

CODE OF CONDUCT

SEARLE

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INTRODUCTION

Our code. Our commitment.

Searle's Code of Conduct represents our commitment to conduct our business ethically and with responsibility, in our efforts to improve the lives and health of millions of people around the world.

Our Code is founded on Core Values that we believe in and exhibit, such as Integrity, Courage and Responsibility.

The Code of Conduct offers us guidance on doing the right thing, being principle centred in all our decisions and having the courage to speak up in case a violation of this Code is observed.

Being a part of Searle makes every employee responsible to abide by the Code. By agreeing to live the principles mentioned in the Code, you are doing your part to make Searle a more responsible, ethical and legally compliant organization.

Hence, we expect 100% commitment from all our employees to abide by the Code of Conduct. Although we are confident our employees are already aligned with all the principles documented within, failure to comply with or a wilful breach of the Code may lead to disciplinary action up to and including dismissal from service.

The actions of each one of us matter. Let us continue to define ourselves as a responsible and ethical organization in letter and spirit.

RESPECT AND FAIRNESS

We treat people with fairness and respect.

We believe in being fair and respectful towards the people we deal with. This includes our employees – leadership and staff; our customers, suppliers and other stakeholders.

We take care of employee rights and provide a level playing field to the members of our organization to deliver excellence in their own domains.

Our employees are expected to respect ethnic diversity, practice gender equality and cultivate an environment free of harassment, discrimination and bullying.

In line with being respectful towards people, we have a policy of protecting individuals who report any breach of regulation, policy or conduct unbecoming of an employee of the organization.

HEALTH, SAFETY AND ENVIRONMENT

We carry out business in a responsible manner, to ensure the health and safety of people and the environment.

We are committed to a Health, Safety and Environment management system to safeguard our people, protect our assets and act with responsibility towards environment.

In order to live this commitment, each and every team lead – Directors and Managers, in the organization has to integrate HSE principles and practices in their strategy and business processes, and every employee should practice and promote responsible HSE behaviours in their daily operations.

Doing the right thing:

- ▶ Attend required safety and environmental training programs
- ▶ Learn and comply with the rules and practices of our job designed to promote safety and protect the environment
- ▶ Use all required safety devices and protective clothing and equipment
- ▶ Learn and follow building evacuation instructions and procedures
- ▶ Understand how to properly handle any hazardous materials in your work area
- ▶ Refrain from all acts and threats of violence
- ▶ Be aware of your surroundings
- ▶ Follow all rules relating to workplace substance use
- ▶ Report all safety, health, fire or environmental hazards or suspected releases to management or the HSE Department

LEGAL COMPLIANCE AND ETHICS

We engage in business activities in a legal and ethical manner.

Our operational decisions and day to day activities are meant to deliver products and services while abiding by prevailing laws and regulations.

Every employee is required to exhibit a responsible attitude by practicing individual integrity in letter and spirit.

To ensure transparency, we encourage our people to contribute and raise their concerns by reporting any unethical practice being carried out within the organization.

We strive to create a positive environment where any intentional or unintentional malpractices are reported proactively and eliminated.

We operate with transparency and make sure that the record of all our business dealings is accurate.

Doing the right thing:

- ▶ Know the applicable laws regulations/policies and always act legally and fairly
- ▶ Do not offer illegal inducements to anyone
- ▶ Strictly curb unethical solutions to all kinds of issues
- ▶ Be vocal if something does not feel right or does not align with the Code
- ▶ Be principle focused instead of searching for loop holes in regulations
- ▶ Make realistic commitments instead of empty promises
- ▶ Seek guidance when in doubt

BRIBERY AND CORRUPTION

We have zero tolerance
for corruption and do not
give or receive bribes.

We are committed to meet the highest ethical standards in the way we do business and have zero tolerance for corruption and bribery.

The company, its employees and anyone acting on our behalf – must abide by the company policies and country laws wherever we operate.

Individuals are expected to act with integrity and are expected to avoid engagement in any corrupt practices. This includes authorization of third party to offer payments or services on our behalf.

CONFLICT OF INTEREST

We do not allow conflicts of interest to influence or compromise any of our professional duties or decisions.

Acting with integrity requires being free from conflicts of interest in all decision making. A conflict of interest occurs whenever the prospect of direct or indirect personal gain may influence our judgement or actions while conducting company business.

Decisions influenced by conflicts of interest are damaging for personal integrity and credibility, and the impact of such decisions may harm the Company's reputation and violate the trust of our stakeholders.

We expect our employees to uphold the letter and spirit of our Code of Conduct in all their dealings and abide by the guidelines mentioned within. To this effect, willful violations of the Code shall result in appropriate and just disciplinary action.

COMPANY ASSETS AND INFORMATION

We protect company information, resources and assets from loss or misuse.

We act with integrity and responsibility to prevent the misuse or loss of company resources and assets by being cautious and alert in our work.

We expect our employees to follow approved processes and standard operating procedures and take a proactive approach to prevent the loss of or damage to tangible assets of the Company.

We treat Company information as one of our most valued assets and handle confidential and sensitive information with utmost care.

Confidential information

“Confidential” information is that which we are required by law or agreement to keep confidential, or where unauthorized use or disclosure could harm our Company or its business partners or associates. This includes third-party information that our Company has agreed to handle in a confidential manner.

INSIDER TRADING

We prohibit insider trading.

It is illegal to buy or sell securities (for example, stocks, bonds or options) of a company when one is aware of “inside information”— material, non public information—relating to the Company.

Corporate laws and the Company prohibit us from using or disclosing any inside information that we may acquire during the course of employment at Searle.

SEARLE

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