and controls prevent and detect bribery (e.g., false invoices).
- Review financial transactions for red flags.
- Conduct ABAC due diligence on suppliers, agents, and contractors, with partnership from IT and Compliances as needed.
- Ensure that anti-bribery clauses are included in vendor contracts
- Collaborate with compliance in reviewing payments to agents, vendors, and government officials.

❖ Compliance and Internal Audit

- Conduct risk assessments to identify and evaluate bribery and corruption risks.
- In partnership with
 - Finance - oversee due diligence on third parties, employees, and high-risk transactions and evaluate the integrity of financial and operational records for compliance risks.
 - HR and Chief Ethics Officer - investigate reported violations or suspicions of bribery or corruption.

❖ Legal Advisory

- Advise on relevant ABAC legislation and regulatory obligations.
- Support investigations and disciplinary actions for confirmed breaches.
- Assist with contractual protections and anti-corruption clauses in agreements.
- Manage external legal inquiries or enforcement actions.

❖ Employees (All Staff)

- Complete mandatory training/refreshers on ABAC.
- Comply with the ABAC policy and procedures.
- Not offer, give, or receive bribes or facilitation payments.
- Report any suspicions or incidents via proper channels.

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6. Prohibitions

The following conduct is strictly prohibited:

- Offering, giving, soliciting, or accepting bribes or kickbacks.
- Making or accepting facilitation payments.
- Offering or providing cash or cash equivalents.
- Providing anything of value to improperly influence a decision or outcome.
- Payments without a legitimate business purpose or adequate documentation.
- Falsifying, mischaracterizing, or concealing transactions in company records.
- Routing payments through personal accounts or unrelated third parties.
- Retaliation against individuals who raise concerns in good faith.

7. Guidelines

7.1. Cash or Cash Equivalent

Cash in any currency or any instrument, payment method, or benefit that is readily convertible into cash, is usable as cash, or provides unrestricted monetary value to the recipient.

Direct Monetary Forms	Stored-Value & Digital Instruments	Bank & Financial Transfers	Financial Advantages Functioning as Cash	Indirect Cash Substitutes
<ul style="list-style-type: none"> • Physical cash (notes or coins) • Cheques (personal, cashier’s bearer) • Demand drafts or money orders 	<ul style="list-style-type: none"> • Gift cards or gift vouchers (physical or electronic) • Prepaid cards or prepaid debit cards • Mobile wallets or e-wallet credits • Digital payment credits • Recharge coupons or top-up credits. <p style="font-size: small; margin-top: 10px;"><i>Even when branded or nominally restricted, these are treated as cash equivalents because they allow discretionary personal use.</i></p>	<ul style="list-style-type: none"> • Direct bank transfers to personal accounts • Peer-to-peer payment apps • Reimbursements paid without documented business expense. 	<ul style="list-style-type: none"> • Loans or advances • Forgiven debts • Discounts not available to the public • Rebates paid to individuals • Excessive honoraria not linked to fair market value services. 	<ul style="list-style-type: none"> • Paying personal bills or liabilities • Covering school fees, rent, utilities, or medical bills • Travel or accommodation unrelated to legitimate business activity • Providing services or benefits that free up personal cash

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Distinction of treatment for Third parties and Employees

Benefits provided internally to employees, as part of approved compensation, welfare, or recognition programs do not constitute bribery under this Policy, provided that such benefits:

- Are not linked, directly or indirectly, to influencing any external business decision or outcome.
- Are not used as a proxy to provide value to third parties.
- Are not transferred, reimbursed, or passed through to any external stakeholder.
- Are properly approved, documented, and taxed in accordance with applicable laws.

Employee benefits must never be used to fund or facilitate gifts, hospitality, or other transfers of value to third parties.

Vouchers to Employees – Permitted with Controls	Vouchers to Non-Employees – Prohibited
<p>Gift vouchers (e.g., Amazon, Starbucks) may be provided to employees when all the following conditions are met:</p> <ul style="list-style-type: none"> • Provided solely to employees (not contractors or external parties) • Issued under a legitimate HR or internal recognition program with documented eligibility criteria • Not linked to securing or influencing any external business outcome - Prohibition on reimbursement of vouchers purchased personally • Not transferable, reimbursable, or redeemable for the benefit of third parties • Purchased and issued through approved Company processes (personal purchases are not reimbursable) - Employee benefits must never be used to fund external gifts or hospitality. • Properly approved by HR and Finance • Accurately recorded in the Company’s books and taxed in accordance with local laws. <p>Under these conditions, vouchers are treated as employee benefits, not cash equivalents for the purpose of this Policy.</p>	<p>The same vouchers become cash equivalents when provided to:</p> <ul style="list-style-type: none"> • Healthcare Professionals (HCPs) • Clients or customers • Government officials • Vendors, suppliers, or business partners • Speakers, advisors, consultants, or contractors

7.2. Bribe, Facilitation Payments or Kickbacks

Docquity prohibits all forms of bribery and corruption, whether direct or indirect, involving Government Officials, Healthcare Professionals, private sector individuals, or entities. Docquity conducts its business lawfully and ethically and expects all persons associated with the Company to always act with integrity, regardless of local customs, traditions, or practices that may be inconsistent with this Policy.

