Code of Conduct of Jubilant Generics Limited

August 2021

Code of Conduct

Message from the Chairmen

Jubilant Bhartia Group is committed to highest standards of Corporate Governance and Ethical Practices. To achieve this objective, the group has established various policies and procedures. Our Promise of 'Caring, Sharing, Growing' and Our Values - Inspire Confidence, Always Stretch, Nurture Innovation and Excellent Quality are the building blocks of our group's philosophy and culture.

We believe that there is only one way of doing business – the ethical way. For us, values & ethics are non-negotiable. The group has established a corporate Ombudsperson office, proactively, so that all stakeholders can have the opportunity to voice concerns, resolve issues effectively and help do our business in a way consistent with our values, ideals and policies.

We believe our culture plays an important role and that doing the right things consistently defines us as who we are. Our updated "**code of conduct**" represents our promises, our values and our commitment.

With the expanding global footprint of our business across different geographies, we are mindful of the differences in the regulatory and statutory requirements of the geographies that we operate in. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activity. Employees should seek guidance when they are in doubt about the proper course of action in a given situation.

At Jubilant, it is the responsibility of all employees to adhere to the code and to follow it in letter and spirit. We ask each one of you to read, understand and practice the code of conduct and play an active role in making Jubilant the most ethical Company. We encourage you to live by our Values, at all times and we rely on your personal commitment to protect and enhance the reputation of Jubilant.

Shyam S Bhartia
Founder & Chairman

Hari S Bhartia
Founder & Co-Chairman

CODE OF CONDUCT

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** Disclaimer: This Code acts as guideline for all the employees of Jubilant Generics Limited and is to be used strictly for internal circulation only.*

CODE OF CONDUCT

1. PREAMBLE

Jubilant Generics Limited (the **"Company")** is committed to creating and nurturing a work environment that promotes transparent business practices in accordance with the statutory and regulatory requirements. The Company works towards enabling an atmosphere wherein employees treat their colleagues, business partners, and all stakeholders with respect, courtesy, honesty, ethically, and with fairness. The Company encourages diversity, and appreciates the differences in values, beliefs, cultures and religions, gender and ethnicity.

The Company discourages situations and behaviors which can be construed as intimidating, disrespectful or condescending towards their colleagues and is outside the moral, ethical and legal purview**.**

2. OBJECTIVE

The Code of Conduct (henceforth referred to as the "**Code**") has been designed to:

a) provide guidelines to all Employees of the Company regarding their conduct and actions during the employment.

b) ensure that Employees adhere to the statutory and regulatory requirements across the geographies/ locations we operate in.

c) establish and define the acceptable standards of behavior and conduct for Employees when dealing with any stakeholder, including government, on behalf of the Company.

d) enable Employees to actively create and foster a work environment, which promotes fairness, integrity and transparency in all interactions with suppliers, vendors, business partners, employees and the community at large.

3. EFFECTIVE DATE OF POLICY

This version of the policy supersedes all earlier versions and associated documents and stands effective from 1st August 2021

4. APPLICABILITY OF THE CODE

This Code is applicable to the Company and all its subsidiary / associate / joint venture companies. This Code is applicable to all employees, employees who are Directors, Officers or workers of the Company on full-time or part-time employment with the Company, whether unionized or non-unionized, in permanent, probationary, trainee, retainer, temporary or contractual appointments ("**Employees")**

It is expected that all the Employees will follow this Code in letter and spirit.

