



**ALKEM LABORATORIES LTD.**

Regd. Office : ALKEM HOUSE, Senapati Bapat Marg,  
Lower Parel (West), Mumbai - 400 013, Maharashtra, India.

- Phone: +91-22-3982 9999 • Fax: 022-2495 2955
- Email: contact@alkem.com • Website: www.alkemlabs.com
- CIN: L00305MH1973PLC174201

11<sup>th</sup> April, 2022

To,

**Shri Daara Patel,**  
Secretary General,  
Indian Drug Manufacturer's Association  
102, A Wing, Poonam Chambers,  
Worli, Mumbai 400 018.

**Re: Your Email dated 5th April, 2022 and our letter dated 8<sup>th</sup> April, 2022 seeking clarification in the below subject matter**

**Sub: Illegal business activities by M/S Alkem Laboratories Limited-regarding.**

Dear Sir,

This is in continuation of our clarification vide letter dated 8<sup>th</sup> April, 2022 on the above subject.

We would like to clarify that we have since our incorporation followed an ethical code of conduct and have considerably invested in imparting ethical training to our marketing executives during their induction as well as routinely, to build a robust, strong and an ethical marketing team. We instill values of safety, equality, honesty, responsibility, respect, compassion, gratitude and adaptability amongst our employees. We foster diversity and ensure a free, safe, healthy and a violence free work environment. In all our training programmes including induction and regular training batches we extensively cover the values and Code of Ethics session where we extensively emphasize on Alkem's ethical Values and the Code of Conduct. Through continuous effort, we have created significant goodwill and reputation in the market. One of the presentation on Code of Ethics is enclosed herewith as '**Annexure A**'.

As indicated in our earlier letter of 8<sup>th</sup> April, 2022, we also have a robust Whistleblower Policy in place to look into any complaints and/or any unethical practices that are brought to our attention. The said Policy is also displayed on the official website of our Company. The purpose of the said Policy is to enable our employees and/or others to report any action or suspected action that is illegal, fraudulent and is in violation of any adopted policy of our Company and to build and strengthen a culture of transparency and trust within the organization.

In the event, an individual reasonably believes that a violation has occurred, the individual is encouraged to share his/her complaints to a person designated by our Company. In addition to the same, under exceptional circumstances where a complainant wants to complain directly to the Chairman of the Audit Committee he/she is entitled to do so.

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We encourage anyone reporting a violation to identify himself/herself in making a Report in order to facilitate the investigation of the violation, however, reports maybe submitted on a confidential basis by the Complainant or maybe submitted anonymously by filling out a reporting form. Thereafter, all reported violations are promptly investigated for causing appropriate corrective action to be taken if warranted by the investigation.

Further, our Annual Report also mentions the number of whistleblower complaints received, the nature of the complaints and the number of complaints that are resolved and/or remain pending. We also mention about our Whistleblower Policy in our Corporate Governance Report and our Boards Report, which in turn forms part of our Annual Report.

We would like to humbly submit that the allegations made in the present Complaint are vague, evasive, non-specific and are based on conjectures and surmises. We would also like to bring to your attention that the said Complaint is also devoid of any material particulars and has been made without any proof to substantiate the allegations mentioned therein. We would also like to state that it appears that the Complaint has been initiated with an objective to malign our reputation and goodwill and should be dismissed.