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7.2.1. Offering or Giving Improper Benefits

No employee, director, or third party acting on behalf of Docquity shall directly or indirectly offer, give, promise, authorize, or arrange the provision of money or anything of value to any person or entity, including Government Officials, Healthcare Professionals, or private sector counterparties, where such payment or benefit is:

- a. Intended to improperly influence the judgment, decision, or conduct of the recipient in the performance of their duties.
- b. Intended to secure preferential treatment, business, regulatory relief, or any other improper advantage for Docquity; or
- c. Intended as gratification for the recipient having taken, or refrained from taking, any action that benefited or was expected to benefit Docquity.

7.2.2. Requesting or Accepting Improper Benefits

No employee, director, or third party acting on behalf of Docquity shall directly or indirectly solicit, request, accept, or receive money or anything of value from any person or entity where such benefit is:

- a. Intended to improperly influence the employee's judgment or conduct in the performance of their duties; or
- b. Intended as gratification for a decision, action, or omission that benefits, or is expected to benefit, the person or entity providing the benefit.

This prohibition applies regardless of whether the benefit is provided to the employee directly or indirectly, including through family members or associates.

7.2.3. Facilitation Payments and Kickbacks

Docquity does not make or accept facilitation payments, kickbacks, or similar improper payments of any kind.

Employees must avoid any conduct that may lead to, suggest, or create the appearance that a facilitation payment or kickback will be made or accepted by or on behalf of Docquity, even where such payments are described as customary, routine, or necessary to conduct business.

7.2.4. Payments, Proportionality, and Due Diligence

Where an employee is requested to make a payment on behalf of Docquity, the employee must ensure that:

- The payment has a legitimate and documented business purpose.
- The amount is proportionate to the goods or services provided.
- The payment is supported by a detailed and accurate receipt or invoice.

Any suspicion, concern, or uncertainty regarding a payment must be promptly escalated to the Chief Ethics Officer or through the Company's reporting mechanisms, without delay or hesitation.

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7.2.5. Illustrative Examples of Prohibited Conduct

The following examples are indicative and non-exhaustive:

Offering a bribe

Offering tickets, travel, or other benefits to a potential client or counterparty on the condition that they agree to do business with Docquity constitutes bribery, as the benefit is offered to obtain an improper commercial advantage. Both the individual making the offer and Docquity may be liable for such conduct.

Receiving a bribe

Accepting a personal benefit, such as employment for a family member, from an agent or vendor in exchange for using one's position to influence Docquity's business decisions constitutes bribery, even if the benefit is provided indirectly.

7.2.6. No Adverse Consequences for Refusal to/accept Bribe

Docquity does not tolerate bribery as a means of conducting business. Employees will not be penalized, disciplined, or disadvantaged for refusing to make or accept bribes, even if such refusal results in delayed transactions, lost opportunities, or adverse commercial outcomes.

7.3. Gifting, Hospitality and Entertainment

Docquity recognizes that modest gifts and hospitality may be customary in certain jurisdictions. However, gifts, hospitality, or entertainment must never be used to influence, or appear to influence, a business decision or outcome.

7.3.1. Absolute Prohibition – Government Officials

Gifts, hospitality, entertainment, travel, or any other benefit of any value are strictly prohibited when offered or provided, directly or indirectly, to Government Officials.

No approvals or local customs shall override this prohibition.

Exception – Incidental Meeting Refreshments

Notwithstanding the above prohibition, the provision of incidental, modest refreshments (such as tea, coffee, or a light working breakfast or snacks) served during a bona fide business meeting with Government Officials is permissible, provided that:

- The refreshments are modest in nature, reasonable in value reasonable and compliant with local law and internal expense standards.
- They are incidental to the meeting and not provided as a standalone benefit.
- They are provided uniformly to all meeting participants and not selectively to Government Officials.
- No alcohol is provided.

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- The meeting has a legitimate business purpose and is properly recorded in company records.

