




Global Ombudsperson Policy

Version: 5

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	Issued by:	Global Legal and Compliance	Version	5
	OMBUDSPERSON POLICY		Effective Date	01-09-2023

Overview

'Good Health' is always our goal. We see medicines not just as molecules, but as means to attain good health. Being in the pharmaceutical industry we realize our unique role, as well the ethical and moral imperative, to help patients regain good health as quickly as possible and to promote wellness among them.

Dr. Reddy's Laboratories Limited including its subsidiaries and affiliate companies (hereinafter referred to as "Dr. Reddy's" or the "Company") is committed to the highest legal, moral and ethical standards in conducting its business. The Company has adopted the Code of Business Conduct and Ethics ("the Code" or "COBE"), which lays down the principles and standards that should govern the actions of the Company and its employees regarding Ombudsperson Policy.

This policy is intended to provide guidance on raising concerns of any actual or potential violations of COBE, policies and procedures of the Company, any applicable laws and regulations, unprofessional or inappropriate conduct and address them appropriately.

This Policy is not intended to address individual employee grievances or complaints relating to job performance and terms and conditions of employment, or individual third party grievances relating to terms and conditions of contract, which will be addressed by the respective departments in line with existing policies.

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Version Supersedes	Reasons for Change
Version 4	<ul style="list-style-type: none"> Incorporated changes basis suggestions from Audit Committee member



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OMBUDSPERSON POLICY

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WHO DOES THIS POLICY APPLY TO

This Policy applies to Dr. Reddy's operations globally, including all legal entities worldwide owned or controlled by Dr. Reddy's (including all group companies), and to all directors, officers, employees, consultants, business partners, contractors, and other third parties acting on behalf of Dr. Reddy's and any other person retained or hired by the Company to facilitate business world-wide and requires them to comply with this Policy.

They are obligated to report any actual or potential violations of COBE, policies and procedures of the Company, any applicable laws and regulations or any other unprofessional and inappropriate conduct.

FEW BASIC TERMS YOU NEED TO KNOW

All words used in this Policy but not defined, have the same meaning assigned to them in COBE.

- **Audit Committee** means the Audit Committee of the Board constituted as per applicable statutory requirements.
- **Chief Compliance Officer (CCO)** is a designated authority reporting to the Chief Ombudsperson of Dr. Reddy's for the purpose of compliance with the Ombudsperson Policy.
- **Chief Ombudsperson** is a designated Independent Director from the Board of Directors of the Company.
- **Complainant** means any employee or third party raising a concern under the purview of this Policy.
- **Third party** includes retainers, consultants, service providers, distributors, vendors, customers or any other person dealing directly or indirectly with the Company.
- **Concern** means any actual or potential violations of COBE, policies and procedures of the Company, any applicable laws and regulations or any other unprofessional and inappropriate conduct by employees or third party.

RAISING A CONCERN

You may raise concern by:

- Accessing <https://drreddys.ethicspoint.com>. It can be accessed through intranet and the Company's website.
- Calling on the hotline number. List of hotline numbers are available in "Raise a Concern by Phone" section of <https://drreddys.ethicspoint.com>. The hotline is available 24x7 in multiple languages.
- Writing to complianceofficer@drreddys.com or chiefombudsperson@drreddys.com.
 - By Post / Courier to:
Chief Compliance Officer / Chief Ombudsperson,
Dr. Reddy's Laboratories Limited,
8-2-337, Road No. 3, Banjara Hills,
Hyderabad – 500 034, Telangana, India.





