



Embio Ltd.

ETHICS POLICY

DOC-EL-POL-02

REV. NO. 01

Effective Date: 01/01/2024

Next Review Date: 31/12/2027

INDEX

Introduction.....	3
Scope	3
Policy Statement.....	3
Key Focus Areas.....	4
SDGs Covered	4
Responsibility.....	6
Review mechanism.....	7
Acknowledgement.....	7

Introduction

At Embio Ltd., ethical business practices are the foundation of our success and leadership in the industry. With over 30 years of expertise in Bacterial, Fungal, and Category 1 GMO biotransformation, we uphold the highest standards of compliance, transparency, and integrity across all business activities. This ethics policy establishes clear directives to prevent corruption, conflicts of interest, fraud, money laundering, and unethical information management, ensuring responsible and sustainable operations.

Scope

This policy applies to all employees, workers, contractors, suppliers, business partners, and stakeholders of Embio Ltd. It governs all business dealings and interactions within the organization and with external parties, ensuring strict adherence to ethical standards globally. This policy applies to following locations:

Embio Ltd. (Corporate)	501, Sentinel, 5th Floor, Central Avenue Road Hiranandani Gardens, Powai 400076 Mumbai, Maharashtra India
Site Address	E-21, E-22/1/2/3, E-23-1/2/3/MIDC Industrial Estate, Mahad - 402 309, Dist. Raigad, Maharashtra, India

Policy Statement

Embio Ltd. operates with absolute integrity and enforces a zero-tolerance policy against bribery, conflicts of interest, fraudulent activities, and money laundering. We mandate strict compliance with legal and ethical obligations while ensuring the secure handling of third-party information.

Key Focus Areas

1. Anti-Bribery and Corruption

We are committed to maintaining a business environment free from bribery and corruption by enforcing strict ethical guidelines, compliance measures, and mandatory training programs. Our goal is to achieve 100% completion of anti-bribery training for all employees by 2030, increasing from 0% in 2022. Additionally, we aim to conduct annual bribery risk assessments across all business units, increasing coverage from 50% in 2022 to 100% by 2030.

2. Conflict of Interest Prevention

We are committed to ensuring transparency and fairness in decision-making by mandating conflict-of-interest disclosures for employees. We aim to achieve 100% annual disclosure compliance from senior management and key decision-makers by 2030, increasing from 60% in 2022. Furthermore, we will implement conflict-of-interest training for all employees, ensuring 90% completion by 2030, up from 30% in 2022.

3. Fraud Prevention

We are committed to eliminating fraudulent activities by implementing strict financial controls, regular audits, and a whistleblowing system. Our objective is to reduce reported fraud incidents by 50% by 2030 compared to baseline incidents recorded in 2022. Additionally, we will increase the number of internal fraud audits conducted annually from 20% in 2022 to 40% by 2030.

4. Anti-Money Laundering

We are committed to preventing illicit financial activities by ensuring all transactions and partnerships undergo stringent due diligence. We aim to conduct 100% due diligence checks on new suppliers and business partners by 2030, up from 75% in 2022. In addition, we will increase employee participation in anti-money laundering training to 95% by 2030, up from 40% in 2022.

5. Responsible Information Management

We are committed to securing third-party information through robust data protection and cybersecurity measures. We will ensure 100% of employees handling sensitive data complete cybersecurity training annually by 2030, up from 50% in 2022. Additionally, we will conduct 100% risk assessments on data security across all operations to identify and address potential vulnerabilities by 2030.

6. Whistle-blower Protection

We are committed to fostering a transparent and accountable workplace by ensuring the protection of whistleblowers. Our objective is to establish a fully anonymous and secure whistleblowing system by 2025, with the goal of increasing whistleblower reports by 80% by 2030, up from baseline levels in 2022. Additionally, we aim to conduct awareness campaigns on whistleblower rights, ensuring 100% of employees are informed by 2030, up from 50% in 2025.