Such refreshments shall **not be considered gifts, hospitality, or entertainment** under this policy.

7.3.2. General Principles (Non-Government, Non-HCP Counterparties)

Subject to applicable laws and internal procedures, modest gifts or hospitality may be offered or accepted only where all the following conditions are met:

- a. There is **no quid pro quo**, and no intent to influence a business decision.
- b. The item is not given or received in exchange for a favor, preferential treatment, or improper advantage.
- c. It does not include cash or cash equivalents, including gift cards, vouchers, sponsorships or subscriptions.
- d. It is reasonable, appropriate, and proportionate in nature and timing.
- e. It is provided openly and transparently, not secretly.
- f. It is offered in the name of Docquity and not in the name of any individual employee.
- g. It is accurately recorded in the Company's books and records.

Refer [Annex A - Festival / Customary Gift Decision Tree](#)

7.3.3. Healthcare Professionals

Any gifts, hospitality, entertainment, or other transfers of value involving Healthcare Professionals are governed exclusively by the **HCP Interaction Policy** and are subject to stricter industry codes and regulatory requirements. Please

7.3.4. Approvals and Operational Controls

Operational thresholds, approval requirements, and country-specific limitations for permissible gifts and hospitality are governed under the Employee Expense, Gifts & Hospitality Matrix. Please refer to the **International Travel Policy and Local Travel and Expense Claims Policy**

7.4. Donations and Grants

Docquity may provide donations or grants strictly for legitimate charitable, humanitarian, or educational purposes, and only to bona fide organizations. Donations and grants must never be used, directly or indirectly, to influence business decisions, obtain or retain business, secure preferential treatment, or create any improper advantage for Docquity, its clients, or any third party.

7.4.1. Charitable Donations

Charitable donations may be provided only to recognized charitable, social, humanitarian, or public-interest organizations and must meet all the following conditions:

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a. **No Individual Recipients**

Donations must not be made directly to individuals.

b. **No Quid Pro Quo**

Donations must not be given, promised, or conditioned upon:

- the purchase, recommendation, prescription, registration, or use of any product or service.
- product standardization decisions.
- favourable treatment or any other business advantage.

c. **Written Agreement Required**

All donations must be supported by a written agreement with the recipient organization, hospital, or non-profit entity. The agreement must clearly state that the recipient shall:

- comply with all applicable laws and regulatory procedures governing charitable or foreign aid funding.
- use the donation solely for the agreed humanitarian or public-interest purpose and for no other purpose.
- maintain transparency through proper documentation, tracking, and reporting of the donation.
- ensure that donated items or services provide a clear and demonstrable benefit to patients or communities, are appropriate for the stated purpose, and do not carry product, brand, or therapeutic-area branding.
- define clearly the amount, nature, and frequency of the donation.

d. **Prohibited Recipients and Uses**

Donations must not be made to:

- political parties, political organizations, or political candidates.
- entities or programs that are controlled or directed by Government Officials for personal benefit.
- any organization where the donation could reasonably be perceived as influencing a decision affecting Docquity.

7.4.2. **Government & Tender-Specific Controls**

The Company prohibits any informal or undocumented communication with tender committee members or public officials involved in procurement.

- All tender-related communications, including pre-bid and clarification stages, must be:
 - Documented, and
 - Conducted only through authorized and approved channels.
- The Company prohibits success fees, facilitation payments, or commission structures linked to:

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- Tender awards, or
- Expedited approvals, clearances, or regulatory actions.
- Prior Legal approval is mandatory before:
 - Appointing tender agents, consultants, or intermediaries.
 - Entering into consortium, joint venture, or similar collaborative arrangements related to public tenders.
- Charitable donations, sponsorships, or CSR contributions are prohibited where they are:
 - Linked to tender timing, evaluation, or award; or
 - Intended to influence regulatory approvals or government decisions.
- Enhanced scrutiny and senior management approval are required where:
 - A charity or beneficiary is connected to a public official; or
 - Donations are proposed in high-risk or sensitive geographies, or during an active tender process.

7.4.3. Educational Grants

Grants for educational purposes, including financial support for educational programs, may be provided only when all the following conditions are met:

- a. The grant request is unsolicited.
- b. The grant is given to an institution, organization, or conference organizer, and not to an individual Healthcare Professional.
- c. The grant is independent of and unrelated to the prescribing, purchasing, registration, recommendation, or use of any product or service.
- d. The grant is supported by written documentation detailing the nature, scope, and objectives of the educational program.
- e. The grant arrangement is transparent, documented, and capable of withstanding public, regulatory, and audit scrutiny.

