

SUVEN PHARMACEUTICALS LIMITED



Policies Covering Principles of Business Responsibility and Sustainability Reporting (BRSR)

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I. Anti-Corruption and Anti-Bribery Policy

Objective:

This Policy is part of Company's Code of Business Conduct and Ethics.

Scope & Applicability:

This Policy applicable to all the stakeholders of the Company at all the locations of Seven Pharmaceuticals Limited (SPL).

Definition:

A "Bribe" is defined as:

- a. Offering, promising or giving anything of value to improperly influence another in order to obtain or retain business for the Company or to gain an advantage for an individual; or
- b. Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the obtaining or retaining of business by the Company.

There is no minimum monetary threshold that defines a Bribe; "anything of value" includes both monetary and non-monetary payments, such as gifts, stock interests, contractual rights, real estate, debt forgiveness, personal property, product or service discounts, loans, meals, entertainment, travel expenditures, political and charitable contributions, and other interests arising from business relationships.

Policy Description:

We always expect a high degree of honesty and integrity from its employees. Employees must understand the company's value system, Code of Conduct, Business ethics, accountability etc.

Compliance with anti-bribery legislation is an ongoing responsibility of each individual Employee along with maintaining Ethics, transparency and accountability.

We are committed to conduct the fair business with the highest standards of ethics and integrity; will not allow public or private bribery. One should not ignore the policy and each and every member of this organization is responsible for proper conduct and must use careful judgment at all times.

The company will not encourage Promising, offering or giving, as well as requesting, demanding or accepting, any improper payment or advantage (a bribe), whether directly or indirectly (such as through a third party) to or from any Public Servant, business partners, family member of a public official or of a business partner, agents, dealers, distributors, contractors, growers, consultants, logistic providers, custom brokers, management advisors, professional advisors or its firms, any other business associates. There are no substitutes to bribery.

Employees are encouraged to report any instances where they suspect that anyone acting for or on behalf of SPL may have engaged in conduct in violation of this policy. Such report may be submitted to their Line Manager or Compliance Officer. Employees who are not comfortable talking to their Line Manager or Compliance Officer, can report to whistle blower mechanism at wbm@suvanpharm.com

The company has zero tolerance levels for any victimization/retaliation against any Complainant.

Employees are expected to adhere to governance, procedures and practices that ensure ethical conduct at all levels and to avoid adopting the practices that are corrupt, abusive or anti-competitive to the Company.

Transparency in communication of information including financial matters shall be maintained that impact various stakeholders.

Facilitation Payments:

Company will not pay any facilitation payments or substitutes to facilitation payments for getting orders, tender information, procurement process, evading taxes/ duties/ penalties/ damages, etc.

Disciplinary Action:

Any violation in the Policy will lead to appropriate disciplinary action, including dismissal from employment or termination of contracts where warranted, and potentially legal sanctions.

Enforcement and Penalties:

Anti-bribery legislation provides for both criminal and civil enforcement.

Training Procedures, Audit and Regular Review:

We are committed to ensuring that employees are regularly trained, and that its compliance procedures generally are regularly audited and reviewed.

Clarifications, Interpretation & Amendment of Policy:

1. Clarifications may be sought from Corporate HR Dept. and/ or Location HR Dept. about this policy.
2. Contextual jurisprudence of the management will prevail in prudent application of the policy and its benefits.
3. Management at its sole discretion can rescind, amend, add to, delete or supersede any of the clauses mentioned herein, if it feels necessary to do so.

In the event of any dispute arising out of implementation of the Policy, management`s decision will be final and binding upon all.

II. Supplier Code of Conduct

Preface

Suven Pharmaceuticals Limited suppliers are an integral part of the overall success of Suven Pharmaceuticals Limited. Each day, Suven Pharmaceuticals Limited and its suppliers make decisions that impact Suven Pharmaceuticals Limited ability to provide quality health care products to its customers.

This documents the principles, guidelines and expectations for establishing and maintaining a business relationship with Suven Pharmaceuticals Limited. Suven Pharmaceuticals Limited works with standards by federal, state, and industry regulations and is committed to having business relationships with suppliers who share the company's dedication to providing quality products and conducting business in a legal and ethical manner. Because our suppliers are an extension of our business and we expects same from them.

