

Whistleblowing Policy

1. Purpose and Objective

We are committed to conducting our business with honesty and integrity and we expect all of our Employees and Business Partners of Glenmark, to work to the same high standards, as set out by our Values, the Glenmark Code of Conduct and the Glenmark Way.

Living our values is one of the governing principles of delivering long term, sustainable and compliant growth.

This policy is intended to encourage internal reporting of misconduct or unethical behaviour through appropriate channels so that the matter in question can be investigated promptly and any finding of poor behaviour addressed and remedied.

This policy supports those who raise concerns in good faith and provides provision to safeguard genuine reporters, including a commitment to respecting confidentiality (as long as local laws allow).

This policy will tell you what to do if you have a concern to raise, how to report it and what will happen once you have raised a report.



2. Who does this policy apply to?

This policy is global in scope and applies to all Employees of Glenmark Pharmaceuticals Limited, its subsidiaries, affiliates, successors, assigns and representatives (“Glenmark”) worldwide, and Business Partners engaged in activities with Glenmark. This policy does not apply to Ichnos Sciences Inc., USA, or its subsidiaries.

3. How to raise a concern? – Available Reporting Channels

At Glenmark there are a number of ways in which you could raise a concern. You could:

- Tell your manager, or if you can't do this
- Tell a different manager who you trust, or
- Tell your HR representative,
- Tell your Compliance Officer

If you feel unable to do any of those, then Glenmark would still like to hear your concern and you can use the Confidential Reporting Line – EthicsLine.

Please note, if you are a manager who has a concern raised to you, then you should in turn raise it with your HR representative, Compliance Officer or through the confidential reporting line.

EthicsLine is a secure, toll free, Reporting Line available in multiple languages. EthicsLine is managed by an independent third- party service provider and you can report both confidentially and anonymously if you wish to (as long as your local laws allow). You can find the telephone numbers for your country at <http://glenmark.ethicspoint.com> or on the posters that are displayed in your workplace. You can also make a report online using the EthicsLine Web Portal using the same link, if you prefer.

Notwithstanding the aforesaid, concerns can also be raised in one of the following ways:

- by contacting the Legal Department at GlobalCompliance@glenmarkpharma.com, or
- by contacting the Chairman of the Audit Committee at chairaudit@glenmarkpharma.com,
- by sending a complaint letter in a sealed envelope marked “Private and Confidential” to the Chairman of the Audit Committee at below address:

Chairman of the Audit Committee,
Glenmark Pharmaceuticals Limited,
Glenmark House, B.D. Sawant Marg,
Chakala, Andheri - East,
Mumbai- 400099,
India.

4. What happens after you raise a concern?

4.1 Investigation

All concerns raised are looked into independently, and taken seriously, and carried out in line with our principles of investigation – that they are: Proportionate, Fair, Robust, Legal and Drive Continuous Improvement.

You will be informed when the matter has been concluded, if you wish to know, where possible, the outcome will be shared.

4.2 Sanctions, Process improvements CAPAs as may be required

Where an investigation makes findings that require further action, such as a breach of policy or process, then appropriate action will be taken which can include disciplinary action, recommendations to improve processes or other corrective actions. Any actions that are implemented will be in line with our policies and local law.

5. Safeguarding Reporters raising concerns

Glenmark wants you to be able to raise concerns without fear of others treating you badly for doing so. Glenmark will not tolerate, and expressly prohibits, treating negatively any person who makes a report in good faith.

If you think that this has happened to you then please raise the matter as detailed in the How to raise a concern section. Reports of negative treatment will be fully investigated.

Anyone who behaves negatively against someone who has reported a concern in good faith will be subject to corrective action by Glenmark, up to and including disciplinary action such as termination of employment or contract.

Anyone who intentionally makes a malicious report using this process, which they know is false will be subject to investigation and appropriate action will be taken, including disciplinary action.

6. Definitions

Employees: all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, and agents, or any other person associated with the Glenmark, wherever located.

Business Partners: any individuals, companies, associations, partnerships, or other entities retained to act on behalf of or for the benefit of Glenmark. The term includes, but is not limited to agents, consultants, lobbyists, suppliers, distributors, resellers and their employees

“Audit Committee” means the committee constituted by the Company in accordance with Section 177 of the Companies Act, 2013 in India.