7.4.4. Prohibited Conduct

Under no circumstances may donations or grants be used to:

- reward past decisions or actions.
- influence future business or regulatory outcomes.
- bypass restrictions on gifts, hospitality, or transfers of value.
- serve as an indirect benefit to an individual decision-maker.

7.4.5. Governance and Approvals

All donations and grants must be subject to the following governance and control framework:

a. Founder Approval

All donations and grants require prior written approval from the Founders, based on a documented recommendation from the Chief Financial Officer.

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b. **Centralized Financial Review & Disbursement**

The Finance function is responsible for:

- reviewing the financial and control aspects of the proposed donation or grant, including budget availability, accounting treatment, and tax considerations; and
- ensuring that all approved donations and grants are disbursed directly by Finance to the recipient organization.

Under no circumstances may donations or grants be paid, reimbursed, or routed through employees or personal accounts.

- c. All approved donations and grants must be disbursed **directly by the Finance function**. Under no circumstances may donations or grants be paid, reimbursed, or routed through employees, third parties, or personal accounts.

d. **Recipient Due Diligence**

Appropriate risk-based due diligence must be conducted on the recipient organization prior to approval, including verification of legal status, ownership, purpose, and any affiliations with Government Officials or decision-makers.

Where an ABAC risk is identified or reasonably foreseeable, **consultation with the Compliance Function or Chief Ethics Officer is mandatory** prior to approval or disbursement. Refer [ANNEX C - ABAC Risk Escalation – Indicative Triggers](#)

e. **Documentation and Record-Keeping**

All donations and grants must be accurately recorded in the Company's books and records, supported by written agreements, approval documentation, and evidence of disbursement and use, in accordance with applicable accounting standards and legal requirements.

f. **Monitoring and Audit Rights**

Docquity reserves the right to monitor the use of donations and grants and to require reporting or audits by the recipient to ensure funds are used solely for the approved purpose.

Refer [ANNEX B - Donation & Grant Approval Workflow](#)

7.5. **Third-Party Risk Management**

Docquity may be held liable for corrupt acts committed by third parties acting on its behalf, hence -

- Risk-based due diligence must be conducted prior to engaging third parties.

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- Written contracts must include anti-bribery and audit clauses.
- Success-based or contingency fees tied to regulatory approvals, licensing, or market access are prohibited.
- Docquity reserves the right to audit third-party compliance.
- Any ABAC breach by a third party may result in immediate termination.

8. Books, Records, And Internal Control

All Company Personnel must

- Accurately reflect transactions in reasonable detail.
- Be complete, truthful, and timely.
- Be supported by appropriate documentation and approvals in accordance with the relevant company policies.

All accounts, entries, and expense descriptions must be complete, accurate, and reflective of the true nature and purpose of the transaction.

9. Reporting, Protection, and Enforcement

All employees and third parties must promptly report suspected violations through the Company's Whistleblower mechanism or to the Chief Ethics Officer. Docquity strictly prohibits retaliation against individuals who raise concerns in good faith.

Violations of this Policy may result in disciplinary action up to and including termination of employment and referral to law enforcement authorities.

10. Training and Awareness

A mandatory Anti-Bribery and Anti-Corruption Training is provided to all staff via the online portal. The module, through examples and scenarios on fraud, bribery, and corruption, relays the practical application of this policy.

Completion Timelines/Frequency:

- For New Joiners - Within 30 working days from the Date of Joining
- As an Annual Refresher - the employees become eligible at 11 months from the last completion and must complete within 30 days of becoming eligible.

11. Relationship with Other Policies

Healthcare-specific interactions, pharmaceutical codes of practice, and transfers of value to healthcare professionals are governed separately under the **HCP Interaction & Transfers of Value Policy**.

Operational spending limits, approvals, and country-specific thresholds are governed under the **Employee Expense, Gifts & Hospitality Matrix**.

This Policy must be read in conjunction with those documents.

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12. Legal and Regulatory Compliance

Docquity conducts its business in compliance with the anti-bribery and anti-corruption laws of the countries in which it operates. The specific legal frameworks may vary by jurisdiction – refer [Annex D - Country-Specific Anti-Bribery and Anti-Corruption Requirements](#) for the applicable principles.

13. Policy Governance

The Company's approach to anti-bribery and corruption is to be communicated to all suppliers, contractors, agents and business and other partners at the outset of the Company's relationship with them and as appropriate thereafter.

The Company reserves the right to amend this Policy at any time to reflect legal or regulatory changes.