Suven Pharmaceuticals Limited is aware of cultural differences and challenges associated with interpreting and applying these principles globally. While Suven Pharmaceuticals Limited believes these principles are universal, we understand that the methods for meeting these expectations may be different but must be consistent with the laws, values and cultural expectations of the different societies of the world.

It is the responsibility of all Suven Pharmaceuticals Limited suppliers to maintain a Quality Management System that assures consistent conformance of their products and services to specified requirements. Suven Pharmaceuticals Limited suppliers are fully responsible for the quality of their products/services and supply chain.

All Suven Pharmaceuticals Limited suppliers are expected to understand and comply with the "Suven Pharmaceuticals Limited Supplier Code of Conduct." Suppliers are strongly encouraged to contact a Suven Pharmaceuticals Limited purchasing representative with any questions.

Suppliers are also strongly encouraged to contact Suven Pharmaceuticals Limited Purchasing and Supplier Management whenever there are questions relating to the appropriateness of any activity. Purchasing employees can provide an overview and further guidance on applicable Suven Pharmaceuticals Limited policies.

Suven Pharmaceuticals Limited reserves the right to verify a supplier's compliance with the "Suven Pharmaceuticals Limited Supplier Code of Conduct". If Suven Pharmaceuticals Limited becomes aware of any actions or conditions not in compliance with the "Suven Pharmaceuticals Limited Supplier Code of Conduct," Suven Pharmaceuticals Limited reserves the right to seek corrective action and may stop further business immediately. Suven Pharmaceuticals Limited has established a program to monitor Supplier's

compliance which includes surveying and auditing supplier adherence to the Seven Pharmaceuticals Limited Supplier Code of Conduct. Seven Pharmaceuticals Limited shall communicate its supplier's code of conduct to all its suppliers.

Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. Seven Pharmaceuticals Limited expects suppliers to comply with all legal and regulatory requirements regarding ethics including:

1. Conflict of Interest

A conflict of interest exists whenever there is a competing interest that may interfere with our ability to make an objective decision and act in the best interest of Seven Pharmaceuticals Limited. Seven Pharmaceuticals Limited, along with suppliers, are expected to use good judgment and to avoid situations that can lead even to the appearance of a conflict that may undermine the trust others place in us.

Suppliers that do business with Seven Pharmaceuticals Limited shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of Seven Pharmaceuticals Limited. Good judgment is expected as well as avoiding the appearance of a conflict of interest.

All suppliers shall notify Seven Pharmaceuticals Limited immediately in the event of a potential or actual conflict of interest.

2. Business Integrity and Fair Competition

Suppliers shall conduct business competitively and in full compliance with all applicable laws, codes and regulations. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Suppliers shall employ fair business practices including accurate and truthful advertising.

Suppliers shall be informed of the applicable provisions of the Seven Pharmaceuticals Limited Code of Business Conduct, including the following concepts related to interactions with Seven Pharmaceuticals Limited employees:

- Employees shall deal with all suppliers, customers, and all other persons doing business with Seven Pharmaceuticals Limited in a completely fair and objective manner without favor or preference based on personal financial considerations or personal relationships.
- Employees shall not accept or provide (directly or indirectly) gifts, prejudicial discounts, payments, fees, loans, entertainment, favors or services from any person or firm, which may influence or give the appearance of influencing purchasing decisions.

- No employee shall do business on behalf of Suven Pharmaceuticals Limited with a close relative or own any financial interest in a supplier's business where the Suven Pharmaceuticals Limited employee has the appearance or ability to impact the supplier's relationship with Suven Pharmaceuticals Limited. Such relationships must be disclosed per Suven Pharmaceuticals Limited policies.
- No employee shall grant permission for use of Suven Pharmaceuticals Limited's name without permission from Suven Pharmaceuticals Limited's management.

Suven Pharmaceuticals Limited contract workers and agents (for example, consultants, contract sales forces, speakers, distributors, clinical investigators, etc.) must also comply with the applicable provisions of the Suven Pharmaceuticals Limited Code of Business Conduct.

Suven Pharmaceuticals Limited employees and suppliers are expected to report violations or possible violations of the Suven Pharmaceuticals Limited Supplier Code of Conduct to Suven Pharmaceuticals Limited Purchasing head / Management.

Suven Pharmaceuticals Limited will promptly investigate reported violations of the Suven Pharmaceuticals Limited Supplier Code of Conduct and expect employees and suppliers to cooperate in the investigation. If corrective action is required, Suven Pharmaceuticals Limited will outline steps to address the issue.