For Senior Management of the Company, a separate Code of Conduct has also been implemented in compliance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

5. SCOPE AND COVERAGE OF THIS CODE

5.1. PROMOTING A SAFE AND PRODUCTIVE WORKPLACE

a) Fair Treatment and Diversity

The Co`mpany is committed to provide fair treatment to all Employees and build a diverse yet inclusive workplace that is representative of the marketplace and the communities in which the Company operates.

b) Free of Discrimination or Harrassment

(i) The Company is committed to ensuring that the workplace is free from all forms of discrimination. Employees must respect the rights of all individuals and treat them in all aspect of employment, consistent with applicable laws, (with and outside the Company) on the basis of their ability and with respect. Employees shall do this irrespective of nationality, race, caste, creed, age, differently abled, religion, gender or sexual orientation (LGBT) in a manner that self-esteem and dignity are maintained at all times. No one shall discriminate or unfairly treat a medical condition person (for e.g.HIV-affected) on any ground.

(ii) The Company is committed to a gender friendly workplace and it seeks to prevent/stop/redress sexual harassment at the workplace and institute good employment practices. Employees shall be bound by the “Prevention of Sexual Harassment at Workplace” (POSH) policy

(iii) Employees are advised to abstain from conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on grounds of racial identification or particular religious beliefs.

(iv) Employees are expected to not engage in bullying. Bullying is unreasonable behavior that is directed against an individual or group by another individual or group and is derived from the misuse of power. This may include:

i. Verbal abuse, shouting
ii. Mental abuse through actions (e.g. excluding or isolating behaviour)
iii. Deliberately withholding information vital for effective work performance
iv. Giving employees impossible assignments
v. Physical abuse

c) Personal Conduct

(i) Employees are expected to act in accordance with the highest standards of personal and professional integrity, independence, honesty and ethical conduct including use of utmost care and sound judgement in good faith while making business decisions.

(ii) Business must be done through lawful, ethical and fair means and must bring about a reputation of ethical business dealings by the Company. There shall be no room for discrimination, harassment, retaliation or any

form of corruption and/or conduct that is likely to bring discredit to the Company. Every Employee shall ensure, at all times, the integrity of data or information furnished by him/her to the Company.

(iii) Employees are expected to be punctual & regular in their attendance.

d) Dress Code

Employees' grooming and attire should reflect the high standards that the Company represents. While exercising personal judgment, every employee is expected to dress in accordance with accepted business practice (or other attire approved by the Company), avoiding extremes in clothing styles.

e) Health and Safety

The Company strives to provide a safe and healthy workplace. Each Employee is responsible for observing the laws, regulations and policies that relate to on-the-job health and safety. Should an Employee come across any unhealthy or unsafe practice, the same should be reported to their Reporting Manager/Supervisor and the concerned person at their location (for a swift redressal of the same).

f) Drugs, Alcohol and Weapons Use

Alcohol and drugs (including cannabis) have no place in the workplace and are inconsistent with a safe, conducive and productive work environment. Employees should not be under the influence of alcohol or other substances while they are at work functions.

Employees are prohibited from consuming alcohol or using, possessing or distributing drugs while working or operating within Company premises (including Company vehicles) or while engaging in the Company's business and activities.

There may be company-sponsored events where management approves the serving of alcoholic beverages. In these cases, all appropriate liquor laws must be followed, including laws regarding the prohibition of serving of alcohol to those under the legally permissible age. However, under all such cases, excessive drinking, intoxication and misbehavior at these events is prohibited and will be dealt with severely. The Company strictly prohibits drinking and driving as it poses a safety hazard.

The Company prohibits the possession and/or use of weapons by any Employee while at work, on Company premises or off-site while on Company business. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons in certain establishments.

g) Entertainment

In accordance with the Travel Policy of the Company, any expenses against Liquor, Cigarette, etc. shall not be borne by the Company while employees are on Official travel/ Duty except during Company – sponsored events, Employee Welfare and Engagement get-togethers, Business meetings and conferences.

5.2. JUBILANT BUSINESS CODE

a) Business Records and Communication

Employees shall create or maintain records, reports, and any other information and ensure the integrity and accuracy of such records, reports, and information, and shall never create a false or misleading record or report. All Employees must legibly record information accurately and completely, and ensure preservation in accordance with Company's requirements. Employees must also ensure that all reports to regulatory authorities are full, fair, accurate, timely and understandable and that the true nature of any transaction is never falsified or distorted.

