

## 1. Policy

1.1. This Policy on Reporting and Responding to Compliance Issues (this “Policy”) applies to all Personnel of Chetan Meditech Pvt Ltd (herewith referred to as “Biotek” or the “Company”), and its subsidiaries and sets forth the duties and responsibilities of Biotek Personnel to report and raise Compliance Issues. This Policy also articulates Biotek’s commitment to prohibit retaliation against or intimidation of any Biotek Personnel who reports or raises, in good faith, a Compliance Issue or who provides information for an investigation or investigates such matter. This Policy also describes Biotek’s process for responding to a report of a potential Violation, including processes for tracking, investigating, and taking disciplinary actions, corrective actions and other remedial actions for each matter, as appropriate.

## 2. Definitions

2.1. For purposes of this Policy, these terms have the following meanings:

2.1.1. “Compliance Issue” includes any question, concern or issue related to Biotek’s Code of Conduct and Business Ethics (the “Code”), Biotek’s policies and procedures, Biotek’s financial accounting, internal controls and auditing practices, and applicable laws, regulations and industry guidelines.

2.1.2. “Disclosure Program” means Biotek’s program enabling and encouraging Biotek Personnel to report and raise Compliance Issues and disclose any potential Violations, including through Biotek’s Anonymous Reporting Hotline.

2.1.3. “Biotek Personnel” includes Biotek officers, directors and full-time, part-time, temporary, and contract employees of Biotek.

2.1.4. “Violation” means an act or omission that violates the Code, Biotek’s policies and procedures, Biotek’s financial accounting, internal controls and auditing practices, and applicable laws, regulations and industry guidelines, including any act or omission that may put Biotek at risk for regulatory or compliance scrutiny, or legal action.

## 3. Scope

3.1. This Policy is applicable to all Biotek Personnel. In addition, Biotek strongly encourages third parties, including vendors and contractors of Biotek, to report and raise Compliance Issues.

## 4. General Requirements

### 4.1. Reporting Responsibilities

4.1.1. Biotek Personnel are responsible for promptly reporting and raising any Compliance Issues.

## 4.2. Culture of Compliance

4.2.1. All Biotek Personnel who have supervisory or management responsibilities and/or are members of Human Resources, Finance, or the Biotek Legal department are expected to foster a culture of compliance and ethics; create a culture that enables Biotek Personnel to comfortably report and raise any Compliance Issues; and keep an “open-door” policy to encourage Biotek Personnel to report and raise any Compliance Issues.

## 4.3. Prohibition Against Retaliation

4.3.1. Biotek does not permit retaliation against or intimidation of any Biotek Personnel who has reported or raised, in good faith, any Compliance Issues or any Biotek Personnel who provides information in an investigation or investigates any potential Violation.

## 4.4. Oversight by the Audit and Compliance Committee

4.4.1. The Directors of Biotek are responsible for oversight and governance of compliance-related matters, including oversight over Biotek’s Disclosure Program and ensuring prompt and appropriate responses to potential Violations. The Biotek Director who has operational control over the Disclosure Program is subject to oversight by the Audit and Compliance Committee.

## 5. Procedures

### 5.1. Reporting Process

5.1.1.1. By calling Biotek’s Directors;

5.1.1.2. By email to [info@biotekortho.com](mailto:info@biotekortho.com) (must include Company’s name in the report);

5.1.1.3. By contacting a direct supervisor, a direct supervisor’s manager, a member of Human Resources, the Biotek Legal department or Finance, or such other Biotek Personnel with whom they feel comfortable consulting; and

5.1.1.4. Biotek Personnel located in other countries outside India shall be subject to local applicable laws and their use of Biotek’s Anonymous Reporting should be in accordance with any related privacy notices that may be provided by Biotek, or otherwise.

5.1.2. Biotek discourages the use of social media for reporting or raising any Compliance Issues.

5.1.3. Biotek shall publicize the existence of the Disclosure Program, including Biotek's Reporting, via periodic e-mails to Biotek Personnel, posting information on Biotek's website, posting information in facility common areas, through references in the Code, during compliance training and other means, as appropriate.

5.1.4. All Biotek Personnel who receive a report of a Compliance Issue, whether verbally or in writing, are required to communicate such report to the Directors.

5.1.5. To the extent allowed by law and as appropriate, Biotek shall protect the identity of individuals who request anonymity when reporting a Compliance Issue.

## 5.2. Receipt of Reports

5.2.1. All reports of Compliance Issues through all reporting channels shall be reviewed by the Biotek Directors.

5.2.2. Upon receipt of a report, the Biotek Director or Biotek Compliance Officer's designee shall review the report to determine whether further review or investigation should be conducted. The Biotek Directors or the Biotek Director's designee shall ensure that all substantiated reports of a potential Violation will be investigated.