3. Identification of Concerns

Suppliers shall be encouraged to report concerns or illegal activities in their relationship with Suven Pharmaceuticals Limited without threat of reprisal, intimidation or harassment to Purchasing head. Suven Pharmaceuticals Limited will review the concerns and respond to them in a timely manner.

4. Animal Welfare

Using animals in any testing or process should only occur after alternate methods have been fully explored and rejected. Animals shall be treated humanely, minimizing pain and stress. Animal testing should be performed only after consideration has been given to non-animal based test methods, reducing the numbers of animals used, or refining procedures to minimize distress in animals being tested.

Alternatives should be used when scientifically valid and acceptable to regulators included Licenses/Approvals as applicable.

Contract laboratories and collaborating laboratories must be accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC).

5. Privacy

Suppliers shall not use or disclose Suven Pharmaceuticals Limited confidential information other than with the express prior written consent of, and for the benefit of, Suven Pharmaceuticals Limited. In particular, suppliers shall not exchange or otherwise disclose Suven Pharmaceuticals Limited confidential information with any competitor or other supplier. Any information or data regarding Suven Pharmaceuticals Limited operations shall always be treated as strictly confidential unless that information is in the public domain. Confidential information includes, but is not limited to:

- Purchase material specifications and conditions
- Requests for quotation
- Cost sheets
- Profit information
- Asset information
- Names of suppliers
- Pricing
- Purchase strategies
- Contact details
- R&D data
- Financial/sales/marketing information
- Operating processes/formulas and other know-how which are Suven Pharmaceuticals Limited property and have not yet been disclosed to the general public
- Suven Pharmaceuticals Limited Intellectual Property (IP)
- Computer software programs
- Personal information about employees, offices and directors
- Wage and salary scales
- The Suven Pharmaceuticals Limited name or logo

Suven Pharmaceuticals Limited require that suppliers confirm these obligations by entering into a confidentiality agreements with regard to any of the previously listed confidential information to ensure that company, worker and patient privacy rights are protected.

6. Sales Techniques

Suppliers are expected to interact with Suven Pharmaceuticals Limited in an open and honest manner. The following sales techniques are strictly prohibited:

- Backdoor selling – circumventing the proper Suven Pharmaceuticals Limited channels to convince an individual to purchase a specific product or service.

- Inaccurate lead time commitments – knowingly providing unattainable lead time commitments to Suven Pharmaceuticals Limited in an effort to secure business.
- Over-committing capacity – making commitments to provide a product or service without having the capacity to meet the commitment.
- Request for competitor information – asking for information regarding a competitor’s product, pricing, terms, distribution or other segment of their business.
- Offering gifts to get a business advantage.
- Providing pricing structures that are less favorable to Suven Pharmaceuticals Limited if the supplier is the single or sole source for the goods or services provided.
- Requesting Suven Pharmaceuticals Limited to accept a proposal after the closing date.

7. Supplier Visitation Process

Suppliers have limited access to Suven Pharmaceuticals Limited facilities. The following procedures are to be followed by all Suven Pharmaceuticals Limited suppliers:

- Suppliers are to be accompanied by a Suven Pharmaceuticals Limited employee at all times.
- Suppliers are never to occupy a Suven Pharmaceuticals Limited employee’s office or cubicle without displaying proper Suven Pharmaceuticals Limited-issued identification.
- Suppliers, upon departure of Suven Pharmaceuticals Limited facility, are to leave their visitor badges/properties if any with the concerned department.
- Suven Pharmaceuticals Limited host/sponsor is responsible for suppliers while on site.

Labor

Suppliers shall commit to fair treatment of their employees and to treat them with dignity and respect. Suven Pharmaceuticals Limited expects suppliers to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees including:

1. Freely Chosen Employment

Suppliers shall not use forced, bonded or indentured labor, involuntary prison labor or human trafficking.

2. Child Labor and Young Workers

Suppliers shall not use child labor. The employment of young workers below the allowable age shall only occur in non-hazardous work and when young workers are above a country’s legal age for employment or the age established for completing compulsory education. Employee files should be maintained with adequate data to verify ages of employees.

3. Non-Discrimination

Suppliers shall provide a workplace free of harassment and discrimination. Harassment or discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not condoned or tolerated. Suven Pharmaceuticals Limited expects suppliers to share its commitment to equal opportunity in employment and its commitment to employee diversity.

