



## **Cohance Lifesciences Limited**

(Formerly, Suven Pharmaceuticals Limited)  
(CIN: L24299MH2018PLC422236)

### **Registered Office**

215 Atrium, C Wing, 8th Floor,  
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Andheri East, Chakala MIDC,  
Mumbai, Maharashtra, India, 400093  
Tel: +91 22 61539999

### **Corporate Office**

202, A Wing, Galaxy Towers,  
Plot No 1, Hyderabad Knowledge City,  
TSIIC Raidurg, Hyderabad,  
Telangana, India, 500081  
Tel: +91 40 23549414

**Website:** <https://cohance.com>

## **Whistle Blower Policy**

*(Amended Code effective from November 12, 2025)*

# Whistle Blower Policy

## Whistle Blower Policy

### 1. Objective and Scope

Cohance Lifesciences Limited (Formerly, Suven Pharmaceuticals Limited), as a responsible corporate entity, is committed to adopting best practices in compliance with legal and ethical standards. The Whistle Blower Policy complements Code of Conduct and Business Ethics (“Code”) by establishing a framework to address concerns or complaints of misconduct, fraud, financial irregularities, and health, safety, or environmental issues, amongst others. This Policy shall be read in conjunction with the Code. In case of contradiction, the provisions of Code shall prevail over this Policy.

The Company has adopted the Code, which lays down the principles and standards that should govern the actions of the Company and its employees regarding Whistle Blower Policy. This policy is intended to provide guidance on raising concerns of any actual or potential violations of the Code, policies and procedures of the Company, any applicable laws and regulations, unprofessional or inappropriate conduct and address them appropriately. This policy ensures that any violations, wrongdoing or non-compliances are addressed appropriately and promptly. This Policy encourages employees and third parties to raise concern relating to matters, including, but not limited to:

- Financial irregularities including fraud or suspected fraud;
- Conflict of interest;
- Gifts, bribery and kickbacks;
- Misuse or misappropriation of assets or information;
- Insider trading;
- Sales, marketing and promotional practices;
- Employee relations, discrimination, inappropriate behavior and sexual harassment;
- Data privacy and information security;
- Safety, health & environment;
- Any other violations of policies and procedures.

This Policy is not intended to address individual employee grievances or complaints relating to job performance and terms and conditions of employment, or individual third-party grievances relating to terms and conditions of contract, which will be addressed by the respective departments in line with existing policies. This policy does not cover the following indicative but not exhaustive aspects:

- Compensation related issues, like, salary/ wages, increments, bonus payouts, etc.
- Actions which have been taken in compliance with applicable law
- Inappropriate administration services, etc.
- Malfunctioning of information technology assets, like, laptop, printers, etc.
- Queries relating to job openings, internal transfers, etc.
- Recommendations for strategy related decisions and/ or operational efficiencies.

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## 2. Applicability

This Policy applies to Cohance operations globally, including all legal entities worldwide owned or controlled by Cohance (including all group companies), and to all directors, officers, employees, consultants, business partners, contractors, and other third parties acting on behalf of Cohance and any other person retained or hired by the Company to facilitate business world-wide and requires them to comply with this Policy (“Associates”). They are obligated to report any actual or potential violations of Code, policies and procedures of the Company, any applicable laws and regulations or any other unprofessional and inappropriate conduct.

## 3. Policy Framework

- 3.1 This Whistle Blower Policy provides a platform to address any concern. It is important that our Associates speak up promptly regarding any concern, so that it can be addressed in a timely manner. The Company will strive to maintain confidentiality to the greatest extent possible, and discussion of the concern should be limited to only those individuals with a “need to know”.
- 3.2 Senior executives in leadership role play an important role in the implementation of the principles set forth in this policy. It is the responsibility of these leaders to:
  - Make Associates aware of the principles set forth in this policy and the Company’s commitment to it;
  - Create an environment in which all Associates can, without fear of retaliation, raise what they believe to be honest issues to any level of leadership;
  - Report all the Concerns to the appropriate authority promptly.
- 3.3 No person should interfere with the investigation and attempts to withhold, destroy, damage or tamper with evidence, or attempts to influence/ coerce/ threaten/ entice a party participating in the investigation process. Any such activity may warrant a disciplinary action that may even include termination of employment of an Associate or termination of association with a party.
- 3.4 The Company shall ensure that any employee assisting in the said investigation is protected to the same extent as a Whistle Blower.
- 3.5 Investigations will be treated as a fact-finding discovery and not as an accusation in itself. The outcome of the investigation may conclude that there is no violation of the Cohance Code. All parties should cooperate with the investigation process, without compromising their self-incrimination privileges under applicable laws.
- 3.6 Associate raising the concern will be required to provide below mentioned information:
  - Nature of concern;
  - Name of person against whom the concern is raised;

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- Location or business unit related to the concern;
- Details of the concern;
- Period during which concern occurred, including specific dates and times of the violation;
- Necessary supporting evidences/ proofs, if any;
- Contact details.