5.2.3. If a report concerns a Compliance Issue involving an Biotek officer or director, the Biotek Directors or the Biotek Director's designee shall provide a summary of the report to the Directors. The Directors may engage outside experts to assist with review, investigation or other actions, as appropriate.

## 5.3. Investigation Process

5.3.1. The Biotek Directors or the Biotek Director's designee shall initiate and oversee, with the assistance of Human Resources, Finance and the Biotek Legal department, all investigations, as necessary and appropriate.

5.3.1.1. Each matter shall be referred to the appropriate department within Biotek to investigate or assist with investigations, as appropriate. For example:

(a) Reports involving employment/workplace issues shall be sent to Human Resources;

(b) Reports involving accounting/financial issues shall be sent to Finance/Internal Audit; and

(c) Reports involving manufacturing issues shall be sent to Regulatory.

5.3.1.2. Outside experts, including accounting experts, can be brought in, as needed and appropriate.

5.3.1.3. Depending on the facts and circumstances, including nature and severity of the potential Violation, the Biotek Directors or the Biotek Director's designee shall consider using outside legal counsel to assist in conducting an internal investigation under attorney-client privilege.

5.3.2. The nature and scope of the investigation will vary according to the facts and circumstances, but each investigation should be sufficiently detailed to identify the root cause of the concern.

5.3.3. Investigations shall be treated in as confidential a manner as appropriate under the circumstances.

5.3.4. All Biotek Personnel shall fully cooperate with all compliance investigations and keep the fact that the investigation is being conducted as well as anything discussed confidential.

#### 5.4. Remedial Actions

##### 5.4.1. Disciplinary Actions

5.4.1.1. If the Biotek Directors or the Biotek Director's designee, in consultation with the Biotek Legal department, as appropriate, determines that Biotek Personnel has committed a Violation, in consultation with Human Resources, Biotek shall take all appropriate disciplinary action up to and including termination, such as coaching or training; oral or written warning; suspension; demotion; reduction in compensation; and termination.

5.4.1.2. The severity of the disciplinary action will depend on the facts and circumstances, including:

(a) The nature and severity of the Violation;

(b) The authority of the individual involved;

(c) The individual's history with respect to compliance;

(d) Whether the individual self-reported the conduct; and

(e) Whether the individual cooperated with the investigation.

#### 5.4.2. Corrective Actions

5.4.2.1. If the Biotek Directors or the Biotek Director's designee, in consultation with the Biotek Legal department, as appropriate, determines that there has been a Violation, Biotek shall take all appropriate corrective actions to correct any deficiencies and prevent similar future Violations, including conducting compliance training, implementing formal corrective action plans and such other appropriate measures to improve or modify performance, processes, or policies and procedures.

5.4.2.2. Business, as appropriate, shall consult with the Biotek Legal department to develop and implement appropriate corrective action plans, which shall be reviewed, approved, and monitored to completion by the Biotek Directors.

#### 5.4.3. Additional Remedial Actions

5.4.3.1. Biotek may take such other remedial actions, as appropriate.

5.4.3.2. If the Biotek Directors, in consultation with the Biotek Legal department, determine that there has been a Violation of law, Biotek shall take remedial actions, including reporting to the governmental and regulatory authorities, as appropriate.

#### 5.5. Prohibition on Retaliation

5.5.1. Biotek Personnel may not be discharged, demoted, suspended, threatened, harassed or discriminated against for reporting and raising, in good faith, any Compliance Issues, or for providing information in an investigation or assisting in investigating a potential Violation.

5.5.2. Any Biotek Personnel who believes retaliation or intimidation is occurring or has occurred must report the concern promptly.

5.5.3. Any Biotek Personnel who engages in retaliation or intimidation in violation of this Policy shall be subject to disciplinary action, as appropriate.

## 5.6. Recordkeeping

5.6.1. The Biotek Directors or the designee shall maintain documentation regarding all reported Compliance Issues, including the following:

5.6.1.1. Log of all reports of Compliance Issues through all reporting channels, including status and disciplinary, corrective or other remedial actions;

5.6.1.2. Scope, findings, and recommendations of investigations;

5.6.1.3. Any work papers, interview notes and other documents generated as part of an investigation; and

5.6.1.4. Any records that are attorney-client privileged, in secure fashion.

## 6. Documentation

6.1. Biotek shall maintain all documentation required under this Policy in its records for a period of no less than four (4) years.

## 7. Auditing and Monitoring

7.1. This Policy, together with supporting documentation and records required by it, is subject to periodic auditing and monitoring.

## 8. Exceptions

8.1. Any exceptions to the requirements of this Policy must be approved by Biotek's Directors.