



Business Partner Code of Conduct

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Introduction

Biocon is committed to sustainability in all its business activities. Corporate integrity, responsible product sourcing, and the safety and well-being of personnel across the global chain are of paramount importance to Biocon Limited and its subsidiaries. Biocon supports the ten principles of the United Nations Global Compact (UNGC) on Human Rights, Labor, Environment and Anti-Corruption.

This Business Partner Code of Conduct is based on the framework of the Responsible Business Alliance (RBA) Code of Conduct 8.0, that establishes standards to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that business operations are conducted ethically and environmentally responsible.

Our Business Partner Code of Conduct, as may be amended from time to time, outlines Biocon's expectations and guidelines with respect to responsible sourcing including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain.

Biocon expects its Business Partner, service providers and their sub-contractors to adhere to this Business Partner Code of Conduct.

"Business Partner" shall mean and include all third parties doing business with the Company, including manufacturers, distributors, vendors and service provider. The Business Partner Code of Conduct does not supersede any local law. Biocon expects its Business Partners to operate in compliance with applicable laws, rules, and regulations, in addition to the aspects contained herein.

Applicability

1. This Code of Conduct applies to all Business Partners doing business with Biocon. Business Partner is responsible for compliance with the standards set out in this Code of Conduct ("Standards") throughout its operations and throughout its entire supply chain.
2. Without limiting Business Partner's obligations hereunder, Business Partner should comply with these Standards in:
 - all its facilities; and
 - all its operations, including with respect to manufacturing, distribution, packaging, sales, marketing, product safety and certification, intellectual property, labour, immigration, health, worker safety, and the environment.
3. Without limiting Business Partner's obligations hereunder, Business Partner is responsible for compliance with the Standards by all its business partners, vendors, agents, and subcontractors and their respective facilities ("Partners").

Ethics and Integrity

To meet social responsibilities, all Business Partners are expected to conduct their business upholding highest ethical standards and act with integrity. Business relationships shall be based on trust, transparency, and mutual accountability.

Anti-Bribery and Anti-Corruption

Bribery is the act of giving money in cash/kind, goods, or services, in an attempt to unduly influence a business decision for an undue/improper advantage. Business Partners are expected to refrain from any form of bribery, corruption, extortion, or embezzlement. Business Partners are expected not to offer any bribes or any other kind of direct or indirect benefits to Biocon employees or to any government official, directly or indirectly, to improperly influence the performance of a duty. Business Partners shall commit to

prevent, detect, and tackle any form of corruption, bribery, gifts, illegal political contributions, fraud, extortion, and money laundering and follow all applicable laws, rules, and regulations. To uphold our zero-tolerance stance on bribery and corruption, caution must be exercised when giving or receiving gifts or hospitality. Such exchanges must not create obligations, suggest impropriety, or result in actual or perceived conflicts of interest.

Anti-Money Laundering

Money laundering is the process by which individuals or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. Business Partners are expected to ensure that they are conducting business with reputable vendors and customers, for legitimate business purposes with legitimate funds. Business Partners should check for “red flags” in any unusual payment transactions.

Fair Competition

Business Partner are expected to conduct their business in line with fair competition and in accordance with all applicable laws. Business Partner should deal fairly with all customers and competitors and should not take unfair advantage of any company, through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

Compliance with Laws

1. Business Partners must conduct their business in compliance with all applicable laws and regulations, including, but not limited to, those relating to corruption, bribery, money laundering, tax evasion (including the facilitation of tax evasion), competition, export controls, modern slavery (and human trafficking), and health, safety, and environment.
2. Business Partner should not carry out any conduct or activity that would expose Biocon to a risk of penalties under any laws and regulations: or make any act or

omission that will cause or lead Biocon to breach any applicable laws or regulations.

