



DOING WHAT'S RIGHT

Alkem Code of Ethics

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FOREWORD



Basudeo N. Singh
Executive Chairman



Sandeep Singh
Managing Director

Welcome to Alkem's Code of Ethics. As we continue to grow our business and extend our reach both in India and overseas amidst a demanding environment, it is essential to reaffirm our ethical vision and to state clearly our principles, values and responsibilities. This is your guide to "Doing What's Right" for our Company and all our stakeholders. This Code provides everyone working or associated with our Company a clear understanding of our underlying values and the way we conduct our business.

Our ethics, integrity and transparency, among our other values, have been pivotal in the context of where Alkem is today. As we aspire to take our Company to newer heights, we must ensure that each of us continues to demonstrate the highest standards of professional and ethical behaviour in all of our actions and relationships. An organisation cannot grow and sustain unless we all come together to do everything right – first time and every time. We must comply with the rules, ethics and laws, individually and collectively. The responsibility lies with each one of us to understand our Code, know how it impacts our specific work areas, and comply with its directions and the values it expresses. As you familiarise yourself with this Code, we are sure that it will serve as a valuable guide in making informed and ethical decisions in your day-to-day activities.

While it is important that you apply diligence and conscience to do things right, it is equally important that you have the courage to speak up if you know of, or have a good reason to suspect an unlawful or unethical situation, or believe you are a victim of prohibited workplace conduct. We assure you reporting any misconduct will not be held against you and there will be no retaliatory action.

We are confident that we will all work together to deliver our goals in a way that make us proud. Thank you all for doing your part in creating a culture of ethics and compliance at Alkem.

INTRODUCTION TO CODE OF ETHICS

Alkem's reputation and growth rests on each of us. We must demonstrate ethics, integrity and transparency in all that we do.

Our Code of Ethics ("Code") - 'Doing What's Right' - is a compilation of the Alkem way of doing business. It contains the principles, rules and guidelines to help us make the best decisions and to comply with the laws and regulations that govern our business. Ethics means doing what is right, even when no one is watching.

Within this Code, we declare our values and commitments to our Company and our various stakeholders including patients, consumers, healthcare professionals, regulators, suppliers, business partners, colleagues, investors and the community at large. While our stakeholders have high expectations from us, we have even higher expectations from ourselves. Thus, 'Doing What's Right' is not an option at Alkem; working here means making a firm pledge to uphold our Company values at all times and following the ethical standards outlined in this document.

As we carry out our responsibilities, we may face complex situations or those that may pose an ethical dilemma. In such circumstances, or even when we lose sight of what is essential, this Code will serve as a guide to make the right choice. We, therefore, encourage you to carefully read and understand this Code.

We must recognise that no code of conduct can cover every possible situation. Alkem, therefore, relies on you to exercise good judgment in deciding the right course of action. When in doubt or dilemma, do not hesitate to seek clarity from your supervisors, HR or compliance.



OUR VALUES

Our values are at the core of who we are and how we act. They guide us in the choices and decisions we make at work every day. Embrace the spirit of our values to create a culture of compliance and ethics at Alkem in which we all can rightfully take pride.



Safety

of the highest grade in product manufacturing and workplace environment



Quality

in our products and services by striving to provide defect-free products and services to our customers



Honesty

in communicating within the Company and with our suppliers, customers and all stakeholders while at the same time protecting the Company's confidential information and trade secrets



Responsibility

for our words and actions and their consequences



Compassion

in our relationships with fellow employees and the communities affected by our business and in which we operate



Fairness

to fellow employees, shareholders, customers, and suppliers through adherence to all applicable laws, regulations and policies, transparency and a high standard of behaviour.



Respect

for fellow employees, shareholders, customers, and suppliers, which showing willingness to elicit, listen and to take into account their opinions and value their feedback.



Adaptability

of thinking and behaviour to meet the ever-changing conditions, taking care to act in harmony with nature to ensure progress and success in all endeavours



Gratitude

for all the benefits received, confident that this attitude will be a source of unbounded joy and vitality, enabling us to overcome any obstacles we may encounter

KNOW YOUR RESPONSIBILITY

Who needs to follow our Code?

Unless the context requires otherwise, the term “Company” or “Alkem” in this Code includes Alkem Laboratories Limited and its subsidiaries across the globe. Our Code applies to all Alkem Employees (permanent, and contractual, part time and full time), Managers and Members of the Board. We also expect our Suppliers, Vendors, Agents, Consultants and other Third Parties to hold themselves to similar standards when acting on Alkem’s behalf. Alkem will take appropriate measures when it believes third parties have not met its expectations or their contractual obligations.



