



DOING WHAT'S RIGHT

ALKEM CODE OF ETHICS

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FOREWORD FROM THE EXECUTIVE CHAIRMAN AND MANAGING DIRECTOR



Basudeo N. Singh
Executive Chairman



Sandeep Singh
Managing Director

Our ethics, integrity and transparency, amongst our other values, have been pivotal in the context of where Alkem is today.

Dear Alkemiters,

It is our pleasure to welcome you to Alkem's Code of Ethics. Today, like never before, 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. Our Code also serves to provide everyone who works with our Company a clear understanding of our underlying values and the way we conduct our business.

Our ethics, integrity and transparency, amongst 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 principled 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 good reason to suspect an unlawful or unethical situation, or believe you are a victim of prohibited workplace conduct. We assure you that raising integrity violation or reporting misconduct will not be held against you and there will be no retaliatory action.

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

Warm regards,

Basudeo N. Singh



Executive Chairman

Sandeep Singh



Managing Director

INTRODUCTION TO OUR 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, both on and off the job and to comply with the laws and regulations that govern our business.

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, industry, investors and the community at large. While our stakeholders have high expectations of us, we have even higher expectations of 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 our Code. We also 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.

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 highest grade in product manufacturing and workplace environment



Quality in our products & 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



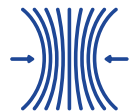
Compassion in our relationships with our fellow employees and the communities affected by our business and in which we operate



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



Respect for fellow employees, shareholders, customers and suppliers while 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



1

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), 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 we believe third parties have not met our expectations or their contractual obligations.



2

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 our values and our 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 making a report in good faith. They must commit to full, fair and impartial investigation and must commit to acting appropriately in response.



3

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, it is left to the discretion of the Head of the Departments/ Board of Directors/ Management to take appropriate action against the person who has violated the Code. This discretion, however, will not be exercised arbitrarily and regard will be held to various factors such as the nature and circumstances of each case, the severity and impact of the non-compliance, whether the intention of the accused was mala fide, etc. 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. Where laws have been violated, the Company will cooperate fully with the appropriate authorities.

SPEAKING UP



See something? Say something

We all have an obligation to uphold our Code. Speak up if you see anything that appears to breach 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 reporting what you believe, in good faith, to be a breach of this Code. 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. You may discuss concerns with your Reporting Manager, Head of Department or Human Resource Department. Choose whichever option you are most comfortable using. Whichever option you choose, your confidentiality will be protected.

Reporting Channels:

Head - Legal, Company Secretary & Compliance Officer

Alkem House, Senapati Bapat Marg,
Lower Parel, Mumbai - 400013. (India)

Phone: +91 22 3982 9999

Email :

whistleblower@alkem.com

DOING WHAT'S RIGHT FOR OUR PATIENTS AND CONSUMERS



Our patients and consumers place their trust in Alkem products. To preserve this trust, we have an uncompromising commitment to product safety, quality and efficacy throughout our Company.



Ensure product quality and safety

Alkem is committed to develop and manufacture high-quality, safe products that promote good health and well-being. 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. Quality-related complaints must be taken very seriously and should be reported immediately to Alkem Head of Quality function of the unit or of the overall organisation for investigation..



Adhere to standards

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



Share product details

We have a responsibility to share accurate product information in a proper manner. This includes providing details on benefits, risks, side-effects and complete scientific information on our products. Any discrepancy with respect to label claims must be brought to the notice of the management and other relevant authorities immediately without any fear.



Prevent counterfeits

Counterfeit medicines and healthcare products are a serious risk to the health and safety of patients and consumers. Not only do such illegal products lack the active ingredients to treat medical conditions, but they also often contain contaminating substances that can negatively impact health. They also inflict severe damage to our brand name and sales. All such instances or even suspected instances of counterfeit Alkem products must be immediately reported to Head of the Business or Head of Legal Department.



QUICK RECAP :

- 1 Ensure sound quality practices and compliance of regulatory requirements at all stages of the product life cycle
- 2 Provide product information accurately and clearly
- 3 Protect patients and customers from counterfeit medicines

HEALTHCARE PROFESSIONALS, REGULATORY AUTHORITIES AND INDUSTRY



We will comply with all applicable laws and regulatory requirements, conduct our business in a way that ensures fair competition and we will be honest and fair in all our business dealings.