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1. Open door policy: While you can raise your concern via the modes of reporting mentioned above, we also want employees to feel free to voice their thought and concerns with their managers.
2. Please note that when you report your concern, you may choose to remain anonymous, wherever allowed by local laws. However, you are encouraged to identify yourself, as doing so can help resolve the situation, especially if there is a need to follow up for additional information. When you identify yourself, every reasonable effort will be made to keep your identity confidential.
3. If any person other than CCO or Chief Ombudsperson receives a concern made by any Complainant, then the same must be forwarded to the CCO without fail. In such cases, appropriate care must be taken to ensure the confidentiality of Complainant.
4. Any past employee / Third party needs to raise the Concern within a period of 12 months from the termination of their association with the Company and/or closure of any litigation between the company and third party (if any). On a case to case basis, Chief Compliance Officer can decide to take up any reported concern for investigation, even the same is reported beyond the period mentioned.
5. Complainant shall provide below mentioned information while raising the Concern:
 - Nature of concern
 - Name of person against whom the concern is raised
 - Location or business unit related to the concern
 - Details of the concern
 - Period during which misconduct occurred, including specific dates and times of the violation
 - Necessary supporting evidences/proofs, if any
 - Contact details

In case complete details are not available, concern can still be raised with the available information.

6. This Policy encourages employees and Third parties to raise Concerns relating to matters, including, but not limited to:
 - Gifts, Bribery and Kickbacks
 - Conflict of interest
 - Financial issues and Fraud
 - Antitrust and Unfair competition
 - Misuse or Misappropriation of assets or information
 - Insider trading
 - Sales, Marketing and Promotional practices
 - Employee relations, Discrimination and Inappropriate behavior (not Sexual harassment)
 - Sexual harassment
 - Data privacy
 - Information security
 - Safety, Health & Environment
 - Any other violations of policies and procedures

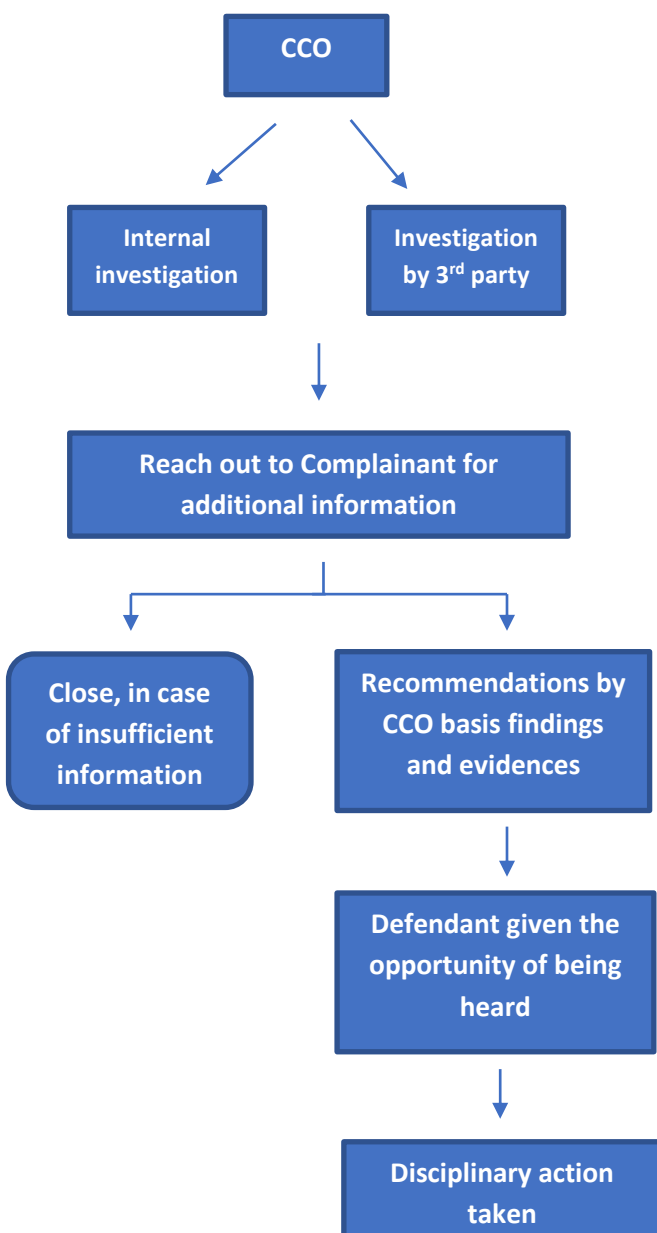
The Complainant is not required or expected to act as investigator or finder of facts themselves, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.

