

CADILA PHARMACEUTICALS
LTD.

COMPLIANCE COMMITTEE

A separate committee has been constituted to investigate and resolve all reported complaints and allegations concerning dishonest behaviour/misconduct/wilful negligence/ violation of professional conduct or suspected misconduct/violations of legal or regulatory requirements, incorrect or misrepresentation of financial statements, reports etc.

The CPL Compliance Committee comprises following members:

- Chairman of the Audit Committee
- Executive Director
- Company Secretary
- Head of HR
- Head of Finance & Accounts
- Head of Security & Admin
- Head of Legal

METHODOLOGY

On receipt of any complaint of dishonest behaviour/ misconduct/violation of professional conduct or suspected misconduct/ violations of legal or regulatory requirements, incorrect or misrepresentation of financial statements, reports etc within the organisation, the Committee will meet and appoint a special investigation team to initiate the investigation of the issue within two business days.

Consequent to the detailed investigation and corresponding report the committee may at its discretion; depending on the gravity of issue; initiate disciplinary proceedings which may lead to termination and/ or potential criminal prosecution.

ROLE OF INVESTIGATION TEAM

- Record all complaints received from employees and third parties on suspected incidents of fraud/misconduct/ dishonest behaviour.
- Conduct investigations to identify the facts / details about the reported incident and identify the perpetrator. A report will be prepared and put up to the committee for further directions.
- The investigation team will complete the investigation within 7 working days of initiation and present its report to the CPL Compliance Committee.
- Suggest corrective action and measures to prevent recurrence of such incidents.
- Will not divulge any information regarding the identity of the whistle blower.

SAFEGUARD TO WHISTLEBLOWER

1. Complete anonymity shall be maintained for the person reporting the misconduct/ violation of professional conduct or suspected misconduct/ violations.
2. No employee who in good faith reports a violation/ misconduct shall suffer harassment, retaliation or adverse employment consequence.
3. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action upto and including termination of employment.

4. Allegations that are found to be fabricated, malicious and devoid of any merits shall be viewed seriously.

Appendix: Scope of Activities Covered

1. Misappropriation of assets
2. Embezzlement of Money/ Assets
3. Pilferage
4. Financial fraud.
5. Espionage
6. Corruption - a breach of trust in the performance of official duties.
7. Taking Bribes
8. Insider Trading
9. Abuse of position
10. Disclosing confidential Information
11. Manipulation of Records
12. Inappropriate Relationships
13. Unethical/ Unbecoming behaviour
14. Biased decision-making - deliberate deception to help or conceal the fraud/violation
15. Any dishonest behaviour having serious implications for an agency's financial outcomes, human resources and community standing.