Political Involvement Policy

Version 1.0

7th January 2026

Lupin Limited is committed to engaging in public policy and political processes responsibly, lawfully, and transparently across all geographies where we operate. Lupin strictly prohibits any attempt to improperly influence public officials or political processes and does not tolerate bribery, facilitation payments, or quid pro quo arrangements.

As a responsible leader in the healthcare & pharma industry, Lupin recognizes that engagement in public policy should be conducted ethically, legally, and transparently. Our **Code of Business Conduct & Ethics** outlines the ethical standards and core commitments that guide our participation in public policy and political activities. The Code outlines the standards required to uphold Lupin's commitment to ethical conduct in all business and personal interactions with third parties, including government officials and external stakeholders.

Purpose: This policy outlines Lupin's position on political involvement to ensure transparency, integrity, and alignment with our values and stakeholder expectations.

Scope: This policy applies to all employees, contractors, and representatives acting on behalf of Lupin globally.

Lupin is committed to acting responsibly and in full compliance with all applicable anti-bribery, anti-corruption, and transparency laws, regulations, and applicable industry codes across the jurisdictions in which we operate.

Policy: We commit to the following:

Prohibited Political Involvement

Lupin strictly prohibits:

- Any form of political contribution (monetary or in-kind) made on behalf of the company without prior approval from the Board.
- Use of company resources (including time, funds, facilities, or communication channels) for political campaigning.
- Employees representing Lupin in any political activity unless explicitly authorized.
- All forms of political advertising and communication.

Limited Engagement

Lupin may engage in lobbying /advocacy efforts through trade associations or industry bodies that *inter-alia* supports patient health, equitable access to high-quality medicines, scientific innovation, sustainable healthcare systems, or public health objectives.

Such engagements must:

- Be approved by the Leadership.
- Be conducted through registered and reputable channels or trade associations.
- Engagement should be non-partisan and evidence-based, and should align with Lupin's **Code of Business Conduct & Ethics**, values, and long-term business sustainability

Disclosure Commitment
Lupin is committed to transparency in its political engagement. In accordance with applicable laws, the company will publicly disclose any political donations and/or lobbying expenditures made on its behalf. These disclosures will be included in Lupin's annual ESG Report or Integrated Report.

All political contributions must be lawful and fully compliant with relevant regulations. They must be transparently and accurately recorded in Lupin's books and records, in line with the company's accounting standards and internal governance practices.

Reporting Concerns and Non-Retaliation
Employees and third parties are encouraged to report suspected violations of this Policy through Lupin's whistleblower channels, including the hotline, compliance portal, or directly to Legal or Compliance. Anonymous reporting is available. Lupin prohibits retaliation against any person who raises concern in good faith. Reports are investigated promptly and fairly, and substantiated violations result in corrective actions.

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 global best practices, applicable regulations and laws.

The Policy has been approved by.

Ramesh Swaminathan
Executive Director, Global CFO, Head of IT & API Plus SBU

Definitions

- *Political activity:* Any activity intended to influence public policy, legislation, regulation, executive actions, administrative decisions, or electoral outcomes.
- *Lobbying/advocacy:* Direct or indirect engagement with public officials, policymakers, or their staff to inform or influence policy or regulatory outcomes, including participation in consultations, submissions to authorities, or industry forums.
- *Public official:* Any elected or appointed official, civil servant, regulator, employee of a government department, statutory authority, or public sector entity, or any person acting in an official capacity for or on behalf of government or public institutions.
- *Political contribution:* Monetary or in-kind support (e.g., goods, services, facilities, advertising, sponsorships) provided to political parties, candidates, political committees, ballot initiatives, referenda, or other political purposes as defined by applicable law.
- *Political advertising/communications:* Public communications that promote or oppose political parties, candidates, or electoral outcomes; subject to relevant electoral and advertising rules.
- *Quid pro quo:* Any exchange of value intended to improperly influence an official act or decision strictly prohibited.