 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 Whistleblower		
	Policy No: LPHRGNP-17-00	Effective Date: 01-04-2025 Review Date: 31-03-2027	Page 1 of 5

1. Objective

Lee Pharma is dedicated to cultivating a workplace culture that encourages honest, transparent, and respectful communication. This policy outlines a clear and secure process for individuals to raise concerns in good faith with the management, and to seek resolution without fear of retaliation. It ensures that any instances of misconduct, policy violations, or non-compliance are addressed swiftly, fairly, and with the seriousness they warrant.

Definition: A **whistleblower** is an individual—typically an employee, director, or stakeholder—who reports suspected misconduct, unethical behavior, or legal violations within the organization. The disclosure is made in good faith and may be done confidentially or anonymously through designated channels.

2. Governance

Any revisions to this policy will be carefully tracked and documented for future reference. Changes will only be made following prior approval from the Compliance committee

The Compliance Officer will conduct periodic reviews and update the policy to reflect changes in applicable laws or regulatory notifications.

The Ethics Committee will oversee the implementation of this policy, regularly evaluating its relevance, adequacy, and effectiveness to ensure it continues to serve its intended purpose.

3. Applicability

This policy applies to all Associates, Board Members, employees, contractors, consultants, trainees, service providers of our Company and our subsidiaries, affiliates, group companies and persons or entities contractually obligated across the globe.




4. Scope


4.1 This policy covers reporting of any violation, wrongdoing or non-compliance, including without limitation, those relating to the Code of Conduct, policies and standard procedures.

The scope of policy also covers raising of any incident involving leak or suspected leak of unpublished price sensitive information or unethical use of UPSI in accordance with SEBI (Prohibition of Insider Trading) Regulations, including any amendment thereof.

4.2 This policy does not cover the following indicative but not exhaustive aspects:

- Compensation related issues like quantum of increments, bonus payouts, etc.

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 Human Resources	 Human Resources	 Director

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- Queries relating to deduction of tax from salary, etc.
- Inappropriate administration services e.g. quality of food, malfunctioning of phones, etc.
- Malfunctioning of information technology assets like laptop, printers, etc.
- Queries relating to job openings, internal transfers, etc.
- Recommendations to enhance operational efficiencies and/or strategy related decisions.

5. Policy Framework

5.1 At Lee Pharma, our Whistleblower Policy serves as a primary and effective channel for raising concerns.

We encourage all associates to speak up promptly so that any issue can be addressed in a timely and appropriate manner.

Lee Pharma is committed to maintaining confidentiality to the fullest extent possible, and any discussion related to a concern will be limited strictly to individuals who need to be involved.

5.2 Associates with management responsibilities 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 Lee Pharma'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 Ethics Committee promptly.

5.3 No individual, including those who are the subject of a whistleblower investigation, is permitted to interfere with the investigative process.

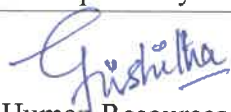

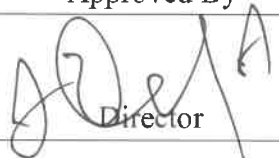
Any attempt to conceal, destroy, alter, or tamper with evidence or to influence, intimidate, or manipulate individuals involved in the investigation will result in disciplinary action, which may include termination of employment or business association.


Lee Pharma also ensures that employees assisting in investigations receive the same level of protection as whistleblowers, reinforcing our commitment to fairness and integrity.

5.4 All individuals involved in an investigation are expected to cooperate fully, while retaining their legal rights, including protection against self-incrimination under applicable laws.

Investigations are intended to uncover facts and should not be viewed as accusations or judgments.

It is possible that, upon completion of the investigation, no violation of Lee Pharma's Code of Conduct or internal policies may be found.

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6. Ethics Committee

The Ethics Committee shall be a cross-functional body responsible for overseeing the implementation, monitoring, and enforcement of the Whistleblower Policy. The committee will ensure impartiality, confidentiality, and timely resolution of all reported concerns.

