



# **STRIDES PHARMA SCIENCE LIMITED**

## **VENDOR'S CODE OF CONDUCT**



## 1. INTRODUCTION

It is vital to the business success and sustainability of Strides Pharma Science Limited and its subsidiaries (“Strides” or the “Company”) that alongside the Company, its vendors/ suppliers (hereinafter referred to as “vendors”) share the Company’s commitment to high ethical standards and operate in an environmentally responsible and ethical manner.

This Vendor’s Code of Conduct (“Code”) is accordingly drafted to reinforce the values of the Company and to set expectations of all the vendors of the company to:

- diligently follow the standards laid out in the Code;
- operate in full compliance with all applicable laws, rules, regulations, and other Strides policies and principles;
- integrate these principles in a manner that is consistent and agreeable with the prevailing local laws and rules in the region of operation. Should there be any conflict therein, we expect our vendors to give precedence to the local laws while seeking to uphold the principles mentioned in this Code;
- take responsibility for establishing effective communication and standard processes within their organization and their related business partners to meet the standards outlined in this Code

## 2. SCOPE

This Code applies to and expects adherence from all direct and indirect vendors that supply inter-alia raw materials, active pharmaceutical ingredients, components, finished goods and services etc., or any other products, to the Company.

While this Code does not attempt to describe all potential areas that vendors should adhere to, some common standards are described.

## 3. BUSINESS ETHICS AND PRACTICES

Vendors are expected to consider the following to enable them to conduct their business in an ethical manner and act with integrity. Vendors shall:

- a) uphold the highest standards of integrity and transparency in all their transaction with Strides and remain committed to working against all forms of corruption (incl. monetary/ non-monetary bribes), including gifts, loans, rebates of unreasonable value, etc), extortion, embezzlement , or related activities prohibited by law. Vendors should ensure effective in-house processes to prevent bribery and corruption cases, and issue strong reporting guidelines to deal with non-compliance [Anti-bribery and corruption];
- b) conduct their business in a fair and resilient manner and in accordance with all applicable anti-trust and competition laws and standards [Fair competition];
- c) adopt fair business practises including accurate and truthful advertisement and sharing



- of information [Accurate Advertisement];
- d) ensure that confidential information (e.g. any information disclosed by Strides' representatives, whether in writing, orally, visually or otherwise) is used only for its intended purpose as decided and agreed upon by Strides and the vendor in a fair, transparent and secure way, ensuring the protection of privacy and valid intellectual property rights of Strides, its directors, employees, agents, and business partners.
- Trade secrets and other confidential, proprietary, and sensitive information shall always be kept secure from unauthorized usage, damage, and disclosure.
  - Vendors should never communicate externally about Strides' prospects, performance or policies nor disclose inside information which would affect the price of Strides' securities unless they are required under any law or by an order from a competent authority [Data Privacy, Confidentiality, Insider Trading and Intellectual Property]
- e) report to Strides in case any situation that may appear as a conflict of interest, viz., when there is a prospect of direct or indirect gain which may improperly or unlawfully influence the vendor's actions while conducting business with Strides [Conflict of Interest];
- f) provide a mechanism for their employees, and business partners to report concerns or potentially unlawful activities at the workplace without fear of reprisal or threat. The vendor must ensure protection of whistle blower confidentiality and prohibit retaliation against employees, who participate in such programs in good faith. Vendors should also be able to demonstrate how the reported matter was assessed and corrective action steps [Identification of Concerns and Whistleblowing];
- g) ensure responsible conduct across laboratory research through animal testing and treat animals humanely and in a responsible, ethical and compassionate manner. Alternatives should mandatorily be used to minimize any pain or distress, wherever scientifically valid and acceptable to regulatory bodies [Animal welfare];
- h) comply with all applicable legal requirements and regulations of the jurisdiction they conduct their business to ensure that their dealings are conducted legally and with integrity for legitimate business purposes with legitimate funds. Vendors must actively implement robust fraud prevention and reporting program [Anti Money-Laundering and Fraud];
- i) not accept, give, or offer to give any inappropriate gifts, favours, services, entertainment, money or other material benefits to any of Strides' employees, business partners or other representatives intended to influence judgment or reward an action as well as attempt to influence business decisions for or on behalf of Strides [Gifts, Entertainment, Hospitality];



- j) Ensure that all financial books must be complete and accurate in all material respects; be legible, transparent, reflect actual transactions and payments and conform to generally accepted accounting principles [Documentation];
- k) Vendors must provide goods and services that consistently meet prescribed standards, are safe for their intended use, and work as intended. Vendors are expected to meet the specifications agreed upon in the applicable purchase order or other contractual relationship with Strides [Quality and Sustainable Sourcing];
- l) comply with applicable national and international export control laws, trade, economic or financial sanctions, restrictions or embargoes applicable to them. Vendors are expected to know the laws that apply to them as each country may have different requirements and they must maintain complete and accurate import/export records [Trade Sanctions]

#### **4. HUMAN RIGHTS AND LABOUR**

Vendors must not be involved in any form of forced, bonded, indentured, or child labor. Vendors are expected to consider the following and protect the human rights of their employees and continue to treat them with dignity and respect. Vendors shall:

