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# SUPPLIER 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 wellbeing of personnel across the global supply chain are of paramount importance to Biocon Limited and its subsidiaries ('Biocon').

Our Supplier Code of Conduct (the 'Code'), 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 suppliers, service providers and their sub-contractors to adhere to this Code. A 'supplier' refers to any third party who provides goods or services to Biocon for compensation or otherwise.

The Code does not supersede any local law. Biocon expects its suppliers to operate in compliance with applicable laws, rules, and regulations, in addition to the aspects contained herein.

• Scope: Biocon Limited and all its subsidiaries, except Biocon Biologics Limited, Syngene International Limited and their respective subsidiaries.

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- Revision and Approval by: Chief Executive Officer and Head of Supply Chain Management and Central Engineering, Biocon Limited



## **Ethics and Integrity**

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

### 1. 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. Suppliers are expected to refrain from any form of bribery, corruption, extortion, or embezzlement. Suppliers are expected not to offer any bribes or any other kind of direct or indirect benefits to Biocon or their appointed agents. Suppliers 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.

### 2. 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. Suppliers are expected to ensure that they are conducting business with reputable vendors and customers, for legitimate business purposes with legitimate funds. Suppliers should check for 'red flags' in any unusual payment transactions.

### 3. Fair Competition and Trade Controls

Suppliers are expected to conduct their business in line with fair competition and in accordance with all applicable laws. Suppliers shall comply with applicable laws pertaining to imports, exports, re-exports and diversion of products, goods or services and technical data, import export laws, economic sanctions and denied parties lists.

### 4. Compliance with Laws

Suppliers shall comply with all applicable legal requirements and regulations of the jurisdiction they conduct their business in, to ensure that their dealings are conducted legally and with integrity.

### 5. Privacy and Intellectual Property

Suppliers 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 as decided and agreed upon by Biocon and the supplier in a fair, transparent and secure way, ensuring the protection of privacy and valid intellectual property rights of all employees and business partners. Trade secrets and other confidential, proprietary, and sensitive information shall always be kept secure from unauthorized usage, damage, and disclosure.





### 6. Identification of Concerns/Whistleblowing

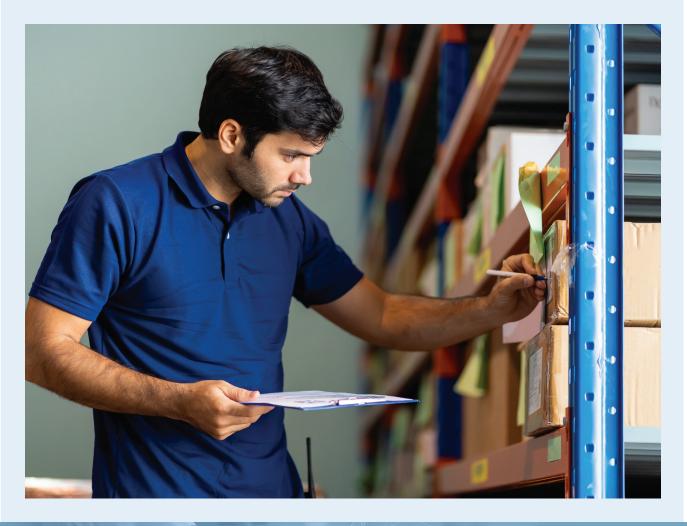
Suppliers are expected to provide a mechanism for their employees/business partners to report concerns or potentially unlawful activities at the workplace without fear of reprisal or threat. Any concern should be treated in a confidential and anonymous manner. Suppliers must investigate such concerns and take corrective action, as needed. Biocon places highest priority on transparency of all business processes.

### 7. Conflict of Interest

Suppliers must avoid participating in any business activity that can create a conflict. Suppliers are expected to have established measures to prevent any conflict of interest that improperly influences any business judgement. Suppliers are expected to notify all affected parties of an actual or potential conflict of interest.

### 8. Quality

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



## Labor and Human Rights

Suppliers shall not use any form of forced, bonded, indentured, or child labor. Suppliers shall protect the human rights of their employees and are expected to promote and maintain a culture that treats them with dignity and respect.

### 1. Child Labor and Forced Labor

Suppliers shall not use child or forced labor. Biocon does not conduct business with suppliers employing child or bonded labor or those that use any form of mental or physical compulsion as a form of discipline.

### 2. Anti-Discrimination

Suppliers 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.