Responsibilities of Leaders and Managers

Leaders and Managers at Alkem have the added responsibility of leading by example and ensuring that their team understands the requirements of the Code and applies it in practice. They must inspire others to embrace the values and the Code, encourage ethical decision-making and create a respectful and inclusive work environment. Support must be extended to fellow team members when they ask questions and raise ethical concerns. Leaders and Managers must never retaliate or allow others to retaliate against someone for reporting a concern or misconduct.



Consequences of violation of our Code

It is expected that all employees of the Company will adhere to the Code in carrying out their duties for the Company. In the event of non-compliance with the Code, the Company will take appropriate action against the person who has violated the Code. Disciplinary actions may include termination of employment. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible.



SPEAKING UP



See Something, Say Something

We all have an obligation to uphold our Code. Speak up if you see anything that you believe in good faith to be a breach of this Code; even if such acts are done by your own colleagues or Manager (however senior the person may be in the organisation). By doing so, you give our Company the opportunity to deal with the issue promptly and responsibly. Remaining silent about unethical, illegal or unsafe activities may worsen a situation and harm our reputation. You are also free to ask questions if you are not sure how to respond to an issue that the Code does not address or if you are unclear about any aspect of the Code. Please remember that you are not alone. We are all part of a team.

Zero tolerance for retaliation

Please be assured that your concerns will be taken seriously and you will not be penalised or retaliated against for speaking up. Any act or threat of retaliation will in itself be considered a serious violation of this Code. The information you provide will be kept confidential, except as required to conduct a fair and complete investigation.

Where to go for help or to report your concern

If you see or come to know of any kind of wrongful behaviour or unethical situation within the Company, or if anyone is forcing you to get involved in such wrongdoings, please do not hesitate to report. We encourage you to reveal your identity; however, concerns can also be submitted anonymously. The escalation process for reporting incidents specific to discrimination and/or harassment is to discuss concerns with your Reporting Manager, Head of Department or Human Resource Department. Our Whistleblower policy also empowers stakeholders to report any wrongdoings to the person designated by the company. In addition, a complaint can be addressed to the Chairman of the Audit Committee in exceptional circumstances. Choose whichever option you are most comfortable using. Whichever option you choose, your confidentiality will be protected.

Reporting Channels:

Head Internal Audit & Risk Assurance

Alkem House, Senapati Bapat Marg, Lower Parel, Mumbai – 400013, India

Phone: +91 22 3982 9999

Email: whistleblower@alkem.com

UPHOLDING GOVERNANCE STANDARDS



We are committed to the highest standards of ethical business conduct. To preserve the trust of all our stakeholders, we have an uncompromising commitment to product quality, adhering to all applicable laws and regulatory requirements, conducting our business in a way that ensures fair competition and honesty and fairness in all our business dealings.

Quality & Safety



Alkem is committed to developing and manufacturing high quality products that meet all regulatory requirements. Our products comply with regulatory standards of quality, safety, and efficacy wherever we operate. Robust quality management systems and good practices are in place at our research laboratories, in our clinical trials and in our manufacturing plants and distribution centers. We must all ensure adherence to these quality practices.

At every stage of product lifecycle, be it research, development, manufacturing, storage, marketing and distribution, all our activities must adhere to our internal standards as well as applicable laws and regulations. This holds for all countries where we do business.

Respect the Law



At Alkem, we conduct all activities in accordance with applicable laws, rules and regulations. We need to ensure that we comply with laws of the countries in which we operate.

Anti-Bribery & Anti-Corruption



Alkem prohibits bribery and corruption in any form, direct or indirect. All employees and third parties acting on our behalf are prohibited to give, receive, offer, solicit or promise directly or indirectly, bribes or facilitation payments to any governmental official/public official or any other person/entity for the purpose of improperly obtaining or retaining business advantage for Alkem. Alkem believes and practices zero-tolerance to bribery and corruption regardless of the recipient's status (i.e. whether government or private person/entity, etc.). You must never attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or a kickback.

For more details refer to our global anti-bribery and anti-corruption policy:

[Alkem Anti-Bribery and Anti-Corruption Policy](#)

Examples

Offering a bribe

Scenario: You offer a potential client/customer/healthcare professional tickets to a major sporting event if they agree to do business with us.

What it means: This would be an offence as you are making the offer to gain a commercial and/or contractual advantage or to obtain business for us. It may also be an offence for the potential client/customer/ healthcare professional to accept your offer.