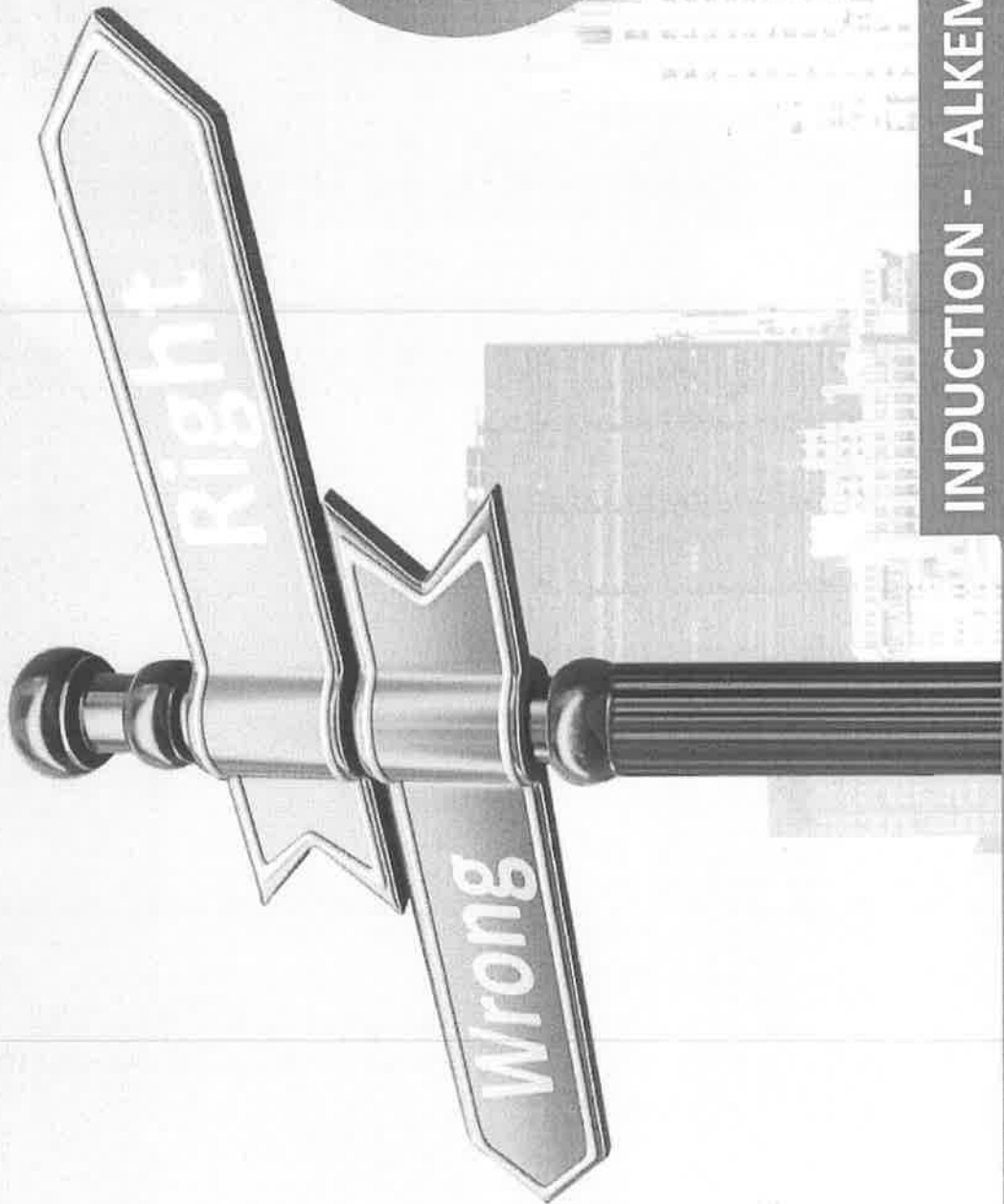
In view of the aforementioned, we request you to kindly present these facts to the Department of Pharmaceuticals, Ministry of Chemicals and Fertilizers accordingly.

Yours Faithfully,

Rajesh Dubey  
President Finance and CFO,  
Alkem Laboratories Ltd.

Place: Mumbai,

Date: 11<sup>th</sup> April, 2022



DOING  
WHAT'S  
RIGHT ...

