 Lee Pharma Limited	LEE PHARMA LIMITED		
	Reg Office: SY. No. : 257 & 258/1, Door No : 11-6/56-C, Opp : IDPL Factory, Moosapet, Balanagar (Post), Hyderabad – 500 037, India		
	TITLE: Policy on Business Conduct & Ethics		
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1. Objective:

This Code of Business Conduct supports acceptance with legal requirements and our standard of business conduct. All employees including trainees are expected to read and understand this Code of Conduct, uphold the standards, comply with all applicable policies and procedures and ensure that our Contractors/Subcontractors/ Suppliers/ Vendors and other stakeholders are aware of, understand and follow these standards.

2. Applicability:

This policy is applicable to all the employees of all units of Lee Pharma Limited.

3. General Code of Conduct:

The Code of Business Conduct & Ethics sets forth legal & ethical standards that applies to all employees (full & part time) of Lee Pharma Limited. The Code is not intended to be inclusive and does not cover every conceivable situation an employee may encounter. For that, we place a high degree of trust in judgement and discretion of individual Employees and it is for the Employee concerned to decide what is right, including sense of when it is proper to seek guidance from others on the appropriate course of conduct.

This Code is a general statement of expectations from individual and business conduct. It is not intended to and does not in any way constitute an employment contract or assurance of continued employment and does not create any legal rights in any Employee, client, supplier, competitor, shareholder or any other person or entity.




3.1 Employees Responsibilities:


The term “Employee” in this policy means, employee who are on regular Lee Pharma rolls, contract employee who is on contractor payroll but working in Lee Pharma, consultants who are in consultation with Lee Pharma.

It is the responsibility of the employees to familiarize with the code of conduct, policies, and procedures of Lee Pharma and ensure compliance of these standards. Employees are obliged to report any deviations or violations. Reporting of deviations will not lead to any retaliation of any kind, as long as the same is made in good faith.

3.2 Compliance with Law:

As our organization Lee Pharma, strives to conduct business and comply with all

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applicable and local laws and regulations. Violation of law may subject individual and Company to various civil and criminal penalties and also it may lead to defamation of company. Therefore, it is advised that every employee should be familiarize with basic legal requirements that are applicable to his/her job. It is the responsibility of the employee to inform/intimate their managers in case of any clarifications, guidance or deviation.

3.3 Compliance at Lee Pharma Limited:

Compliance is a shared responsibility between Lee Pharma & Employees. Respective Functional Compliance Experts/Departmental Heads are responsible for ensuring compliance in their respective areas. They are responsible for implementing these principles, if necessary, through a more detailed manner in their team members.

3.4 Data Privacy:

We strongly believe in data privacy and data protection of all our stakeholders be it, customers, clients, suppliers, employees, and our organization. Data Privacy is one of our Core values and it is non-negotiable.


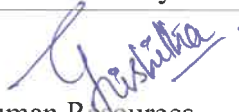

4. OUR COMMITMENT TO EACH OTHER AND TO LEE PHARMA:


4.1 Working Environment:

Lee Pharma provides a healthy working environment for all its employees irrespective of caste, creed, religion, region & gender. Managers and supervisors should make all decisions relating to employment relationship including hiring, training, promotion, compensation, transfers, layoffs and team member relationship without regard to gender, age, religious creed sexual orientation, racial background, pregnancy, regional, political affiliation or any preconceived notion.

4.2. Employee Privacy:

Lee Pharma collects and maintains all the personal information of employees for various purposes primarily relating to establishing and managing compensation & benefits employment relationships and human resource management. Generally, this information is kept confidential and privacy is maintained However in certain exigencies/business

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requirement Personal information would be shared to other units and to limited number of external parties for administration of benefits, business and legal purposes.

Company reserves the right to search the personal items or information placed in the company premises or placed or sent through company information and communication systems.

4.3 Information and Communication Systems:

Employees are responsible to use the information and communication systems responsibly and appropriately, including adhering to the IT policies and procedures. The information and communication systems should not be used for: 1.) Unlawful activities, 2.) Visiting internet sites that contains sexual content, 3) Visiting restricted sites/Apps during working hours, 4.) Political/ Religious/ Commercial purposes that interfere with employment or obligations to the organization 5.) Sending unsolicited electronic messages (spam) 6.) Using the systems that is disabling the employee's productivity 7.) taking unauthorized copies or usage of unauthorized software.

