



## **MANAGING DIRECTOR'S COMMITMENT**

At NuLife Pharmaceuticals, we are committed to building culture of Excellence and World Class Quality Standards by enhancing our performance.

We actively promote Holistic Human Development as a part of building intellectual capital in our organization. We believe in Integrity, Honesty, Tolerance and Patience as fundamental virtues in our business. We value our Employees, Customers, Bankers, Depositors and Suppliers as our prime assets. We share Ethical principal values, policies and procedures with a clear understanding of Legal and Regulatory requirements.

These are the basic guidelines laid out in "The Code of Conduct". At NuLife Pharmaceuticals, all the employees, contract workers, agents and suppliers are bound to read, understand and abide by this Code. This Code of Conduct makes it clear that we believe and abide to Ethical and Transparent business activities. NuLife is committed to highest quality customer service, customer satisfaction and social responsibility over 37 years making a remarkable difference in the lives of people across the globe.

I take this opportunity to thank you for the efforts for safeguarding the trust of people around the globe.

Mr Umesh Jayantilal Trivedi

Managing Director



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## **INTRODUCTION**

NuLife Pharmaceuticals is committed to maintaining highest quality standards.

The Code of Conduct is adopted by the company focus the attention of the Directors and Senior Managers, to the employees, vendors and customers to have to govern the ethical working relationships of the company.

The Code of Conduct is administered in accordance to the local, state and national laws. Each Director, Senior Manager and employee of the company should abide by the Code of Conduct and understand its spirit.

## **FOR EMPLOYEES**

By accepting employment at NuLife, employees shall abide by the Code of Conduct. You must promptly ask for assistance to the Director or Senior Managers for any ambiguity in any part of the Code. Any act of breach of the Code shall be promptly informed to the Director without any hesitation as the company shall protect and support the employees in doing so.

## **FOR MANAGERS**

One has to lead by an example for others to follow. It is the responsibility of the Managers that they themselves follow this Code of Conduct. It is the moral responsibility of the Managers to encourage the employees to report incidents of any serious nature without any fear or hesitation. Managers must evaluate such situations and take appropriate action on them.

## **WITH RESPECT TO GOVERNMENT OFFICIALS**

No employee shall indulge in any activity as offering gifts, services or entertainment to any Government officials to induce any favor on behalf of the company or influence any decision in favor of the company in any legal matters. Any Government official or agency demanding such favors should be reported to Senior Managers immediately.



## **FOR SUPPLIERS**

NuLife ensures that we buy goods of highest quality through reliable sources. All the Suppliers are dealt with honesty and uniformity. We do not accept any gifts or services from our Supplier which may compromise our decisions in dealing with them. The Suppliers shall report any illegal incident that they encounter while dealing with any employee of NuLife.

Suppliers shall not disclose any confidential information about the dealings with any other competitor or supplier.

NuLife will investigate reported violations and will further investigate. The employees and Suppliers are requested to co-operate in this case.

Suppliers shall not make any commitments without having capacity to meet the commitment.

## **EQUAL OPPORTUNITY OF EMPLOYMENT**

NuLife encourages people from both the genders to be applicable for employment. There is no distinction made with respect to any employee on the basis of gender.

## **CONFLICT OF INTERESTS**

The Director, Senior Managers and employees shall avoid any conflict of interest between themselves and the company. Any conflict of interest arising in the company due to any reason whatsoever shall be immediately informed to the Senior Managers/ Director.

## **CONFIDENTIALITY**

No one shall involve in collecting any details of the competitors in any illegal or unethical manner. No employee shall disclose any such information with a third party that will affect the business and integrity of the company.

## **FINANCIAL RECORDS**

Accuracy and integrity of Books of Accounts and Records. All the Books of Account and Records shall clearly indicate the transactions taken place in the company in a proper format. All the assets and liabilities shall be properly recorded.