The Complainant raising a Concern or the persons to whom the concern is made or any person involved in the investigation including witnesses shall maintain confidentiality and shall not disclose/ discuss the Concern or the internal proceedings with any third party, lawyer, reporter etc.

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In case the concern being raised involves the Chief Compliance Officer or General Counsel, the concern can be raised directly with the Chief Ombudsperson by writing to chiefombudsperson@drreddys.com. Investigation to these concerns will be conducted through an independent team/third party/ professional firm as the case may be, as deemed fit by the Chief Ombudsperson. While appointing investigator/investigating team, it will be ensured that conflict of interest situation will be kept in mind. Also, if an investigator develops conflict during investigation, then such investigator will recuse himself/herself from investigation.

HANDLING CONCERNS



1. The CCO, at his discretion, based on preliminary facts available may decide to address the concern either by investigating internally or through identified external third party service providers. Complainants who identify themselves may be invited to provide leads and evidences (including circumstantial) to supplement information gathered in the course of investigation.
2. The purpose of the investigation of a concern includes:
 - a) To determine if the specific allegations of misconduct are substantiated by the available oral and documentary evidences.
 - b) To determine whether other misconduct may have occurred.
 - c) To identify areas of potential risks to the Company as a result of misconduct.
 - d) To identify areas of business operations that may require improvement as a result of misconduct.
3. CCO, at his discretion, may consider the concern closed if there are no specific details provided by the Complainant and there was no response from the Complainant for a reasonable period of time.
4. Based on findings supported by necessary evidence, appropriate recommendations will be finalized by the CCO after consultation with the appropriate management and/ or HR.
5. Person against whom the concern is raised shall be provided with a reasonable opportunity of being heard, before taking any disciplinary action in this regard.



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- The investigation procedures will be duly followed irrespective of title or position of the employee.
- No one shall create, withhold, tamper or destroy any evidence or other document(s) related to the concern and also should not interfere in the fair proceedings of the investigation.

MANAGERS TO BE MINDFUL

Employees in the role of Managers should be mindful of the following:


1. Ensure the overall approach to incentives is aligned with and does not advertently undermine the company's values and culture.
2. Set targets/goals which are achievable without resorting to illegal, unethical or negligent behaviour.
3. Set ethical targets or use ethical thresholds for rewards to distinguish outcomes from the means used to achieve them.
4. In case of misconduct by employee same should be considered in promotion and year end process
5. Ensure that staff are not promoted or rewarded if they have breached the Company's principles, even if they have met or exceeded their targets.
6. Introduce ethics and values measures into performance reviews, such as the quality of work and how a job is done.

EFFECT OF NON - COMPLIANCE

1. Disciplinary action policies, including those described in the Code of Business Conduct and Ethics, apply to employees and complementary workers at all levels of the company, regardless of their role.
2. Failure to comply with the Code of Business Conduct and Ethics, company policies, or applicable legal and regulatory requirements may result in disciplinary action up to and including termination of employment.
3. This also applies to managers who ignore violations or fail to detect and/ or correct them. Complementary workforce / workmen disciplinary issues will be dealt with via their applicable laws and regulatory provisions.
4. Managers and Human Resources are responsible for overseeing appropriate disciplinary actions in line with company discipline standards, as allowed by local labour laws.
5. Breaches of law may also result in civil or criminal penalties for the violator.

ENSURING NON - RETALIATION

Dr. Reddy's will not tolerate any retaliation against an employee or third party who in good faith raises concerns or who assists in an investigation of suspected wrongdoing, in line with the Company's Non- Retaliation Policy. Reporting "in good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken. Disciplinary action may be initiated if an employee knowingly raises a false or misleading concern. For further details refer 'Non-Retaliation policy'.

