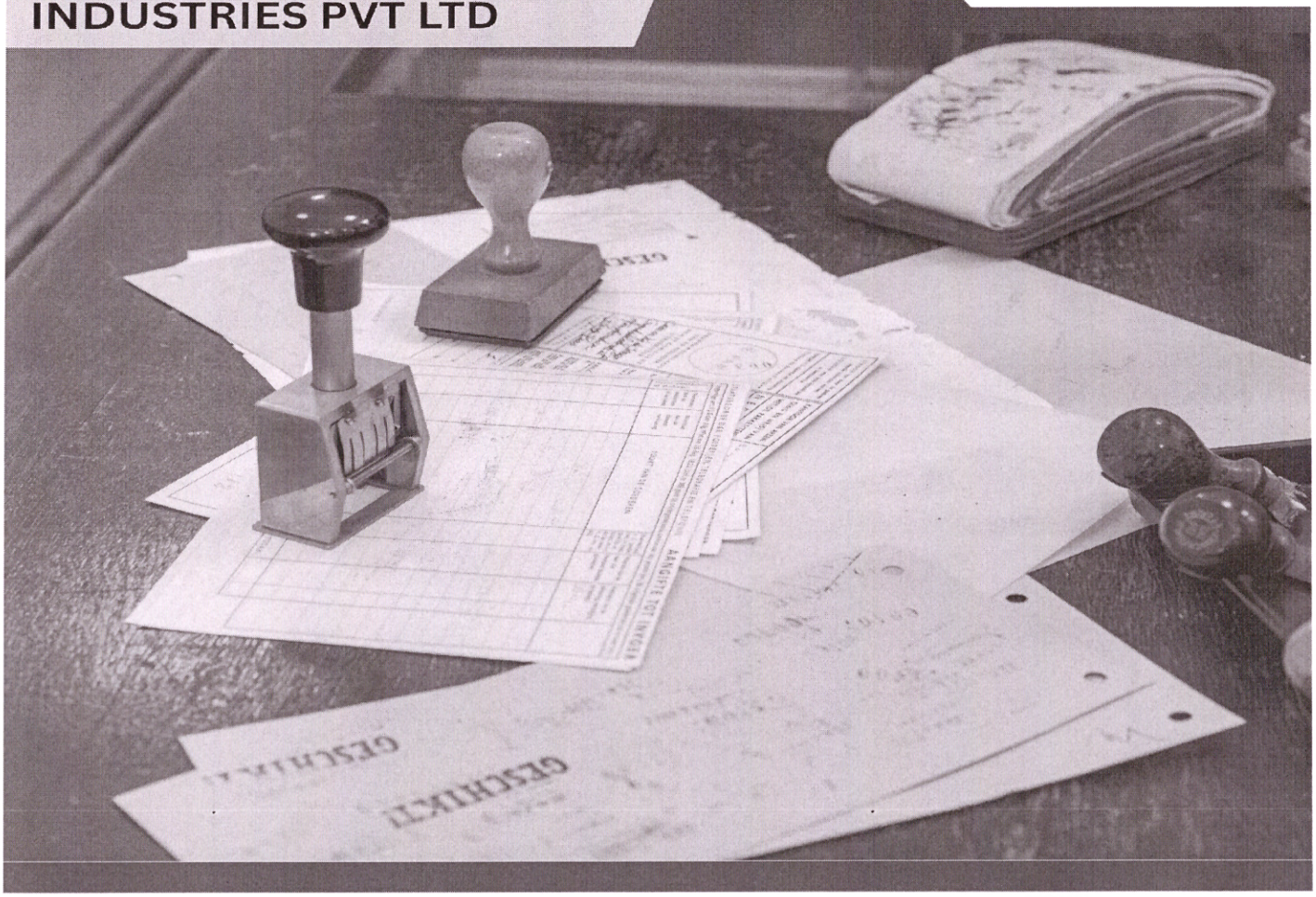
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ROYAL PHARMA

ROYAL PHARMACEUTICALS INDUSTRIES PVT LTD



ETHICAL SOURCING AND BUSINESS CONDUCT POLICY

E-128 MIDC Industrial Area, Tarapur Boisar 401506 Palghar, Maharastra India

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1. Introduction

Royal Pharmaceuticals Industries Pvt. Ltd. is committed to conducting business with the highest standards of integrity, honesty, transparency, and accountability. The Company integrates ethical business practices into all operations, business decisions, and stakeholder relationships through strong governance, legal compliance, and continual improvement, reinforcing its commitment to responsible and sustainable business conduct.