This applies to written and electronic documents and communications of all kinds, including but not limited to texts, e-mail and "informal" notes or memoranda.This includes but is not limited to:

i. Financial statements and related accounting entries and adjustments;
ii. Expense reporting;
iii. Time reporting;
iv. Production and quality records; and,
v. Documents filed with or submitted to government or regulatory agencies;
vi. Environment, Health and Safety (EHS) / Environmental Social and Corporate Governance (ESG) records

b) Financial Integrity

All Employees shall ensure and display financial integrity standards by way of:

i. Recording all financial transactions accurately to permit timely preparation of financial statements.
ii. Following the Company's internal control procedures, delegation of authority and other defined standard operating procedures;
iii. Avoiding undisclosed or unrecorded funds, payments, or receipts which are not in accordance with the Company's business practices.

c) Authority to Act on Behalf of the Company

The Company has delegated to certain members of management approval authority to act on its behalf. Employees must adhere to the limits of their authority to act on Company's behalf and not to take any action that exceed or circumvent such delegated power; unless specifically authorized to do so in writing. Signing of any document/agreements on behalf of the Company, or in any other way representing the Company, should be in exercise of such authority.

d) Company Assets

Employees are expected to use Company's assets only for legitimate business purposes and are prohibited from using Company's assets for personal gain, except in accordance with this Code or by specific permission.

These assets include tangible assets such as equipment and machinery, system facilities, materials and resources, as well as intangible assets such as

information technology and systems, proprietary information and intellectual property.

While using the Company's assets, the Employee shall take care that costs are reasonable and there is no wastage. Protecting the physical and intellectual assets of the Company is the responsibility of every Employee. Any suspected loss, misuse, theft, waste or carelessness should be reported to one's Reporting Manager/Supervisor or any other appropriate supervisor at their location.

e) External Communication with Media and Investors

To maintain and retain the Company's reputation and to ensure that information to media and investors is accurate and properly presented, only the Chairman or Co-Chairman and Managing Director or the designated representatives such as CEO or Group CFO / CFO of the respective entity would give interviews or make statements to media / investors.

Any Employee receiving requests for information from media, investors, analysts, brokers, or any external agency should promptly refer all such requests to Corporate Communications.

f) Conflict of Interest

(i) A conflict of interest can arise whenever an Employee acts in a manner, or participates in any transaction, relationship or situation, which conflicts with or may appear to conflict with the best interests of the Company. An employee shall always act in the interest of the company and ensure that any business or personal association which he /she may have does not involve a conflict of interest with the operations of the company and his / her role therein. An employee shall not engage in any business, relationship or activity which might conflict with the interest of company.

(ii) A conflict of interest, actual or potential, may arise in the following situations where, directly or indirectly

- An employee of the company engages in a business, relationship or activity with anyone who is party to a transaction with his / her company.
- An employee is in a position to derive an improper benefit, personally or to any of his / her relatives, by making or influencing decisions relating to any transaction.
- An independent judgment of the Company's interest cannot be exercised.

(iii) The main areas of such actual or potential conflicts of interest shall include the following:

- An employee of the company conducting business on behalf of his / her company or being in a position to influence a decision with regard to his / her company's business with a supplier or customer where his / her relative is a principal officer or representative resulting in a benefit to him / her or his / her relative.
- Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of the company, where the employee is in a position to influence decisions with regard to such benefits.

(iv) The interest of the company or the Group can be compromised or defeated.

- Notwithstanding such or any other instance of conflict of interest that exist due to historical reasons, adequate and full disclosure by concerned employees shall be made to the Company's management.
- It is also incumbent upon every employee to make a full disclosure of any interest which the employee's immediate family, including parents, spouse and children, may have in a family business or a company or firm that is a competitor, supplier, customer or distributor of the Comapny
- Upon a decision being taken in the matter, the Employee concerned shall be required to take necessary action, as advised, to resolve / avoid the conflict.
- If an employee fails to make the required disclosure and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the Employee, the management shall take a serious view of the matter and consider suitable disciplinary action against the employee.