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MAINTAINING CONFIDENTIALITY AND RETENTION OF DOCUMENTS

The identity of the Complainant shall be kept confidential to the extent possible and permitted under law. There may be circumstances where the identity may become known for reasons outside the control of the CCO / Chief Ombudsperson.

All the documents received from the Complainant and evidence obtained during the investigation and the report shall be kept confidential and retained in accordance with applicable laws, unless disclosure is mandated by a court order or is otherwise necessary to comply with the requirements of applicable laws.

OVERSIGHT

CCO will provide a summary of concerns handled under the Ombudsperson policy to the Chief Ombudsperson on a quarterly basis. Chief Ombudsperson may seek additional information on the concerns handled and may order further investigation.

In addition to the Chief Ombudsperson being an independent director of the board of directors, the mechanism of concern handling under this policy is overseen by the Audit Committee.

ADHERENCE TO THE POLICY AND REQUIREMENT FOR PERIODIC TRAINING

All Employees and Third Parties acting on behalf of Dr. Reddy's are responsible for adhering to the principles set out in this Policy.

Employees and Third Parties acting on behalf of Dr. Reddy's shall familiarize themselves with the Ombudsperson Policy and Non-retaliation Policy and shall participate in all training sessions periodically conducted by the Legal and Compliance Team.

PRECEDENCE

This Policy shall be read in conjunction with COBE. The provisions of COBE shall prevail in case of any contradiction between this Policy and COBE.


AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Key Takeaways: After reading this policy, you should be able to:



1. Understand who does this policy apply to;
2. How to raise a concern via the modes available;
3. Have an overview of how a concern is handled by Dr. Reddy's;
4. Things to be mindful of, if you are a manager;
5. Understand the effect of non – compliance with this policy;

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ANNEXURES

Annexure 1: Frequently Asked Questions (FAQs) in relation to the Ombudsperson Policy

Question 1:

I know of a COBE violation that is not related to the department I belong to. Can I raise the concern under this Policy?

Answer: Yes. Any concern which is pertaining to an actual or potential violation of COBE, policies and procedures of the Company, any applicable laws and regulations or any other unprofessional and inappropriate conduct need to be raised irrespective of whether it is within your department or not.

Question 2:

There is a concern that is known to many people in my department but they have chosen to be silent. Should I raise the concern?

Answer: Yes. The concern should be raised so that investigation is initiated and appropriate action is taken. As a responsible employee of the Company, you have to raise the concern as per this policy.

Question 3:

Can a third party associated with the Company raise a concern?

Answer: Yes. Any third party associated with the Company can raise a concern on actual or potential violation of COBE and applicable policies and procedures.

Question 4:

Where are the hotline numbers available?

Answer: Hotline numbers for each of the country are listed in 'Raise a Concern by Phone' section of <https://drreddys.ethicspoint.com> website. The hotline is available 24x7 in multiple languages operated by specially trained third-party representatives. In case of countries not having a hotline, concerns can be raised via email by writing to complianceofficer@drreddys.com or chiefombudsperson@drreddys.com

Question 5:

If I raise a concern, my manager may harass me. What should I do?

Answers: Any concern can be raised under this Policy without fear of retaliation. If any retaliation occurs, the same should be reported by accessing 'drreddys.ethicspoint.com'. Refer COBE/ Non-Retaliation policy for further details.

Question 6:

I don't have all the details required to be provided for raising a concern like how long for which the malpractice continued, name of the person who violated the Policy, or other details. What should I do?

Answer: In case complete details are not available, concern can still be raised with the available information.




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Question 7:

Is it compulsory to provide the details of the complainant for raising a concern?

Answer: No. It is not compulsory to provide the details of the complainant for raising a concern. However, Dr. Reddy's encourages complainants to identify themselves, so that additional information required for investigation, if any, can be obtained.

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Annexure 2: Procedure for handling concerns under the Ombudsperson Policy

This Procedure shall be read in conjunction with COBE and Ombudsperson Policy of the Company. The provisions of COBE shall prevail in case of any contradiction between this procedure and COBE.