4.4 Protection of company's confidential information:

Employees are responsible for protection of all confidential information such as nonpublic information, intellectual property, and trade secrets. Non- Public information's shall include but not limited to price sensitive information, trade secrets such as know. — how, formulae, manufacturing practices, procedures, developmental or research information, customer and client lists, financial data, major contracts, marketing information, sales strategies and plans of any kind. Employees are not authorized to share any confidential information to third party unless with the consultation and approval from Managing Director (MD)/Director consent. This obligation shall continue for all employees even after of cessation of employment.




4.5 Authority to make business commitments:


Authority to make business or financial commitments shall be done only by Managing Director (MD) or by Director or by the concerned who would be designated from time to time in clear written delegation by Managing Director/Director.

5. OUR COMMITMENT TO OUR BUSINESS PARTNERS:

5.1 Fair dealing with customers and suppliers:

In dealing with business partners, employees are not expected to show any favor or preferences to

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any person or business. Employees should not let the interest of company influenced by personal or family interests.

LEE PHARMA is committed for free and fair competition and relies on high quality and competitiveness of its products. Employees are expected to conduct operations in accordance with these principles.

5.2 Gifting and entertainment:

LEE PHARMA discourages offer/receipt of gifts, entertainment, or payments by employees directly or indirectly from the parties conducting the business or seeking the business. It is the individual discretion to accept/offer in case of a courtesy and ensure that the gift is of minimal value (ex. calendar, diaries, greetings, or a lunch/dinner business meet).

5.3 Dealing with Government Officials:

Employees must understand and strictly comply with any applicable anti bribery legislation. Employees must not offer/promise or authorize any payment of money or inducements or anything of value to Government officials for the purpose of influencing any act or decision.

5.4 Government regulation for all our business:

Employees should follow all the Government regulations pertaining to manufacturing, labelling, marketing and sale of its products.

5.5 Government funded programs:




Employees must comply with all laws and regulations that apply to providers of products and services under government funded programs.


5.6 Government request for information and retention of records:

Employees are expected to cooperate with reasonable requests for information from government agencies and regulators. Employees are advised to consult respective Functional Heads/ Chairman/ MD before responding to any non-routine requests. Employees must comply with record retention or preservation requirements as required by various statutory and compliance norms.

5.7 Contributions to Political Parties:

Any political contribution must be lawful and approved by the Chairman/ Managing Director.

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Approvals shall not be made for affiliation or for inducement.

6. OUR COMMITMENT TO OUR STAKEHOLDERS:

6.1 Conflict of interest:

“Conflict of interest will occur whenever the prospect of direct or indirect personal gain may influence or appear to influence employee’s judgement or actions which could compromise the integrity, judgment or ability of the employee to fulfil his or her entrusted duty while discharging business actions for the company.”

Conflict of interest will arise even while dealing with the Company employees, Contractors/ Suppliers/ Vendors or any third party. Conflict of interest may also arise when an employee’s immediate family members act as an elected or nominated Government official or acts as a consultant or advisor to government agency or regulatory body. A few of conflict of interests & proposed resolution is enclosed at annex to this policy. However, in case of ambiguity the conflict can be resolved through reporting manager & HR.

6.2 Book keeping and records:




Accurate business records will fulfill the obligation of LEE PHARMA to provide full, fair, timely and understandable financial and other disclosures to comply with applicable accounting principles, laws and regulations. Employees must record all the information honestly and accurately. Employees are forbidden in altering or destroying the documents or records in response to an investigation or other lawful requests.


7. OUR COMMITMENT TO SOCIETY:

7.1 Environment, Health and Safety:

Employees should work to promote environmental care, increase understanding of environment issues and inculcate good environmental practices. Employees should comply with all legal requirements pertaining to environment.

LEE PHARMA is committed to all Environment, Health and Safety aspects in which it operates and ensures the health and safety of its employees, contractors, visitors and community.

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7.2 External communication through direct Media or social Media:

Employees are forbidden to communicate to media on behalf of the company. Only the designated management representatives are allowed or authorized to communicate to the media. Posting of any organizational information by employees on social sites is a willful violation of code of conduct and appropriate action would be taken against such cases. Employees are forbidden to post any information in social media platforms which could be detrimental to the reputation of the company.

7.3 Speaking in Public forums:

When employees speak in public forums on their personal views it should not leave any impression that it is representation of company’s commitment or view. It is responsibility of employee to ensure that company’s reputation is not at stake.

8.0 REPORTING OF VIOLATION OF CODE OF CONDUCT:

Non-compliance with this code may result in serious legal, safety, monetary and other similar consequences. Employees must be aware that failure to follow any legal requirement may result penalization from regulatory agencies, judicial action, shut down of facilities or loss of company’s reputation and loss of public trust.