(v) A conflict of interest may also arise in a situation that involves not only the Employee personally but also *Relatives of the Employees or someone (other than an Employee) who shares the Employee's home (For definiton of *Relatives, refer clause [**5.2 (p)]**

g) Concurrent Employment

(i) As per Employment Contract, no concurrent employment is allowed

(ii) An employee shall not, without the requisite official written approval of the Company, accept employment or a position of responsibility (such as a consultant or a director) with any other company, nor provide freelance services to anyone, with or without remuneration.

(iii) The above shall not apply to the following (whether for remuneration or otherwise):

- Nominations to the boards of Jubilant Bhartia Group companies, joint ventures or associate companies.
- Exceptional circumstances, as determined by the competent authority.

(iv) A written approval is also applicable for the directorship or positions of responsibility held by an employee, with or without remuneration, prior to joining Jubilant. In case, the Company does not approve the request, then the concerned employee will have to immediately resign from such position and intimate the Company in writing.

(v) The process of prior approval is as follows :

- For Employee (upto the level of Vice President) approval needs to be taken from the CEO and CEO in consultation with CHRO will take the decision.
- For Employee's above the level of Vice President, approval needs to be taken from Chairman/CCMD

h) External Engagements

An Employee wishing to undertake teaching or writing, or becoming a member in any industry association or body, or participating in any government forum, committee or panel as an honorary activity, or participating in any social organization, can do so only with prior approval, provided the Employee ensures that there is no interference with his / her work schedule and there is no conflict of interest or intellectual property protection issue. **The Process of Prior Approval mentioned in [5.2 (g-v)]**

i) Dealings at the Workplace

Every Employee has a responsibility to make decisions on their merit in consultation with the appropriate authority within the Company as per the delegation of authority. Employees must not use their official position to influence any person to enter into financial or other arrangements with them or with anyone else. Employees must not abuse their official position to obtain a benefit or business opportunity for self or for someone else, in financial or some other form. No Employee shall compete with the Company, and/or its subsidiaries.

j) Gifts and Donations

It is prohibited to receive from, or give gifts to third parties, having business relationship with the Company. However, Employees may accept and offer nominal gifts, which are customarily given and are of commemorative nature, but which do not have a value exceeding USD20 or INR1200. The total value of such gifts received in a fiscalyear should not exceed USD50 or INR3000.

k) Prohibition of Insider Trading

The Company has formulated a Code of Conduct for Prevention of Insider Trading, which needs to be complied with by certain employees, known as designated persons.

"**Designated Persons**" mean:

(i) Promoters, Directors, Key Managerial Personnel (KMP), Chief Executive Officers ('CEOs') and employees upto two levels below CEOs of the Company;

(ii) All employees of the Company of the rank of senior vice president and above, business heads, functional heads, plant heads and plant finance heads of the Company;

(iii) All employees of the Company in finance & accounts, secretarial, information technology, legal, taxation, management assurance, corporate communications, investor relations, financial planning & analysis and strategy & business development of the rank of manager and above located at the corporate office of the Company;

(iv) Directors, CEO(s)/ President(s), Business Heads, Chief Financial Officer(s) and Finance Heads of the subsidiary companies;

(v) Employees upto two levels below CEOs of material subsidiaries;

(vi) Secretaries and executive assistants of Chairman, Co-Chairman & Managing Director, Whole-time Director, KMP and CEO of the Company;

(vii) Any other person as identified and notified by the Co-Chairman & Managing Director in consultation with the Compliance Officer from time to time.

l) Protection of Trade Secrets and Confidential Information

(i) The Company's trade secrets may consist of any design, product or information that is used in our business and that gives us an opportunity to obtain an advantage over our competitors. This can also include business research, new product plans, strategic objectives, any type of marketing or sales material or information, any unpublished financial or pricing information, employee, customer and vendor lists, and information regarding customer requirements, preferences, business habits and plans.

