



WELCOME TO BSV Compliance Program

Distributor Compliance Training

- Audience: This course is intended for employees of Third-Party Intermediaries who interact or conduct business on behalf of BSV with Health Care Professionals and/or Government Officials





Objective

GAIN A COMPREHENSIVE UNDERSTANDING OF
THE COMPLIANCE OBLIGATIONS OF BSV AND TPIS

Context

- BSV is subsidiary of Mankind Pharma Limited. BSV has wholly owned subsidiaries in Philippines, Germany, and US. The following acts apply to BSV
 - Foreign Corrupt Practices Act
 - UK Bribery Act
- Indian Regulatory Laws such as the Prevention of Corruption Act also apply to BSV
- Virtually all countries around the world, have:
 - Laws containing anti bribery and anti-corruption provisions
 - Laws prohibiting bribery in private sector

Global Anti-Bribery and Anti-Corruption Regulations

ANTI-BRIBERY AND ANTI-CORRUPTION
PROVISIONS FOR BOTH PUBLIC AND PRIVATE
SECTORS

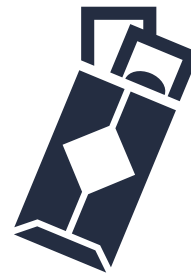


Key Compliance Considerations



Bribery and Inducements

Distributors/Stockists must not offer or accept bribes or other illegal inducements in any business or government relationships



Value of Benefits

Includes cash, reimbursements, gifts, hosted travel, or any other benefit offered to influence decision-making

Applies to all actions intended to further a corrupt payment, not just the payment itself

HCP Interactions



SERVICES SHOULD BE DOCUMENTED IN A WRITTEN AGREEMENT, DETAILING COMPENSATION AT FAIR MARKET VALUE



PERFORMANCE OF SERVICES MUST BE RECORDED BEFORE PAYMENTS ARE MADE



TRAVEL, LODGING, AND MEALS FOR HCPS MUST BE REASONABLE AND NOT INCLUDE NON-SERVICE-RELATED INDIVIDUALS OR SIDE TRIPS



MEETING LOCATIONS MUST BE SUITABLE FOR BUSINESS OR SCIENTIFIC EXCHANGE



NO ENTERTAINMENT OR RECREATION IS ALLOWED FOR HCPS

Gifts to HCPs

- Gifts must be
 - Educational or scientific in value
 - Beneficial to patients and relevant to the HCP's practice
 - Cash gifts are never permitted



Gifts to Government Officials

- Officials are prohibited from soliciting or accepting gifts
 - Modest and within permissible limits
 - In compliance with local law



Documentation Requirements

- All invoices, debit notes, and documents must be
 - Clear, with sufficient detail
 - Transparent to enable proper auditing



Important Distributor Guidelines

- Distributors must communicate any changes in legal status, constitution, or authorized signatories to BSV with supporting documents
- Products must always be insured
- No transfer of rights or benefits without BSV's prior written consent
- Compliance with all local regulations, including temperature maintenance at distribution facilities, is essential
- BSV's employees/representatives may verify stock levels, inspect temperature control equipment, conduct quality audits, and check the validity of licenses



Tenders & Procurement Guidelines

- Distributors must
 - Follow local tender regulations
 - Share only officially approved information
 - Maintain confidentiality while ensuring transparency