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ANNEXURE

ANNEX A - Festival / Customary Gift Decision Tree

“Cultural or festive practice does not override ABAC requirements. All gifts must meet the organization’s defined criteria for nominal value, transparency, and independence from business decision-making.”

Steps	Action	Ask Yourself	Make Selection
1	Is a Gift Being Considered?	Is anything of value (goods, hospitality, services, discounts, vouchers) being proposed?	<input type="checkbox"/> No → Proceed. No ABAC impact. <input type="checkbox"/> Yes → Go to Step 2
2	Is the Gift Cash or a Cash Equivalent?	Is the item cash, gift card, voucher, prepaid card, or anything readily convertible to cash?	<input type="checkbox"/> Yes → STOP. PROHIBITED. Do not proceed. <input type="checkbox"/> No → Go to Step 3
3	Are There Any Business Decision Nexus?	Is any of the following ongoing, upcoming, or recent (± 6 months)? <ul style="list-style-type: none"> • RFP / tender / procurement • Contract award, renewal, amendment • Pricing or commercial negotiations • Vendor onboarding, audit, or performance review • Approval, certification, or evaluation by the recipient 	<input type="checkbox"/> Yes → STOP. PROHIBITED due to business linkage. <input type="checkbox"/> No → Go to Step 4
4	Who Is the Recipient?	Who will receive the gift?	<div style="border-bottom: 1px solid black; padding-bottom: 5px;"> <input type="checkbox"/> An individual decision-maker or approver <input type="checkbox"/> A government or public-sector official <input type="checkbox"/> A private individual at their home High risk — STOP or seek Compliance/Finance/Management approval </div> <div style="padding-top: 5px;"> <input type="checkbox"/> A department / team / office (shared use) <input type="checkbox"/> Corporate reception / common area Lower risk — Go to Step 5 </div>
5	Is the Gift Nominal and Proportionate?	Does the gift meet <i>all</i> the following? <ul style="list-style-type: none"> <input type="checkbox"/> Low / nominal value (within internal threshold) <input type="checkbox"/> Reasonable for the local culture and festival <input type="checkbox"/> Not luxury or personal use oriented <input type="checkbox"/> Comparable to what would be given to multiple clients/vendors 	<input type="checkbox"/> No → STOP or seek Compliance/Finance/Management approval <input type="checkbox"/> Yes → Go to Step 6

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Steps	Action	Ask Yourself	Make Selection
		<input type="checkbox"/> It would not cause embarrassment if disclosed publicly	
6	Frequency & Pattern Check	Has the same vendor/client exchanged gifts: <input type="checkbox"/> More than once in the past 12 months? <input type="checkbox"/> With increasing value over time? <input type="checkbox"/> Outside major festivals?	<input type="checkbox"/> Yes → High-risk pattern — seek Compliance/Finance/Management approval <input type="checkbox"/> No → Go to Step 7
7	Transparency & Documentation	Can the following be completed before or immediately after the gift exchange? <input type="checkbox"/> Gift recorded in Gift & Hospitality register (<i>Finance</i>) <input type="checkbox"/> Estimated value documented <input type="checkbox"/> Festival/occasion stated <input type="checkbox"/> Confirmation of no business decision linkage <input type="checkbox"/> Compliance/manager approval obtained (if required)	<input type="checkbox"/> No → DO NOT PROCEED <input type="checkbox"/> Yes → Go to Step 8
8	Final Perception Test	Would the organization be comfortable if this gift were disclosed to: <ul style="list-style-type: none">• Regulators• Auditors• Media• Board / Audit Committee	<input type="checkbox"/> No → DO NOT PROCEED <input type="checkbox"/> Yes → PROCEED — Low ABAC Risk

Summary Outcome Matrix

Outcome	Action
Cash / business-linked / high-value / personal	Prohibited
Nominal, shared, documented, no nexus	Permissible
Grey area (timing, value, frequency)	Approval required

Practical Guidance

Pharma companies, being high-risk regulated entities, apply stricter ABAC and ethics standards to all third-party interactions, which is why most adopt a zero-gift or near-zero-gift rule.