4. Fair Treatment

Suppliers shall provide a workplace free of harsh and inhumane treatment. This includes, but is not limited to, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or intimidation of workers.

5. Wages, Benefits and Working Hours

Suppliers shall pay their workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits as per custom of the country of employment.

Suppliers shall communicate with their worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime. Suppliers shall keep accurate records regarding employee working hours and vacation hours. Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged.

6. Freedom of Association

Suppliers shall respect the rights of their workers, as set forth in local laws, to associate freely with one another. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Health and Safety

Suppliers shall protect their workers in the workplace, and in any company-provided living quarters, by providing a safe and healthy environment. Suven Pharmaceuticals Limited expects suppliers to comply with all standard, legal and regulatory requirements regarding employee health and safety including:

1. Worker Protection

Suppliers shall protect their workers from exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and other company-provided facilities, including their occupational health, living quarters and transportation vehicles. For example, supplier's management is responsible for providing appropriate hearing protection, gloves, masks or other forms of worker protection based on the type of work performed. Suven is expecting to protect the health of the supplier's employees and their other relevant stock holders. It has to be monitored and evaluated through periodical health checkups.

2. Process/procedural Safety

Suppliers shall have programs in place to prevent and respond to catastrophic chemical or biological releases or any other related process hazards.

3. Emergency Preparedness and Response

Suppliers shall identify including anticipated emergencies/assess emergency situations affecting the workplace and any company- provided living quarters and shall minimize potentially adverse consequences by implementing and maintaining effective emergency plans and response procedures easily available. For example, supplier's management is responsible for providing safety awareness training, safety drills or other types of safety training as required by the industry type and based on fire and safety regulations.

4. Hazard Information

Suppliers shall make available safety information relating to hazardous materials in the workplace, including pharmaceutical compounds and pharmaceutical intermediate materials, to educate, train and protect workers from hazards.

5. Anti-Counterfeiting

In an ongoing effort to work together to secure the supply chain from the dangers of counterfeiting, illegal diversion and theft of Suven Pharmaceuticals Limited products, Suven Pharmaceuticals Limited expects that suppliers notify us immediately if they are offered the opportunity to purchase counterfeit, illegally diverted or stolen product or otherwise become aware of any such products.

Environment

Suppliers shall operate in an environmentally responsible and efficient manner and shall strive to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible, and to promote activities that reuse and recycle. Suven Pharmaceuticals Limited expects suppliers to comply with all laws, regulations, standards, ordinances, rules, permits, license approvals and orders regarding the environment and the use of restricted substances.

1. Environmental Authorizations

Suppliers shall obtain all required environmental permits, licenses and approvals and comply with all applicable operational and reporting requirements.

2. Waste and Emissions

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

3. Spills and Releases

Suppliers shall have systems in place to prevent and quickly respond to all accidental spills and releases into the environment.

4. Restricted Substances

Suppliers are to adhere to all applicable restricted substance laws, regulations and customer requirements including responding to requests for substance composition in materials/parts, prohibition or restriction of specific substances, including labeling for recycling and disposal.

5. Procurement

Suppliers should have a sustainable procurement policy in place to ensure their own suppliers conduct business to minimize environmental impact and avoid having adverse health impacts on communities where they operate.

Management Systems

Suppliers shall have a quality management system in place to facilitate continual improvement and ensure compliance with the principles outlined in the Suven Pharmaceuticals Limited Supplier Code of Conduct. Suppliers are encouraged to maintain conformance to local and international standards.

Management System elements include:

1. Commitment and Accountability

Suppliers shall allocate adequate financial, human, and technical resources.

2. Legal and Customer Requirements

Suppliers shall identify all applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards and relevant customer requirements and ensure compliance with them.

3. Risk Management

Suppliers shall have mechanisms in place to determine and control risks in all areas addressed by this document. Suppliers shall have adequate financial resources to assure business continuity and maintain financial solvency.

4. Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these principles and compliance with applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards and relevant customer requirements.

5. Training and Competency

Suppliers shall have an effective training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to perform the service that Suven Pharmaceuticals Limited has requested and is covered by a contract. Documented training must be available for all employees as evidence that training was performed.

6. Continual Improvement

Suppliers are expected to continually improve by setting performance objectives, executing Implementation plans and taking necessary actions to correct deficiencies identified by internal or external assessments, inspections and management reviews.