Receiving a bribe

Scenario: An agent gives your nephew a job but makes it clear that in return, they expect you to use your influence in Alkem to ensure we continue to do business through them.

What it means: It is an offence for an agent to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official or a public official

Scenario: You arrange to pay an additional payment to a foreign official or a public official to speed up the pharmaceutical license application process.

What it means: The offence of bribe has been committed as soon as the offer is made (i.e., even if the additional payment is ultimately not made). This is because it is offered to gain a business advantage for us. We may also be found to have committed an offence.

Interactions with Healthcare Professionals



Interactions with healthcare professionals must at all times be ethical, appropriate, transparent and professional. We are committed to ensuring that promotion of our products is consistent with the terms of its marketing approval, backed by adequate, unbiased and truthful scientific data. We are committed to adhering to applicable reporting and transparency requirements for our engagements with healthcare professionals. Employees must never offer anything to any healthcare professional that would have an inappropriate inducement or influence. Off-label promotion of products is strictly prohibited.

Fair Marketing Practices



We have a responsibility to ensure that all our marketing, promotional and non-promotional materials are internally approved, contain accurate and balanced information about our products and are not misleading. We must base our sales and marketing material on facts and documented research and include all legally required information. We all must engage in fair and honest marketing practices, ensuring that interactions with customers, healthcare professionals, and healthcare organisations are ethical and conducted with integrity and transparency, while maintaining their independence.

Fair Competition & Anti-Trust



We believe in free and fair competition. We must never engage in any unethical and anti-competitive behaviour or collusion with our competitors, suppliers or any other third party. We must abide by applicable anti-trust and competition laws.

Fair Dealing



We should always treat our vendors, suppliers, channel partners and others with whom we interact in the course of our business with fairness and respect. We will not misrepresent or omit material facts, disclose or threaten to disclose another party's confidential business information or otherwise engage in any other type of unfair dealing or practice. We expect the same integrity from all third parties, agents and anyone else who performs work on Alkem's behalf. We will conduct ourselves in a manner which is compliant with applicable anti-trust and anti-competition laws.

Gifts & Hospitality



Alkem employees are strictly prohibited from offering or receiving gifts, hospitality, entertainment or any other business courtesy that can create a feeling of obligation or give rise to the perception of impropriety or a reward for a decision or action.

Gifts given or received by Alkem must meet the following conditions:

- Nominal in value
- No cash or cash-equivalents such as gift cards/certificates/vouchers, etc
- Does not violate applicable laws

Conflict of Interest



A conflict of interest can occur when our personal activities, investments or associations compromises our judgment or ability to act in the Company's best interests. We should all avoid such situations and even situations that have just the appearance of a conflict. The following can be actual or potential conflict of interest:

- A situation that interferes with one's duties or responsibilities towards Alkem, or that affects one's ability to act in the best interests of Alkem
- A situation when one receives an improper benefit as a result of his/her position with Alkem
- An instance where one learns about a business opportunity using Company property, information, or position and uses it for personal benefit or otherwise competes with, or diverts business from Alkem.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived conflict of interests to their manager and the HR Department.

Examples



Your spouse has an ownership interest in a company for which Alkem is contracting. You do not have any decision-making responsibilities or role in the selection of any vendor by Alkem. Do you need to report your wife's ownership interest in the said company?



Yes, any such situation needs to be brought to the notice of your reporting manager and HR for approvals.

Q

A technical equipment supplier delivers a defective laboratory item. The warranty period for the product has not yet expired. However, the supplying company is owned by your father-in-law, and as a result, you do not send the part back to the supplier. Is this right?

A

This is a violation of the Code. Your decision-making must not be influenced by your private relationship to the supplier. It is your duty to act in the best interest of the Company. The relationship to the supplier should have been disclosed to your reporting manager and HR for approvals

Q

Your division is seeking advice of a cardiologist for a new product. Can you propose your father, who is a renowned cardiologist for the same?

A

Yes, you are welcome to propose your father as a consultant cardiologist if he meets the qualifications. However, you should disclose and excuse yourself from the review or selection process.

Anti-Money Laundering



We comply with global anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate channels to hide their true origin. Employees must never facilitate money laundering or terrorist financing and must take steps to prevent use of Company's funds or business activities for these purposes.

Global Trade Compliance



As we expand our operations globally, we must ensure compliance with all export and import laws and regulations that apply to us wherever we do business. Trade sanctions may restrict or prohibit dealings with certain countries. It's important for us to respect applicable restrictions wherever we are doing business.