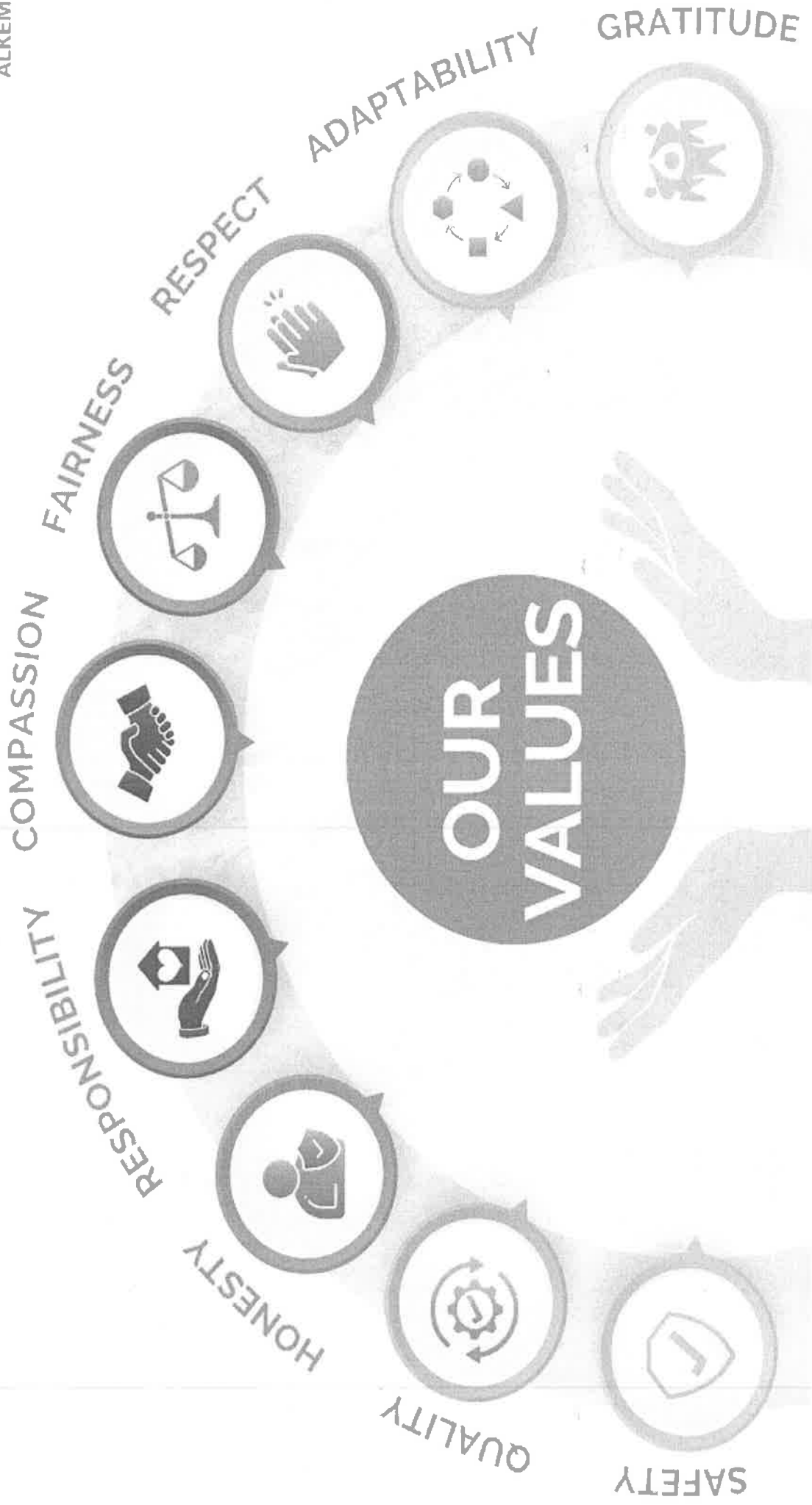
INDUCTION - ALKEM CODE OF ETHICS

“

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



## MANAGEMENT'S MESSAGE



# Our Values are at the core of who we are and how we act



**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

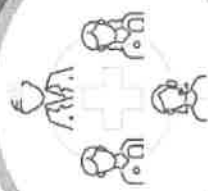
**Adaptability** of thinking and behaviour to meet the ever-changing conditions, taking care to act in harmony with nature to ensure progress and success in all endeavours

**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

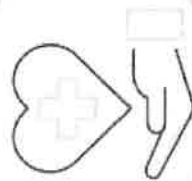
**Our Colleagues**



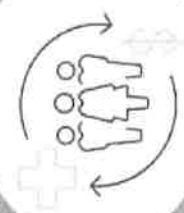
**Healthcare  
professionals,  
Regulatory  
Authorities  
& Industry**



