

## Communication Policy

### **Short description:**

Wockhardt Limited places considerable importance on effective communication.

### **1. Purpose**

Wockhardt is a listed company and as a consequence it is under the obligation to promptly communicate any information to the public, including those that could have a significant effect on the price of its securities, such as shares, debentures and bonds, if any.

This Policy establishes a set of principles to ensure that communication across Wockhardt is effective and appropriate and responds to the diverse information needs of all our stakeholders. The purpose of this policy is to help preserve and enhance the Company's reputation, both internally and externally, and to help ensure that relevant information reaches the targeted audience in the right format and at the right time. It is key for every Wockhardt employee to understand the value of effective communication. Accurate and timely communication with stakeholders is integral to a business' risk management process.

### **2. Scope:**

This Policy is applicable to relevant to all employees of the Wockhardt Group, including its subsidiaries and affiliates worldwide. The policy covers all forms of communication – written, electronic and verbal.

### **3. Guiding Principles:**

Communication at Wockhardt shall be guided by the following principles:

- 1. Authorised spokespersons:** Communication with stakeholders, media and financial markets must be aligned with the Company's official stance and strategy and must only be done by duly authorised Company spokespersons. Any person not authorised to speak or write on behalf of the Company, asked by the media, shareholders (internal or external) or market analysts, or other stakeholders must decline to comment and refer them to the Corporate or local Communications team. Any employee who does not follow this rule may be held personally liable for his/her actions.
- 2. Responsible individual behaviour:** All Wockhardt employees should, in their daily work, behave as if they were representatives and ambassadors of the Company. Therefore, each employee should be committed to preserving and enhancing Wockhardt's reputation. Any illegal or offensive behaviour or statement, including via social media accounts, which could cause damage to the Company should be avoided. The core values of Sustainability, Quality and Leadership that underpin the Wockhardt brand should be reflected in everything we say or do. Unpublished internal information may only be disseminated through an authorised channel (Company press releases). Each employee should keep any unpublished internal information about Wockhardt strictly confidential and not trade in Wockhardt securities while in the possession of any unpublished-price sensitive inside information in line with the Company's code of Conduct for prevention of Insider Trading.
- 3. Transparency:** Wockhardt is committed to providing the public with clear, accurate and reliable information at all times. We seek to establish close relationships with our stakeholders, both internal and external, through regular communication, integrity and transparency.

4. **Two-way communication:** Wockhardt believes in clear, accurate and reliable top-down and bottom-up communication through all levels of the organisation. Efficient two-way channels of communication ensure that employees understand, are aligned with and help the Company achieve its business objectives. The communication with all stakeholders, internal and external, must proceed in line with the Company's official stance and strategy.
5. **Presenting at conferences:** Before speaking at conferences, any presentation which touches upon Wockhardt' business, should be reviewed and approved by Corporate Communications/ Legal or Investor Relations team in advance.
6. **Official language:** Wockhardt recognises the rich linguistic diversity within the Group. However, English has been identified as the official language of the Group, and the learning and use of this language should be promoted.
7. **Fair and prompt disclosure:** Wockhardt recognises the value of communicating company-related information in a timely and nonselective manner. Publicly available information on company related matters should be released to all internal & external stakeholders and to the public simultaneously. While making any public disclosure, the Company shall adhere to the Company's '**Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information**' and the '**Policy for determining Materiality of Events**' as approved by the Board of Directors of the Company and for the time being in force.
8. **Confidentiality:** All Wockhardt documentation, correspondence and company-related information, unless and until publicly available must be treated as confidential. Non-public information from or concerning suppliers, customers, employees, agents, consultants and other parties must also be protected in accordance with legal and contractual requirements.
9. **Compliance:** This policy should also be read in conjunction with the Wockhardt's **Code of Conduct**. Wockhardt is committed to complying with all applicable laws, rules and regulations on the disclosure of financial and other information about the Company. Furthermore Wockhardt fully respects the legal rights of the employees in all countries. In case of contradiction between this policy and applicable laws, applicable laws shall prevail.