



Shaping Healthcare Possibilities

CitiusTech Supplier Code of Conduct



Background & Applicability

Integrity is the foundation for everything we do at CitiusTech Enterprise (CTE). CitiusTech Enterprise (hereinafter referred as 'CTE' or the 'Company', which includes whether individually or collectively CitiusTech & its affiliates). We are committed to operating under the highest ethical standards of integrity, honesty, respect, responsibility and compliance with the laws and regulations that govern our business activities around the world. Our customers expect this commitment from us, and we expect the same from the individuals and entities we engage in supporting our business activities.

To ensure that such practices are followed not only within CTE but also along CTE's supply chain, CTE has globally implemented a 'Supplier Code of Conduct' (hereinafter referred as 'CTE - Supplier COC'), applicable to CTE's vendors, service providers, agents, subcontractors, consultants, business partners etc. (hereinafter referred to as 'Suppliers'). CTE expects its Suppliers (which includes their employees, directors, officers, agents, subcontractors, business partners and representatives) to embrace this commitment to integrity by complying with the requirements stipulated under this Supplier Code of Conduct and act with diligence, while conducting business with or on behalf of CTE.

Code of Conduct and Anti Bribery & Corruption (ABC) Compliance

We expect our Suppliers to comply with applicable regulatory requirements and terms and conditions of this Supplier COC. Furthermore, we expect our Suppliers to introduce suitable processes within their organizations that support such compliance with regards to the requirements included in Supplier COC. The Supplier having received, read and understood the CTE - Supplier COC, hereby assert and affirm the following:

- Supplier recognizes that as a matter of corporate policy, CTE expressly prohibits financial or other advantages being received or offered, directly or indirectly including payment of bribes or any facilitation money or grease payments in connection with its business operations by any Suppliers engaged to provide goods and/or services to CTE and/or its clients.
- Supplier hereby confirms that supplier shall abide by the provisions of the CTE - Supplier COC and the provisions of all applicable laws including but not limited to anti-bribery and anti-corruption laws.
- Supplier warrants that they have valid authorizations, licenses and permits to carry out business. Supplier hereby represents and warrants to CTE that supplier has in place adequate systems, controls and procedures to comply with all applicable laws and generally accepted standards of business ethics and conduct.
- Supplier shall comply with all applicable laws and regulations that prohibit money laundering, support and financing of terrorism and that require the reporting of cash and suspicious transactions. Supplier shall only conduct business, to the best of our knowledge, are involved in legitimate business activities, with funds derived from legitimate sources.
- Supplier shall not engage in or tolerate any kind of bribery and shall not promise, offer, provide, or authorize anything of value, including without limitations payments, gifts, travel, meals, entertainment, political contributions and contributions of any kind of nature, such as donations and sponsorships or favors, to any Government Official to improperly influence any act or decision-making in violation of law. A Government Official includes any government officer or employee at any level (international, national, state, or local), a Government Official's family members, employees of any government-owned enterprise, political parties, party officials and any candidate for political office.
- Supplier shall not request, authorize or tolerate any kind of bribery or any other kind of illegal or unethical action from others for us, in our name, on our behalf or any other way related to your business activities with us or on our behalf.