**Our Assets**

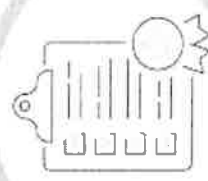


**Our Patients  
& Consumers**



**DOING WHAT'S RIGHT  
"ALKEM CODE OF ETHICS"  
FOR...**

**Our Suppliers,  
Channel  
Partners & Other  
Third Parties**



**Our Communities  
& the  
Wider World**



**Our Company &  
Shareholders**

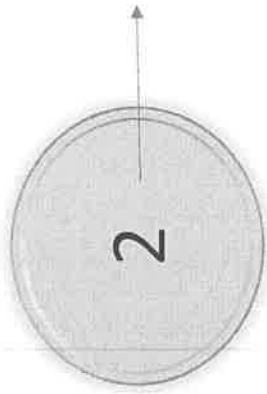




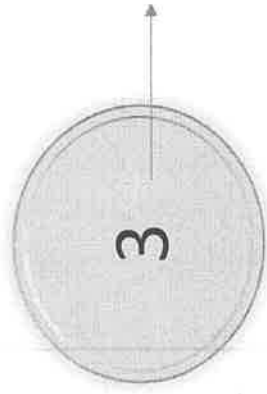
# KNOW YOUR RESPONSIBILITY



Our Code applies to all Alkem employees (permanent and contractual), Managers & Members of the board. We also expect our suppliers, Vendors, Agents, Consultants & other third Parties to hold themselves to similar standards when acting on Alkem's behalf.



Leaders and Managers at Alkem have the added responsibility of leading by example & ensuring that their team understands the requirements of the Code & 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.



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 after taking into consideration all relevant factors. Disciplinary actions may include termination of employment.



DOING WHAT'S RIGHT -

## ALKEM CODE OF ETHICS FOR PATIENTS AND CONSUMERS

To preserve the trust in Alkem products, we have an uncompromising commitment to...



### Product Quality & Safety

Committed to develop & manufacture high quality, safe products that promote good health & well-being



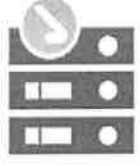
### Adhere to standards

Ensure compliance of regulatory requirements at all stages of the product life cycle



### Share Product details

Provide product information accurately & clearly



### Prevent Counterfeits

Prevent patient & customers from counterfeit medicines

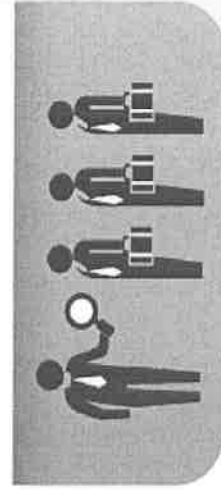


## DOING WHAT'S RIGHT - FOR OUR SUPPLIERS, CHANNEL PARTNERS & OTHER THIRD PARTIES

-Our relationships with our business partners must be based on lawful & fair practices...

### Fair Dealing

Treat everyone with whom we do business fairly & avoid situations that could create the appearance of bias or favouritism



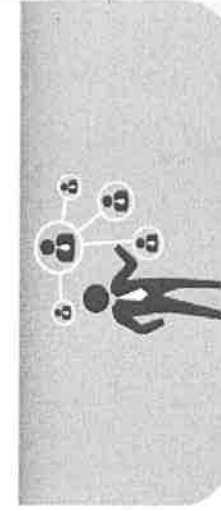
### Responsible sourcing

Follow the right procedures while dealing with business partners & work only with those who uphold Alkem's values & integrity standards



### Proper Communication

Ensure that right communication practices are followed when interacting with third parties





DOING WHAT'S RIGHT FOR  
HEALTHCARE PROFESSIONALS, REGULATORY AUTHORITIES & INDUSTRY



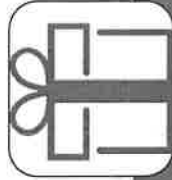
**RESPECT THE LAW**

Uphold the laws & regulatory requirements that govern our business



**FAIR MARKETING PRACTICES**

Compete vigorously but fairly & never use deception or misrepresentation or abuse confidential information to gain an unfair advantage over our competitors