7. Communication

Suppliers shall maintain open and direct communication with appropriate Suven Pharmaceuticals Limited business functions, including Purchasing.

Suppliers shall notify Suven Pharmaceuticals Limited prior to making any change that may affect conformance to defined requirements, product quality, or a regulatory filing outlined within a supply agreement and/or quality agreement.

Data Requirements

Suppliers shall meet all data requirements like data storage, retrieval and retention prior to conducting business with Suven Pharmaceuticals Limited.

1. Supplier Set-Up

Suppliers shall provide all key data (also including tax documents, banking information, etc.) to ensure proper set up in Suven Pharmaceuticals Limited's systems.

2. Transactions

Suppliers shall not perform any service without a fully-executed contract and/or Purchase Order in place. Suppliers shall provide all accurate information on submitted invoices, as instructed by Suven Pharmaceuticals Limited.

3. Other requirements

Suppliers shall allow and or share Suven Pharmaceuticals Limited business related documents/records to evaluate the requirements at any point of time. Supplier should intimate the Suven Pharmaceuticals Limited, in case of any event happened in the supplier facility which resulted in stop of the material related to the Suven Pharmaceuticals Limited manufacturing.

III. Environment, Health and Safety Policy (EHS)

We at Seven Pharmaceuticals Limited, recognize Environment, Health and Safety as an integral part of our overall business philosophy.

We believe in the philosophy of "**doing good EHS**" means "**doing great in business**"

Our commitment:

- ❖ Comply and satisfy all applicable legal, regulatory and statutory requirements.
- ❖ Our people are key resources - Focus on creating an injury free and healthy work place by eliminating or reducing the hazards and at-risk-behaviors, control of OH&S risks using the hierarchy of controls and promote wellness.
- ❖ Achieving sustainable business growth by promoting the best environmental, health, safety practices and sustainability initiatives.
- ❖ Continually improve EHS performance by setting EHS targets on specific issues and periodically reviewing with management system to be in line with industrial best practices.
- ❖ Conservation of resources and adoption of eco-friendly processes with focus on - water conservation, waste water recycle, waste minimization, energy conservation and green practices to reduce GHG emissions.
- ❖ During the Research and Development stage, the products are designed to have longer shelf-life.
- ❖ Following the safety statutory requirements and industrial good practices in handling chemicals and waste in a safe manner to achieve zero harm. Adopting practices in workplace to achieve EHS as an individual responsibility for all Employees and encourage reporting near miss or any incident proactively for taking corrective and preventive action.
- ❖ Creating EHS awareness and developing knowledge / skills among the employees through internal/ external trainings and communication.

The policy applies to all Seven Pharmaceuticals Limited sites. It is a collective responsibility of the Management and Employees for implementation of this policy requirement. The policy is reviewed once in 3 years or when there is a significant change. Policy is displayed at each site, department and in the Company website. The policy is communicated to the suppliers and encourage them to adopt best safe healthy and environmental practices as deemed necessary.

IV. Code of Conduct of Employees.

Objective:

This Code of Conduct for Employees is a guide to help the employees live up to SUVEN PHARMA's high ethical standards on their own. Though it summarizes many of the laws that SUVEN PHARMA, as Company is required to follow, it also goes beyond the legal minimums by describing the ethical values we share at SUVEN PHARMA.

Scope & Applicability:

The rules and principles set forth in this Code are general in nature and the compliance with the Code shall be ensured read with other applicable policies and standard operating procedures (SOPs) of the Company.

This Policy applicable to employees of Seven Pharmaceuticals Limited at all the Company locations.

Obeying the Law:

The employees are required to comply with the laws and regulations, as amended from time to time, of the countries in which the company operate.

Employees:

SPL is committed to a working environment that promotes diversity and equal opportunity and where there is mutual trust, respect for human rights and no discrimination. We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. We are committed to safe and healthy working conditions for all employees. We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards. We will not use any form of forced, compulsory, trafficked or child labour. We are committed to working with employees to develop and enhance each individual's skills and capabilities. We provide equal opportunities without any gender bias. We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining. We will maintain good communications with employees through company based information and consultation procedures. We will ensure transparent, fair and confidential procedures for employees to raise concerns

Employee's responsibilities:

- Employee shall report to the management instances of unethical behavior, actual or suspected, fraud or violation of companies Code of Conduct.
- Employees are always expected to maintain a high degree of honesty and integrity. Employees must understand the company's value system, Code of Conduct, Business ethics, etc.
- Comply with anti-bribery legislation is an ongoing responsibility of each individual Employee.
- It will be the responsibility of an employee to ensure that he applies for leave and get approval from Reporting Superior and HOD in his respective leave card before proceeding on leave as per rules defined herein.
- This policy aim at providing safe working culture and protect women employees against the sexual harassment at workplace

Integrity:

No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Conflict of Interests:

All employees and working for SPL are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company. Employees must not seek gain for themselves or others through misuse of their positions.