3. Business Partner acknowledges that, upon reasonable prior notice, Biocon may in its discretion conduct inspections of the facilities to confirm Business Partner's compliance with this Code of Conduct. However, Biocon has no obligation to conduct inspections.
4. Business Partners should educate their workers (includes any employee, director, officer, staff, or personnel engaged or employed by a supplier, including agency workers, whether on a permanent, temporary or casual basis) to make ethical decisions in compliance with laws, regulations and contract requirements. If required, Biocon endeavours to provide necessary training / awareness.
5. The Business Partner should ensure compliance with all country regulations and recommendations relating to environmental protection in force within the countries where it carries out its activities. The Business Partner must have the appropriate certificates and/or permits allowing it to operate, implement programs to ensure products do not contain restricted or banned materials as well as programs to verify that plant/forest materials and derivatives purchased are legally harvested and exported/imported.

Data Privacy and Intellectual Property

Business Partner's shall ensure that confidential information (e.g. any information disclosed by Biocon's representatives, whether in writing, orally, visually or otherwise, including but not limited to business plans, contractual, engineering, financial, sales, marketing and operational information, product specifications, technical data, trade secrets, purchase order data, technical know-how, ideas and concepts of Biocon) is used only for its intended purpose.

Business Partner shall establish and maintain adequate personal data and information security protection consistent with applicable data-protection and privacy laws and aligned with industry standards for the protection and security of all information,

including personally identifiable information, as decided and agreed by Biocon and the Business Partner in a fair, transparent and secure way, ensuring the protection of privacy and valid intellectual property rights of all employees and business partners.

Business Partner must make only appropriate use of confidential information and take reasonable measures to address all identified information-security and privacy risks related to information provided by Biocon.

Business Partner shall comply with rules and procedures that Biocon may put in place for accessing, processing, storing, communicating, or providing IT infrastructure for information resources, and must promptly communicate any significant changes that may affect agreed-upon information-security or privacy controls.

Business Partner must apply adequate information-security controls through a formal, auditable program. Trade secrets and other confidential, proprietary, and sensitive information shall always be kept secure from unauthorized usage, damage, and disclosure.

Artificial Intelligence

Business Partners shall ensure that any use of artificial intelligence is responsible, ethical, and aligned with the highest standards of data governance, data integrity, and data privacy. Business Partners shall comply with all applicable laws, rules, and regulations governing the development, deployment, and use of artificial intelligence and related technologies, and shall provide accurate, complete, and truthful information to competent authorities when required.

Cybersecurity

Business Partners shall implement appropriate cybersecurity measures to protect information systems, networks, and digital assets against unauthorized access, cyber threats, and security incidents. Business Partners shall establish and maintain processes for identifying, assessing, preventing, detecting, and responding to cybersecurity risks, including risks affecting data, systems, operations, and business continuity. Where

applicable, Business Partners shall promptly report cybersecurity incidents that may impact Biocon's systems, data, or operations and take timely corrective actions to mitigate such risks and prevent recurrence.

Trade Restriction and Export Controls

Business Partner must abide by all applicable economic sanctions or trade embargoes that are applicable to doing business with Biocon. Business Partner must not directly or indirectly engage in or support any terrorist activity. Neither Business Partner nor any of their affiliates, nor any officer or director of the Business Partner or any of its affiliates, should be included on any lists, including without limitation, as sanctioned entity or sanctioned persons, terrorists or terrorist organizations compiled by the any national or international body.

Marketing and Promotional Practices

All marketing and promotional materials and activities pertaining to Biocon business, must conform to high ethical, medical and scientific standards and comply with all applicable laws and regulations. When engaging with Healthcare Professionals (HCPs), Healthcare Organizations (HCOs), or patients, all Business Partners must adhere to relevant industry code that apply to them.

Business Partners should not provide HCPs/HCOs anything that could be perceived as an inducement to prescribe such as financial benefit or benefit-in-kind which could include scholarships, subsidies, consulting contracts, educational items, or practice-related items, that can be alleged to have an inappropriate influence on HCP's prescribing practice. Any such benefit in kind should be modest, fit for purpose and allowed as per local regulations.