(ii) Employee obligations with respect to company's trade secrets and other confidential information are:

- Not to disclose this information to other employees of the company or third parties except on a "need to know" or "need to use" basis and, in those instances, with confidentiality designations and other data protection mechanisms such as password protection or encryption, as appropriate; and not to otherwise disclose this information
- Not to engage third parties to handle this information without an appropriate review of the security and information technology controls of the third party
- Not to post or discuss this information on publicly available websites or social media sites
- Not to use this information for your own benefit or the unauthorized benefit of persons outside of the company.
- To take all other reasonable measures to protect company's trade secrets and confidential information

m) Compliance with the Code and Laws

Employees shall adhere to the rules, regulations and policies of the company, including but not limited to :

1) Social Media Policy
2) Media Policy
3) IT Security Policy
4) Email usage Policy
5) Terms of employment
6) Professional agreements including those related to intellectual property
7) Code of Conduct
8) Prevention of Sexual Harassment at Workplace
9) Whistle Blower Policy
10) Confidentiality and Non-Disclosure Agreement
11) Code of Conduct for prevention of insider trading
12) Privacy Policy
13) Travel Policy
14) Any other policy issued from time to time and available on the Company's Intranet.

For more details, please refer to the individual policies posted either on the company's intranet or available with the local Human Resources Department.

It is the responsibility of each Employee to access, read and understand the Company Policies. In the event that an Employee has any queries with respect to the Code, they must approach their respective Human Resource representative to seek clarification.

Every Employee shall ensure compliance of all the applicable laws, rules and regulations while discharging his/her duties as per local laws of the respective country including import and export controls.

Violations of these laws jeopardize Company's ability to service its customers and also subject the Company to substantial fines and other penalties. Therefore, all Employees are encouraged to comply with proper custom procedures.

n) Child Labour

Company mandates employment as per labour laws of a respective country. All employees shall adhere to the same and shall ensure that no child labour is employed. In order to ensure this, in certain jurisdictions, every applicant is required to submit a proof of age. Further, the Company is committed to work in a pro-active manner to eradicate child labour by actively contributing to the improvement of children's social situation. To promote this, the Company encourages its Suppliers also to work towards a no child-labour code

o) Forced and Compulsory Labour

The Company respects the dignity of labour and denounces all forms of forced and compulsory labour. The Company therefore, ensures that its terms of employment are transparent and voluntary. The Company encourages its suppliers and service providers to adhere to a no-forced and compulsory labour Code.

p) Employment of Relatives

Relatives will not be hired or be encouraged to get transferred into departments/teams in which a related employee is currently employed, when the hiring/transfer will result in or has the potential to result in a conflict of interest/influence. In all cases where relatives are being hired or recommended to be hired, the concerned Employees are mandatorily required to make disclosures to the HR team.

The following are examples of conflict situations:

i. Direct or secondary involvement in processes which involve decision making in situations such as hiring, promotion, salary and leave arrangements of a relative;
ii. Direct or indirect involvement in situations which would or potentially could create a risk in internal control, accounting or labour relations practices;
iii. Access to confidential information pertaining to a relative or a relative's employment.

'***Relatives***' are defined as spouse, live-in partner, son, daughter, mother, father, brother, sister, grand-parent or child, step-parent or child, step-sister, step-

brother, in-laws, aunt, uncle, nephew, niece, first cousin, significant other, domestic partner or any other relationship that would present a conflict of interest as determined by the Company.