- a) prohibit all employment of forced, bonded or child labour whether paid or unpaid
  - Vendors must take active steps to assist in the freedom of children from the worst forms of child labour and rehabilitate them [Child Labor];
  - Workers above the legal working age shall be free to leave work or terminate their employment with reasonable notice. Workers must not be mandated to surrender any government-issued identification, passports, or work permits as a condition of employment. Vendors shall ensure that contracts for both direct and contract workers convey the conditions of employment in a language understood by the worker [Forced Labor];
  - Strides 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
- b) not discriminate or make distinction, exclude or give preference on the basis of race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status, in hiring and other employment practices including but not limited to remuneration, promotions, rewards, assignments, etc [Non-Discrimination];
- c) maintain a conducive work environment for all including employees, workers, contractors, visitors and undertake appropriate and strict measures to avoid any kind of harassment, harsh or inhumane treatment;



- d) maintain and actively implement policies and procedures stating their commitment towards safeguarding of human rights, prevention of sexual harassment & abuse in the workplace [Fair treatment];
- e) Comply with all applicable laws and mandatory industry standards pertaining to minimum wages, equal remuneration for all workers for work of equal value, overtime pay and legally mandated benefits, amongst others to ensure acceptable living conditions for its employees and workers
  - Vendors must clearly communicate with the workers about the overtime requirements and the wages to be paid for that;
  - Vendors must follow wage fixing system capable of determining and periodically reviewing and adjusting minimum wage rates having the force of law;
  - Vendors 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 [Fair Wages and Benefits]
- f) Respect the right of workers to associate freely, form and join workers organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Employees must not be discriminated against based on union membership or any other permitted form of association [Freedom of Association and Collective Bargaining]

## 5. ENVIRONMENT, HEALTH AND SAFETY

**Vendors shall be committed to providing a safe and healthy working environment for all employees working at their sites. Vendors shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.**

Vendors are expected to:

- a) Provide a safe & healthy working environment for all those who are working at their units, identify and protect workers from any physical, chemical and biological hazards in the workplace as well as from risks associated with any infrastructures, or hazardous installations used by their employees;
- b) Have systems, policies and procedures on safety in the use of hazardous substances at work, which includes the production, handling, storage, transport, disposal, and treatment of chemicals, and materials that are highly active, toxic, or infectious;
- c) ensure adoption and implementation of all policies and procedures related to health and safety. Vendors shall implement workplace safety training sessions for all its employees and workers to guide them on the risk of exposure to chemical, biological, physical hazards and physically demanding tasks;



- d) identify and assess potential emergencies in the workplace and minimize their impact by implementing suitable emergency plans and response procedures including but not limited to fire exits, escape routes, and firefighting equipment;
- e) comply with all applicable environmental laws and regulations governing environment, health, safety and wellbeing at the workplace; obtain & maintain all required environmental permits, licenses, and information registrations, for operational and reporting requirements;
- f) have systems, policies, and procedures
  - to monitor their environmental performance in terms of energy consumption and emissions; adhere to relevant regulatory requirements for air emissions and take appropriate measures to prevent the release of harmful emissions or pollutants into the environment;
  - for the safe handling, movement, storage, recycling, reuse, or management of waste, and wastewater discharges. Before releasing the waste, appropriate risk identification and effective control/mitigation measures should be implemented for toxic materials, pollutants, actives, etc.
- g) ensure judicious use of natural resources like water, energy, and other available resources to control any adverse impact on the environment or surrounding communities;
- h) adhere to responsible, sustainable, and ethical sourcing principles and carry out due diligence on the sourcing of raw materials to promote the traceability of materials;
- i) notify Strides of any significant environmental incidents concerning the manufacturing and/or transportation of products for Strides;
- j) minimize/replace the use of any substances deemed to be of high concern throughout their value chain with less hazardous alternatives where practically possible for its operations related to Strides

## **6. RESPONSIBLE BUSINESS CONDUCT**

Vendors are expected to exhibit commitment and accountability towards responsible business conduct through their objectives, policies, and system/ plan inter-alia including risk management systems and business continuity plans. This includes the following actions expected from the vendors:

- a) adequate control mechanisms and processes to identify and manage risks in all areas addressed in this Code;
- b) implementing and maintaining the processes required for Business Continuity and Disaster Recovery plans for all operations that support any goods or services provided to Strides;

- c) Ensuring adequate and periodic training programs to enhance the knowledge, skills, and abilities of their employees, workers, contractors, etc., to familiarize themselves with this Code and the applicable laws and regulations;
- d) Identification and execution of improvement actions, including effective complaint investigation, undertaking internal audits, and corrective actions as required;
- e) Vendors shall provide effective frameworks to communicate these Principles to workers, contractors and suppliers and encourage its workers to report concerns, illegal activities or breaches of these Principles in the workplace without threat of or actual reprisal, intimidation or harassment. Vendors shall investigate and make remedial changes if necessary.

## **7. PERIODIC REVIEW**

The code shall be subject to mandatory review at least once in every three years and as may be deemed necessary and in accordance with regulatory amendments and international guidelines.

## **8. ANNUAL DECLARATION**

Enclosed as Annexure 1 which shall be collected from every vendors annually and also as part of vendor surveillance.

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**DECLARATION BY (Full name of the vendor to be filled)**

To,  
Strides Pharma Science Limited,  
Corporate Office: 'Strides House', Bilekahalli,  
Bannerghatta Road, Bangalore – 560 076

**Dear Madam/ Sir,**

The undersigned, being an Authorized representative of **(Full name of the vendor to be filled)** (hereinafter referred to as “vendor”), acknowledge on behalf of the vendor that we have received, read and understood the contents of the Strides’ Vendor Code of Conduct and shall abide by the same.

**Signature:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Designation:** \_\_\_\_\_

**Date:** \_\_\_\_\_