Unacceptable Practices



Collusion or manipulation in public procurement



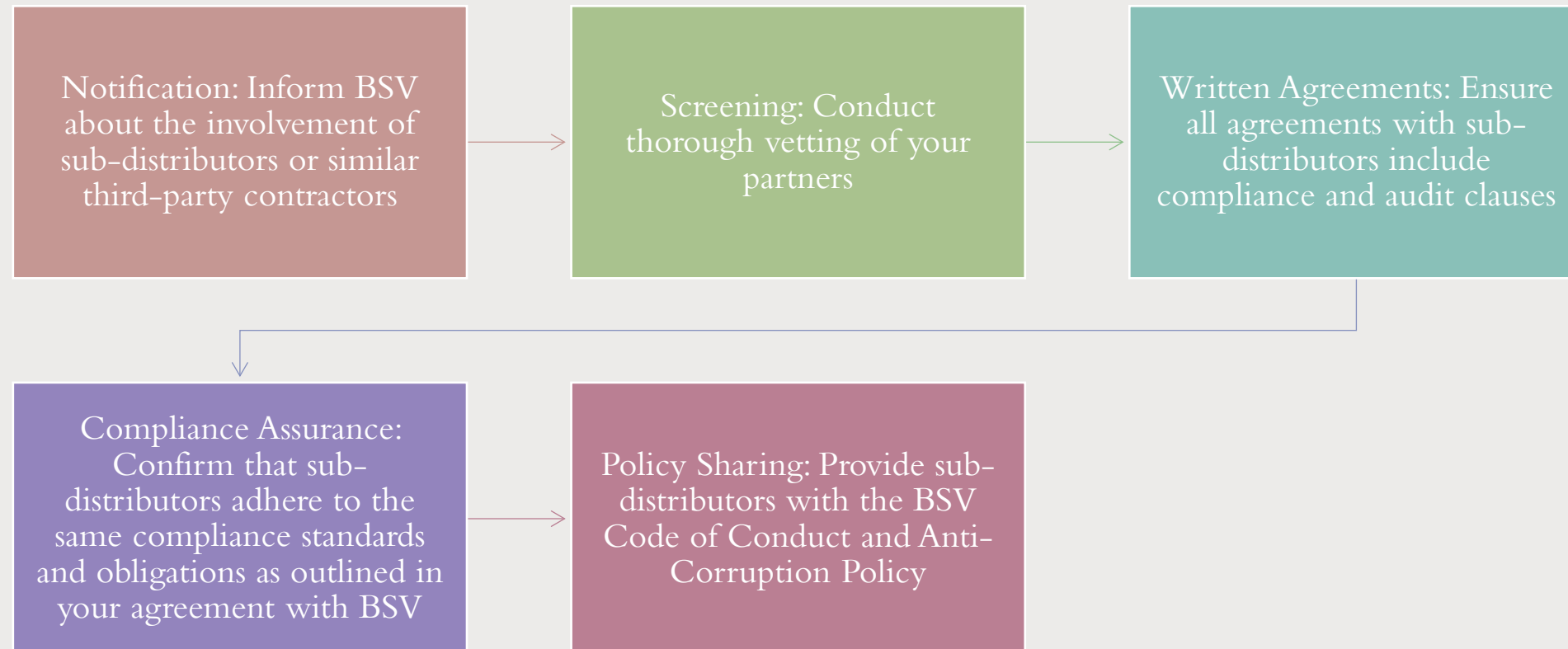
Offering unapproved products/services or providing unofficial materials

CASE STUDY

- Context: According to our agreement with BSV, Distributors are required to notify us of any use or intention to use sub-distributors or other similar third-party contractors



ACCEPTABLE PRACTICES



UNACCEPTABLE PRACTICES



Conflicts of Interest: Do not engage sub-distributors or third-party contractors who have a vested interest with public officials to gain undue favors



Recommendations: Avoid hiring sub-distributors solely based on recommendations from customers



Risk Ignorance: Do not overlook potential risks or red flags with such parties



Unethical Conduct: Do not permit sub-distributors or third-party contractors to act unethically or breach the BSV Code of Conduct

CASE STUDY 3

Overview: Anti-competitive practices are actions that hinder or reduce competition within a market



ACCEPTABLE PRACTICES



Independent Collaboration: Collaborate with customers, such as sub-distributors, at arm's length



Non-Binding Price Recommendations: You may provide sub-distributors with a non-binding price recommendation, as long as no pressure or incentives are used to enforce the price



Independent Decision-Making: Make independent decisions regarding tender participation and avoid sharing these decisions with sub-distributors or competitors

UNACCEPTABLE PRACTICES



Anti-Competitive Agreements: Do not engage in agreements with competitors, customers, or suppliers that could be considered anti-competitive



Exchange of Sensitive Information: Do not share commercially sensitive information with competitors



Control Over Sub-Distributors: Avoid exercising control or influence over sub-distributors' business activities, including imposing resale price maintenance, exclusive purchasing/supply obligations, territorial or customer restrictions, export bans, or online sales restrictions



Abuse of Dominance: Do not abuse any dominant market position through exclusivity clauses, loyalty rebates, or discriminatory practices

Key Takeaways



Strict compliance with
BSV agreements and
ABAC laws



Ensure clear
documentation and
transparency in all
transaction