**MODEST GIFTS ONLY**

Never allow gifts, entertainment or other personal benefits that undermines the integrity of business relationships



**PUBLIC POLICY ADVOCACY**

Unless you are authorised to do so, do not make any public statements on Alkem's behalf



**NO BRIBERY**

Refuse any offer or request for an unlawful payment and report the incident to the Company





DOING WHAT'S RIGHT FOR OUR COLLEAGUES

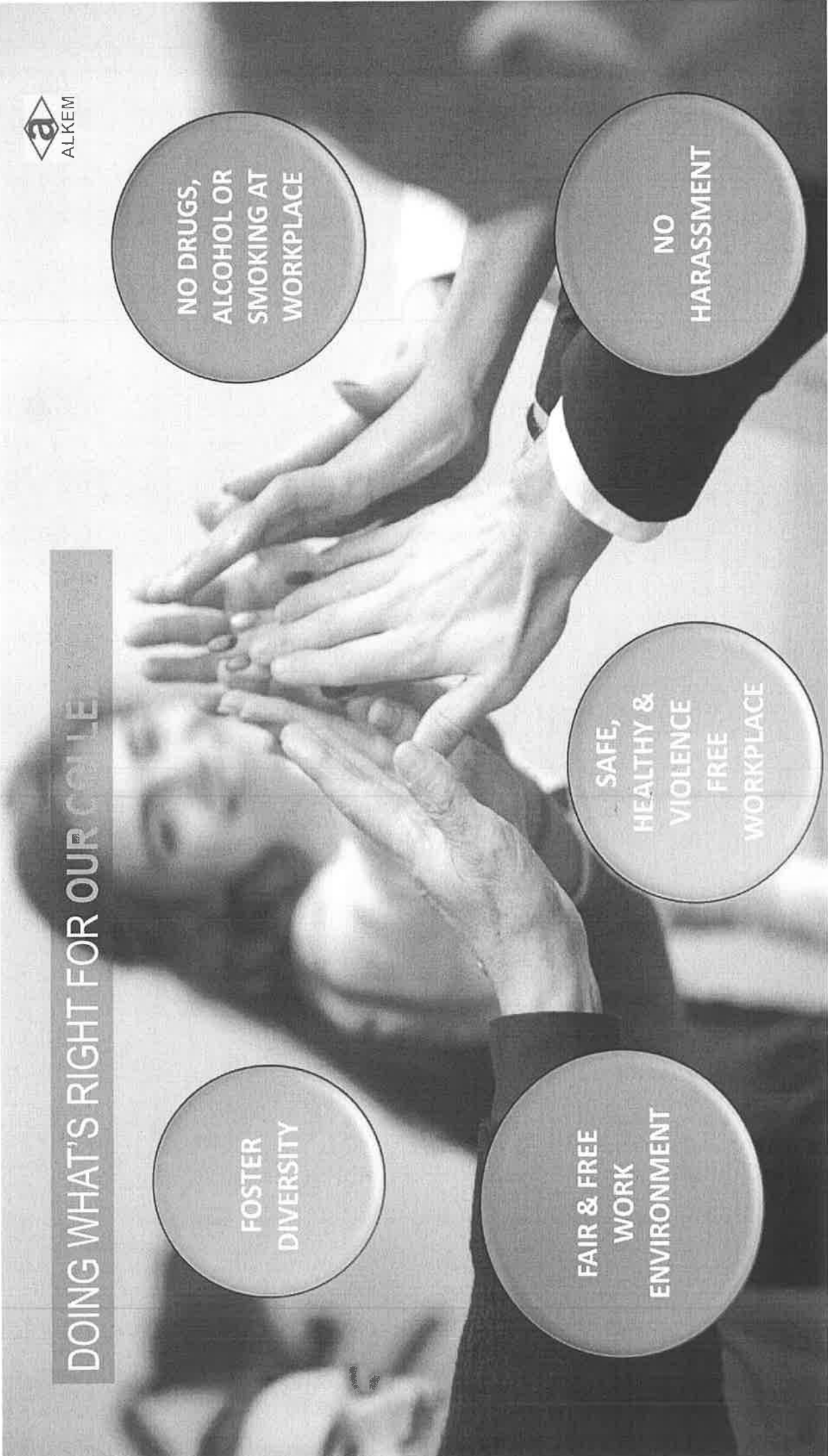
NO DRUGS,  
ALCOHOL OR  
SMOKING AT  
WORKPLACE

