

ASTRAZENECA PHARMA INDIA LIMITED

WHISTLE- BLOWING POLICY AND PROCEDURES

Introduction

AstraZeneca Pharma India Limited is committed to the highest standards of moral and ethical integrity, transparency and propriety in its work. Towards this end, the company encourages employees and directors with bona fide concerns over core values, probity and integrity, legal compliance, violation of the AstraZeneca Code of Ethics or good SHE practices to come forward and express their bonafide concerns without fear of victimization, harassment or retribution. Section 177, The Companies Act, 2013 (“**the Act**”) of the Act read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 provides for establishment of a vigil mechanism and mandates that every listed company shall establish a vigil mechanism for their directors and employees to report their genuine concerns or grievances.

Regulation 4(2)(d)(iv) of the Listing Obligations and Disclosure Requirements (LODR) states that a listed entity shall devise an effective whistle blower mechanism enabling stakeholders, including individual employees and their representative bodies, to freely communicate their concerns about illegal or unethical practices. Regulation 46(2)(e) further requires the listed entity to disseminate the details of Whistle Blower Policy on its official website.

Aim and Scope

This policy aims to -:

- Provide avenues for employees, directors or its vendors and authorized third parties to raise serious concerns regarding ethical values, probity and integrity, legal compliance, violation of the AZ Code of Ethics or good SHE practices.
- enable employees to report instances of leak of unpublished price sensitive information
- Redress any harassment or victimization in work place including sexual harassment.
- Enable management to be informed at an early stage to take corrective action and avoid any complication at a later date
- Develop a culture of openness, accountability and total integrity.
- Reassure employees and directors that they would be fully protected from harassment or victimization for whistle blowing in good faith

Safeguards

The company will ensure the following safeguards to employees and directors making such disclosures provided –

- the disclosure is made bonafide and in good faith;
- the employee reasonably and bonafide believes that the information or allegations he / she discloses is substantially true and;
- the employee or whistle-blower is not acting for any personal gain

Prevention of harassment or victimization

The employee and directors would be protected against actions such as dismissal, demotion, disciplinary action or punishment or any form of harassment or victimisation, discrimination, bias, or other unfair employment practices directly or indirectly attributable to whistle-blowing. Any action as aforesaid or threat of any such action would be treated as a serious disciplinary offence and liable to serious disciplinary action.

Sexual harassment

In the case of any complaint of sexual harassment, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 will be followed.

Confidentiality

The company recognises that some individuals would wish to raise a concern in confidence. The Company will do its best to protect the identity of any employee who whistle-blow and wishes to remain anonymous as also the confidentiality of the concern raised in confidence.

Reckless / Irresponsible Allegations

Investigations are costly, time-consuming and potentially damaging events and the company will not encourage allegations that are reckless, irresponsible, malicious or where made for ulterior purposes. In case of repeated frivolous complaints being filed by a director or an employee, the Company may take suitable action against the concerned director or employee including reprimand.

Procedure for handling Whistle Blowing incidents:

The Company would investigate any such reported incident and take appropriate action and the Company and/or the auditors of the Company shall make the necessary disclosures as required in the Act and the Listing Obligations and Disclosure Requirements.

Procedures for raising concern:

The company offers the employee and directors multiple options to raise and get answers to questions about integrity issues and to raise any concerns about what might be a violation:

1. Locally	Consider contacting - the line manager or any other Senior Manager within AstraZeneca Pharma India Limited. - Head - HR - Head – Legal - Head - Compliance - Company Secretary - The Managing Director - Chairman, Audit Committee.
2. Contact the Code of Ethics Confidential Helpline	At www.azethics.com .
3. Contact Global Compliance	At globalcompliance@astrazeneca.com

Power to Amend:

The Company shall have the power to amend the Policy in light of changes/ amendments in the Act and LODR and or other statutory provisions as maybe be notified from time to time.

Revision History:

Version 2.0	15 th June 2021	Submitted for reapproval without changes for ensuring relevance
Version 1.0 April 2019		
a) Addition of listing requirements in Introduction		
b) Addition of third party and vendor in the “aim and scope” section of this policy		
c) Addition of disclosure requirements in “procedure for handling whistle blowing incident” section		
d) Addition of the “power to amend” clause in the policy		
e) Addition of reporting of leak of price sensitive information		
f) Introduced Versions for ease of reference		

Approved by: Gagan Singh
(Managing Director)

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Gagan Singh
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