### 3. Fair Treatment

Suppliers must be committed to establishing a workplace that is 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 or physical coercion, or verbal abuse.

### 4. Employment Policy

Suppliers 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 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.

### 5. Fair Wages and Working Hours

Suppliers should ensure that they pay workers according to the applicable wage laws, including minimum wages, overtime hours and mandated benefits. There should be proper communication with the workers about the basis on which they are being compensated in a timely manner. The suppliers are also expected to communicate with the workers about the overtime requirements and the wages to be paid for that. Suppliers must follow a minimum wage fixing system capable of determining and periodically reviewing and adjusting minimum wage rates having the force of law. Suppliers must respect workers' rights to rest and leisure, and avoid unsafe working conditions by providing enough rest period during the workday, honor agreed upon days off from work and maximum working hours.



## Health and Safety

Suppliers shall provide a safe and healthy working environment for all employees working at their sites. Suppliers 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.

### 1. Workers' Health and Safety Protection

Suppliers shall identify and protect workers from any physical, chemical or biological hazards at the workplace, as well as from risks associated with any infrastructure used by their employees. Safety information on identified workplace risks shall be made available to inform and train workers to protect them from those risks. This includes safety information about hazardous substances used, such as chemicals, active pharmaceutical ingredients, intermediate products, etc.

### 2. Protection from Chemical Exposure

Suppliers 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.

### 3. Response to Emergency

Suppliers are expected to identify and assess possible emergency situations in the workplace and minimize their impact inside and outside the site by implementing emergency response plans and procedures.

### 4. Process Safety

Suppliers are expected to have safety programs in place for managing and maintaining their production processes in accordance with the applicable safety standards. Suppliers shall address product-related issues and their potential impact during all stages of the production process. For hazardous installations, the



suppliers are expected to conduct specific risk analyses and implement measures to prevent the occurrence of incidences, such as chemical releases or explosions.

### 5. Adherence to Environment, Health and Safety (EHS) Directives

Suppliers, when inside premises that are under the control of Biocon, should adhere to 'Biocon EHS Directive for Suppliers'. Contractors and sub-contractors related to construction, erection, commissioning, operation and maintenance inside premises that are under control of Biocon are expected to strictly adhere to 'Biocon EHS Directive for Contractors'.

### 6. Facilities

Suppliers shall ensure that all their facilities have adequate approvals to operate and meet minimum required safety standards.

### 7. Transparency and Disclosure

Suppliers are expected to make reasonable efforts to disclose topics (e.g. on a website or publicly available report) and goals relating to employee health, safety, wellness programs and human rights investments.

### **Environment Compliance and Sustainability**

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

### 1. Waste and Emissions

Suppliers should have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and waste-water discharges. Any of these activities, which have the potential to adversely impact human or environmental health, shall be appropriately managed, measured, controlled, and treated prior to their release into the environment.

### 2. Resource Conservation and Climate Protection

Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impact on the environment and climate shall be minimized or eliminated at their source by practices such as the modification of production,

maintenance and facility processes, material substitution, conservation, recycling, and material reutilization.

### 3. Compliance with Legal and Regulatory Requirements

Suppliers should ensure compliance with all regulations and recommendations relating to environmental protection enforced within the countries where they carry out their activities. Suppliers must have the appropriate certificates and/or permits allowing them to operate and implement programs to ensure products do not contain restricted or banned materials, as well as programs to verify that the plant/forest materials and derivatives purchased are legally harvested and exported/imported.

### 4. Spills and Releases

Suppliers 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.

### 5. Transparency and Disclosure

Suppliers are expected to make reasonable efforts to disclose topics (e.g. on a website or publicly available report) and goals relating to energy, waste and water usage.

### Management Systems \_\_\_\_

Suppliers 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.

### 1. Commitment and Accountability

Suppliers are expected to allocate appropriate resources to ensure commitment to this Code.

### 2. Risk Management

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Code and all applicable legal requirements. This includes assessing activity risks carried out by any third party acting on its behalf.



### 3. Documentation

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

### 4. Training and Competency

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

### 5. Audits and Assessments

Suppliers are expected to carry out periodic self-evaluations to ensure that the supplier, its sub-contractors, and next-tier suppliers are complying with this Code's requirements. Suppliers should also ensure timely remediation of gaps/deficiencies that are identified.

### 6. Continual Improvement

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management review.



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

Disclaimer: This Supplier 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 external sources of information, but Biocon Limited has no responsibility for the content of such other sources and shall not be liable for any damages or injury arising from that content.

