



Abbott India Limited

Procedure for inquiry into leakage of Unpublished Price Sensitive Information

1. Covered Activities:

- 1.1 This Procedure applies to all employees of Abbott India Limited (“the Company”). It governs the mechanism for conducting an inquiry in case of leak of or suspected leak of unpublished price sensitive information (“UPSI”) and inform the Board promptly of such leaks, inquiries and results of such inquiries.
- 1.2 This procedure is drafted in compliance with Regulation 9A of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended (“**SEBI PIT Regulations**”).

2. Applicability:

This Policy shall be applicable with effect from April 1, 2019

3. Why It Matters:

Leakage of UPSI is a matter of serious concern for the Company, and the Company shall strive to restrict and prohibit the leakage of UPSI originated from the Company and have appropriate internal control systems to prevent occurrence of such leakage of UPSI.

4. Unpublished Price Sensitive Information:

means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily include, but not restricted to, information relating to the following:

- 1) Periodical financial results of the Company;
- 2) Intended declaration of dividends (both interim and final);
- 3) Change in capital structure;
- 4) Issue of securities or buy-back of securities;
- 5) Any major expansion plans or execution of new projects;
- 6) Amalgamation, mergers, de-mergers, acquisitions, takeovers, delistings, disposals and expansion of business and such other transactions;
- 7) Disposal of the whole or substantial part of the undertaking;
- 8) Any significant changes in policies, plans or operations of the Company.
- 9) Changes in Key Managerial Personnel.

5. Conducting Inquires

The Compliance Officer may on becoming aware suo moto or on receipt of a written intimation of leak or suspected leak of UPSI from the genuine source shall take cognizance of the matter and promptly proceed with inquiry into the matter.

“**Leak of UPSI**” means directly or indirectly communicate, provide, or allow access to any Unpublished Price Sensitive Information to any person or procure from or cause the communication by any insider of Unpublished Price Sensitive Information, relating to the Company or securities listed except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

6. Assigning Investigations

Once an information/allegation is received, the Compliance Officer designated under the SEBI PIT Regulations or his/her delegate, will decide as to the appropriate Investigation group who will conduct necessary inquiry into the matter.

7. Conducting Inquiry and Disclosure

- 7.1 The Compliance Officer along with Investigation group basis the preliminary inquiry shall determine facts and gather sufficient evidence to allow the Investigation group and management to determine if further investigation is warranted. The Compliance Officer shall disclose and discuss all the findings of the Investigation group with the Managing Director and/or to the Board of Directors to assess the inquiry to determine appropriate follow-up action, including potential corrective action and/or disciplinary action.
- 7.2 Ongoing Inquiries are confidential in nature, and all reasonable steps will be taken to protect the Company’s interests, to respect the rights of its employees, and to respect the confidentiality of information involved. The Company reserves the right to make any disclosures of information learned in Investigations as appropriate or necessary to protect its interests, seek advice, counsel or assistance from third parties in connection with the Investigation, to comply with applicable laws or regulations.
- 7.3 All employees, insiders and designated persons must cooperate fully with and provide appropriate assistance to ongoing Inquiry, and must maintain the confidentiality of the same.
- 7.4 On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the Board shall promptly determine and direct the Managing Director/Compliance Officer to intimate to the Bombay Stock Exchange and SEBI.

8. Disciplinary action and corrective action:

At the conclusion of every Inquiry/investigation, with input as deemed appropriate by the Investigation group, the Managing Director in consultation with the Board of Directors will determine if disciplinary action is warranted, and if so, the appropriate disciplinary action. They may determine that suspension is warranted even prior to the conclusion of an Investigation.

9. Document retention:

All enquiry/Investigation documents/evidences/files will be retained for seven years from closure.

10. Amendment:

The Company, with the approval of the Board of Directors, reserves its right to amend or modify this Procedure in whole or in part, at any time without providing any reason whatsoever.

Version: 1.1

Date of approval: May 27, 2019