2. Purpose

The purpose of this Ethical Sourcing and Business Conduct Policy is to establish the principles, commitments, and expectations that guide ethical decision-making and responsible business conduct across all operations of Royal Pharma Industries Pvt. Ltd.

This Policy aims to:

- Promote a culture of integrity, honesty, transparency, and accountability in all business activities.
- Ensure compliance with all applicable laws, regulations, industry standards, and contractual obligations.
- Prevent and address unethical practices, including corruption, bribery, fraud, conflicts of interest, money laundering, and other forms of misconduct.
- Protect confidential information, intellectual property, and company assets through responsible information management.
- Foster fair, ethical, and transparent relationships with employees, customers, suppliers, contractors, business partners, regulators, and other stakeholders.
- Encourage the timely reporting of suspected unethical conduct and ensure protection against retaliation for individuals who report concerns in good faith.

3. Applicability

This Ethical Employment and Human Rights Policy applies to the manufacturing facility of Royal Pharmaceuticals Industries Pvt. Ltd. located at **E-128, MIDC Industrial Area, Tarapur, Boisar – 401506, Palghar, Maharashtra, India**. It applies to all employees, directors, contractors, suppliers, consultants, service providers, and other personnel working on behalf of the Company.

4. Policy Commitment

Royal Pharmaceuticals Industries Pvt. Ltd. is committed to conducting business with integrity, honesty, fairness, and transparency. The Company integrates ethical principles into all business activities through strong governance, compliance with applicable laws, and a zero-tolerance approach to corruption, bribery, fraud, money laundering, and conflicts of interest, supporting responsible and sustainable business growth.

5. Strategic Commitments

1) Anti-Corruption & Anti-Bribery

Objectives

- We strive to foster a culture of integrity, transparency, and accountability by maintaining zero tolerance for bribery, corruption, facilitation payments, kickbacks, extortion, or any other form of unethical business conduct across all business operations.
- We will ensure that all business decisions, procurement activities, sales transactions, regulatory interactions, and commercial negotiations are conducted fairly, ethically, and solely on merit without any improper influence.
- We aim to maintain fully compliance with the local and international regulations and standards.
- We seek to conduct the regular risk assessment and establish effective governance, internal controls, and due diligence processes to identify, prevent, detect, and mitigate corruption-related risks associated with employees, suppliers, contractors, distributors, consultants, and other business partners.
- We seek to prevent and mitigate corruption risks through the implementation of a Gift & Hospitality Register, Third-Party Due Diligence, an Approval Matrix, and a confidential Whistleblower Mechanism across all business operations.
- We seek to promptly investigate all reported or suspected incidents of corruption or bribery and implement appropriate corrective, preventive, disciplinary, and legal actions where violations are confirmed.
- We aim to train our employees on the Anti-Corruption and Anti bribery issues.

Targets

- We aim to maintain **Zero Confirmed Incidents** of bribery, corruption, facilitation payments, or kickbacks across all Company operations throughout **FY 2029–30**, compared to the **FY 2025–26 baseline**.
- We will provide annual Anti-Corruption and Anti-Bribery awareness training to **100% of employees** and other relevant personnel by **FY 2029–30**.

- We strive to communicate the Company's Anti-Corruption and Anti-Bribery requirements to **100% of significant suppliers, contractors, consultants, distributors, and other high-risk business partners** through contractual obligations, Supplier Code of Conduct, or formal communication by **FY 2029–30**.
- We aim to investigate and close **100% of reported bribery or corruption concerns** within the Company's defined investigation and corrective action timelines.
- We strive to achieve **100% compliance** with applicable anti-corruption laws, regulatory requirements, and Company procedures throughout the policy period.
- We will conduct periodic internal compliance reviews or audits covering **100% of identified high-risk transactions and business activities** to evaluate compliance with this Policy by **FY 2029–30**.
- We aim to ensure **100% declaration and approval of reportable gifts, hospitality, sponsorships, and donations** in accordance with the Company's approval procedures throughout the policy period.