Business Partner should not interact with HCPs in a manner that may adversely impact Biocon's reputation. Business Partners should adhere to applicable ethical codes of practice, local industry codes, and legal and regulatory requirements that apply to

interactions with HCPs, HCOs, etc.

Where applicable, Business partners should ensure that promotional items and activities are compliant as per local regulations and should have internal systems to allow for approvals of these items by cross functional teams including legal, regulatory, medical, etc, as mandated by local authorities and / or as per applicable laws.

Where applicable, Business partners are encouraged to maintain local promotional/medical messaging in line with and aligned to global messaging as communicated by Biocon.

Social Media

- **Freedom of Expression with Responsibility**

Business Partners are encouraged to express themselves freely on social media platforms, including blogs, wikis, chat rooms, and comment forums. However, they must exercise caution to ensure that their posts do not negatively impact the perception or reputation of both themselves and Biocon. This includes avoiding any content that could be seen as defamatory, obscene, or offensive.

- **Confidentiality and Proprietary Information**

It is crucial to protect Biocon's confidential and proprietary information. Business Partners must not disclose any confidential information about Biocon, its products, customers, or business operations on social media. This includes avoiding the use of Biocon's logo, trademarks, or other intellectual property without prior authorization.

- **Professionalism and Accuracy**

All social media communications related to Biocon should be conducted with professionalism, accuracy, and honesty. Business Partners should avoid making any claims about Biocon's products or services that are not verified or approved by the company. They should also refrain from engaging in discussions about "off-label" or unapproved uses of Biocon's products.

- **No Representation without Authorization**

Business Partners are not authorized to speak on behalf of Biocon or represent Biocon in any capacity on social media unless they have taken explicit permission from the Global Communications through their Biocon Point of contact. If they are contacted for comments about Biocon from any Media Journalist, they must direct the inquiry to the Biocon Global Communications team. If they wish to make any public statement or announcement related to their association or business with Biocon they must contact Biocon Global Communications through their contact.

- **Reporting Negative Content**

Business Partners are encouraged to promptly notify Biocon if they come across any social media content that negatively impacts the Biocon reputation. This proactive approach helps Biocon address and mitigate any potential damage swiftly.

- **Global Applicability**

Biocon social media Policy is applicable to its employees as well as to consultants, trainees, interns, partners, as well as Business Partners and agencies working on behalf of the company. It is mandatory for all these constituents to be familiar with Biocon's Code of Conduct and comply with the social media guidelines outlined here.

- **Compliance with Social Media Platforms' Terms of Use**

Business Partners must ensure that their use of social media complies with the terms of use of the respective platforms. This includes adhering to restrictions on advertising, marketing, and the use of intellectual property. They should also respect the privacy rights and responsibilities outlined by the social media sites.

Identification of Concerns / Whistleblowing

Business Partners are expected to provide a mechanism for their employees/business partners to report concerns or potentially unlawful activities at the workplace without fear of reprisal or threat. Any concern should be treated in a confidential and anonymous manner. Business Partners must investigate such concerns and take corrective action, as

needed. Biocon places highest priority on transparency of any business processes. Any individual can report concerns regarding suspected unethical / non-compliant activities as soon as possible, in accordance with our Whistle Blower & Integrity Policy.

Conflict of Interest

Business Partners must avoid participating in any business activity that creates a conflict. Conflicts include situations involving personal interests or those of close relatives, friends, or associates that may influence independent judgement. Business Partners are expected to have established measures to prevent any conflict of interest that improperly influence any business judgement. Business Partners are expected to notify all affected parties of an actual or potential conflict of interest.

Quality

Business Partners of Biocon are expected to provide goods and services that consistently meet prescribed standards, are safe for their intended use and perform as intended. Business Partners must meet the specifications agreed upon in the applicable agreement, purchase order or other contractual relationship with Biocon.