5.3 JUBILANT BUSINESS PRACTICE CODE

The Company intends to do business only with those customers, suppliers and other business partners who are compliant with the law and demonstrate high standards of business ethics.

a) Confidentiality

Employees shall not disclose or disseminate any data or information (including soft copies) concerning the Company or its business operations (including Employees' information), plans, strategies or policies of the Company, nor Company's customers, associates or contracting parties, and shall maintain highest standards of confidentiality during their tenure of service with the Company and thereafter.

In certain jurisdictions, the Company reserves the right to monitor, track and peruse all data and mails on all Company assets used by the Employees. For details, refer to the IT Code regarding IT Security, Assets Management, Acceptable Usage and Email Usage.

b) Anti-Bribery and Corruption

Employees shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits to/from any government or regulatory official, that are intended for or are perceived as undue favours for the conduct of business of the Company.

The Company, its Subsidiaries, any of their respective directors or employees, agents, or other persons acting on behalf of the Company, shall not, directly or indirectly, do any of the following:

i. use any funds for any unlawful contribution, gift, entertainment or other unlawful expense relating to political activity; or
ii. make or take any action in furtherance of an offer, promise or authorization of any direct or indirect unlawful payment, or benefit, to (1) any foreign or domestic government or regulatory official, including any government owned or controlled public entity or organization, or (2) any political party or party official or candidate for political office from corporate funds; or
iii. cause the Company or any of its Subsidiaries to be in violation of any applicable provision of the U.S. Foreign Corrupt Practices Act of 1977, or the U.K. Bribery Act of 2010, each as may be amended, to the extent applicable to the Company or any Subsidiary, or any applicable law or regulation implementing the Organisation for Economic Co-Operation and Development (OECD), Convention on Combating Bribery of Public Officials in International Business Transactions, or commit an offence under any other applicable anti-bribery or anti-corruption national or local law, rule or regulation; or

iv. make any offer, agree, request or take any action in furtherance of any bribe or other unlawful payment or benefit, including without limitation, any rebate, payoff, influence payment, kickback or other unlawful or improper payment or benefit.
v. shall not obtain or attempt to obtain confidential government papers, reports of information, unless the same are in public domain and can be used as per Law.

c) Preventing Money Laundering

Money laundering is the process of hiding illegal funds, or making them look as though they are legitimate, or using legitimate funds to finance/support crime or terrorism.

The Company cannot be used as a vehicle for any money laundering activities, and will co-operate fully with any investigation conducted by regulatory authorities involving potential money laundering by an Employee, officer or director of the Company.

Employees are advised to:

i. never become involved in money laundering,
ii. act diligently to prevent Company's products and services from being used to further money laundering and/or finance/support crime or terrorism, and
iii. report any suspicious activity of money laundering.

d) Anti-Terrorism

Terrorism as defined by the UN Security Council Resolution 1566 (2004):
"*Criminal acts, including against civilians, committed with the intent to cause death or serious bodily injury, or taking of hostages, with the purpose to provoke a state of terror in the general public or in a group of persons or particular persons, intimidate a population or compel a government or an international organization to do or to abstain from doing any act*"

i. The Company will acknowledge the *counter-terrorism* legislations set up by the international community, the donors and the country of operation, but disapprove all *counter-terrorism* measures which violate the known international Law;
ii. Employees will follow the International Law as well as the International Humanitarian Law as adopted in India. The Company will ensure not to indulge in any illegal /terrorist activity which can cause threat to the national security of the country;
iii. Employees will not commit or condone acts which would be considered as *terrorism* bythe UN Security Council Resolution 1566 (2004);
iv. Employees will not provide assistance, of any form, to any groups/individualsconsidered as *terrorists* by the international communityand the country of operation;
v. Employees will not cooperate with any groups/individuals considered as*terrorists* by the international community and the countryof operation;
vi. Employees will not collaborate with known-associates of anygroups/individuals considered as *terrorists* by the international community and the country of operation;

Any breach of this policy must be immediately reported by the Employee to his / her reporting manager.

e) Marketing Practices

The Company believes in competing for business diligently, openly and honestly. Employees shall not misrepresent Company products, services or prices; make false or misleading claims about Company products, services, performance or track record; or make false or misleading statements about the products, service performance or track record of our competitors.Employees should check with the Legal Department before using comparative advertising.

f) Dealing with Customers, Suppliers and Consumers

The Company values its partnerships with customers, suppliers and consumers and expects that all dealings with them will be carried out with fairness, honesty and respect.

