

Aurobindo's Supplier Code of Conduct

AUROBINDO

Aurobindo Pharma Limited

Galaxy, Floors: 22-24, Plot No.1, Survey No.83/1, Hyderabad Knowledge City, Raidurg
Panmaktha, Ranga Reddy District, Hyderabad – 500032, Telangana, India

1. PURPOSE

At Aurobindo, our mission is to become the most valued Pharma partner to the Global Pharma fraternity by continuously researching, developing and manufacturing a wide range of pharmaceutical products that comply with the highest regulatory standards. In this journey, we recognize the importance of our suppliers, who play a vital role in attaining exceptional performance and efficiency across our supply chain.

2. Scope and Applicability

The Supplier Code of Conduct (CoC) is applicable to all the suppliers registered with Aurobindo Pharma Limited and its subsidiary companies. As part of our procurement process, the suppliers shall comply with this code, which comprises principles for five aspects, namely Ethics, Labor & Human Rights, Health and Safety, Environment and Management Systems. These principles are in line with the Pharmaceutical Supply Chain Initiative (PSCI) for Responsible Supply Chain Management

3. RESPONSIBILITY

Head - Corporate EHS

Heads - Supply chain management/Raw material Procurement

4. PRINCIPLES

The five principles that this Code of Conduct is based on are detailed below:

ETHICS

- **Anti-bribery and Corruption:** Our suppliers shall ensure that all types of bribery, corruption, extortion, and embezzlement are prohibited. They shall also guarantee that they have proper anti-bribery mechanisms in place along with adherence to all the applicable laws.
- **Fair Competition:** Our suppliers are required to do business in a fair manner, in accordance with all applicable anti-trust laws. They shall adhere to fair business practices in an ethical manner, including accurate and truthful advertising.
- **Data privacy and security:** Our suppliers shall ensure that individuals' privacy rights shall be protected by limiting the use and disclosure of Personally Identifiable Information to the purposes for which it was collected.
- **Patient Safety and Access to Information:** Our suppliers shall have adequate management procedures in place to reduce the risk of patients losing their rights, including their right to health and direct access to information if applicable.

- **Conflict of Interest:** Our suppliers shall exercise reasonable caution to avoid and manage conflicts of interest. If an actual or perceived conflict of interest emerges, they shall notify Aurobindo.

LABOUR & HUMAN RIGHTS

- **Freely chosen employment:** Our suppliers shall not use forced, bonded, or indentured labor, as well as involuntary prison labor. No worker should be forced to pay for a job or denied their freedom of movement.
- **Child Labor and Young workers:** Our suppliers are not permitted to use child labor in any of its activities. The young workers under the age of 18 may only be employed in non-hazardous jobs and when they are over the legal working age in their country or the age at which they shall complete compulsory education.
- **Non-discrimination:** Our suppliers shall ensure that there is no discrimination towards gender, race, religion, age, marital status, disability, sexual orientation or nationality. The workers shall be treated with respect and dignity, without any discrimination carried out for hiring and employment practices.
- **Fair treatment:** Our suppliers shall provide a work environment devoid of harassment, harsh, threat and cruel treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of employees, as well as the fear of such treatment.
- **Wages, benefits and working hours:** Our suppliers are required to pay employees in accordance with applicable labor regulations, including minimum wages, overtime hours, and mandatory benefits. They should clearly communicate with the employee the basis on which they are being compensated; and whether overtime may be required and the wage paid for such overtime.
- **Freedom of association:** Our suppliers shall encourage open dialogue and direct engagement with workers to resolve workplace and compensation related queries/concerns. They shall respect workers' rights to freely associate, join or not join labor unions, seek representation, and join workers' councils, as defined by the local laws. Additionally, the workers shall be able to openly discuss working conditions with the management without fear of retaliation, intimidation or harassment.

HEALTH AND SAFETY

- **Worker protection:** Our suppliers shall protect workers in the workplace and any company-provided living quarters from excessive exposure to chemical, biological, and physical risks. They shall maintain proper housekeeping and supply workers with safe drinking water.
- **Process safety:** Our suppliers shall have management systems in place to identify chemical and biological process risks, as well as to avoid or respond to catastrophic chemical or biological agent releases.
- **Emergency preparedness and response:** Our suppliers are responsible for identifying and assessing emergency situations in the workplace and any company-provided living quarters, along with creating emergency plans and response procedures to mitigate their impact.

- **Hazard information:** Our suppliers shall ensure that safety information for hazardous materials, including pharmaceutical compounds, shall be available to educate, train, and safeguard their workers from all possible hazards.

ENVIRONMENT

- **Environmental permits and authorizations:** The suppliers need to adhere to all applicable environmental requirements. All the applicable environmental permits, licenses shall be obtained along with their operational and reporting obligations to be followed.
- **Management of Wastes and emissions:** Suppliers shall have procedures in place to guarantee that all types of wastes such as, Solid waste(Both hazardous and non-hazardous), air pollutants and wastewater discharges and other wastes are evaluated for reuse, recycle where possible, stored, disposed of in a safe manner. Prior to disposal of, any waste, wastewater, or emissions that have the potential to harm human or environmental health shall be properly treated, regulated and released in compliance with applicable laws.
- **Spills and releases:** Our suppliers shall ensure that mechanisms are in place to prevent and control environmental spills, as well as negative effects on the local population.
- **Resource use:** Suppliers shall take necessary steps to enhance efficiency and reduce resource consumption across operations
- **Sustainable sourcing and traceability:** To encourage sustainable sourcing, suppliers shall establish required systems, procedures and protocols enhancing environment and social performance across the supply chain

MANAGEMENT SYSTEMS

- **Commitment and accountability:** Our suppliers shall demonstrate their commitment to the concepts contained in this policy by allocating adequate resources and designating senior accountable persons.
- **Legal and customer requirements:** Our suppliers are responsible for identifying and adhering to all applicable laws, rules, standards, and customer requirements.
- **Risk management:** In all the areas covered under this COC, our suppliers shall have the processes in place to identify and manage risks.
- **Documentation:** Our suppliers shall keep all the required documents to demonstrate compliance with both the principles mentioned and applicable regulations.
- **Training and competency:** Our suppliers shall have a training programme in place to ensure that management and staff have the necessary knowledge, skills and abilities to meet the requirements of the principles mentioned in this policy.
- **Continual improvement:** Our suppliers are expected to set performance objectives, facilitate implementation plans and take appropriate corrective actions steps for inconsistencies found by internal or external evaluations, inspections and management reviews.
- **Identification of concerns:** Our suppliers are expected to encourage their employees to report any workplace issues, unlawful activity, or violations of these principles without fear of

retaliation, intimidation, or harassment. Suppliers shall investigate and, if necessary, take corrective action.

- **Communication:** Our vendors shall have strong procedures in place to communicate these Principles to their employees, contractors, and vendors.

COMPLIANCE MONITORING

It is the supplier's responsibility to ensure that all its employees, representatives, and sub-contractors are aware of and adhere to this Code of Conduct.

If a potential supplier or a current supplier fails to comply with these guidelines, Aurobindo maintains the right to disqualify them or terminate their agreement.

Periodic due diligence of key raw material suppliers of finished dosage forms will be conducted for compliance monitoring.

5. ABBREVIATIONS :

EHS – Environment, health & safety

COC – Code of Conduct

PSCI – Pharmaceutical supply chain initiative

6. ANNEXURES

Nil

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