Responsible Sourcing



We expect our suppliers, vendors, their employees, sub-suppliers and any other stakeholders or parties involved with the execution of work, to comply with the applicable laws and the standards set forth in our Code of Ethics for Suppliers, Vendors & Other Stakeholders. We reinforce this shared commitment by conducting appropriate due diligence, using clear and specific contract terms, monitoring compliance during the relationship and acting when our expectations are not met.

For more details refer to our Code of Ethics for Suppliers, Vendors & Other Stakeholders: [Alkem Code of Ethics for Suppliers, Vendors & Other Stakeholders](#)

Maintaining Accurate Records



All Alkem records need to meet internal standards, accounting principles and regulatory requirements. Business records include financial statements, accounts, contracts, research & development data, time sheets, vouchers, bills, invoices, expense reports, payroll & benefits data, performance evaluations and other essential Company data. Records, whatever be its form - paper documents, CDs, computer hard disks, USBs, email, cloud data, floppy disks, microfiche, microfilm or all other media - must be maintained in proper condition. It's important never to falsify records or intentionally try to hide information. Managing our records the right way allows us to meet our business needs, safeguard investor confidence and comply with necessary laws and regulations. Proper management also ensures that our records are available in case of litigation, audits or investigations.



Quick Recap

- ▶ Ensure sound quality practices and compliance of regulatory requirements at all stages of the product life cycle
- ▶ Provide product information accurately and clearly
- ▶ Uphold the laws and regulatory requirements that govern our business
- ▶ Ensure interactions with healthcare professionals are always ethical, appropriate, transparent and professional
- ▶ Compete vigorously but fairly and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors
- ▶ Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- ▶ Refuse any offer or request for an unlawful payment and report the incident to the Company
- ▶ Do not enter into situations in which your personal, or family interests may conflict with those of Alkem
- ▶ Employees are prohibited from participating in, or facilitating money laundering
- ▶ Treat everyone with whom we do business fairly and avoid situations that could create the appearance of bias or favouritism
- ▶ Follow the right procedures when dealing with business partners and work only with those that uphold Alkem's values and integrity standards
- ▶ Ensure that all business records are accurate, clear and complete

MAINTAINING WORKPLACE CONDUCT



We promote an atmosphere of mutual respect, inclusion and collaboration. We are also committed to maintaining and enhancing workplace health, safety and security.

Foster Diversity



We are committed to promote an inclusive and diverse culture where all colleagues feel valued, challenged, motivated and treated fairly. Diversity is embraced in all aspects of business and at all levels, as we are convinced that the best solutions are often those that draw on our diverse ideas and perspectives. We are an equal opportunity employer. Our employment decisions are made purely based on merit and are free from any sort of bias or discrimination based on race, religion, gender, nationality, internal influence or others. Employment decisions like hiring, exits and promotions are be based on legitimate job-related factors alone.

We prioritise creating a workplace environment that is safe, hygienic, and accessible. We regularly engage in consultations with our workforce, providing a platform for everyone to voice their needs and concerns about workplace conditions. By embracing continuous improvements and adaptations, we ensure compliance with safety and accessibility standards. This commitment helps us foster a respectful and inclusive atmosphere.

No Harassment, No Discrimination



We have a zero-tolerance policy towards harassment and discrimination. We do not tolerate harassment in any form, be it non-sexual or sexual in nature. Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment. Do not engage in inappropriate sexual banter or make inappropriate sexual advances to employees or others in the workplace. Our aim is to create a safe environment free of discrimination in any form. Never use derogatory references to any race, age, gender, religion, ethnic group, sexual orientation or disability. The Company will ensure that employees who bring such charges will have their concerns investigated fairly and will not face any manner of retaliation. The Company assures employees of total confidentiality in such matters. Employees who engage in discrimination or harassment will be in violation of this Code and shall be subject to appropriate corrective or disciplinary action as per the Company standards.

Safe & Healthy Workplace



We conduct business in accordance with applicable health and safety requirements and strive for continuous improvement in our health and safety policies and procedures. We strive to create value for all our stakeholders in a manner that is ethical, legal and environmentally conscious while minimising the adverse effects of our operation on the environment and communities.

All employees are expected to apply safe work practices at all times and in all locations. Applicable safety and health requirements must also be communicated to visitors, customers or contractors at any Company location. Workplace injuries, illnesses or unsafe practices or conditions, including “near-misses” must be immediately reported to the Reporting Manager or Site Head.

Violence-free Workplace



Resolve problems respectfully and never resort to acts or threats of violence. These standards apply while working on the Company premises, at offsite locations where the Company’s business is being conducted and at Company sponsored business and social events. In addition, on client locations, we are required to adhere to the client’s code of conduct as well.

