

# **ETHICAL MARKETING POLICY**

At Lupin, we maintain high ethical standards, with responsibility and accountability being at the heart of our organization. We are committed to ethical marketing and promotional practices of our healthcare products to ensure well-being of patients and customers.

**Purpose:** The objective of this policy is to ensure that our customers, healthcare professionals (“HCPs”) and patients receive accurate and complete information with regard to medications, while abstaining from activities that could unduly influence their decisions.

**Scope:** This policy applies to all forms of communication from Lupin and its subsidiaries related to the sales and marketing of its products and services.

**Policy :** We commit to the following:

- Ensure drug promotions and any marketing communication is reliable, accurate, up-to-date, informative, balanced and not misleading.
- Ensure any promotional material such as mailers and advertisements provide accurate, balanced and scientifically substantiated information and are not designed to disguise any other messaging.
- Avoid making any misleading or unsubstantiated claims regarding the efficacy or safety of Lupin's products.
- Not misuse technical or scientific data or terminology or vocabulary to mislead customers, patients or HCPs on Lupin's products or services.
- Will comply with applicable anti-bribery and anti-corruption laws and ensure interactions with organizations (such as patient groups/patient organizations) and individuals outside of Lupin are conducted with integrity.
- Conduct ethical business practices and prohibit use of any unlawful inducement, bribe, or other payment in order to improperly influence a third party for the sale, recommendation, prescription or preferential treatment of Lupin's products or services.
- Conduct promotions, marketing, and sales of Lupin's products and services in accordance with national health policies, regulations, and applicable marketing standards, practices and guidelines like the Uniform Code for Pharmaceutical Marketing Practices (UCPMP) and World Health Organization's (WHO) Ethical Criteria for Medicinal Drug Promotion. The promotional materials and non promotional materials are approved by Lupin Business Ethics and Compliance team.
- Follow ethical practices and country specific guidelines while engaging with HCPs to avoid unethical marketing practices.
- Ensure that no financial or material benefit is offered to HCPs or customers for influencing them to promote or endorse or increase sales of Lupin's products or services.
- Abstain from gifting, travel, any form of entertainment, social, or recreational activity for personal benefit of HCPs or their relatives.
- Pay reasonable and justifiable consideration to HCPs in the line with the fair market value only for actual professional services rendered by HCPs to Lupin.

To disclose contributions to healthcare professionals if any in accordance with applicable regulations or industry codes.

- Provide periodic training to Lupin's sales representatives in product knowledge and ethical marketing practices.
- Include all information needed for the safe use of drugs, in line with regulatory authority guidelines on packaging and labels.
- Clearly state any ingredients or excipients which may cause adverse reactions as required by the regulatory guidelines on packaging and labels.
- Ensure ethical marketing practices and promotions are covered in internal control management system, corporate audits and form a part of enterprise risk management system.
- Monitor product safety and quality post-launch, analyze issues through quality and pharmacovigilance system, and report to regulatory authorities as per guidelines issued by them.
- Monitor and review frequently the content, materials and activities on social media and other digital channels to ensure compliance with local laws and applicable regulations on consumer marketing.
- Ensure that our direct-to-consumer marketing clearly specifies the approved health conditions for the medicine which is approved. Provide a balanced presentation of both the benefits and risks associated with the medication.
- Train and inform employees and relevant stakeholders to adhere to, and enforce this policy effectively.
- Establish a mechanism for reporting and voicing concerns against unethical marketing and sales practices or any related promotional activities.
- Document and thoroughly investigate all concerns by ensuring appropriate actions to address the concerns reported.

## Reporting Concerns:

Stakeholders may report their concerns at [Lupinglobal.ethicspoint.com](https://lupinglobal.ethicspoint.com)

[EthicsPoint - Lupin Limited](https://lupinglobal.ethicspoint.com)

**Changes to the Policy:** Lupin will periodically review and update this policy in consultation with relevant internal and external stakeholders to ensure that the policy statements are aligned with applicable regulations and best international pharmaceutical industry practices.

Approved by

**SWAMINATHAN RAMESH**

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Date: 7<sup>th</sup> February 2025