No false entries shall be made for any purpose whatsoever. No voluntary omissions of any records shall be done from the Books of Accounts and Records.



## **RESPECT FOR ALL CULTURES AND RELIGIONS**

We at NuLife understand that people from various cultures and religions are employed in the organization. We respect and maintain harmony within the organization by creating a tolerant and harmonious atmosphere. Any complaints of intolerance leading to disrupting the harmonious culture within the company shall be dealt with strictly by the Senior Managers.

## **WORK PLACE HARASSMENT**

NuLife recruits employees only on the base of required qualifications, other than caste, creed, religion, sex, marital status and color. No employee shall indulge himself in any such activity which may lead to harassment of other employees. Any gesture or incident of sexual harassment at the workplace shall be immediately reported to the Senior Managers. Any such act done by any employee of the company shall be solely considered as an act of the employee and not the company.

## **UNIFORM CODE OF PHARMACEUTICAL MARKETING PRACTICES**

NuLife is implementing the Uniform Code of Pharmaceutical Marketing Practices as per the Government & MCI Guidelines.

## **COMMITMENT TOWARDS HEALTH & SAFETY**

Monitoring the occupational hygiene, disaster protection, security and enhancing it through upgradation in the safety systems at the company.

## **COMMITMENT TOWARDS ENVIRONMENT**

We realize that there should not be development at the cost of environment and hence we comply with the following environmental laws of the country.

- ❖ Water (Prevention & Control Pollution) Act, 1974
- ❖ Air (Prevention & Control Pollution) Act, 1981
- ❖ Environment (Protection) Act, 1986
- ❖ Noise Pollution Act, 2000



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## COMPLIANCE WITH THE FOLLOWING GLOBAL AND LOCAL LAWS

- ❖ Central Drugs Standard Control Organization (CDSCO)
- ❖ Drugs Price Control Order, 1955 (DPCO)
- ❖ Drugs & Cosmetic Act, 1940
- ❖ Schedule M
- ❖ Schedule T
- ❖ The Pharmacy Act, 1948
- ❖ World Intellectual Property Organization (WIPO)
- ❖ Good Manufacturing Practices (GMP)
- ❖ Securities Laws (SEBI)
- ❖ Foreign Exchange Management Act (FEMA)
- ❖ Competition Act, 2002
- ❖ Trademarks Act, 1999
- ❖ Indian Medical Council
- ❖ Uniform Code for Pharmaceutical Marketing Practices (UCPMP)
- ❖ The Drugs & Magic Remedies (Objectionable Advertisement) Act, 1954
- ❖ International Conference on Harmonization (ICH)
- ❖ US Food & Drugs Administration (FDA)
- ❖ World Trade Organization (WTO)
- ❖ State Drug Control Standard Organization (SDCSO)
- ❖ Good Laboratory Practices Guidelines (GLP)
- ❖ Information Technology Act, 2000 (IT Act)
- ❖ Information Technology Rules, 2011
- ❖ Patents Act, 2005
- ❖ Copyright Act, 2012
- ❖ National List of Essential Medicine

## TAX AFFECTING LAWS

- ❖ Income Tax Act, 1961
- ❖ Transfer Pricing Regulations
- ❖ Custom Duty
- ❖ Sales Tax/ Value Added Tax
- ❖ CENVAT
- ❖ Service Tax
- ❖ Tax Deducted at Source (TDS)
- ❖ Local Body Tax (LBT)



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## **INTERPRETATION OF THE CODE**

Any ambiguity in any part of the Code shall be addressed to the Senior Managers or the Managing Director of the company for any further clarification or interpretation.

## **AMENDMENTS TO THE CODE**

From time to time the company may alter its Code of Conduct for the betterment of the company and its employees. Any such amendment shall be approved in writing by the Managing Director.

## **DISCLAIMER**

This Code of Conduct does not create any right to customers, employees or any other person. It is only a statement of values and policies to be followed at the Company.

NuLife