

BIOCON LIMITED POLICY DOCUMENT

MARKETING & SALES PRACTICES CODE

Policy Title:	Marketing & Sales Practices Code		
Scope:	Applicable to all employees, trainees, interns, apprentices, contract workforce and vendors (termed as 'Personnel' in this policy) of Biocon Limited & its subsidiaries (termed as 'Biocon' or 'Company' in the policy), except Biocon Biologics Limited & Syngene International Limited (including their subsidiaries)		
Policy Version No:	1.0	Policy Effective Date:	15-10-2023
Policy Next Review Date:	On or before 14-10-2025	Policy Implementation Date:	15-10-2023
Policy Revision & Approval Authority:	Reviewed by: Head - Legal Head - HR CFO Head - Commercial Approved by: Chief Executive Officer and Managing Director		

1. Objective of the policy:

Biocon is committed to conduct its business in accordance with applicable laws, rules, and regulations in all regions the Company operates in and with highest standards of business ethics, transparency, and professionalism. Biocon aims to uphold standards to integrity, transparency, and accountability by enforcing zero tolerance towards any misconduct or any other activity resulting in serious reputational loss.

The Company advocates and practices five values, listed herein, with a zero tolerance approach to violations:

- Integrity & ethical behavior
- Performance driven work culture
- Value creation through innovation & differentiation
- Quality through compliance & best practices
- Collaboration, teamwork & mutual respect

2. Governance:

- Changes to this policy shall be reviewed by Head of Legal and Head of Commercial, and approved by Chief Executive Officer & Managing Director
- Head of Legal shall ensure that the reference to this policy is included appropriately in all the contracts, purchase orders which Biocon enters into with business partners
- Any violation of this policy may have significant consequences and will be dealt with according to Biocon's Code of Conduct and other relevant policies

3. Policy Framework:

- Biocon must ensure that:
 - » Competitors or their products are not disparaged
 - » All necessary approvals for marketing the products are obtained

- » Products are not promoted for uses other than what they are approved for
- » False, misleading information or misrepresentation is not included in any of the marketing communication
- » Statutory requirements and industry codes of respective geographic locations are adhered to
- » Information provided on the packaging label, inserts, or sales and advertising material complies with all applicable laws, standards, and regulations, and are supported by scientific evidence where relevant
- Biocon respects the principles and rules of fair competition. Biocon aims at maintaining a free, fair, and robust competitive environment, avoiding anti-competitive practices such as bid rigging, price fixing & territory splitting
- Competition laws prohibit anti-competitive agreements between competitors. Biocon fully supports the development and operation of competitive open markets and promotes the liberalization of trade and investment in each country and market in which it operates
- All personnel covered by this policy are expected to
 - » Comply with standards set out in local laws, regulations, applicable industry codes while interacting with HCPs (Health Care Professionals) or Government officials
 - » Always act with honesty, fairness, and integrity while interacting with HCPs or Government officials
- Third parties interacting with HCPs or carrying out any marketing activities on behalf of Biocon are expected to comply with this policy, requirements of local laws, regulations, and applicable industry codes
- Appropriate due diligence should be carried out on third parties to ensure compliance. The contracts with third parties should include requirements to abide by all applicable laws, regulations, industry codes and Biocon policies
- Scientific engagement activities are not promotional; they do not have the appearance of being promotional and are not designed to influence the prescription, supply, sale, or use of our products. Biocon understands the importance of avoiding activities which could be construed as promotion of a new product or new use of an existing product before necessary marketing authorization is obtained

4. Raising a concern:

We encourage personnel covered in this policy to speak up without any hesitation or fear, if they believe, in good faith, that any of Biocon's policies or this policy is being breached, or an individual or group of individuals are acting in a manner that could adversely impact the interest of Biocon and /or its employees.

Awareness about such misconducts will enable Biocon to address them without delay and protect the interests and rights of individuals covered in this policy. As enshrined in Biocon's Whistle Blower & Integrity Policy, any personnel can raise a concern against suspected unethical /non-compliant activities through multiple channels, including writing to: integrity@biocon.com

5. Reference to other relevant policies:

- Biocon's Code of Conduct
- Biocon's Policy for Anti-Bribery and Anti-Corruption
- Biocon's Supplier Code of Conduct