In case complete details are not available, concern can still be raised with the available information.

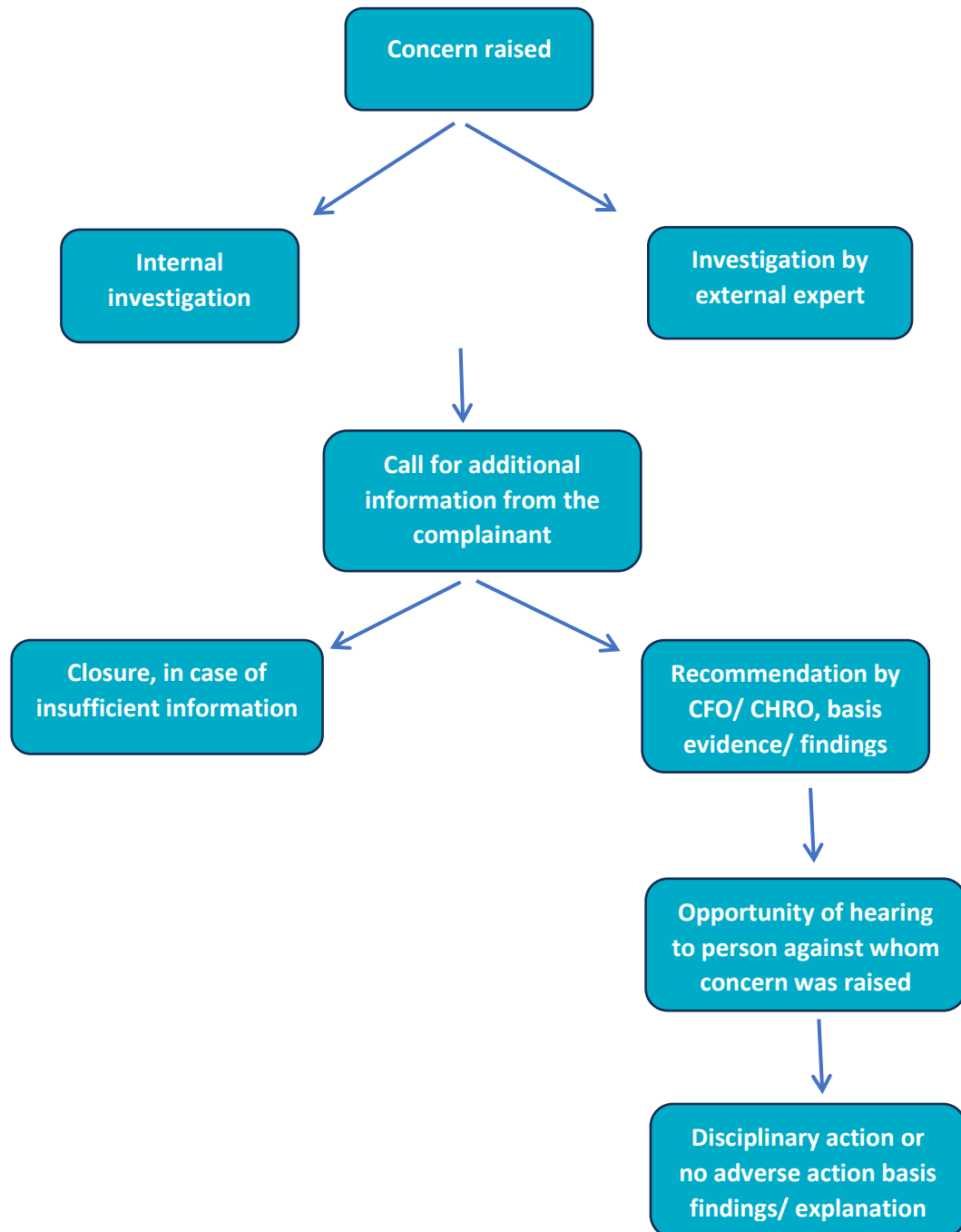
### 3.7 Raising a concern

- Associate can raise concern through either of the following channels:
  - Email: [whistleblower@cohance.com](mailto:whistleblower@cohance.com)
  - Written complaint to: Chief Financial Officer (“CFO”) or Chief Human Resources Officer (“CHRO”), Cohance Lifesciences Limited, 202, A Wing, Galaxy Towers, Plot No 1, Hyderabad Knowledge City, TSIC Raidurg, Hyderabad, Telangana, India, 500081.
- In case of any concern is pertaining to any director or senior management personnel of the Company, then the Whistle Blower can address the concern to the Chairperson of the Audit Committee. The relevant contact details are:
  - Email: [chairman.auditcommittee@cohance.com](mailto:chairman.auditcommittee@cohance.com)
  - Written complaint to: Chairperson of Audit Committee, Cohance Lifesciences Limited, 202, A Wing, Galaxy Towers, Plot No 1, Hyderabad Knowledge City, TSIC Raidurg, Hyderabad, Telangana, India, 500081.
- The Whistle Blower shall have the right to access the Chairman of the Audit Committee directly in appropriate or exceptional cases and the Chairman of the Audit Committee is authorized to prescribe suitable directions in this regard, as may be deemed fit.
- Any past employee/ third party needs to raise concern within a period of 3 months from the termination of their association with the Company. On a case-to-case basis, CFO or CHRO is authorised to decide to take up any reported concern for investigation, even the same is reported beyond the period mentioned.
- Associate may choose to remain anonymous, wherever allowed by local laws. However, Associate is encouraged to identify self, as doing so can help resolve the situation, especially if there is a need to follow up for additional information. Every reasonable effort will be made to keep the identity of the complainant confidential.
- If any person other than Audit Committee Chairman or CFO or CHRO receives a concern made by any complainant, then the same must be forwarded to the CFO or CHRO without fail. In such cases, appropriate care must be taken to ensure the confidentiality of Complainant.

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### 4. Dealing with the reported Concerns

4.1 Following process will be followed in dealing with reported concerns, as may be received by the Chairman of the Audit Committee or CFO or CHRO.



4.2 Based on preliminary facts available, CFO/ CHRO will decide to address the concern either by investigating internally or through external expert.

4.3 Complainants who identify themselves may be invited to provide leads and evidence (including circumstantial) to supplement information gathered in the course of investigation.

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- 4.4 The purpose of the investigation of a concern includes to determine if the specific allegations are substantiated by the available oral and documentary evidence, to identify areas of potential risks to the Company as a result of concern and to identify areas of business operations that may require improvement as a result of concern.
- 4.5 CFO/ CHRO at their discretion, may consider the concern closed if there are no specific details provided by the Complainant and there was no response from the Complainant for a reasonable period of time.
- 4.6 Based on findings supported by necessary evidence, appropriate recommendations will be finalized by CFO/ CHRO after consultation with the Chairman.