2) Conflict of Interest

Objectives

- We strive to promote transparency, impartiality, and accountability by ensuring that all business decisions are made in the best interests of Royal Pharma Industries Pvt. Ltd., free from actual, potential, or perceived conflicts of interest.
- We aim to maintain fully compliance with the local and international regulations and standards.
- We will require employees, directors, and individuals acting on behalf of the Company to promptly disclose any personal, financial, family, or external interests that may influence, or appear to influence, their professional judgement or decision-making.
- We seek to establish a structured process for identifying, assessing, disclosing, managing, and monitoring conflicts of interest to safeguard the integrity of business operations and maintain stakeholder trust.
- We strive to ensure that procurement decisions, supplier selection, recruitment, promotions, contracting, investments, and commercial transactions are conducted fairly, objectively, transparently, and solely on merit.
- We seek to identify, disclose, and manage conflicts of interest through Annual Conflict of Interest Declaration Forms, a Conflict of Interest Register, and an independent management review process.
- We aim to train our employees on the Conflict of interest issues.

Targets

- We aim to achieve **100% submission of Conflict of Interest Declarations** by all Directors, Senior Management, Key Managerial Personnel (KMP), and designated employees annually by **FY 2029–30**, compared to the **FY 2025–26 baseline**.
- We will ensure **100% disclosure, assessment, and documentation of all identified actual, potential, or perceived conflicts of interest** in accordance with the Company's procedures throughout the policy period.
- We strive to investigate and resolve **100% of reported conflict of interest cases** within the Company's defined investigation and corrective action timelines.
- We aim to provide annual Conflict of Interest awareness training to **100% of employees** and relevant third parties by **FY 2029–30**.
- We will conduct annual conflict of interest compliance reviews covering **100% of high-risk functions**, including Procurement, Finance, Human Resources, Sales & Marketing, Regulatory Affairs, and Senior Management by **FY 2029–30**.
- We strive to maintain **Zero Confirmed Incidents** of undisclosed conflicts of interest resulting in regulatory violations, financial loss, or reputational damage throughout the policy period.
- We aim to maintain **100% compliance** with applicable legal requirements, internal governance procedures, and this Policy regarding conflict of interest management throughout the policy period.

3) Fraud Prevention

Objectives

- We strive to maintain a culture of honesty, integrity, and accountability by adopting a zero-tolerance approach towards fraud, theft, embezzlement, forgery, financial misconduct, asset misappropriation, falsification of records, and any other fraudulent or deceptive practices.
- We seek to prevent and detect fraud through Maker–Checker Controls, Segregation of Duties (SoD), Surprise Cash Verification, Inventory Reconciliation, and a confidential fraud reporting mechanism.
- We seek to safeguard the Company's financial resources, physical assets, intellectual property, confidential information, and information systems against unauthorized use, manipulation, theft, or misappropriation.
- We aim to maintain fully compliance with the local and international regulations and standards.
- We will ensure that all financial transactions, accounting records, production records, inventory records, procurement activities, expense claims, regulatory submissions, and operational documentation are accurate, complete, truthful, and supported by appropriate evidence.

- We strive to strengthen fraud risk management by conducting periodic fraud risk assessments, internal audits, management reviews, and data verification activities to identify vulnerabilities and implement appropriate preventive and corrective measures.
- We aim to train our employees on the Fraud prevention.

Targets

- We aim to maintain **Zero Confirmed Incidents** of fraud, embezzlement, theft, financial manipulation, asset misappropriation, or falsification of records across all Company operations throughout **FY 2029–30**, compared to the **FY 2025–26 baseline**.
- We will provide annual Fraud Prevention and Ethical Conduct awareness training to **100% of employees** and other relevant personnel by **FY 2029–30**.
- We strive to investigate and resolve **100% of reported or suspected fraud cases** within the Company's defined investigation and corrective action timelines.
- We aim to conduct annual fraud risk assessments covering **100% of high-risk business functions**, including Finance, Procurement, Stores, Production, Quality, Sales & Marketing, and Information Technology by **FY 2029–30**.
- We will conduct periodic internal audits and compliance reviews covering **100% of identified high-risk financial and operational processes** to assess fraud prevention controls and identify improvement opportunities by **FY 2029–30**.
- We aim to ensure **100% implementation of corrective and preventive actions (CAPAs)** arising from confirmed fraud investigations within the agreed timelines throughout the policy period.