7. Reporting Channels

You can convey your Concerns through either of the following channels:

Written complaint to: hrd@leepharma.com

In case of any disclosures pertaining to members of the Ethics Committee, a member of the Board of Directors of the Company, the Whistle-Blower shall address the Chairperson of the Audit Committee. The relevant contact details are:

Written complaint to: hrd@leepharma.com

8. Dealing with the reported concerns

8.1 If Whistle-Blower chooses to express his / her Concern, he / she may disclose his / her identity. The Whistle-Blower must disclose:

- Associates or group of Associates against whom he / she has a concern; and
- Nature of Concern




8.2 Lee Pharma's Ethics Committee is a multidisciplinary body responsible for overseeing the whistleblower framework, ensuring impartial handling of concerns, and upholding the principles of transparency and integrity.


The committee shall include senior representatives from Compliance, Human Resources, Legal, Internal Audit, and relevant business units.

The Compliance Officer will serve as the Chairperson, supported by the Head of HR, Legal Counsel, and Internal Audit Lead. A rotating member from a business function may be included to provide contextual insights.

Where necessary, an independent advisor or external expert may be invited to ensure neutrality and strengthen the credibility of the process.

8.3 If a concern is raised against a member of the Ethics Committee, that individual must immediately step aside from all involvement in the investigation. The remaining committee members will carry out the

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8.3 If a concern is raised against a member of the Ethics Committee, that individual must immediately step aside from all involvement in the investigation. The remaining committee members will carry out the inquiry independently to ensure impartiality and integrity throughout the process. This approach safeguards the fairness of the investigation and maintains trust in the whistleblower framework.

8.4 Ethics Committee Member(s) meet at regular intervals to discuss and assess the nature and gravity of Concern(s) and document the minutes of such discussions for future reference.

8.5 Whistle-Blower should co-operate during investigation and thereafter, whenever called-upon by Ethics Committee. Ethics Committee shall ensure that such interactions are at a minimum to avoid harassment.

8.6 Members of the Ethics Committee are expected to make every effort to complete the investigation within 90 days from the date a concern is received.

A detailed report should be prepared, which includes the original concern raised by the whistleblower, records of the investigation maintained in coordination with relevant stakeholders, and a summary of findings, recommended actions, responsible individuals, and timelines for implementation.

8.7 Ethics Committee may communicate the results of investigation to the Whistle-Blower after completion of Investigation. Ethics Committee may keep Whistle-Blower informed about the development(s) of the Investigation.




8.8 Ethics Committee should also ensure that recommended actions are implemented.


8.9 Respective Business Heads, depending on the nature of Concern(s) or complaint(s) should extend their co-operation to Ethics Committee whenever required.

8.10 If a concern is raised against a member of the Ethics Committee, that individual must immediately withdraw from participating in the investigation related to that concern.

The remaining committee members will proceed independently with the inquiry to ensure impartiality and maintain the integrity of the process until the matter is fully resolved.

8.11 Ethics Committee shall maintain complete confidentiality of Whistle-Blower and protect him / her from retaliation during investigation and thereafter.

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9. Whistle-Blower Retaliation

Retaliation against a whistleblower refers to any adverse action taken in response to a protected disclosure. Such actions may negatively impact the individual who raised the concern and are strictly prohibited under Lee Pharma's Whistleblower Policy.

Retaliation against any Whistle-Blower who raises a concern or reports misconduct is strictly prohibited. In case of any retaliation against raising a concern in good faith, you should contact the Ethics Committee immediately.

If any individual regardless of their position within Lee Pharma engages in retaliatory behavior against a whistleblower, appropriate disciplinary action will be taken.

This applies even if the concern raised by the whistleblower is later found to be incorrect, provided it was reported in good faith.

Lee Pharma is committed to protecting those who speak up responsibly and ensuring a safe environment for ethical reporting.

10. False Reporting

If it is found that a concern was raised with dishonest intent or malicious motives, the individual responsible may face disciplinary action.

This could include termination of employment or ending any professional association with Lee Pharma, depending on the severity of the misconduct.

The company maintains a zero-tolerance stance toward misuse of the whistleblower framework.

11. Reporting

A report on complaints received under this Policy is periodically reviewed by the Audit Committee.




12. Record Retention

All documents generated or received during the reporting, investigation, and resolution of concerns under this policy will be retained in accordance with Lee Pharma's data retention guidelines and applicable legal or regulatory requirements.

This ensures proper documentation, accountability, and compliance with relevant standards.

13. Exceptions

All exceptions to this policy must be approved by Ethics Committee.

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