Respect the law

All Alkem employees are required to conduct their activities in accordance with applicable laws, rules and regulatory orders. This includes acquiring appropriate knowledge of the requirements relating to each employee's duties to recognise potential dangers and to know when to seek legal advice. We also need to ensure that we comply with laws of the countries in which we operate. When local laws and regulatory requirements are stricter than our corporate standards, we must comply with the former.



Fair marketing practices

We have a responsibility to ensure that all our marketing and promotional materials contain balanced information about the risks and benefits of our products. This means we will not misrepresent our products or prices, or those of our competitors. We must base our sales and marketing material on facts and documented research and include all legally required information. This will help healthcare professionals in making the right decision while prescribing medicines.



Modest gifts only

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. Alkem employees are strictly prohibited from offering or receiving gifts, hospitality, entertainment or any other business courtesy that create a feeling of obligation or give rise to the perception of impropriety. We are committed to winning business only on the merits of our products, services and people, and we must comply with all legal requirements for giving and receiving gifts and entertainment.

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

- Nominal in value
- Not a regular practice
- Consistent with acceptable business and industry practices
- Permitted by law and the policies of both the giver and receiver
- Would not embarrass Alkem if disclosed publicly
- Never cash or cash-equivalents such as gift cards/ certificates/vouchers



No bribery

Bribery and corruption are strictly prohibited at Alkem. You must never attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or kickback. This applies to persons in government and in private business. Selection of third parties must also be done based on merit and they must be monitored continuously to ensure that they do not engage in bribery.



Public policy advocacy

Only authorised personnel of Alkem can engage with the public, trade and industry associations 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 :

- 1 Uphold the laws and regulatory requirements that govern our business
- 2 Compete vigorously but fairly and never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors
- 3 Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- 4 Refuse any offer or request for an unlawful payment and report the incident to the Company
- 5 Unless you are authorised to do so, do not make any public statements on Alkem's behalf

OUR COLLEAGUES



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 such as race, religion, gender, nationality, internal influence or others. Employment decisions like hiring, exits and promotions are be based on legitimate job-related factors alone.



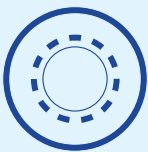
No harassment

We do not tolerate harassment in any form. 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. 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.



Safe and 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. 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 Reporting Manager or Site Head/Site Safety Head.



Fair and 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.



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.

QUICK RECAP :

- 1 Treat all fellow employees and other stakeholders with respect at all times
- 2 Any type of harassment, including physical, sexual, verbal or other, is prohibited
- 3 Comply with workplace safety and health regulations
- 4 Never pressure a team member to do something that is in violation of our way of working
- 5 Do not work under the influence of drugs or alcohol. Smoking is prohibited within the premises of work
- 6 All forms of violence or threats, either on site or off site, is prohibited

OUR SUPPLIERS, CHANNEL PARTNERS AND OTHER THIRD PARTIES



We are committed to the highest standards of ethical business conduct and seek to do business with partners who share our values. Our relationships with our business partners must be based on lawful and fair practices.



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 will obtain information about competitors, competitor products, customers and suppliers ethically and legally. Gifts or entertainment offered to or received from business partners must not violate our Code, Company policy or the law. We expect the same integrity from all third parties, agents and anyone else who performs work on Alkem's behalf.



Responsible sourcing

When choosing third parties, we require that their processes and procedures meet the standards we set for ourselves. 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. It is also our expectation that suppliers, vendors, their employees, sub-suppliers and any other stakeholders or parties involved with the execution of work, comply with the applicable laws and the standards set forth in our Code of Ethics for Suppliers, Vendors & Other Stakeholders*.