Fair & Free Environment



We support a fair and free workplace where all employees, irrespective of their position in the organisation, can contribute to business goals ethically and without any fear. Any form of pressure on junior colleagues to bypass processes will not be tolerated and will be dealt with strictly. Use of management name for putting pressure on colleagues from different departments to circumvent or ignore processes will also not be accepted. All Alkem employees are encouraged to report any instance of interference with respect to their ability to fulfil their job responsibilities honestly.

No Drugs, Alcohol or Smoking at Workplace



Working under the influence of alcohol, illegal drugs or controlled substances is prohibited as it can adversely affect safety, productivity and judgment. The unauthorised use, possession or distribution of drugs or alcohol while working on Alkem business or at any of our workplaces is also prohibited. It is important that our colleagues can work in a smoke-free environment. The entire work premise of Alkem and all its subsidiaries is a 'No Smoking' zone.

Outside Employment



In consideration of employment with the Company, all employees are expected to devote their full attention to the business interests of the Company. They are prohibited from accepting simultaneous employment offer from a Company supplier, customer, developer or competitor, or from taking part in any activity that enhances or supports a competitor's position. Employees may accept invitation from institutes with or without honorarium as lecturers or similar activities outside their employment on weekend or after office hours. However, before undertaking such activities, prior written approval must be taken from the reporting manager and the HR Department.

Commitment to Human Rights & Anti-Modern Slavery



We must always show respect for human dignity in our interactions with one another, customers, suppliers and all those whom we meet in the course of our business activities. We provide safe workplaces, reasonable working hours and fair remuneration for our employees. We have zero tolerance policies for the use of child labour, forced labour, modern slavery or human trafficking. We will also refuse to do business with subcontractors, business partners and suppliers who engage in these practices.



Quick Recap

- ▶ Treat all fellow employees and other stakeholders with respect at all times
- ▶ Any type of harassment, including physical, sexual, verbal or other, is prohibited
- ▶ Comply with workplace safety and health regulations
- ▶ Human rights must be upheld across all the Company locations
- ▶ Never pressure a team member to do something that is in violation of our way of working
- ▶ Do not work under the influence of drugs or alcohol. Smoking is prohibited within the premises of work
- ▶ All forms of violence or threats are prohibited

PROTECTING ASSETS & THE BRAND

We all have the responsibility to safeguard and respect Alkem's assets, which include both our tangible and intangible resources, and to maintain and protect the reputation of our Brand. All assets should be used for legitimate purposes, efficiently and for Company business only.



Responsible Use of Assets



Alkem's assets refer to both tangible and intangible resources. Our assets include facilities, plant & machinery, products, equipments, computers & information systems, telephones, vehicles, confidential & proprietary information, intellectual property and Company funds, among others. We are all expected to use Company's assets responsibly and protect them from loss, damage, misuse, theft, embezzlement, destruction or cyberattacks. We must never use Company's assets without proper approval and for personal purposes. All Company-owned assets must be immediately surrendered on leaving the employment of the Company.

Proper Usage of Information Technology



We must be careful when using electronic means of storing and sending information. Protect your user IDs, passwords and PINs and do not share these with anyone as this may violate our data security requirements. All employees must use only authorised software, devices and procedures. Employees are not allowed to use Company's computer system to download or install illegal or unauthorised programmes, software or data, whether on or off Company premises.

Confidential Information



Confidential information is a highly valuable asset for the Company and must be protected at all times. Disclosure of confidential information without authorisation is prohibited. All third-parties and vendors must sign appropriate written non-disclosure agreements. Remember, you also have an obligation to protect Alkem's confidential information even after you leave the Company.

What comprises confidential information?

Confidential information includes intellectual property, corporate strategies, processes, sensitive product related information, terms of contracts, business plans, trade secrets, formulas, customer information, supplier lists, research & development data, marketing strategies, non-public financial information, manufacturing techniques, employee records such as salary and performance information and personnel information.

Data Privacy



At Alkem, we respect the privacy rights of all individuals we interact with and prioritise the protection and responsible use of personal data in accordance with applicable data privacy laws. We ensure that all personal data collected, stored, processed, and shared is handled lawfully, fairly, and transparently.

We also expect our partners, consultants and vendors to align with our privacy approach and maintain compliance, confidentiality, and accountability at every level.

Responsible Use of Artificial Intelligence (AI)



At Alkem, we are committed to the ethical and responsible development, deployment, and use of Artificial Intelligence (AI) technologies. We do what is right in conducting our business, including work related to data and AI, which is essential for building trust, safeguarding individuals and our Company.