Grievance handling:

Employees are encouraged to report any instances where they suspect that anyone acting for or on behalf of SPL may have engaged in conduct in violation of this policy. Such report may be submitted to their Line Manager or Compliance Officer. Employees who are not comfortable talking to their Line Manager or Compliance Officer, can report violations directly to whistle blower mechanism at wbm@suvenpharm.com.

Sabotage:

All the employees with Suven Pharmaceuticals Limited (SPL) shall handle and treat the Company's property with utmost care and shall not indulge or involve in any damage intentionally or un-intentionally. This shall also apply to various equipment / furniture / fixtures / tools provided to the respective (need

based) employees as a requirement or a facility to better their performance. Any such deviation / dilution from the above shall attract appropriate disciplinary action.

Debarments:

We do not engage individuals that have been debarred by the Food & Drug Administration under the Generic Drug Environment Act of 1992.

All the employees on the rolls of Suven Pharmaceuticals Limited (SPL) and Full time Retainers shall not be allowed to take up either directly or indirectly any part time or full-time employment / assignment elsewhere or do practice or vocation or business during their services with the Company.

Attendance:

Employees who are habitual/chronic late comers and report late for duty continuously, this late coming will be viewed seriously by the management and HR Dept will initiate disciplinary action. This will also have impact on the employee's annual appraisal performance ratings.

Early Leaving:

1. Employees have to work minimum 08 hours per shift per day. However to meet any exigency situations, they are allowed to exit early from duty with due written permission/e-mail and the same should be approved by HOD and location HR.
2. Early leaving is not a matter of right. It is the discretion of the HR Department to approve or reject the early going application of the employee recommended by HOD.
3. In case an employee found to be intentionally deviating with the policy or violating or taking undue advantage of the facility; it will be seriously viewed by the management

Drug and Alcohol Policy:

Employees are prohibited from being under the influence of alcohol or drugs while on company business. Any employee who violates these prohibitions will be subject to discipline, up to and including discharge.

Non-Disclosure/Confidentiality:

The protection of confidential business information and trade secrets is vital to the interests and success of SPL. Such confidential information includes, but is not limited to, the following:

- Intellectual Property Management
- Product, process, methods, systems, designs, drawings, technical know-how, etc.
- Pending projects and proposals
- Marketing Information /Business development activities
- Financial information
- Personnel records
- Compensation data
- Conversations between any persons associated with the company

Employee has to sign the Confidentiality Disclosure Agreement (CDA) at the time of joining the Organization by keeping in view of the Organization's interest as a whole. The employee must read carefully, understand the contents. However, HR department will also explain all the contents in the language understood by the employee.

Disciplinary Action:

Any violation in the Policy will lead to appropriate disciplinary action, including dismissal from employment or termination of contract where warranted, and potentially legal sanctions.

V. Rights of Persons with Disabilities Policy

1. Objective

This policy defines the guidelines pertaining to rights and benefits of persons/employees with disabilities

2. Scope & Applicability

- i. This Policy applicable to all locations of Suven Pharmaceuticals Limited (SPL).
- ii. This policy is in line with “The Rights of Persons with Disabilities Act, 2016 and Rules, 2017”.
- iii. This policy applicable to all the employees who are with disabilities.

3. Definitions & Features

- A. The persons with disabilities enjoy various rights such as right to equality, life with dignity, respect for his or her integrity, etc., equally with others.
- B. “Discrimination” in relation to disability, means any distinction, exclusion, restriction on the basis of disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation.
- C. “Establishment” includes a Government establishment and private establishment.
- D. “High Support” means an intensive support physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy.
- E. “Person with benchmark disability” means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority.

- F. “Person with disability” means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others.
- G. “Person with disability having high support needs” means a person with benchmark disability certified which needs high support.
- H. “Specified disability” means the disabilities as specified in the Schedule.