4) Anti-Money Laundering & Financial Integrity

Objectives

- We strive to conduct business with integrity by preventing money laundering, terrorist financing, financial crime, and other illicit activities through responsible business practices and robust financial governance.
- We seek to prevent money laundering and financial crime through Know Your Customer (KYC) verification, Sanctions Screening, Bank Account Verification, and a Payment Authorization Matrix for all applicable business transactions.
- We aim to maintain fully compliance with the local and international regulations and standards.
- We will establish and maintain appropriate due diligence processes to verify the legitimacy, integrity, and compliance of customers, suppliers, distributors, contractors, consultants, and other business partners before entering into or continuing business relationships.

- We seek to ensure that all financial transactions are conducted through authorized, transparent, and traceable channels and are supported by complete, accurate, and verifiable documentation.
- We will maintain accurate, complete, and timely financial books, records, invoices, contracts, payment records, and accounting documentation in accordance with applicable legal, regulatory, taxation, and accounting requirements.
- We aim to train our employees on the AML.

Targets

- We aim to maintain **Zero Confirmed Incidents** of money laundering, terrorist financing, financial crime, or other illicit financial activities across all Company operations throughout **FY 2029–30**, compared to the **FY 2025–26 baseline**.
- We will provide annual Anti-Money Laundering (AML) and Financial Integrity awareness training to **100% of employees** working in Finance, Procurement, Sales, Commercial, Supply Chain, and other identified high-risk functions by **FY 2029–30**.
- We strive to conduct documented due diligence for **100% of newly on boarded high-risk customers, suppliers, distributors, consultants, and other significant business partners** before establishing business relationships by **FY 2029–30**.
- We aim to investigate and resolve **100% of reported suspicious financial transactions or money laundering concerns** within the Company's defined investigation and corrective action timelines.
- We will conduct annual money laundering and financial crime risk assessments covering **100% of identified high-risk business functions and financial processes** by **FY 2029–30**.

5) Responsible Information Management & Data Protection

Objectives

- We strive to protect the confidentiality, integrity, availability, and responsible use of Company information, intellectual property, personal data, and other sensitive business information throughout its lifecycle.
- We seek to safeguard Company information through Multi-Factor Authentication (MFA), Role-Based Access Controls (RBAC), Data Backup, Firewall Protection, and Data Loss Prevention (DLP) measures.
- We aim to maintain fully compliance with the local and international regulations and standards.
- We will establish and maintain appropriate information management practices, including information classification, secure storage, controlled access, secure transmission, retention,

and disposal of information in accordance with applicable legal, regulatory, and business requirements.

- We seek to ensure that confidential business information, trade secrets, research and development data, manufacturing processes, quality records, customer information, supplier information, and employee records are accessed and used only by authorized personnel for legitimate business purposes.
- We will implement appropriate technical, physical, and administrative safeguards to protect information assets against unauthorized access, disclosure, alteration, loss, theft, cyber threats, and other security risks.
- We strive to promote responsible use of Company information systems, digital resources, communication platforms, and electronic devices by ensuring they are used ethically, securely, and solely for authorized business purposes.
- We aim to train our employees on the IT Security.

Targets

- We aim to maintain **Zero Confirmed Incidents** of unauthorized disclosure, theft, loss, or misuse of confidential Company information, intellectual property, or personal data across all Company operations throughout **FY 2029–30**, compared to the **FY 2025–26 baseline**.
- We will provide annual Information Security, Data Protection, and Confidentiality awareness training to **100% of employees** and relevant contractors by **FY 2029–30**.
- We strive to investigate and close **100% of reported information security incidents, data breaches, or confidentiality violations** within the Company's defined incident management and corrective action timelines.
- We aim to conduct annual information security and data protection risk assessments covering **100% of critical business processes and information assets** by **FY 2029–30**.
- We strive to maintain **100% compliance** with applicable data protection laws, intellectual property requirements, information security procedures, and Company record management practices throughout the policy period.
- We aim to ensure **100% implementation of appropriate access controls** for employees handling confidential, financial, quality, manufacturing, research, and personal information based on business needs and authorized responsibilities by **FY 2029–30**.
- We will periodically review the effectiveness of information management, cybersecurity, and data protection controls **at least once every year** and implement continual improvement measures to address emerging risks and technological developments.