1. Assume gifts will be declined unless explicitly cleared.
2. Know your contractual obligation with the client
3. Limit to:
 - Very low-value branded items – No luxury items
 - Corporate, not personal, utility - No personal benefit perception
4. Maintain:
 - Gift details
 - Business justification
 - Proof of nominal value

Alternative safer options - Thank-you letters, Co-branded educational materials, Corporate-level acknowledgements (not individual gifts)

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ANNEX B - Donation & Grant Approval Workflow

Step 1: Initiation of Request

- Donation or Grant request is initiated by an authorized employee using the approved **Donation & Grant Request Form (Annex E)**.
- The request must clearly state:
 - Purpose and justification
 - Recipient organization details
 - Nature (Donation or Educational Grant)
 - Amount, frequency, and form (financial / non-financial)
 - Confirmation of no quid pro quo

Step 2: Finance Review (Primary Review Function)

The Finance function conducts a comprehensive review, including:

- verification of completeness of the request.
- assessment of budget availability and accounting treatment.
- confirmation that the request complies with the ABAC Policy, including:
 - no quid pro quo,
 - no linkage to commercial or regulatory decisions,
 - no personal benefit to individuals.
- preliminary **ABAC risk assessment** based on defined risk indicators.

Step 3: ABAC Risk Assessment & Escalation (Conditional)

- Where the Finance review identifies an **actual or reasonably foreseeable ABAC risk**, the matter **must be escalated** to the Compliance Function/Chief Ethics Officer and/or Legal for guidance.
- Examples include (non-exhaustive):
 - links to Government Officials or public institutions,
 - cross-border donations,
 - reputational sensitivity,
 - unusual urgency or pressure.
- Where no such risk is identified, the request may proceed without consultation.

Step 4: Founder Approval

- All donations and grants, irrespective of value, require **prior written approval from the Founders**.
- Approval is based on:
 - Finance review outcome; and
 - Compliance / Ethics input, where escalation has occurred.

Step 5: Execution & Disbursement

- Upon approval:
 - any required written agreement is executed with the recipient organization; and
 - **Finance directly disburses** the approved amount or arranges delivery of approved non-financial support.
- Payments or transfers:
 - must not be made in cash.
 - must not be routed through employees or third parties.
 - must be made only to the approved recipient organization.

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Step 6: Recording & Documentation

- Finance ensures:
 - accurate recording in the Company's books and records.
 - retention of all approvals, agreements, and supporting documentation in accordance with the Records Retention Policy.

Step 7: Post-Disbursement Monitoring (Where Applicable)

- For higher-risk or material donations or grants, Docquity may:
 - request utilization reports.
 - monitor use of funds or support; and/or
 - exercise audit or review rights as contractually agreed.

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ANNEX C - ABAC Risk Escalation – Indicative Triggers

The presence of any such indicator does not automatically prohibit a donation or grant, but it requires enhanced review and documented guidance from the Compliance Function/ Chief Ethics Officer and/or Legal before proceeding.

1. Counterparty / Recipient Risk

Assess who the Company is dealing with.

- Whether the counterparty is:
 - a Government Official, public institution, or state-owned or state-controlled entity.
 - a Healthcare Professional or healthcare decision-maker.
 - an entity owned, managed, or influenced by a Government Official or HCP.
- Nature of the organization (public vs private, for-profit vs non-profit).
- Ownership, control, and key decision-makers.
- Reputation, past enforcement actions, or adverse media (where known).

2. Purpose and Legitimacy of the Transaction

Assess why the transaction is being proposed.

- Whether there is a legitimate, documented business, charitable, or educational purpose.
- Whether the purpose aligns with Company policy and stated objectives.
- Whether the transaction could reasonably be perceived as intended to:
 - influence a decision,
 - obtain preferential treatment, or
 - reward past actions.
- Whether the request is unsolicited (where required, e.g., grants).

3. Value and Proportionality

Assess what is being provided.

- Monetary value or estimated fair market value of non-financial support.
- Whether the value is:
 - reasonable,
 - proportionate, and
 - consistent with customary practice.
- Whether cumulative or repeated transactions increase overall risk.

4. Timing and Context

Assess when the transaction is occurring.

- Proximity to:
 - commercial negotiations,
 - procurement or tender processes,
 - regulatory approvals or inspections,
 - licensing, registration, or enforcement actions.
- Whether the timing could reasonably create an appearance of influence or inducement.

5. Geography and Jurisdictional Risk

Assess where the transaction takes place.

- Countries involved in the transaction, including cross-border elements.

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- Whether the jurisdiction is subject to:
 - heightened corruption risk,
 - complex regulatory oversight, or
 - sanctions or export control restrictions.
- Whether local law imposes stricter prohibitions than Company policy.

6. **Payment and Disbursement Method**

Assess how value is transferred.

- Whether payments are made:
 - directly by Finance,
 - to an approved organizational account.
- Whether any cash, cash equivalent, or indirect benefit is involved.
- Whether there are requests for:
 - personal accounts,
 - intermediaries,
 - reimbursements, or
 - undocumented payments.

7. **Third-Party and Intermediary Risk**

Assess who is involved beyond the Company and the recipient.