It is expected that Employees shall:

i. not engage in unfair, deceptive or misleading practices;
ii. represent Company's products and services in an honest and forthright manner;
iii. uphold the confidentiality of customers and their information in all dealings.
iv. The Company is committed to maintaining the accuracy, security and privacy of the personal information of its customers, suppliers and other business partners that it collects, processes, stores, uses and discloses in the course of its business in accordance with applicable legislation and its Privacy Policies.

g) Dealing with Competitors/ Industrial Espionage

Any contact or association with competitors including membership of a trade association etc. should be limited to legitimate purposes. Engaging or using an association for the purpose of stealing/seeking business information, gaining employee information, planning price cartels, or market strategies etc. is prohibited.

Employees, particularly in sales/marketing, when interacting with competitors or participating in trade association meetings or trade shows, should refrain from discussions on prices, or any other agreements to control prices, boycott, territory allocation, or gathering competitive information, etc. as these actions can be considered as violations of competition law.

Employees shall not enter into agreements or understanding:

- With a competitor to fix, raise, peg, stabilize or even lower prices, or to eliminate or reduce price competition.
- With a competitor to allocate or apportion customers, groups of customers, lines of business, products or geographic areas
- With suppliers or customers which involve exclusivity or other restrictive arrangements

h) Political Parties

(i) Employees must refrain from engaging in political activities at work. “Political activities,” for purposes of this policy, means activities in which there is no direct connection to a specifically identified employment concern. No Employee shall take an active part in politics and/or stand for elections, without prior approval of the Chairman, Co-Chairman or Ombudsperson, CEO or CFO and Deisignated Persons. Employees in certain jurisdictions where participation in politics is a constitutional right, are exempt from this clause, provided such participation does not interfere with the Employee’s job obligations

(ii) Employee must be careful not to use Company’s name, property or other resources to support his / her personal political activities, and should exercise discretion in discussing his / her personal political views with third-party business contacts. Employees are not reimbursed by the Company for personal political contributions, and employee compensation will not be increased or otherwise adjusted to reflect political contributions made. An Employee is encouraged to participate in civic and political activities as long as such activities are on his / her own time and expense, and are in compliance with applicable laws. An Employee shall not suggest or imply that his / her donation of time, resources or money is from or endorsed by the Company.

5.4. JUBILANT ENVIRONMENTAL COMPLIANCES

a) The Company is committed to the environment protection laws. Each Employee shall act in support of environmental practices and initiatives. While business segments have designated Employees who coordinate and manage compliance of environmental laws by the Company, all Employees are responsible for compliance with environmental laws.

b) Employees must try to minimize, to the extent practical, the adverse impact if any, of the Company products, processes and services on the environment.

c) The Company facilities shall comply with environmental laws and would not operate without the required environmental permits, approvals and controls. In addition, each facility and business segment must have an environmental compliance plan in place that it shall follow, and update each year. Each Employee is expected to be fully aware of and comply with the environmental compliance plan.

6. VIOLATION OF THE CODE

In the event of violation of this Code by an Employee, corrective and disciplinary action will be taken, as directed by Chairman / Co-Chariman & Managing Director to the concerned CEO/ Chief of Human Resources, including, potential dismissal or termination of employment or any other legal action as may be applicable in the Company or all of the above together. The decision in this regard will lie with the management and shall be binding on the employee.