Milestone #1:

Receipt of a concern raised

Concerns raised by accessing Ombuds reporting web page i.e. <https://drreddy.ethicspoint.com> or by hotline are automatically logged as concerns in Global Ombudsperson Case Management system (GOCMS).

Concern received through any other modes (i.e. email, post, in person) are logged into GOCMS by the Compliance team. Based on nature of concern, the same gets notified to respective stakeholders for investigation.

Milestone #2:

Horizon scan in relation to the concern raised

The Chief Compliance Officer to take into consideration all / anonymous complaints for appropriate investigation based on the following factors:

1. The seriousness of the concern raised;
2. The credibility of the concern;
3. The likelihood of confirming that the allegation is raised through reliable sources; and
4. The ability to investigate into anonymous complaints.

Dr. Reddy's needs to do initial assessment to ensure allegation is reviewed and a response plan is created, as well as take into consideration the seriousness of the allegation. It needs to be determined if the allegation is serious enough that it needs to be escalated to an audit committee or if the company has more time to review the allegation.

CCO to determine the credibility of an allegation by below ways:

- a. Gather what it knows about the allegation and compare that information to the known facts;
- b. Review source of the allegation to get additional information or get clarification.

Once an allegation is proven credible, the company must then take necessary steps to preserve the data and information tied to the allegation, then begin an investigation.


Milestone #3:

Determining the investigation team

The team for investigating a concern would be determined basis a set of parameters, which would also assist in indicating the severity of the concern raised.

Prior to beginning an investigation into a significant concern of unethical or illegal conduct raised by a person, the appropriate personnel will discuss and agree on:

- a. The level of internal elevation needed to ensure that all appropriate internal stakeholders are involved;
- b. The person who is managing the investigation and communicating to the person who raised the concern during the investigation and at the close out meeting;

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- c. Whether there are any special precautions, beyond those described in the Ombudsperson policy that are needed at the outset to safeguard the employee raising the concern during the investigation.

Milestone #4:

Investigation of the concern raised

Responsibility & Accountability for carrying out investigation, appropriate closure and tracking & monitoring of Corrective Action & Preventive Action (CAPA) are provided below:

#	Nature of Concern	Responsibility & Accountability of Investigation and closure	Tracking & Monitoring of CAPA
1	Ethical Misconduct	Chief Compliance Officer & Lead – Corporate Compliance	Regional Compliance Officers
	Gifts, Bribery and Kickbacks		
	Conflict of interest		
	Financial issues and Fraud		
	Antitrust and Unfair competition		
	Misuse or Misappropriation of assets or information		
	Sales, Marketing and Promotional Practices		
2	Employee relations, discrimination and inappropriate behavior (not Sexual harassment)	Head of Corporate HR	BU HR Heads
3	Data privacy	Chief Data Privacy Officer	Regional Data Privacy Officers
4	Information security	Chief Information Security Officer	Chief Information Security Officer
5	Safety, Health and Environment	Head – SHE & Sustainability	Head – SHE & Sustainability
6	Sexual harassment	Apex Disciplinary Committee	Apex Disciplinary Committee
7	Insider trading	Company Secretary	Company Secretary
8	Others	Chief Compliance Officer & Lead – Corporate Compliance	Regional Compliance Officers



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Milestone #5:
The process
Timelines

- The timeline to conclude the investigation is **90 days**. However, in case of complex investigations, the timeline may get extended by CCO based on merits and specifics of the matter.
- On a quarterly basis, details of concerns not closed within the stipulated timeline and the reasons for such delay need to be communicated to Chief Ombudsperson, as part of quarterly update.

Supplementary evidence from the Complainant

- Complainants who identify themselves may be requested to provide leads and evidences (including circumstantial) to supplement information gathered in the course of investigation.
- Consent to be obtained for access to call records/ mails/ messages

Evaluation of concern

- On receiving the concern, the allegations may be reviewed to determine, whether there is sufficient information mentioned in the allegations to determine the credibility of the concern.
- Also, where complainant did not indicate/ provide specific details while raising the concern, efforts should be made to reach out to the complainant and seek specific details.
- Concern reported can be categorized basis Milestone #2 above.