7. Ethical Supply Chain Management

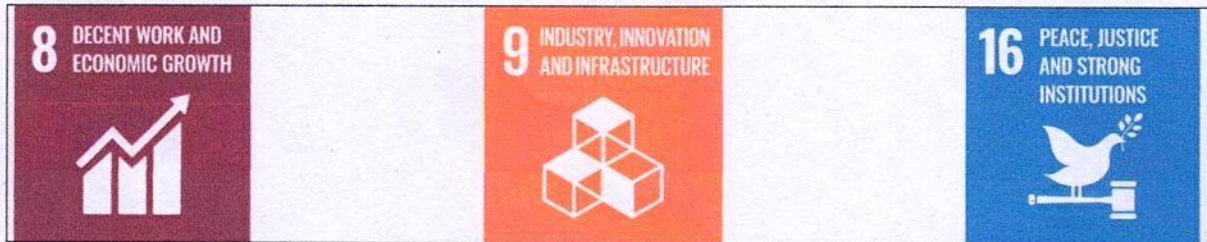
We are committed to ensuring ethical sourcing and fair labor practices throughout our supply chain. Our goal is to audit 100% of high-risk suppliers for compliance with ethical standards by 2030, up from 40 % in 2025. Additionally, we will implement mandatory ethics training for 100% of procurement personnel by 2030, increasing from 50% in 2025.

8. Fair Competition and Anti-Trust Compliance

We are committed to upholding fair competition and preventing anti-competitive practices. Our target is to provide 100% of relevant employees with anti-trust compliance training by 2030, increasing from 30 % in 2025. Additionally, we will implement an internal monitoring system to detect and address anti-competitive behaviour, ensuring 100% compliance reviews by 2030, up from 10% in 2025.

SDGs Covered

This policy aligns with:



Responsibility

- Chief Manager HR & Admin (CMHA) oversee the implementation, enforcement, and continuous improvement of this policy.
- All employees must adhere to ethical standards and promptly report any violations through designated reporting channels.
- Business partners, suppliers, and contractors are contractually bound to comply with this policy, ensuring ethical business conduct.

Governance Mechanism

- An Ethics Committee, chaired by senior leadership and including representatives from Compliance, HR, and Legal departments, will oversee the ethical conduct framework, review complex ethical dilemmas, and provide strategic guidance on policy enforcement.
- A Governance Committee on Ethics & Compliance, chaired by the Chief Manager HR & Admin (CMHA), will monitor policy implementation, conduct periodic compliance audits, and assess risks related to ethical breaches.
- The Internal Audit Team will perform annual ethical compliance reviews and report findings to senior management for corrective action.
- A Whistleblower Protection Committee will ensure the confidentiality and security of all reports, investigate concerns with impartiality, and take necessary corrective actions.
- The Ethics Training & Awareness Program, managed by HR and Compliance teams, will ensure employees receive regular ethics and compliance training to strengthen ethical business practices.

Review mechanism

This policy undergoes a review every three years by the Chief Manager HR & Admin (CMHA) to ensure its effectiveness and alignment with legal and regulatory requirements. Necessary updates are implemented without delay.

Rev No.	Effective Date	Next Review Date	Section Updated	Description of Changes	Reviewed By	Approved By
0	01/01/2024	01/01/2025	Initial Release	First version of the Ethics Policy	Chief Manager – HR/Admin	Vice President- HR / Administration
1.0	01/01/2025	31/12/2027	Governance Mechanism	Added governance structure and policy enforcement measures	Chief Manager – HR/Admin	Vice President- HR / Administration

Last Review Date: 01/01/2025

Next Review Date: 31/12/2027

Approved By: Mr. M. S. Tamhankar

Designation: Vice President- HR & Corporate Affaires

Signature:

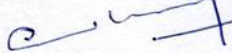



Acknowledgement

I, K. C. Chowdhary, confirm that I have read, understood, and agree to comply with Embio Ltd.'s Ethics Policy. I recognize my responsibility in upholding the company's commitment to *ethical conduct* and *pledge to actively support its implementation*. I will integrate ethical practices into my daily work, adhere to all relevant regulations and company policies, and contribute to the continuous improvement of our ethical standards.

I acknowledge that my commitment is vital to achieving Embio Ltd.'s ethics objectives and fostering a culture of integrity and accountability. I am dedicated to maintaining a trustworthy and ethical workplace and upholding our shared values of ethical responsibility.

Employee Name: K. C. Chowdhary

Employee Signature 

Date: 04/01/25