7. REPORTING PROCESS

a) Interpretation

In applying the Code of Conduct, any Employee may have questions or may need to raise a concern about asuspected violation of the Code of Conduct, the Company's policies or applicable laws,such Employee should seek guidance from the Reporting Manager/Reviewing Manager and/or from the Human Resource Department.

b) No Adverse Action

An Employee who, in good faith, makes a complaint or assists in the resolution of a complaint, whether under this Code or applicable law, will not suffer any adverse action regarding its Employee status or position within the Company (such as dismissal, discharge, victimization, demotion, disciplinary action or discrimination). This is so even if the alleged facts are not proven to be true following an investigation. The Company shall strictly enforce this policy and violations may result in disciplinary action including dismissal.

c) Anonymity & Confidentiality

The Company takes anonymity and confidentiality very seriously. Those handling complaints will take all reasonable measures to maintain confidentiality/secrecy of the complaint and preserve the identity of the complainant/employee, who requested that his/her identity not be disclosed; except that the identity may be revealed or information may be disclosed where required
(i) by law,
(ii) to properly handle or resolve the case,
(iii) to protect the Company's rights and property, or
(iv) to report a criminal act.

d) Clarifications

The circumstances of conduct as set out in this Code, although not exhaustive are intended to cover those situations, which are most likely to be encountered by Employees. In the event that an Employee encounters a situation which is not covered hereunder, then the Employee should seek guidance from the Reporting Manager/Reviewing Manager and/or from the Human Resource Department.

e) Reporting

Any Employee of the Company shall report any queries or complaints of violation or potential violation (with full details and evidence, if any) to the respective Division HR Head ("Division HR Head" means the HR Head who leads the entire business division, for instance, the HR Head who leads HR for all Pharma units globally is the 'Pharma Division HR Head'). The complaint can also be made to the Ombudsperson by using any of the following communication channels:

i. email to: **Ombudsperson@jubl.com**;

ii. logging/ accessing the web portal **www.cwiportal.com**, and clicking on the **'Lodge Report'** button; enter "**Jubilant"** as Organisation Code

iii. post, in a sealed envelope, to the following mail box**: Post Box No. 4374,** Ombudsperson - Jubilant Bhartia Group, New Delhi

iv. Toll Free Number : **18601234525** (Availability: Monday to Friday from 0930 -1730 hrs)

f) Investigation

All complaints will be promptly and discreetly investigated, provided allegations are reasonably clear and specific. An Investigation Committee/Member, appointed by the Ombudsperson, will investigate any complaint, which is of a serious nature.

Upon completion of the investigation, the Ombudsperson will compile a report of the investigation conducted with a recommendation of the disciplinary action to be taken against the Employee(s), and shall present it to the Chairman / Co-Chairman & Managing Director and also to the Chairman of the Audit Committee.

Upon approval, HR of the Company shall, in consultation with the Ombudsperson, implement all the disciplinary and other actions so approved, and notify the complainant and other parties involved as appropriate.

All complaints, identities, investigations, reports, testimonies, evidences, and all other associated documents, shall be kept strictly confidential.

8. REVISION OF THIS CODE

This Code of Conduct will be reviewed periodically, and be modified as deemed necessary by the Board of Directors of the Company.

9. ACKNOWLEDGEMENT OF CODE OF CONDUCT

I acknowledge that I have received and read the Code of Conduct of Jubilant Generics Limited (the **"Company")**.

I agree to abide by the terms and conditions of this Code, and all other applicable Company policies and applicable law, while employed by the Company, and will not use any confidential or proprietary information after I leave the Company. I also understand that signing this Certificate and complying with the Standards does not create an express or implied contract of employment and does not create any contractual rights of any kind between the Company and me.

LAST NAME (Please Print)	FIRST NAME
EMPLOYEE NUMBER	DEPARTMENT NAME
SIGNATURE	DATE

Please return this Certificate as instructed by the Company.