Maintaining confidentiality

- The complainant who has raised a concern, the person(s) to whom the concern is reported, or any other person involved in the course of investigation, including any witnesses, shall maintain confidentiality and not disclose details of the internal proceedings.

Preparation of report

- A Summary Report needs to be prepared in the template provided in Annexure 3 in relation to all concerns raised through the Ombudsperson policy.
- All the relevant details (Info contributors, Tasks, Case notes etc.,) shall be filled by respective investigators in the GOCMS.

Corrective and/ or Preventive Action (CAPA)

- Basis the nature of violation and seriousness of the issue, CCO will take an appropriate decision, in consultation with senior management, to report the matter to appropriate law enforcement authorities.
- Corrective and/ or disciplinary actions taken against an individual shall form part of personnel file of the employee. Nature of violation and disciplinary action shall be taken into account in the performance evaluation of the employee concerned.
- CAPA to be implemented within the agreed timelines. Identified compliance team / team members to track the CAPA for timely implementation.



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Root cause analysis

- Adequate Root Cause Analysis (RCA) including vulnerabilities and accountability lapses, shall be conducted to understand what factors contributed to the misconduct and the degree of remediation needed to prevent similar events in the future, in consultation with relevant stakeholders.
- Conduct a thoughtful RCA of misconduct and implement appropriate and timely remediation measure to address the root causes.
- Remediation to address the issues identified in the root cause and missed opportunity analysis.
- Identifying, defining, and understanding the fundamental cause of non-compliance that gave rise to a problem and applying corrective action to prevent it from recurring.

Communicate closure with the Complainant


- Based on the complexities involved and after considering potential legal issues, Ombuds team/CCO may communicate the outcome of the investigation to the complainant.

Reinforce the non-retaliation policy

- To ensure that, the reported concerns are not recurring and to ensure that there is no offending practice or retaliatory behaviour, appropriate HR personnel should contact the employee(s) who brought forward the concern, to discuss whether the offending practice has ceased to and affirm the Company's Non-retaliation Policy.
- This meeting would occur at regular intervals following the closure of the investigation within 6 months following the close of the investigation.

Prevention of retaliation

- In some circumstances, despite the Company's best efforts to ensure a workplace free from fear of retaliation, the employee may seek a transfer internally.
- In these cases, and as a last resort, Line management in consultation with HR personnel should carefully assess whether a transfer is necessary and appropriate in the circumstances and ensure that the employee's terms and conditions of employment are not impacted negatively in any way.

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Milestone #6:**Reporting to the Chief Ombudsperson**

- Details of ethics concerns received, investigation conducted and conclusion thereof shall be provided to the Chief Ombudsperson on a periodic basis.
- For any guidance as may be required, CCO can discuss the progress or result of investigation of any Concern at any time with Chief Ombudsperson.

Milestone #7**Closure**

1. Following the conclusion of the investigation, the investigation team / CCO either will conduct a “close out” meeting with the identified stakeholders and/or with the person who raised the concerns. The purpose of the close out meeting is to communicate to the employee that the matter has been investigated and, if appropriate, addressed through remedial action.
2. Appropriate HR personnel will contact the employee(s) who brought forward the concern to discuss, if appropriate, whether the offending practice has ceased and to, again, affirm the Company’s non-retaliation policy.
3. This meeting would occur at regular intervals following the close out meeting (i.e. 6 months and one year following the close of the investigation).
4. Dr. Reddy’s will periodically analyze(s) ombuds concerns received, closed and substantiated for identifying patterns of misconduct or other red flags for identifying compliance program weakness, if any. Wherever specific patterns are identified, it will be ensured that preventive actions are addressed on a holistic basis to either prevent or minimize the root causes which is contributing to the said pattern of cases.