Protecting our Brand



The Alkem brand and logo are integral part of our intellectual property and are communicated through the Company's website, products, promotional and marketing materials, press releases and other publications. We must protect our brand to ensure that it continues to be recognised as symbol of quality and trust. The Alkem logo should be used correctly and in appropriate proportion.

Right Practices in External Communication



We are committed to delivering accurate and reliable information to the media, financial analysts, investors and other members of the public. All information disclosed outside the Company, including forecasts, press releases, speeches and other communications, should be honest, accurate, timely and representative of the facts. We must ensure that external communication on behalf of Alkem is only through authorised representatives or designated spokespersons of the Company. Employees must never disclose information which is not already in public domain. Any official statement or announcement on behalf of the Company should be routed through the Corporate Communication team.

Use of Social Media



Alkem respects the right of employees to use social media for personal and professional purposes. However, we must never share confidential information about the Company or speak on behalf of the Company unless expressly authorised to do so. Also, materials and opinions posted online will be regarded as your personal views and are not endorsed by the Company. If it is disclosed that you are an Alkem employee, you must clearly state that the views you are sharing are your personal views. In such cases, it is advised to use a disclaimer such as "opinions are my own" to avoid misunderstanding. Do not post comments or pictures that could harm the Company's brand, reputation or commercial interests. Employees must also avoid any offensive or derogatory online content towards colleagues or business partners as the same will be considered as a violation of our Company's anti-harassment policy.

Communication with Business Partners



We must ensure that all communications with suppliers and channel partners are documented as per the requirement with all stakeholders kept in the loop. Strict adherence to standard operating procedures is required under all circumstances. Bypassing concerned channel of communication or organisational approval will be strictly penalised, irrespective of the seniority level of the defaulter. Leakage of any internal or confidential information to vendors is also a serious misconduct and will be subject to appropriate disciplinary action.



Quick Recap

- ▶ Protect the assets under your control from theft, waste, misuse, loss and damage
- ▶ Help to safeguard all computer equipment and data against unauthorised access or modification
- ▶ Each of us are responsible for keeping confidential information safe and secure
- ▶ Use confidential information only for legitimate Alkem business purposes
- ▶ Respect privacy rights of individuals and adhere to applicable data privacy laws wherever we operate
- ▶ Unless you are authorised to do so, do not make any public statements on Alkem's behalf
- ▶ Do not make social media posts that expose the Company to legal problems or public embarrassment
- ▶ Ensure that right communication practices are followed when interacting with third parties

SECURING INTERESTS OF THE COMPANY & SHAREHOLDERS



We are committed to uphold the reputation of our Company and maintain the trust of our investors. This means that each of us has the responsibility to follow applicable laws and our system of internal controls and conduct ourselves in the best interests of the Company.

No Insider Trading



Many of us are exposed to information about Alkem or any other company with which Alkem has or may be considering a relationship that may not be known to the public. Buying or selling Alkem securities, or of other companies, while possessing Unpublished Price Sensitive Information is prohibited. Sharing information, tips, or encouraging another person to buy or sell securities based on inside information is also prohibited. Any case of suspected insider trading must be immediately reported to the investors@alkem.com.

What is Unpublished Price Sensitive Information?

Unpublished Price Sensitive Information or “UPSI” means 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:

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- changes in Key Managerial Personnel

Other Directorships

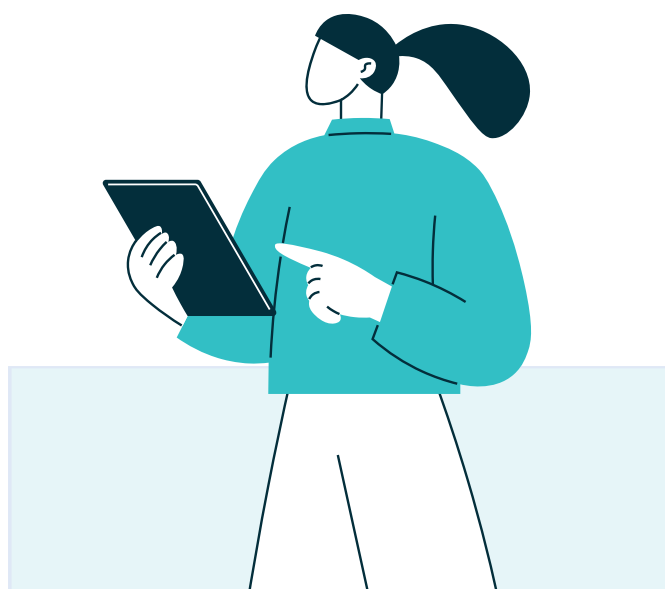


Director(s) are permitted to join the board of other companies only after prior approvals have been taken from the management. However, acceptance by Director(s) of any directorship/assignment in a company or organisation that competes with or is a potential competitor of the Company is prohibited. Appointment /cessation from directorship of other companies must be promptly disclosed by the Director(s).