6) Fair Competition & Ethical Business Practices

Objectives

- We strive to promote a culture of fair competition, integrity, and ethical business conduct by competing lawfully and responsibly while respecting applicable competition, antitrust, and fair trade laws in every market where the Company operates.
- We aim to maintain fully compliance with the local and international regulations and standards.
- We will ensure that all commercial decisions, including pricing, marketing, procurement, sales, tender participation, customer engagement, and supplier selection, are based on legitimate business considerations and are free from anti-competitive or unethical practices.
- We seek to prohibit anti-competitive agreements, price fixing, bid rigging, market allocation, abuse of dominant market position, collusive practices, exchange of commercially sensitive information, and any conduct that may restrict or distort fair market competition.
- We will ensure that all marketing, promotional activities, product claims, customer communications, and commercial representations are accurate, truthful, evidence-based, and compliant with applicable legal, regulatory, and industry requirements.

Targets

- We aim to maintain **Zero Confirmed Incidents** of anti-competitive practices, price fixing, bid rigging, market allocation, unfair trade practices, or violations of applicable competition laws across all Company operations throughout **FY 2029–30**, compared to the **FY 2025–26 baseline**.
- We will provide annual Fair Competition and Ethical Business Conduct awareness training to **100% of employees** working in Sales, Marketing, Procurement, Commercial, Business Development, Finance, and other relevant functions by **FY 2029–30**.
- We strive to investigate and resolve **100% of reported concerns** related to anti-competitive conduct or unethical business practices within the Company's defined investigation and corrective action timelines.

7) Responsible Third-Party Relationships

Objectives

- We strive to establish and maintain ethical, transparent, and mutually beneficial relationships with suppliers, contractors, consultants, distributors, service providers, agents, and other business partners by promoting integrity, accountability, and responsible business conduct throughout our value chain.
- We will ensure that third-party selection, qualification, evaluation, and engagement processes are conducted objectively, transparently, and based on fair competition, competence, quality, regulatory compliance, ethical conduct, and business performance.

- We seek to conduct appropriate due diligence on significant third parties to identify and mitigate ethical, legal, financial, operational, reputational, environmental, labour, human rights, and compliance risks before and during business relationships.

Targets

- We will conduct documented due diligence for **100% of newly on boarded high-risk third parties** before establishing business relationships by **FY 2029–30**.
- We strive to conduct annual ethical compliance evaluations or performance assessments covering **100% of identified high-risk suppliers and business partners** by **FY 2029–30**.
- We aim to investigate and address **100% of reported ethical, legal, or compliance concerns involving third parties** within the Company's defined investigation and corrective action timelines.
- We will maintain **100% inclusion of applicable ethics, anti-corruption, confidentiality, and compliance clauses** in contracts or agreements with significant third parties throughout the policy period.

6. Ownership & Accountability

Managing Director

The Managing Director is responsible for approving the Ethical Sourcing and Business Conduct Policy and providing strategic direction for ethical business conduct across the Company. The Managing Director shall demonstrate leadership and commitment towards integrity, transparency, and ethical decision-making while ensuring adequate financial, human, and technological resources are available for effective implementation of this Policy.

Department Heads

Department Heads are responsible for implementing the Ethical Sourcing and Business Conduct Policy within their respective departments. They shall promote ethical behaviour, accountability, and compliance with applicable laws and Company policies, identify ethical and compliance risks within departmental operations, implement appropriate preventive and corrective actions, and ensure employees understand and comply with this Policy while encouraging the prompt reporting of ethical concerns.

Human Resources (HR)

The Human Resources (HR) Department shall coordinate the communication, implementation, and periodic review of the Ethical Sourcing and Business Conduct Policy. HR is responsible for

integrating ethical conduct requirements into recruitment, onboarding, performance management, employee development, and disciplinary processes, organizing ethics awareness programs, maintaining training records, and supporting the administration of conflict of interest declarations, employee acknowledgements, and ethics-related investigations where applicable.