Important considerations to ensure

Investigation proces

- It shall be ensured that the Concerns are assigned to the independent investigators for fair and impartial investigation process. Confidentiality of the complainant shall be maintained to the fullest extent possible unless legal requirements make it mandatory to reveal the identity of complainant.

Trained investigators

- It shall be ensured that the investigators are competent and adequately trained for that purpose & based on complexity & importance, an external third party may be deployed for an investigation depending on the nature of the Concern. It should be ensured that investigation procedures are followed consistently irrespective of title or position of employee.

Legal implication

- Cases referred to law enforcement agencies would be considered as closed, nevertheless, reserving the right of further inquest and action based on evolving legal developments.
- Wherever the Concern has potential legal implications /consequences, legal team to be notified and updated on the closure/ proposed closure of the issue.

Email access

- Compliance officer email id can be accessed by identified ombuds team members for investigation purposes, in addition to CCO.
- Prior approval of CCO and CISO should be obtained by the investigation team, if the investigation requires any review of email systems.

Disclosures

- Any statutory disclosure in line with applicable laws and regulations including but not limited to SEBI (Listing Obligations and Disclosure Requirements) regulations / Securities and Exchange Commission (SEC) shall be complied with, after due consultation with Company Secretary and Corporate Compliance Council.

Incentive

- CCO may at his discretion may provide appropriate incentive to the employees / third parties raising concerns in good faith. The indicative incentive and recognition methods are mentioned in Annexure 5

Other precautions

- To create a workplace free from fear of retaliation, the below special precautions may be necessary and should be taken on a case - to - case basis. The following are a few instances:
 - Communication and training for managers and peers regarding the company's policies;
 - Zero tollerance for behaviour which create a perception of retiliation or retribution;
 - Internal or public recognition to the employee who raised a concern for value based behaviour



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Annexure 3: Indicative template of an Investigation report

Business Unit/ Location	
Type of concern	
Nature of concern	
Concern raised by	
Allegations on	
Concern raised to Compliance on	
Ethicspoint Case no.	

- A. **Concern:**
- B. **Scope**
- C. **Methodology**
- D. **Personnel Interviewed**

During the course of investigation, interviews were held with the following personnel:

#	Name	Designation / Role

- E. **Process followed in the investigation**
- F. **Summary of Interviews:**
- G. **Observations:**
- H. **Analysis**
- I. **Findings / Conclusion:**



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J. Recommendations:

#	Recommendations	Responsibility	Timelines
1			
2			
3			

K. Documents collected as Evidence:

Particulars	Name	Signature
Prepared by		
Reviewed by		
Approved by		



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Annexure 4: Consequence management matrix

The disciplinary action provided below is indicative in nature. Basis the facts of the case and complexity involved, disciplinary action will be finalized.

Severity	Particulars	Disciplinary Action
Major	Intent to defraud	Separation in the form of Termination/ Resignation
	Gross negligence	
	Gross misconduct	
	Unethical behaviour	
Moderate	Negligence (absence of intent / gross negligence)	Financial penalties in the form of Incentive / Bonus / increment Written warning / Reprimand
Minor	Unintentional mistake / error (absence of intent /gross negligence)	Verbal warning / Counselling

Important considerations:

- Any violation will be taken into account in the performance evaluation of the individual concerned.
- Where the firm deems appropriate, it will report any violation to and/ or cooperate with law enforcement authorities.



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Annexure 5: Indicative list of incentive and recognition methods

1. Introducing ethics and values measures into performance reviews, such as the quality of work and how a job is done.
2. Awards for people who speak up or challenge questionable conduct.
3. Recognition and/ or prizes for people who excel in Ethics and Compliance training.
4. Recognition for outstanding contribution to the Ethics and Compliance program.
5. A company-wide Ethics award scheme.
6. Coverage of examples of good ethical or anti-corruption practice in the company newsletter
7. Thank you letters from CEO or senior management.
8. Dinner with the CEO or senior management.
9. Spot awards for good ethical practice, recognising special contributions as they occur.