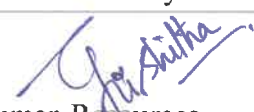
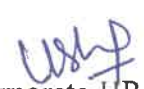
8.1 Disciplinary action would be initiated for


- Authorizing or participating in a violation
- Failing to report a violation or suspected violation.
- Refusing to cooperate with the investigation of a suspected violation.
- Retaliating against an individual who reported a suspected violation in good faith.

8.2 Duty to report and consequences:

Every employee has a duty to adhere to this code and all existing policies and procedures of LEE PHARMA and to report the suspected violations in accordance with the procedure stated in this code. We reiterate that this code not indented to be totally comprehensive and the organization therefore relies on its employees to exercise discretion and engage ethical conduct consistent with this code.

Employees should report any violation or potential violation of this code to their supervisors or managers. Supervisors or managers are supposed to escalate such violations to management.

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If employees are not comfortable in reporting to their managers or supervisors, they may report to their concerned HR Manager or directly inform Director/Managing Director/Chairman.

On the receipt of complaint, a committee shall be formed as advised by the Chairman/Managing Director and the case shall be investigated and corrective and preventive action shall be implemented.

During the process identity of complainant is kept confidential and he/she would not punish even if the compliant is proved wrong as the employee informed in the interest of the company.

9.0 MECHANISM TO CREATE AWARENESS ON THE CODE:


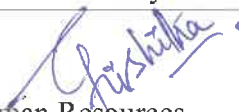

All the employees are encouraged to read the document during the time of joining and also refresh the same on annually basis and give their affirmation. Casual employees who do not understand English should be explained the contents of this policy by a nominated person who can communicate in the language they understand. An undertaking to that affect should be taken from casual employees and also the nominated translator. The sample format is enclosed at annex-C.


It is the responsibility of the Manager to educate their team members and take the consent of code.

10.0 ANNEXURE

10.1 Conflict of Interests – Annexure -A.

10.2 Code of Conduct Affirmation form in English - Annexure-B.

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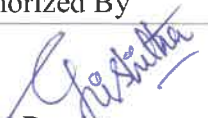

CONFLICTS OF INTERESTS


(Annexure-A)

High Risk Conflicts of Interest that Associates Must Avoid or that Must be Removed

Type of conflict	What must be avoided or removed
Outside engagements, including employment	<p>Employee must not have any kind of paid or unpaid engagement with</p> <ul style="list-style-type: none"> • A LEE PHARMA business partner or competitor unless specifically assigned by Management. • Any other person or company if that impact the LEE PHARMA business Objectives.
Gifts, Favors, travel, entertainment	<p>Employee must not directly or indirectly solicit or accept from any LEE PHARMA business partner or competitor.</p> <ul style="list-style-type: none"> • Cash or cash equivalents (e.g., stocks, gift certificates, discounts not based on a collective agreement, etc.); this includes actual and potential business partners or competitors. • Gifts: if a gift is received nonetheless, it must be returned if it influences or could be perceived as influencing the Employee's business judgment • Meals, travel, or entertainment, unless it predominantly meets a LEE PHARMA business purpose, is accompanied by a representative of the business providing it and does not influence (and cannot be perceived as influencing) the Associate's business judgment. Accepting entertainment of a non-ordinary, exceptional nature requires Manager approval
Fees, commissions, services, other favors	<p>Employee must not directly or indirectly.</p> <ul style="list-style-type: none"> • Solicit or receive a fee, commission, service, or other favor from any actual or potential LEE PHARMA business partner or competitor

Note: - For any guidance or clarification on the above, associate can contact HR Manager or his/her reporting Manager.

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LEE PHARMA LIMITED
CODE OF CONDUCT AFFIRMATION (Annex- B)
(Reference Policy No: LPHRGNP-015)

To
Managing Director,
Lee Pharma Limited
Sy.No.257 &258/1 Door No.11-6/56-C,
Opp: IDPL Factory, Moosapet,
Balanagar (Post), Hyderabad-500 037.

This is to acknowledge that I have received a copy of the Company’s Code of Business Conduct and Ethics.

I Understand that company is committed to a work environment free of discrimination, retaliation or harassment of employees who have reported violation or potential violation of Code of Business Conduct and Ethics to company.

I certify that I will not involve in violation of any of the principles set forth of in the Code of Business Conduct and Ethics nor I am aware of any such violations.

I further agree that if I have any concerns that are related to a violation or potential of the Code of Business Conduct and Ethics, I will immediately report the same to my supervisor or the Manager.

Signature: _____




Name: _____

Employee Code: _____

Designation: _____

Unit: _____

Date: _____

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