Proper communications

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 :

- 1 Treat everyone with whom we do business fairly and avoid situations that could create the appearance of bias or favouritism
- 2 Follow the right procedures when dealing with business partners and work only with those that uphold Alkem's values and integrity standards
- 3 Ensure that right communication practices are followed when interacting with third parties

*The Code of Ethics for Suppliers, Vendors & Other Stakeholders is available on <https://www.alkemlabs.com/policies>

OUR ASSETS



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



Responsible use of assets

Alkem's assets include both tangible and intangible resources like facilities, plant & machinery, products, equipments, computers & information systems, telephones, vehicles, employee time, confidential & proprietary information and Company funds, among others. We are all expected to protect the Company's resources from loss, damage, misuse, theft, embezzlement, destruction or cyber threats. All Company-owned equipment must be immediately surrendered on leaving the employment of the Company. We must never spend Company funds without proper approval.



Proper usage of information technology

While limited personal use of Company-owned phones, computers, electronics and company networks is permitted, we must use good judgment to ensure that personal use does not interfere with our work environment or in any way violate our policies or security requirements.

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 are instructed to 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 in the office, at home, or on the road, since doing so may constitute copyright infringement.



Protect our brand

The Alkem brand and logo are an 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 a recognised symbol of quality and trust. The Alkem logo should be used correctly and in appropriate proportion.



Protect confidential information

Confidential information is a highly valuable asset giving us a competitive edge and must be protected at all times. Disclosure of confidential information is prohibited because it could potentially help our competitors, result in legal violations or otherwise impact Alkem or others to whom the information relates. If you suspect that someone is giving out confidential information without approval, you should speak up immediately. Remember, you also have an obligation to protect Alkem's confidential information even after you leave the Company.



Disclose confidential information only where authorised

To further the Company's business, from time to time the Company's confidential information may be disclosed to potential business partners. However, such disclosure should never be done without carefully considering its potential benefits and risks. Confidential information may be shared with employees or other persons only on a need-to-know basis, as authorised by the person responsible for such information or post consultation with the Company management. Also, the third-party must sign appropriate written nondisclosure agreement prior to the disclosure.

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.

QUICK RECAP :

- 1 Protect the assets under your control from theft, waste, misuse, loss and damage
- 2 Help to safeguard all computer equipment and data against unauthorised access or modification
- 3 Each of us are responsible for keeping confidential information safe and secure
- 4 Use confidential information only for legitimate Alkem business purposes

OUR COMPANY AND 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.



Maintain 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.



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 secretarial@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;
- declaration of a stock split



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.



Avoid conflict of interests

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 are examples of actual or potential conflicts 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, conflicts of interest to their manager or the Human Resources Department.



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 honorarium payments for lectures and similar activities outside their employment. However, before undertaking such activities, prior written approval must be taken from the Management.



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).



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, will be honest, accurate, timely and representative of the facts.



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. Related party transactions are prohibited, unless approved or ratified by the Audit Committee and / or the Board of Directors. 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.



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.

QUICK RECAP :

- 1 Ensure that all business records are accurate, clear and complete
- 2 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
- 3 Do not enter into situations in which your personal, or family interests may conflict with those of Alkem
- 4 Related-party transactions must be reported transparently to ensure that all actions are legal and ethical
- 5 Do not make social media posts that expose the Company to legal problems or public embarrassment
- 6 Comply with all applicable export and import control laws and regulations
- 7 All public disclosure must be accurate and disseminated in accordance with the Company policies

OUR COMMUNITIES AND THE WIDER WORLD



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.



Protect our environment

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. Each of us must also 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.



Commitment to human rights

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 or human trafficking. We will also refuse to do business with subcontractors, business partners and suppliers who engage in these practices.



Undertake welfare activities

Make every endeavour to contribute to society by actively participating in and supporting the Company's corporate social responsibility programmes. Employees are also encouraged to make a difference on a personal level. Be involved in events and activities that contribute to the development and enrichment of society. When a large-scale disaster such as a natural calamity takes place, cooperate with the parties concerned and take supportive action swiftly.



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.



Anti-money laundering

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

QUICK RECAP :

- 1 Business activities must be conducted with the greatest care for the environment
- 2 Human rights must be upheld across all the Company locations
- 3 Participate actively in community welfare programmes
- 4 Do not commit corporate resources for political purposes or solicit contributions or distribute literature for any event or cause from work premises
- 5 Employees are prohibited from participating in, or facilitating money laundering

ACKNOWLEDGMENT OF RECEIPT OF CODE OF ETHICS

The Chief 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 Company 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:



Registered Office:

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