NO  
HARASSMENT

SAFE,  
HEALTHY &  
VIOLENCE  
FREE  
WORKPLACE

FOSTER  
DIVERSITY

FAIR & FREE  
WORK  
ENVIRONMENT



# AVOID CONFLICT OF INTEREST



A conflict of interest occurs when our personal activities, investments or associations compromises our judgement or ability to act in the Company's best interest.

Do not enter into situations in which your personal, or family interests may conflict with those of Alkem

# NO OUTSIDE EMPLOYMENT



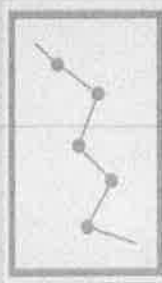
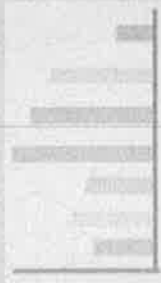
OUTSIDE

All employees are expected to devote their full attention to the business interests of the Company

Employees 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



OFFICE



"DOING WHAT'S RIGHT - ALKEM CODE OF ETHICS" FOR...

## PROPER USE OF INFORMATION TECHNOLOGY

- Protect your user ID's, passwords and PINs & do not share these with ANYONE as this may violate our data security requirements
- Only use authorized software, devices & procedures
- Do not install or download illegal or unauthorised programmes, software or data on company owned devices
- Use good judgement to ensure that personal use of company owned devices & network does not interfere with our work environment in anyway



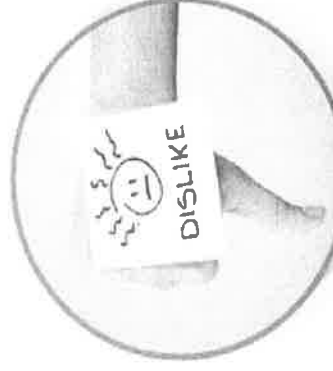
## USE OF SOCIAL MEDIA



Never share confidential information about the Company or speak on behalf of the Company unless expressly authorised to do so



Materials and opinions posted online will be regarded as your personal views and are not endorsed by the Company



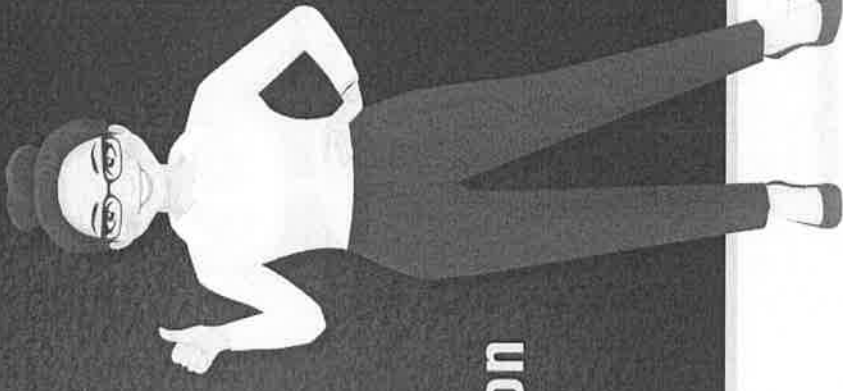
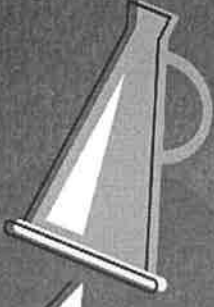
Do not post comments or pictures that could harm the Company's brand, reputation or commercial interests



Avoid any offensive or derogatory online content towards colleagues or business partners



Are you an  
**ALERT**  
Alkemite?



**If you come to know of any  
Unethical Practice or Integrity Violation  
Please report to :**

**[whistleblower@alkem.com](mailto:whistleblower@alkem.com)**

**Raising integrity violation or reporting misconduct is encouraged and will not be held against you and there will be no retaliatory action.**