



IIBAT -SUPPLIER ETHICS POLICY (SEP)

Dated :Wednesday, 11 January 2012

International Institute of Biotechnology and Toxicology (IIBAT) is committed to the highest standards of quality and integrity in their dealings with Sponsors / Customers and Suppliers. As a result, all Suppliers and IIBAT employees / consultants who work with IIBAT are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to IIBAT that suppliers and employees alike maintain high ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

Introduction:-This policy applies globally to all IIBAT suppliers. “Supplier” here means any business, company ,corporation, partnership, firm, trust ,proprietor, person or other entity that sells, or seeks to sell, any kind of goods or services to IIBAT, including the supplier’s employees, agents and other representatives.

Code Of Conduct :- *IIBAT expects that all IIBAT employees / consultants and suppliers of goods and services to IIBAT, to comply with our Code of Conduct regardless of local business practices or social customs.*

Conduct business with the utmost integrity and professionalism.

- Strict adherence to all the laws and uniform commercial codes .
- Refrain from any activity that would embarrass IIBAT by its public disclosure.
- Enable and respect competition.
- No actual or perceived conflicts of interest .
- No bribes or kickbacks .

Bribes :- *Bribes are NOT allowed*

- A bribe or kickback is the payment of something of value (money, gift or favour) to an individual(s) with the goal of influencing his or her decision .
- Bribes should not be offered or solicited, whether directly or through a third party.
- All business transactions should be impartial, objective and free of outside influence .

Gifts and Gratuities :- *At IIBAT we prefer that the supplier not give IIBAT employees/ consultants gifts or gratuities.*

- Gifts that may create an obligation or perceived obligation on the IIBAT employee towards the Supplier (gift giver) will be considered a bribe.
- IIBAT employees are never allowed to request gifts.
- Allowable gifts from Suppliers should only include their company trinkets and other such items of nominal value like calendars ,desk top stuff .
- Cash and cash equivalents are never allowed.
- Under no circumstances a Supplier is to feel obligated to provide gifts to a IIBAT employee.

Entertainment:- IIBAT recognizes that exchanging business courtesies with suppliers such as meals and entertainment can be an element of building strong business relationships .

- Meals and / or entertainment are to be of moderate value, infrequent and limited to only those individuals who are directly involved in the business relationship.
- Under no circumstances a Supplier is to feel obligated to provide food or entertainment to a IIBAT employee / consultant.

Conflict Of Interest :- Avoid any activity that is or may be perceived as a conflict of interest to IIBAT.

- Potential conflicts between personal and professional relationships should be avoided.
- Suppliers must disclose any friends or family members who are IIBAT employees/consultants.
- IIBAT employees/ consultants must disclose any financial interest in a supplier (by employee, friend or family member).

Use Of IIBAT Name :- Do not use IIBAT's name or logos without the permission of IIBAT.

- Suppliers should not use the IIBAT name to advertise its products or use IIBAT logos or trademarks without a written consent from IIBAT.
- Suppliers may not represent themselves as acting on IIBAT's behalf unless authorized in writing by IIBAT.
- Suppliers may not – regardless of value – make donations or gifts in IIBAT's name.
- Suppliers must adhere to the terms contained within the Non-Disclosure Agreement.
- IIBAT may seek restitution and legal action (where appropriate).

Reporting Responsibility:- Report non-conformances or violations, perceived or actual, without fear or hesitation.

- Suppliers are expected and encouraged to report concerns regarding ethical issues or violations of IIBAT's Code of Conduct by any IIBAT employee/consultants, by their own employees or by another supplier. If you have a concern, please email it to The President-IIBAT (Not an Executive serving IIBAT but a member of The Governing Body of IIBAT) president@iibat.com and it will be escalated. **All correspondence will be treated with the utmost confidence.** (emphasis supplied)
- When IIBAT receives an allegation, it will promptly conduct a comprehensive and confidential review of the situation .
- Violation of the Code of Conduct can result in the termination of the business relationship with IIBAT and / or termination of employment of the IIBAT employee.

Purchase Order Management :- No purchase order ,no work, no supply.

- Insist on a Purchase Order before you make any supply or start work .
- IIBAT's Supply Chain Management is the only group authorized to commit funds and issue Purchase Orders jointly. They are The Director-cum-Secretary, The Senior Manager Administration , The supply Chain Officer.(Jointly)
- Purchase Order amount should correlate with the quotation.
- Staggered payment agreements need to be reflected in the quote and Purchase order.
- Do not apply any leftover balance of the Purchase Order amount to other activities not specified in the Purchase order.
- Acceptance of the Purchase Order means acceptance of the amount, terms and conditions. Resolve discrepancies up front, not after the fact.

Avoid Unfair Business Practices:- All IIBAT Suppliers, shall not fix prices or rig bids with competitors. The Supplier will not allocate customers or markets with competitors, or exchange current, recent, or future pricing information with competitors. The Supplier will otherwise comply with all applicable antitrust and competition laws in force.

Provide Quality:- All IIBAT Suppliers, shall supply product that conform in all respects with the requirement of the contracts with IIBAT including, in particular, all applicable quality requirements.

Avoid Political Contributions and Charitable Donations on IIBAT’s Behalf :-IIBAT Suppliers, are not authorized to make any type of political contribution or charitable donations on IIBAT’s behalf.

Avoid Unauthorized Lobbying on IIBAT’s Behalf :-All IIBAT Suppliers, are not authorized to undertake any type of lobbying or other similar representative efforts on IIBAT’s behalf before any kind of government entity, official or body or representative.

Labour and Human Rights:- All Suppliers must uphold the human rights of all workers, and treat them with dignity and respect as understood by the Indian/International community.

Acknowledge and Abide By This Policy:- As a IIBAT Supplier, the suppliers are expected to acknowledge this policy and to apply it in all dealings with, and on behalf of, IIBAT. The Supplier understands that this policy shall form and be read together as part and parcel of all IIBAT’s Purchase Orders / Contracts and failure to follow this policy may result in the Supplier’s disqualification from consideration for business, and/or future business, with, IIBAT. A copy of this policy shall be widely circulated to all The Suppliers of IIBAT either electronically or by print.

The Supplier shall be fully responsible for ensuring that any subcontractors, agents or other third parties that The Supplier employ in their work for IIBAT, as permitted by agreement/s with IIBAT, will act consistently with this policy.

“This Policy Is By Order Of The Executive Council of IIBAT”

For International Institute of Biotechnology and Toxicology,(IIBAT)

Place: Padappai, Tamil Nadu, India

Date :Wednesday, 11 January 2012

Copy to: All Notice Boards of IIBAT and website www.iibat.com as downloadable .pdf file.

Received Copy :-

Name of Supplier :- _____

Address of Supplier :- _____

Signature of Authorised Officer of Supplier:- _____

Name of Authorised Officer : _____

Designation of Authorised Officer : _____

Date : _____ Office Seal of Supplier:- _____