Product Quality

Business Partners involved in the supply, manufacturing, packaging, re-packaging, testing, storage and distribution of materials /products for Biocon must comply with applicable Quality regulations and Good Manufacturing Practice, Good Distribution Practice and Good Laboratory Practice requirements for the markets in which the products are manufactured, registered and distributed. Business Partners must also ensure the integrity of their supply chain, avoiding counterfeiting and adulterations, etc. to protect patients and products.

Supply Chain Integrity

Business Partners are encouraged to implement processes like supplier monitoring and also communicate about their requirements to all their value chain partners/ Partners. Business Partners are encouraged to ensure adoption and set for the principles set in this

Business partners Code of Conduct further down their value chain and ensure these principles are adhered in their value chain and partners.

Business Partners are encouraged to provide opportunities to small and diverse businesses in their supply chains while providing products/ goods and services to Biocon. Biocon recognize that a strong, diverse supplier chain is essential to economic vitality and business continuity, and Biocon seek opportunities to conduct business with competitive, diverse business partners and indigenous businesses.

Labor and Human Rights

Business Partners shall not use any form of forced, bonded, indentured, or child labor. Business Partners shall protect the human rights of their employees and are expected to promote and maintain a culture that treats them with dignity and respect. Business Partners shall promote the fundamental principles and rights enunciated in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Child Labor and Forced Labor

Business Partner s shall not use child or forced labor, and shall not support or engage in slavery, human trafficking, compelled, involuntary, bonded, indentured, or prison labour, and must ensure that all labour performed is voluntary Biocon does not conduct business with Business Partner s employing child or bonded labor or using any form of mental and physical compulsion as a form of discipline.

Anti-Discrimination

Business Partner s shall not engage in any discrimination or distinction, exclusion, or preference made on the basis of race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments or any other basis protected by law.

Fair Treatment

Business Partners must be committed to a workplace free of harassment and should not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment or abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.

Employment Policy

Business Partners are expected to declare and pursue an active policy designed to promote full, productive and freely chosen employment. Such a policy shall aim to ensure that there is work for all who are available for and are seeking work; that such work is as productive as possible; and that there is freedom of choice of employment and the fullest possible opportunity for each worker to qualify for, and to use his or her skills and endowments in, a job for which he or she is well-suited, irrespective of race, color, sex, religion, political opinion, national extraction, or social origin.

Fair Wages, Benefits and Working Hours

Business Partners should ensure that they pay workers according to the applicable wage laws, including minimum wages, overtime hours and mandated benefits, and must maintain proper documentation of wage payments there should be proper communication with the workers about the basis on which they are being compensated in a timely manner. The Business Partners are also expected to communicate with the workers about the overtime requirements and the wages to be paid for such overtime. Business Partners must follow a minimum wage fixing system capable of determining and periodically reviewing and adjusting minimum wage rates having the force of law. Business Partners must respect workers' rights to rest and leisure and avoid unsafe working conditions by providing enough rest periods during the workday, honor agreed upon days off from work and maximum working hours. Business Partner must compensate all workers with wages, including overtime premiums, and benefits at a minimum, meet the minimum wage and benefits established by applicable law. Business Partner should not make any deductions from wages, except applicable income tax withholding and those deductions which are legally allowed as per applicable statutory

requirement.

Freedom of Association

As permitted by applicable laws and regulations, the rights of workers to associate freely, form and join workers organizations, seek representation, and bargain collectively shall be respected. Workers should be permitted to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

Equality, Diversity and Inclusion:

Business Partner shall promote an environment of equality, diversity and inclusion with regards its employees, contractors, officers and Partners.

Health and Safety

Business Partners shall provide a safe and healthy working environment for all employees working at their sites. Business Partners are expected to have a Health and Safety (HS) organization to define, implement and follow-up on an HS policy and HS management system that includes compliance with local and national regulations, and must implement reasonable procedures and safeguards to prevent workplace hazards, industry-specific hazards, and work-related accidents and injuries.