Management Representative

The Management Representative shall monitor compliance with applicable legal, regulatory, and ethical requirements relevant to the Company's operations. Responsibilities include conducting periodic ethics risk assessments and compliance reviews, supporting investigations into reported violations of this Policy, and monitoring the implementation of corrective and preventive actions arising from ethics-related incidents, audits, or investigations.

Finance Department

The Finance Department is responsible for maintaining accurate, complete, and transparent financial records and effective internal financial controls. It shall monitor compliance with financial governance, fraud prevention, and anti-money laundering requirements, report suspicious financial transactions or irregularities through appropriate reporting channels, and support financial audits, investigations, and compliance reviews.

Information Technology (IT)

The Information Technology (IT) function shall implement and maintain appropriate information security and cybersecurity controls to protect Company information and digital assets. It is responsible for supporting responsible information management, data protection, access control, and incident response activities, as well as monitoring and investigating information security incidents and recommending appropriate corrective actions.

Supervisors and Managers

Supervisors and Managers are responsible for leading by example and promoting ethical behaviour within their teams. They shall ensure employees understand and comply with this Policy and related procedures, and promptly address or escalate suspected ethical concerns, misconduct, or policy violations.

Employees

All employees are responsible for reading, understanding, and complying with the requirements of this Ethical Sourcing and Business Conduct Policy. Employees shall conduct all business

activities honestly, ethically, and in compliance with applicable laws and Company procedures, avoid conflicts of interest, promptly disclose any actual, potential, or perceived conflicts, and report suspected unethical or illegal activities through the Company's established reporting channels.

7. Code of Ethics

Royal Pharma Industries Pvt. Ltd. expects every employee, director, contractor, consultant, and business partner to uphold the highest standards of ethical conduct in all business activities. The following Code of Ethics provides practical guidance to support ethical decision-making and compliance with this Ethical Sourcing and Business Conduct Policy.

1. Anti-Corruption & Anti-Bribery

Ethical Guidance: Conduct all business honestly and never offer, promise, request, authorize, or accept anything of value that could improperly influence a business decision or create an unfair advantage.

Do's	Don'ts
Conduct business with honesty, fairness, and transparency.	Do not offer or accept bribes, kickbacks, or facilitation payments.
Follow Company procedures for gifts, hospitality, and donations.	Do not use gifts or entertainment to influence business decisions.
Record all business transactions accurately.	Do not conceal payments or create false records.
Report suspected corruption immediately.	Do not ignore unethical behaviour or suspicious payments.

2. Conflict of Interest

Ethical Guidance: Always act in the best interests of the Company and avoid situations where personal interests may interfere with professional responsibilities.

Do's	Don'ts
Disclose actual, potential, or perceived conflicts of interest.	Do not hide personal or financial interests.
Make objective business decisions.	Do not favour friends, relatives, or personal businesses.
Seek guidance whenever uncertain.	Do not participate in decisions where you have a conflict.

Update conflict declarations whenever circumstances change.	Do not misuse your position for personal gain.

3. Fraud Prevention

Ethical Guidance: Protect Company assets and ensure all records, transactions, and business information are truthful, complete, and accurate.

Do's	Don'ts
Maintain accurate financial and operational records.	Do not falsify documents or records.
Protect Company assets.	Do not steal, misuse, or damage Company property.
Verify transactions before approval.	Do not submit false expense claims or invoices.

4. Anti-Money Laundering & Financial Integrity

Ethical Guidance: Conduct business only with legitimate parties and ensure all financial transactions are transparent, lawful, and properly documented.

Do's	Don'ts
Maintain complete financial documentation.	Do not process unexplained or unusual payments.
Follow approved payment procedures.	Do not accept anonymous or unauthorized payments.
Report suspicious financial transactions.	Do not attempt to conceal financial activities.

5. Responsible Information Management & Data Protection

Ethical Guidance: Protect confidential information, personal data, intellectual property, and Company records from unauthorized access, disclosure, or misuse.

Do's	Don'ts
Use Company information only for authorized purposes.	Do not share confidential information without approval.
Protect passwords and electronic devices.	Do not disclose passwords or system access.
Secure Company records appropriately.	Do not remove confidential information without authorization.
Report information security incidents promptly.	Do not ignore data breaches or cyber threats.

6. Fair Competition & Ethical Business Practices

Ethical Guidance: Compete fairly and ethically while complying with all applicable competition and fair-trade laws.