Reporting Related-Party Transactions



The Company shall engage with related parties in the ordinary course of business and on an arm's length basis to leverage scale, size and drive operational synergies to provide value added, innovative products to its consumers while ensuring that transactions with related parties are fully compliant with applicable regulations. Any dealings with a related party must be conducted in accordance with the Related Party Transaction Policy of the Company with necessary disclosure to the Audit Committee of the Company, wherever applicable. Related party transactions are prohibited, unless approved or ratified by the Audit Committee of the Board of Directors of the Company. Any employee who is aware of any transaction that is or may be perceived to be a related party transaction is required to bring the same to the attention of the Audit Committee through the Company Secretary.



Duties of Independent Directors



Independent directors play a vital role in the Company by offering objective and impartial opinions. They help ensure accountability and adherence to ethical standards in the organisation. As defined in the Companies Act, 2013, some of the key duties of Independent Directors include refreshing their skills, knowledge and familiarity with the Company; striving to attend all meetings of the Board of Directors, the Board of Committees and the General Meetings and participate in them constructively; seeking appropriate clarification or amplification of information where necessary; raising concerns about the running of the Company or a proposed action to the Board; being well informed about the external environment in which the Company operates; ensuring that adequate deliberations are held before approving related party transactions; reporting concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Ethics policy; not disclosing confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board or required by law; and not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board.



Quick Recap

- ▶ Never buy or sell securities when you have material, non-public information, nor should you ever “tip” others by providing them with material non-public information
- ▶ Related-party transactions must be reported transparently to ensure that all actions are legal and ethical
- ▶ All public disclosure must be accurate and disseminated in accordance with the Company policies

CONSIDERING COMMUNITY IMPACT

We must minimise the environmental impact of all of our activities, be a responsible corporate citizen and uphold a reputation of being a trusted neighbour in the communities where we live and operate.



Commitment to Environment and Social Welfare



We are committed to environmental sustainability. Our efforts must be directed towards developing and implementing technologies and processes that are useful in preserving the global environment and pollution prevention. We actively work towards addressing climate change by focusing on reducing our carbon emission intensity. We encourage you to demonstrate proactiveness in minimising resource use (electricity, water, raw materials, supplies, single use plastic material in packaging and day-to-day operations etc.) in our workplace. We also encourage you to make an endeavour to contribute to society by actively participating in and supporting the Company's corporate social responsibility programmes.

No Political Activities



You must not promote any political views or beliefs (including by posting or distributing notices or other materials) on, or around Alkem premises. Employees and third parties acting on behalf of Alkem are prohibited from making direct or indirect political contributions to any political party or organisation or to individuals engaged in politics with the intention of bribery.

Public Policy Advocacy



Only authorised personnel of Alkem can engage with the public, trade or industry associations and non-governmental organisations (NGOs) to share Company information, raise industry benchmarks and for exchange of best practices. All personnel engaging in such activities must remain ethical, transparent and aim towards common good. Communications must be based on facts, evidences and must not be misleading. All interactions with government officials and other third parties must also be in accordance with our commitment to preventing bribery and corruption.



Quick Recap

- ▶ Business activities must be conducted with the greatest care for the environment and society at large
- ▶ Participate actively in community welfare programmes
- ▶ Do not commit corporate resources for political purposes or solicit contributions or distribute literature for any event or cause from work premises
- ▶ Engagement with government officials, trade or industry associations and NGOs must be done only by authorised personnel from Alkem and in a ethical and transparent manner

ACKNOWLEDGMENT OF RECEIPT OF CODE OF ETHICS

The Compliance Officer
Alkem Laboratories Limited
Devashish Building, Alkem House
Senapati Bapat Road, Lower Parel
Mumbai 400 013
India

This is to acknowledge I have read the Company's Code of Ethics. I understand the standards and policies contained in the Code of Ethics and understand that there may be additional policies or laws specific to my job. I have a continuing obligation to familiarise myself with applicable laws relating to my job responsibilities. I further agree to comply with the Company's Code of Ethics.

