

INTERNAL COMMUNICATION

WHISTLE BLOWER POLICY

Suven Pharmaceuticals Limited, being a responsible corporate entity, is committed to adopt best practices through the implementation of various policies under the regulatory framework of law. Whistle Blower Policy (WBP) is one such practice Suven has pressed into service to ensure integrity of its financial and technical information, which is relied upon by the stakeholders.

The vigil mechanism aims to provide a channel to the directors and employees to report genuine concerns about unethical behaviour of any employee of the Company who shall promptly report to the management/audit committee of the Company ("Audit Committee") when he/she becomes aware of any actual possible violation or an event of misconduct, fraud or act not in Company's interest.

The Whistle Blower's role is confined only to disclosure, and such disclosure will be appropriately dealt with and kept confidential by the Company Secretary or the Chairman of the Audit Committee, as the case may be. The company has zero tolerance levels for any victimization/retaliation against any Whistle Blower. The policy disqualifies the Whistle Blower if he/she makes any false or bogus allegations with mala fide intentions, who would, by virtue of this, eventually lose the protection under the policy

The Policy is in addition to the Code of Conduct for the Directors and Senior Management Team. It covers disclosures of any unethical, Improper behaviour or malpractices and events, which have taken place or suspected to have taken place involving:

- i. Breach of Company's code of conduct
- ii. Breach of business integrity and ethics
- iii. Breach of terms and conditions of employment and rules thereof
- iv. Financial irregularities including fraud or suspected fraud.
- v. Forgery, falsification, or alteration of documents
- vi. Gross willful negligence causing substantial and specific danger to the health, safety and environment.
- vii. Manipulation of Company's data and records including computer files/data
- viii. Perforation of confidential/proprietary information



- ix. Deliberate violation of law/regulation
- x. Gross wastage/ misappropriation of Company's funds and/or assets and/or resources
- xi. Any incidence of harassment of any employee of the company based on caste, color, creed, religion, faith, disability, sexual orientation, national origin, age, marital status, sex, veteran or citizenship or other characteristics protected by law
- xii. Instances of leak of Unpublished Price Sensitive Information (UPSI)
- xiii. Any other unethical or improper conduct.

All Disclosures should be in writing and addressed to the Chairman of the Audit Committee through the Company Secretary of the Company. It can be emailed to wbm@suvanpharm.com. The information that is speculative in nature will be ignored.

All Protected Disclosure under this Policy will be recorded and thoroughly investigated. The Vigilance & Integrity Officer will carry out an investigation either himself/herself or by involving any other officer of the Company at the advice of the Integrity Committee or through an outside agency before presenting report of the matter to the Integrity Committee.


CHIEF EXECUTIVE OFFICER