4. Equality and non-discrimination

- i. We at SPL, follows Non-discrimination in employing people with disabilities.
- ii. We at SPL, treat every employee with disability equally with other employees and show no discrimination including promotions.
- iii. We ensure that they enjoy the right to equality, employment life with dignity and respect for his or her integrity equally with other employees.
- iv. We shall not dispense with or reduce in rank of an employee who acquires a disability during his or her service., provided that, if an employee after acquiring disability is not suitable for the post he or she was holding, shall be shifted to some other post with the same pay scale and service benefits.

5. Equal Opportunity Policy

- i. We follow Equal Opportunity policy.
- ii. All facilities and amenities provided to employees with disabilities to enable them to effectively discharge their duties in the establishment.
- iii. Works confined to table work only are identified that are suitable for persons with disabilities.
- iv. We maintain employees’ records of the above along with other employees.

6. Providing appropriate environment and personal liberty

- i. We at SPL, take steps to utilize the capacity of employees with disabilities by providing appropriate environment.
- ii. No employee with disability shall be deprived of his or her personal liberty only on the ground of disability.

7. Protection from abuse, violence and exploitation

- i. We, at SPL, have taken measures to protect employees from all forms of abuse, violence and exploitation.
- ii. To prevent the above, we shall take cognizance of incidents of abuse, violence and exploitation.
- iii. Taking steps for avoiding such incidents and prescribe the procedure for its reporting.
- iv. Taking steps to rescue and protect the employees of such incidents.
- v. Creating awareness and making available information among all the other employees.

8. Protection and Safety

Employees with disabilities shall have equal protection and safety in situations of risk and emergencies.

9. Training Procedures, Audit and Regular Review

We are committed to ensuring that employees with disabilities are regularly trained, and that its compliance procedures generally are regularly audited and reviewed.

10. Clarifications, Interpretation & Amendment of Policy

- i. Clarifications may be sought from Corporate HR Dept. and/ or Location HR Dept. about this policy.

- ii. Contextual jurisprudence of the management will prevail in prudent application of the policy and its benefits.
- iii. Chairman & Managing Director at his sole discretion can rescind, amend, add to, delete or supersede any of the clauses mentioned herein, if he feels necessary to do so.
- iv. In the event of any dispute arising out of implementation of the Policy, Chairman & Managing Director's decision will be final and binding upon all.

VI. Stakeholders Management Policy

Introduction:

The Stakeholders Management policy framework provides the company to maintain highest levels of corporate governance, ethical standards of integrity and regulatory compliance.

Purpose:

The Company identifies the individuals, groups, institutions, authorities who are directly or indirectly dependent on or has an impact with the organisation's activities/business operations as "key stakeholders".

Objective:

- ❖ To identify its stakeholders systematically and engage with them to know the impact of business and to understand their concerns.
- ❖ To be transparent about the business decisions, products, operation, policies, work culture.
- ❖ To make efforts to give special attention to stakeholders in areas that are underdeveloped.
- ❖ To take their feedbacks, suggestions and resolve differences with stakeholders in a fair manner.
- ❖ To engage with the stakeholders and gather inputs on environmental and social topics and takes necessary actions while implementing Company's activities and policies.

Communication with Stakeholders:

The Company interacts with various stakeholders and provides updates about its progress through different channels of communication such as Company's Website, Analysts meet / conference calls, annual reports, quarterly results, media releases, and Newspaper advertisements etc.

The Concerned stakeholder may register their complaint with the Company at wbm@suvenpharm.com

VII. Human Rights Policy

Objective:

The Objective of this policy is to recognize, protect and respect human rights of all stakeholders, workforce and local communities in all locations where company operates and adheres to legal framework at all times and to implement effective mechanism to uphold human values and to protect and prevent abuse of human rights.

Mechanism to protect human rights:

- Persons who attained the age of 18 years and above will be considered after careful scrutiny of necessary documents of candidates, qualifications and abilities and offers employment to join the organization at their free will.
- Treat all employees fairly and equally before law and provides equal opportunities. Creating employee friendly environment to work at their free will leading to their long term association with the company. Encourage and promoting diversity and equal opportunity and dignity of employees.
- Provide all facilities for good and healthy working environment and conditions. We respect the right to privacy of our employees.
- Providing freedom to its employees in choosing employment, and also to become members in Associations, professional bodies and also in various internal committees.
- Respect and protect environment around the local communities where company operates.
- Ensure all the employees are having right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.
- To monitor regularly about the safety, health, welfare and security of the Contractual employees.
- Ensuring that employees are regularly trained, and that its compliance procedures generally are regularly audited and reviewed.
- Taking suggestions of employees/workers and to ensure they participate in the management of our industry.