If I have questions concerning the meaning or application of the Company's Code of Ethics, any Company policies, or the legal and regulatory requirements applicable to my job, I know I can consult immediately my Manager/ Head of Department/ HR Department, knowing that my questions or reports to these sources will be maintained in confidence.

I also recognise that while our Code of Ethics covers many of the ethics and business conduct topics that we are likely to face in our work, no code can cover every possible situation. In any situation where I am not sure what to do, I can ask questions and get help. I am aware that breach of the Company's Code of Ethics, Alkem policies or the law may give rise to disciplinary action up to, and including, dismissal.

Signature:

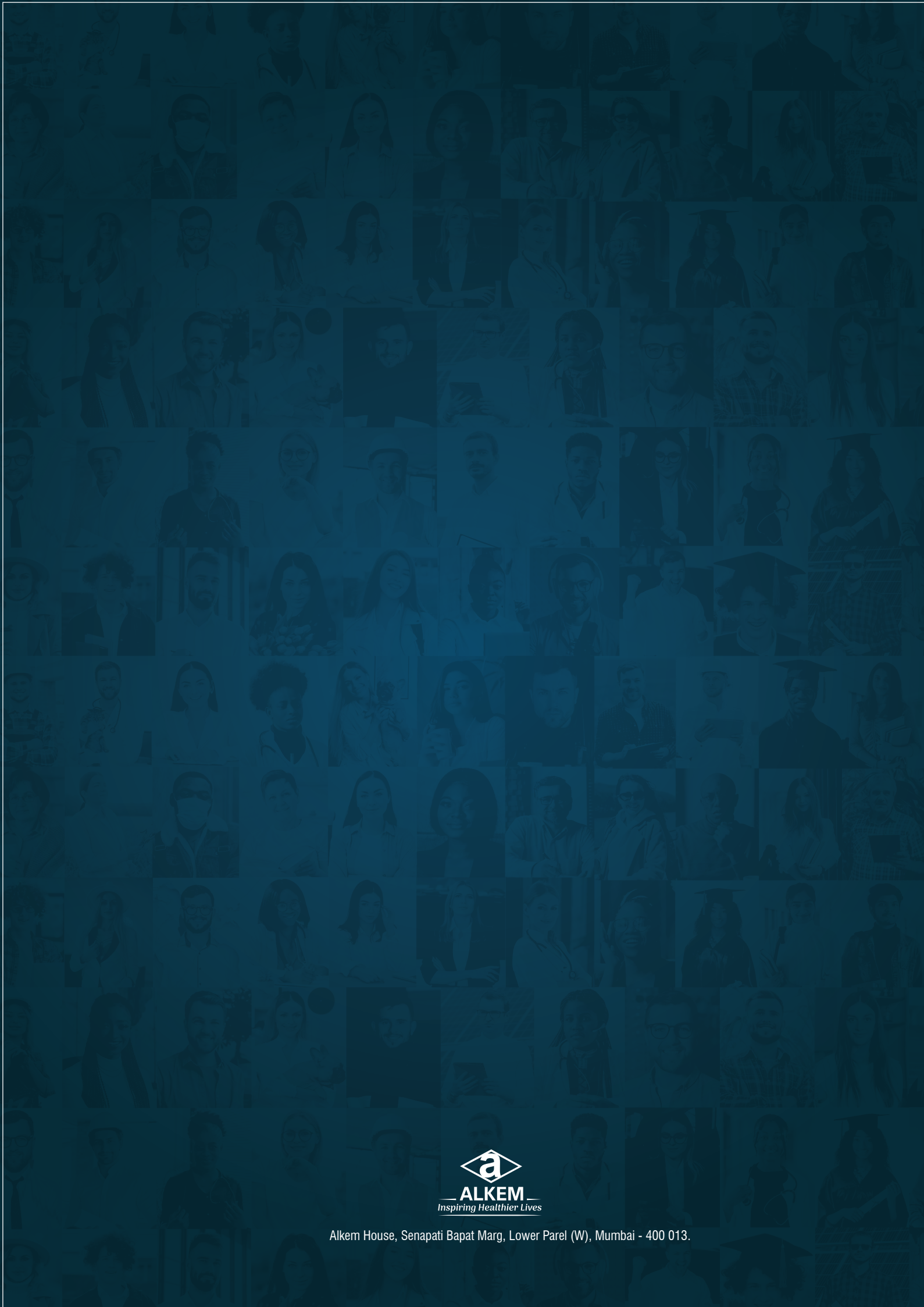
Name:

Employee Code:

Designation:

Business Unit and Location:

Date:



Alkem House, Senapati Bapat Marg, Lower Parel (W), Mumbai - 400 013.