- Use of agents, consultants, distributors, or intermediaries.
- Clarity of services provided and fair market value compensation.
- Whether third parties interact with Government Officials or HCPs on the Company's behalf.

8. **Transparency, Documentation, and Controls**

Assess how the transaction is recorded and governed.

- Availability of written agreements, approvals, and supporting documentation.
- Accuracy and completeness of books and records.
- Ability to withstand:
 - internal audit,
 - regulatory review, or
 - public scrutiny.

9. **Behavioral and Red-Flag Indicators**

Assess how the request is being made.

- Unusual urgency or pressure to proceed quickly.
- Requests to bypass standard processes or approvals.
- Resistance to documentation or transparency.
- Vague or shifting explanations of purpose.

10. **Reputational and Perception Risk**

Assess how the transaction could be viewed externally.

- Potential impact on the Company's reputation.
- Likelihood of negative media, regulatory, or stakeholder attention.
- Whether the transaction could be misunderstood even if technically lawful.

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ANNEX D - Country-Specific Anti-Bribery and Anti-Corruption Requirements

Jurisdiction	Principal Anti-Bribery / Anti - Corruption Law	ABAC Principles
India	Prevention of Corruption Act, 1988 (with 2018 amendments)	<ul style="list-style-type: none"> • Prohibits giving, offering, promising, requesting, or accepting bribes involving public servants. • Includes indirect bribery through intermediaries. • Criminalizes gratification intended to influence official acts. • Corporate entities and individuals may be held liable for corrupt acts.
Singapore	Prevention of Corruption Act (PCA)	<ul style="list-style-type: none"> • Prohibits bribery in both public and private sectors. • Covers direct and indirect payments, benefits, or advantages. • Has extraterritorial reach for acts committed outside Singapore. • No facilitation payment exception is recognized.
Philippines	Anti-Graft and Corrupt Practices Act (RA 3019)	<ul style="list-style-type: none"> • Prohibits corrupt practices involving public officers, including giving or receiving benefits to influence official actions. • Covers transactions causing undue advantage to private parties. • Private individuals and entities may be liable when dealing with public officials.
Malaysia	Malaysian Anti-Corruption Commission Act 2009 (MACC Act), including corporate liability under Section 17A	<ul style="list-style-type: none"> • Prohibits bribery involving public and private sector persons. • Introduces corporate liability for bribery committed by associated persons. • Requires organizations to demonstrate “adequate procedures” to prevent bribery. • No facilitation payments permitted.
Indonesia	Law No. 31/1999 on the Eradication of the Criminal Act of Corruption (as amended)	<ul style="list-style-type: none"> • Prohibits bribery of public officials and abuse of authority. • Covers direct and indirect payments and benefits. • Applies to individuals and corporate entities. • Strict enforcement by the Corruption Eradication Commission (KPK).
Japan	Unfair Competition Prevention Act (UCPA) and related criminal statutes	<ul style="list-style-type: none"> • Prohibits bribery of foreign public officials to obtain or retain business. • Domestic bribery is also prohibited under the Penal Code. • Covers monetary and non-monetary advantages. • Applies to individuals and legal entities.
UAE	Federal anti-bribery and Penal Code provisions	<ul style="list-style-type: none"> • Prohibits bribery involving public officials and private individuals. • Covers offering, requesting, or accepting benefits to influence duties. • Applies to both monetary and non-monetary advantages. • Strict enforcement with criminal penalties.
Saudi Arabia	Penal and anti-corruption provisions in national law (current statute framework)	<ul style="list-style-type: none"> • Prohibits bribery involving public officials and abuse of position. • Covers direct and indirect benefits. • Applies to individuals and entities. • Zero tolerance approach with criminal sanctions
Vietnam	Law on Anti-Corruption, 2018 (with revisions)	<ul style="list-style-type: none"> • Prohibits bribery in both public and private sectors. • Covers giving, receiving, or intermediating bribes. • Requires transparency, proper accounting, and internal controls. • Applies to individuals and organizations.



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ANNEX E - Donation & Grant Request Form

The **Donation & Grant Request Form** is owned and administered by the Finance function, which is responsible for ensuring appropriate approvals, lawful disbursement, accurate accounting, and retention of supporting documentation.