Workers' Health and Safety Protection

Business Partners shall identify and protect workers from any physical, chemical or biological hazards at the workplace as well as from risks associated with any infrastructures used by their employees. Safety information for identified workplace risks shall be made available to inform and train workers to protect them from the risk. This includes safety information about hazardous substances used such as chemicals, pharmaceuticals active ingredients, intermediate products, etc., and Business Partners must conduct health and safety inspections, equipment maintenance, maintenance of facilities, worker training, fire prevention, documentation and recordkeeping as outlined under Business Partner Code of Conduct requirements. Business Partners must provide

workers with adequate and appropriate personal protective equipment (PPE) to protect workers against hazards typically encountered in the scope of work.

Protection from Chemical Exposure

Business Partners should adopt and implement a clear policy on safety in the use of chemicals at work, which includes the production, handling, storage, and transportation of chemicals, as well as the disposal and treatment of waste chemicals, the release of chemicals resulting from work activities, and the maintenance, repair and cleaning of equipment and containers of chemicals.

Response to Emergency

Business Partners are expected to identify and assess possible emergency situations in the workplace and their premises and minimize their impact inside and outside the site by implementing emergency response plans and procedures, and must ensure all required supplies and emergency equipment are available, employees are trained, and emergency response plans are operational across all facilities

Process Safety

Business Partners are expected to have safety programs in place for managing and maintaining their production processes in accordance with the applicable safety standards. Business Partners shall address product-related issues and their potential impact during all stages of the production process. For hazardous installations, the Business Partners are expected to conduct specific risk analyses and implement measures that prevent the occurrence of incidences such as chemical releases or explosions.

Machine safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

Clinical Trial

Business Partners conducting clinical trials on behalf of Biocon, should perform such services in accordance with the global standards of Good Clinical Practices, applicable local regulatory requirements. The trials must be conducted with utmost regard to health and safety of volunteer participants.

Adherence to EHS Directives

Business Partners, when inside premises under the control of Biocon, should adhere to “Biocon EHS Directive for Business Partner’s”. Contractors and sub-contractors related to construction, erection, commissioning, operation and maintenance inside premises under control of Biocon are expected to strictly adhere to “Biocon EHS Directive for Contractors” and communicate the same to their sub-contractors for adherence.

Facilities

The Business Partner should ensure that all facilities fully comply with applicable building codes, industrial design and construction standards, and obtain and maintain all legally required construction, zoning, and use approvals. Without limiting these obligations, the facilities must be equipped with adequate evacuation plans; well-lit, clearly marked, and unobstructed emergency exits and routes; a sufficient number of exit doors; visible evacuation maps in the local language; proper ventilation and lighting; adequate first-aid arrangements; robust fire safety, prevention, alarm, and suppression systems; access to potable water; and private toilet facilities. The Business Partner must also ensure that safety rules, inspection results, incident reports, and permits are displayed or maintained as required under applicable laws

Environment and Sustainability

It is essential that Business Partners should comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements should be followed.

Emissions

Business Partners shall establish and maintain systems and processes to identify, monitor, manage, and control air emissions arising from their operations. Emissions with the potential to adversely impact human health or the environment must be appropriately measured, controlled, and treated prior to release, in accordance with applicable laws, permits, and standards. Appropriate controls shall also be implemented to prevent, detect, and mitigate accidental releases of hazardous substances into the air.

Climate Protection

Business Partners are expected to monitor, manage, and where applicable, reduce greenhouse gas (GHG) emissions arising from their operations. Suitable GHG management and reduction initiatives should be implemented and documented. Business Partners are encouraged to engage suppliers and value-chain partners to support emissions-reduction efforts and to develop and adopt climate-friendly products, technologies, and processes that reduce energy consumption and greenhouse gas emissions.

Water Management

Business Partners are expected to use water resources efficiently and responsibly, including fresh water and process water. Targets for water consumption and wastewater generation should be established, with progress tracked against environmentally relevant objectives. Systems and controls must be in place to manage, store, treat, recycle, and discharge wastewater in compliance with applicable legal and regulatory requirements. Any wastewater with the potential to adversely impact human or environmental health must be appropriately treated prior to discharge, and measures shall be implemented to prevent and mitigate accidental spills or releases.

