WHISTLE BLOWER POLICY OF ALKEM LABORATORIES LIMITED

INTRODUCTION & PURPOSE.

ALKEM Laboratories requires its Officers and Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The purpose of this policy is as follows:

1. To encourage and enable employees and volunteers of the Company to report any action or suspected action taken within the Company that is illegal, fraudulent or in violation of any adopted policy of the Company.
2. To build and strengthen a culture of transparency and trust within the organization.

   This policy applies to any matter which is related to the Company's business and does not relate to private acts of an individual not connected to the business of the Company.

APPLICABILITY.

This policy applies to all the employees of ALKEM, (including outsourced, temporary and on contract personnel), ex-employees, stakeholders of the Company, including Vendors (hereinafter referred to as "Whistle Blower")

VIOLATION, REPORTING IN GOOD FAITH:

All employees and volunteers of the Company are encouraged to report any action or suspected action taken within the Company that is illegal, fraudulent or in violation of any adopted policy of the Company including reporting of instances of leak or suspected leak of unpublished price sensitive information.

"Unpublished Price Sensitive Information" shall mean any information, relating to the Company or its Securities (listed or proposed to be listed), directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

(i) financial results;
(ii) dividends;
(iii) change in capital structure;
(iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; and
(v) changes in Key Managerial Personnel

Anyone reporting a Violation must act in good faith, without malice to the Company or any individual in the Company, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. (Any report which the complainant has made maliciously or any report which the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.)

NO RETALIATION.

No employee or volunteer who in good faith reports a Violation or Cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment or volunteer consequences. Any individual within the Company who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, including termination of employment.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint.

REPORTING PROCESS:

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share his or her questions, concerns, suggestion or complaints to person designated by the Company. (Mr. Sujit Shetty – Head Internal Audit is the Compliance Office for the above policy whose contact no is – 9820002289 and email id – whistleblower@alkem.com)

In addition to the above, under exceptional circumstances where a complainant wants to complain directly to the Chairman of the Audit Committee, he or she may do so at the email address naren.a@anejaassociates.co.in. For any complaints made to the Chairman directly, it is mandatory for the complainant to disclose their identity and provide their contact information. The Chairman of the Audit Committee may choose to discuss the matter with the complainant prior to initiating any review or investigation.

CONFIDENTIALITY:

The Company encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by filling out a reporting form and depositing the form in a designated drop box. (The Drop Box will be installed at all Manufacturing & Research & Development Location). The same to be opened jointly by Location HR & Finance Head to be forwarded to Compliance Officer on monthly basis (30th of every month)

COMPLIANCE OFFICER; HANDLING REPORTED VIOLATIONS:

The Compliance Officer will notify the complainant and acknowledge receipt of a report of Violation within 10 business days, but only to the extent that the complainant's identity is disclosed or a return address is provided.

The Compliance Officer is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation. The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations.

If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

In addition, the Compliance Officer will report to the Executive Directors and Audit Committee of any reported Violations, the current status of the investigation, and the outcome or corrective action taken at the conclusion of the investigation.

In the event the Compliance Officer is suspected of having committed a Violation, then the Violation will be reported to Executive Directors and Audit Committee and the Violation will be investigated by **designated officer** under close supervision of the Executive Directors and Audit Committee.

Retention of Documents: All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a period of seven years.

Amendment: The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees unless the same is notified to the employees in writing.

REVISION HISTORY	
Policy approved by the Board of Directors	16th March, 2015
1st Amendment to the policy	8th February, 2019 (effective from 1st April, 2019)

ANNEXURE - 1: WHISTLEBLOWER REPORTING FORM

1) Is this first time you are filing a report for the improper conduct.

- Yes

- NO, please state the date (s) or approximate date (s) of your previous reports.

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2. Name of the Person Filing Report (You are not required to provide your name and may retain anonymity. If you choose to provide your name, it will remain confidential. Providing your name may facilitate the investigation of the misconduct. Anyone filing an anonymous report will not be updated as to the progress of the investigation, but do understand that investigations are taken seriously and will be addressed. Reporting done by individuals disclosing their names will be attended to first.)

_____ _____

Name Date

3. Name of Person (s) Subject to this Complaint.

_____ _____

Name Positions*

* If this person is not an employee of the Company, please list his or her position or relationship to the Company.

Complaint Report

Please include as much detail as possible to enable a thorough investigation of the matter. Please go beyond the question prompts

4. What act occurred and how do you believe it was fraudulent, illegal, or inappropriate. If applicable – Please describe the nature of any injury or damage sustained.

_____

5. When and where did the misconduct occur? (Please indicate if the actions were committed over a period of time).

_____

_____

6. What do you believe enabled the act(s) to occur? E.g. Lack of controls, circumvention of controls, or collusion with other individuals? Are you aware of any motives for the misconduct?

_____

_____

7. Does the misconduct involve the participation of people external to the Company?

_____

_____

8. Are there any witnesses that can confirm the misconduct?

_____

_____

Evidence: Please attach a copy or original of any supporting documents or other evidence in your possession, if any.