Section 1: Request Overview			
1	Type of Request (select one)	<input checked="" type="checkbox"/> Charitable Donation <input checked="" type="checkbox"/> Education Grant	
2	Nature of Support (select all that apply)	<input type="checkbox"/> Financial <input type="checkbox"/> Non-financial (specify)	
3	Proposed Amount / Value	Currency	Amount
4	Frequency	<input type="checkbox"/> One-time <input type="checkbox"/> Recurring (specify frequency and duration)	
5	Proposed Date of Disbursement (DD/MM/YYYY)	Click or tap to enter a date.	
Section 2: Details of the Requesting Function			
6	Requesting Department / Function		
7	Request Initiator	Name	Title
8	Business Justification / Purpose of Donation or Grant (Describe the charitable, humanitarian, or educational purpose. Commercial justification is not permitted.)		
9	Please indicate how the grant opportunity originated. This information is required to assess independence and anti-bribery risk.	<input type="checkbox"/> The grant request was initiated by the recipient organisation without prior solicitation, suggestion, or inducement by Docuquity or any of its representatives. <input type="checkbox"/> The grant request was initiated following an external call, public application process, or documented eligibility criteria (attach details)	
Section 3: Recipient Organization Details			
10	Legal Name of Recipient Organization		
11	Registered Address		
12	Country / Jurisdiction of Registration		
13	Organization Type	<input type="checkbox"/> Registered Charity / NGO <input type="checkbox"/> Public Hospital / Public Institution <input type="checkbox"/> Educational Institution <input type="checkbox"/> Non-profit Organization	

14	Website (if available)							
15	Primary Contact Person	Name	Title	Email				
Section 4: ABAC Risk Declarations (Mandatory)								
Please complete the following questions to support appropriate review and approval								
16	Is the recipient organization owned, controlled, or materially influenced by a Government Official or public authority?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unknown	
17	Is the recipient affiliated with any Healthcare Professional or healthcare decision-making body?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unknown	
18	Is the request linked in any way to							
a	product purchase, prescription, registration, or use?	<input type="checkbox"/>	Yes	<input type="checkbox"/>			No	
b	procurement, tender, licensing, or regulatory decision?	<input type="checkbox"/>	Yes	<input type="checkbox"/>			No	
19	Was the request made close in time to any commercial, contractual, or regulatory discussion involving Docuquity?	<input type="checkbox"/>	Yes	<input type="checkbox"/>			No	
20	Is this a cross-border donation or grant?	<input type="checkbox"/>	Yes	<input type="checkbox"/>			No	
21	Has there been any urgency, pressure, or request to bypass standard processes?	<input type="checkbox"/>	Yes	<input type="checkbox"/>			No	
22	Could this donation or grant reasonably attract public, media, or regulatory scrutiny?	<input type="checkbox"/>	Yes	<input type="checkbox"/>			No	
If "Yes" to any of the above, please provide details:								
Section 5: Use of Funds / Support Details								
23	Intended Use of Donation / Grant							
24	Expected Public or Community Benefit							

25	Confirmation (tick all)	<input type="checkbox"/> Funds/support will be used solely for the approved purpose <input type="checkbox"/> No branding, product promotion, or therapeutic-area promotion is involved <input type="checkbox"/> Donation/grant will not benefit any individual personally <input type="checkbox"/> Recipient agrees to reporting and audit rights if required	
Section 6: Disbursement & Controls (Disbursement Method: Direct bank transfer by Finance only)			
27	Recipient Bank Account Name		
28	Recipient Bank & Country		
29	Confirmation	<input type="checkbox"/> No cash payment <input type="checkbox"/> No reimbursement to employees or third parties <input type="checkbox"/> No personal accounts involved	
Section 7: Requestor Declaration			
I confirm that this request complies with the Anti-Bribery and Anti-Corruption Policy and that no quid pro quo, improper influence, or business advantage is intended or expected.		Name	
		Title	
		Email	

Section 8: Internal Review & Approvals (Internal Use Only)					
Finance Review		<input type="checkbox"/>	Approved	<input type="checkbox"/>	Rejected
Name	Title	Signature	Date		
Comments					
Click or tap to enter a date.					
ABAC Risk Escalation					
<input type="checkbox"/> ABAC risk identified: Compliance /Chief Ethics Officer consulted		<input type="checkbox"/>	No ABAC risk identified		
Name	Title	Signature	Date		
Compliance / Ethics Comments (if applicable):					
Click or tap to enter a date.					
Founder Approval					
		<input type="checkbox"/>	Approved	<input type="checkbox"/>	Rejected
Name	Title	Signature	Date		
Click or tap to enter a date.					
Section 9: Post-Disbursement (Internal Use)					
<input type="checkbox"/> Agreement executed					
<input type="checkbox"/> Disbursement completed by Finance					
<input type="checkbox"/> Documentation archived					
<input type="checkbox"/> Monitoring completed (if applicable)					