Waste Management

Business Partners should have systems in place to ensure the safe handling, movement, storage, recycling, reuse, and disposal of waste. Any waste management activity that may adversely impact human health or the environment must be appropriately managed,

measured, controlled, and treated prior to release or disposal, in accordance with applicable laws and standards.

Resource Conservation

Business Partners are expected to use natural resources, such as water, energy, and raw materials, in an economical and responsible manner. Environmental impacts should be minimized or eliminated at their source through measures such as process modification, maintenance improvements, material substitution, conservation practices, recycling, and material reutilization.

Biodiversity

Business Partners shall identify, manage, and minimize impacts on biodiversity and ecosystems through their environmental management practices, avoid sourcing materials that contribute to biodiversity loss, and, where applicable, implement measures to protect sensitive or key biodiversity areas and comply with relevant benefit-sharing and disclosure obligations.

Spills and Releases

Business Partners shall have systems in place to prevent and mitigate accidental spills and releases of fuels, raw materials, effluents, intermediates, products, and other hazardous materials to the environment, and where applicable must implement systems to prevent and mitigate accidental spill or release of hazardous waste.

Transparency and Disclosure

Business Partners are expected to make reasonable efforts to disclose (for example on a website or publicly available report) topics and goals relating to energy, waste and water usage.

Management Systems

Business Partners are expected to adopt or establish a management system designed to ensure compliance with the expectations of this code's fundamental principles and all

applicable laws and regulations for identifying and mitigating associated operational risks, establish opportunities, and facilitate continual improvement.

Commitment and Accountability

Business Partners are expected to allocate appropriate resources to ensure commitment to this Business Partner Code of Conduct.

Risk Management

Business Partners are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Business Partner Code of Conduct and all applicable legal requirements. This includes assessing activity risks carried out by any third-party acting on its behalf, and the risk-management process should also extend to contractors and companies carrying out operations on their behalf.

Documentation

Business Partners shall maintain documented information, which demonstrates that they share the principles, values and required conformances expressed in this Business Partner Code of Conduct. This documentation may be reviewed by Biocon staff upon mutual agreement.

Training and Competency

Business Partners are expected to establish appropriate training measures to allow management and employees to gain an appropriate level of knowledge and understanding of this Business Partner Code of Conduct, the applicable laws and regulations and generally recognized standards.

Audits and Assessments

Business Partners are expected to carry out periodic self-evaluations to ensure that the Business Partner, its sub-contractors, and next-tier Business Partners are complying with this code's requirements. Business Partners should also ensure timely remediation of gaps/deficiencies identified. Biocon will continuously monitor compliance with this Code

to Business Partners need to ensure ongoing adherence. As necessary and upon reasonable notice, Biocon reserves the right to conduct audits to verify compliance with this Business Partner Code of Conduct and must maintain original and accurate records and provide access for audits as required.

Continual Improvement

Where applicable, Business Partners are encouraged to continually improve themselves by setting objectives, goals, targets and implementing them and taking appropriate corrective actions for gaps identified by internal or external assessments, inspections or management reviews.

Business Continuity

Where applicable, Business Partners are responsible for the development and implementation of appropriate business continuity plans and management systems for operations supporting our business.

Termination

Biocon may immediately terminate its business relationship (including any purchase order(s) and purchase contracts) if Business Partner fail to meet the Standards.

CONTACT US - For any queries, please feel free to reach out to Global E&C Function at GEC@biocon.com

Business Partner should report any concerns about violation of this policy or applicable laws by writing to integrity@biocon.com

Disclaimer: This Business Partner Code of Conduct document is intended solely to provide general guidance on matters of interest only and does not constitute professional advice. This document may provide links or references to other sources of information, but Biocon Limited and its subsidiaries has no responsibility for the content of such other sources and shall not be liable for any damages or injury arising from that content.