- 4.7 Person against whom the concern is raised shall be provided with a reasonable opportunity of being heard, before taking any disciplinary action in this regard.

### 5. Confidentiality and retention of documents

The identity of the Complainant shall be kept confidential to the extent possible and permitted under law. However, there may be circumstances where the identity may become known for reasons outside the control of the Audit Committee Chairman/ CFO/ CHRO.

All the documents received from the Complainant and evidence obtained during the investigation and the report shall be kept confidential and retained in accordance with applicable laws, unless disclosure is mandated by a court order or is otherwise necessary to comply with the requirements of applicable laws.

### 6. False reporting

If at any time, it is found that the concern was raised with mala-fide intent, then the person reporting it will be subjected to disciplinary action, that may even include termination of employment of an Associate or termination of association with a party. This Policy does not shield individuals from disciplinary measures if they make false or baseless allegations knowingly or with malicious intent.

### 7. Non-retaliation

The Company ensures genuine Whistle Blowers are protected from any form of retaliation or unfair treatment as outlined in this Policy. The Company will not tolerate any retaliation against an employee or third party who in good faith raises concerns or who assists in an investigation of suspected wrongdoing, in line with the Company's Policy. Reporting "in good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

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## 8. Communication and training

Directors and employees shall be informed of the Policy, and the policy will also be placed on the website of the Company. HR department shall ensure adequate training to the employees and create awareness of the recourse available under this policy.

All employees and third parties acting on behalf of Cohance are responsible for adhering to the principles set out in this Policy. Employees and third parties acting on behalf of Cohance shall familiarize themselves with the Whistle Blower Policy and shall participate in all training sessions periodically conducted by the HR Team.

## 9. Reporting

CHRO will provide a summary of concerns handled under the Whistle Blower policy to the Audit Committee on a quarterly basis. The Audit Committee or the Chairman of the Audit Committee may seek additional information on the concerns handled and may order further investigation. Further, mechanism of concern handling under this policy will be overseen by the Audit Committee.

## 10. Amendment

This Policy shall be read in conjunction with the Code of Conduct and Business Ethics. In case of contradiction, the provisions of Code of Conduct and Business Ethics shall prevail over this Policy.

The Board of the Company reserves its right to amend or modify this Policy, at any time without assigning any reason whatsoever.

The provisions of this Policy would be subject to revision / amendment in accordance with the rules, regulations, notifications, etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

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*Whistle Blower Policy – Approved by the Board on March 23, 2020, as amended on November 12, 2025.*

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