Do's	Don'ts
Compete based on quality, service, and innovation.	Do not engage in price fixing or bid rigging.
Provide truthful information to customers.	Do not make misleading product claims.
Respect competitors and their intellectual property.	Do not obtain confidential competitor information improperly.
Follow fair procurement practices.	Do not manipulate tender or bidding processes.

7. Responsible Third-Party Relationships

Ethical Guidance: Work only with business partners who demonstrate integrity, legal compliance, and responsible business practices.

Do's	Don'ts
Select suppliers through fair and transparent processes.	Do not favour suppliers based on personal relationships.
Communicate Company ethical expectations.	Do not overlook unethical supplier behaviour.
Conduct due diligence where required.	Do not bypass supplier evaluation procedures.
Report unethical conduct by third parties.	Do not continue business with partners involved in illegal activities without appropriate review.

8. Legal & Regulatory Compliance

Ethical Guidance: Understand and comply with all applicable laws, regulations, Company policies, and contractual obligations relevant to your responsibilities.

Do's	Don'ts
Follow applicable laws and Company procedures.	Do not knowingly violate legal or regulatory requirements.
Cooperate during audits and inspections.	Do not provide false or misleading information.
Seek guidance if unsure about legal obligations.	Do not ignore compliance concerns.

9. Reporting Ethical Concerns

Ethical Guidance: Every employee has a responsibility to report suspected unethical conduct, policy violations, fraud, corruption, or other misconduct in good faith.

Do's	Don'ts
Report concerns promptly through approved reporting channels.	Do not remain silent if you witness unethical conduct.
Cooperate with investigations honestly.	Do not provide false or misleading information during investigations.
Maintain confidentiality throughout the investigation process.	Do not retaliate against anyone who raises a concern in good faith.

8. Enforcement Actions for Policy Violations

Where a violation of this Policy is confirmed, the Company may take one or more of the following actions, depending on the nature and severity of the breach:

- Issue a verbal or written warning.
- Require mandatory corrective actions or compliance commitments.
- Require completion of additional ethics and compliance training.
- Suspend, restrict, or revoke access to Company premises, systems, or business activities.
- Suspend or terminate employment, engagement, or contractual relationships, where applicable.
- Disqualify suppliers, contractors, consultants, or other business partners from future business opportunities.
- Recover losses or damages arising from the violation, where permitted by applicable law or contractual agreements.
- Report the matter to the relevant regulatory, statutory, or law enforcement authorities where required by law.
- Take legal or contractual action against individuals or organizations responsible for the violation.
- Implement any other disciplinary or remedial action deemed appropriate by the Company in accordance with applicable laws and Company procedures.

This version covers **all stakeholders** (employees and external parties) and is suitable for an Ethical Sourcing and Business Conduct Policy.

Fair Investigation Process

To ensure fairness and consistency, the Company shall:

- Investigate all reported or suspected violations objectively, confidentially, and without unnecessary delay.
- Provide individuals involved with an opportunity to present relevant facts and information during the investigation process.
- Protect individuals who report concerns in good faith from retaliation, discrimination, harassment, or victimization.

9. Monitoring & Measurement

Royal Pharmaceuticals Industries Pvt. Ltd. shall periodically monitor and evaluate the implementation and effectiveness of this Policy through ethics risk assessments, internal audits, compliance reviews, whistleblower reports, incident investigations, corrective actions, and management reviews to ensure legal compliance, effective governance, and continual improvement in ethical business practices.

10. Training & Awareness

Royal Pharmaceuticals Industries Pvt. Ltd. shall provide periodic training and awareness programs on business ethics, anti-corruption, anti-bribery, conflict of interest, fraud prevention, anti-money laundering, fair competition, information security, and applicable legal requirements. Specialized training shall be provided to relevant personnel based on their roles and responsibilities to support effective implementation of this Policy.

11. Review Mechanism

The Ethical Sourcing and Business Conduct Policy shall be reviewed at least annually, or earlier if required due to changes in legal requirements, business operations, or organizational needs by Compliance Head. The review and any revisions shall be approved by the Managing Director or the designated management representative before implementation.

Next Review Date: 01st April 2027

Approved By

01/04/2026

Managing Director