- Facilitation payments are payments made to Government Officials in order to expedite their performance of routine, non-discretionary duties or actions (such as processing of licenses). Supplier shall not make or authorize, directly or indirectly through others, facilitation payments to Government Officials while conducting business activities with us or on our behalf.
- Supplier shall follow the relevant applicable International Trade Control (ITC) regulations of all countries in which supplier operates as they relate to importing and exporting goods, technology, software, services and financial transactions.
- Supplier shall not engage in any activity or relationship that may cause or appear to cause a conflict with the interest of our Company while conducting business activities with us or on our behalf. Supplier relationships with others shall not affect your independent and sound judgment in doing business with us or on our behalf.
- Supplier shall not take any action which places or is likely to place CTE in violation of laws or which could be detrimental to reputation and / or the business interests of CTE. Supplier shall not either directly or indirectly take any action, make any offers or representations, enter into any Agreements (oral or written) with any third party on behalf of CTE without prior written approval from CTE.
- Supplier hereby agrees that supplier shall not buy, sell or otherwise deal in CTE securities if supplier has inside information that shall materially affect the price of listed shares of CTE. Supplier hereby agrees that supplier shall not pass inside information to third parties as it is not only a breach of confidentiality but also an offence.
- Supplier hereby agrees that supplier shall not discriminate in hiring and employment practices on grounds of skin color, age, caste, gender, nationality, socio-economic background, disabilities, political or religious conviction.
- Supplier shall treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier shall comply with applicable working hour's regulations, wage regulations, including those relating to minimum wages, overtime compensation and other legally mandated benefits.
- Supplier shall under no circumstances indulge in or tolerate unacceptable treatment of the employees, such as mental harassment, sexual harassment or discrimination. Supplier shall not employ any child below the age of fourteen years to work in the factory/premises
- Suppliers shall strictly prohibit from engaging in any form of bonded labor, ensuring human rights and fair labor practices are upheld throughout the supply chain.
- Suppliers shall adhere to ethical and sustainable sourcing practices to ensure responsible procurement. Promoting the use of recycled materials and reducing the use of single-use products.
- Suppliers shall comply with ESG practices and provide transparent disclosures regarding their sustainability initiatives and performance.
- Supplier shall comply with all applicable environmental laws, regulations and standards with respect to the conduct of business.
- Supplier shall respond to CitiusTech's annual ESG survey.
- Supplier hereby agrees to report after each annual reporting cycle (i) its global revenue and (ii) its Scope 1, Scope 2, and Scope 3 Greenhouse Gas (GHG) Emissions via CDP or an alternative method.
- Supplier shall work towards reducing resource consumption (water, energy, fuel, electricity etc.) & waste reduction (promote recycling & Disposal through authorized vendors) to minimize environmental impact throughout the supply chain.
- Supplier shall dispose/recycle/reuse waste/hazardous/e-waste generated in an environmentally friendly manner, and as per applicable regulatory law in force. Supplier shall provide an End of Lifecycle report, as and when requested by CitiusTech.
- Supplier shall provide its own employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

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- Supplier shall apply and promote the highest possible standards of ethical behavior, personal and institutional integrity in the supplier's interactions with customers, employees, partners, and other stakeholders, including governments and the public.
- Supplier shall establish and maintain appropriate policies and processes to promote ethical business practices and regulatory compliance by their employees & directors. The types of policies and processes, such as training, monitoring and auditing, will depend on the business of the supplier, the type of work, and the number of employee's supplier has. Supplier shall maintain documentation necessary to demonstrate conformance to this CTE - Supplier COC and allow access to CTE to check compliance upon request with reasonable notice.
- Based on request from CTE, Supplier agrees to submit an annual undertaking for its certification of compliance with the CTE - Supplier COC.
- Supplier hereby agrees that in the eventuality of supplier appointing a subcontractor (with written approval of CTE), supplier will ensure that such sub-contractor shall also comply with this CTE - Supplier COC.
- Supplier hereby agrees to indemnify CTE with regards to any government or third-party investigations arising out of supplier violation of the CTE - Supplier COC.
- Supplier hereby agrees to promptly report any violations of CTE - Supplier COC to CTE. Supplier agrees that CTE has / have a right to terminate the Agreement / Work Order, in the event of any breach of this Code. Supplier hereby agrees that supplier employees and officers shall promptly give all reasonably possible assistance, information and explanations to CTE or its employees and its professional advisors as they may reasonably request in this regard.
- CitiusTech recommends Supplier to support the SBTi journey committing to Science Based Targets and assist in decarbonization efforts.
- The supplier shall align its policies and processes with the principles of the UN Global Compact (UNGC) and the United Nations Sustainable Development Goals (SDGs).
- Any violation of the CTE – Supplier COC by any employee, contractor, third party vendor, consultant or any other person associated with CitiusTech in any capacity, regardless of position and seniority, must be reported without any fear of retribution verbally or in writing. Supplier shall immediately notify CTE regarding any known or suspected improper behavior by the Supplier representatives relating to its dealings with CTE, or any known or suspected improper behavior by CTE employee/representative by email to: grc@citius.tech or through an external platform named Ethicsline to report any potential or actual violations. Details for the same are –

Reporting Channel	Contact Details	Access Code	Availability
Web Portal	https://citius.tech.integritymatters.in/	CITIUSTECH	24X7

- CitiusTech is committed to a non-retaliation policy and strictly prohibits retaliation against anyone who speaks up to raise any concern or reports any violation about illegal or unethical conduct. Confidentiality will be always maintained.

THE COMPANY RESERVES THE RIGHT TO TERMINATE BUSINESS WITH ANY BUSINESS PARTNER THAT FAILS TO COMPLY WITH THIS CODE OR WITH APPLICABLE LAWS AND REGULATIONS.



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CitiusTech is a trusted partner to Healthcare and Life Sciences organizations, enabling them to navigate through their toughest business challenges. We bring deep expertise in healthcare and life sciences, leveraging our experience as industry leaders to help clients envision the future of healthcare. By combining our digital expertise, we drive transformation into the future of healthcare.

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