

Sent
Subject:
Attachments:

Wednesday, April 17, 2019 8:30 AM
Updated Global Whistle Blower Policy | Effective 1 April 2019
Global Whistle Blower Policy.pdf



Dear Colleagues,

Sun Pharma has a Global Whistle Blower Policy ("Policy") to enable employees raise concern against any malpractice like immoral and unethical conduct, fraud, corruption, potential infractions of the Global Code of Conduct, breaches of copyright or patent, etc. This Policy outlines the reporting procedure and investigation mechanism to be followed in case an employee blows the whistle of any wrong-doing within the Company.

The Board of Directors of Sun Pharmaceutical Industries Ltd., at its meeting held on 12/02/2019 had taken a decision to amend the Policy for changing the web portal address for reporting whistle blower complaints. The amended Policy also stipulates that any unauthorized disclosure or leak, by any person, of Unpublished Price Sensitive Information (as defined under the SEBI (Prohibition of Insider Trading) Regulations 2015), and the Company's 'Code of Internal Procedures and Code of Conduct for Prevention of Insider Trading' as amended/updated and for the time being in force, as an additional reportable criteria.

Through this Policy, the organization is seeking to provide a procedure for all employees across the globe to disclose any unethical and improper practices for appropriate action and reporting. All our employees have the responsibility to support the organization's commitment towards conducting its business by adopting the highest standards of professional integrity and ethical behaviour. The organization's Global Code of Conduct directs the employees to uphold the organizational values and urges them to conduct business worldwide with integrity and highest ethical standards. All employees are requested to:

- Familiarize themselves with the revised Global Whistle Blower Policy;
- Support the organization in preventing the occurrences of any practice not in compliance with the Code through the Whistle Blower Policy;
- Report violation of the Global Code of Conduct, such as business integrity, sexual harassment, rights to intellectual property, data protection, fraud, bribery or corruption, environmental issues, criminal activities, wastage/misappropriation of funds/assets, misleading or falsification of financial or other records, accounting or auditing matters, abuse of authority, unethical conduct affecting organization's interest/image, etc.

We look forward to your commitment against any violation while strengthening our business ethics and foundation. For any clarification or questions, please send an email to ashok.bhuta@sunpharma.com / rakesh.sinhal@sunpharma.com.

Best Regards,

Ashok I. Bhuta

&

Rakesh Sinha Sinha

Senior General Manager -Secretarial

Associate Vice President (Legal)

(See attached file: Global Whistle Blower Policy.pdf)