Mechanism to prevent abuse of human rights:

- Fostering an environment where employees work voluntarily and are not forced nor exploited or threatened to work.
- To form internal committees to ensure all people are free from harassment and degrading treatment to maintain an environment that is free from any Threat, physical / verbal abuse, intimidation and hostility, if any including sexual harassment.
- Grievance Redressal Policy to protect confidentiality and protection of workers who report any sort of grievances including suspected violations of ethical misconduct.
- To check there is no denial of access of justice irrespective of their economic or other disabilities. And there are no inadequacies of standard of living, conditions of work ensuring a decent standard of life and full enjoyment of leisure and social and cultural opportunities. To prevent non-compliances with all social securities like PF, ESI Acts and all applicable labour legislations.

VIII. Policy on Responsible Advocacy.

Introduction:

Advocacy refers to influence decision making and bring about positive change that aligns with the organization's mission and values. Advocacy can also help increase the visibility and credibility of the organization, engage with various authorities such as Government agencies, non-governmental organisations, other relevant authorities, is guided by the values of commitment, integrity, transparency, and the need to balance interests of diverse stakeholders.

The Company believes that it is necessary to represent and engage with authorities on matters concerning the sectors in which it operates.

Purpose:

- ❖ To ensure that the advocacy efforts align with the company's values, mission, and goals.
- ❖ Outlining ethical & Legal guidelines for employee's advocacy, such as avoiding conflicts of interest and representing the company's values.
- ❖ Outlining mechanisms for monitoring and evaluating the effectiveness of advocacy activities and ensuring compliance with the policy

This policy is effectively communicated to all the employees in a relevant and comprehensive manner.

Our Guiding Principles:

The Policy on Responsible Advocacy specifies the following critical and necessary guidelines to be followed by all employees:

- ❖ The Company has proper systems and process in place to ensure compliance with the policy including, implement grievance redressal mechanisms to support the investigation of any instance of non-compliance with this policy.

- ❖ Implement suitable corrective measures for any confirmed violations of this policy.
- ❖ Divisional Chief's/Operational heads will ensure implementation of this Policy.
- ❖ The company's legal departments are responsible for monitoring and evaluating the effectiveness of advocacy activities and ensuring compliance with this policy.

The policy shall undergo regular evaluations for its relevance and appropriateness and be revised as required

IX. Corporate Social Responsibility Philosophy and Policy

SPL recognizes that business enterprises are economic organs of society and part of society and draw on societal resources for their growth. They have a duty towards society and the communities and neighbourhoods in whose vicinity they operate. SPL believes that a company should contribute to the communities and neighbourhoods in which it operates. SPL's CSR policy focuses on building economic, social and environmental capital while ensuring greater stake-holder value. It wishes to conduct business in a socially responsible, responsive and ethical manner while ensuring economic and social sustainability and promoting healthcare initiatives, environment, and providing for inclusive growth.

Environment:

Environmental sustainability is accorded high priority on the SPL's agenda. It follows Good Manufacturing Practices, processes and procedures to ensure that its businesses are conducted with the utmost regard for the environment. SPL carefully considers and takes steps to maintain a safe, healthy workplace for all its employees and contractors. SPL while protecting the environment, respects and engages with local communities, wherever its operates while maintaining high ethical standards.

Community:

Every major business has an impact on the neighbourhood, communities and societies in which it operates. SPL contributes to local and regional, economic and social development in various ways to enhance economic progress, skill development, productivity and quality of life. It seeks to engage communities in self help and mutual help activities to develop capacity, competence and care for its community assets.

Health:

SPL believes that preventive health measures if adopted by the community are more effective than avoidable and costly curative measures. It organizes Health Awareness campaigns and Health Checkup camps for the benefit of communities around the plant locations and desires to set up Health and Wellness centers with the help of Government wherever feasible.

Water and sanitation:

SPL believes that safe water and good sanitation are crucial for good health and clean environment. It provides potable water to communities and has voluntarily set a goal of providing every single household within the Company's operating areas and neighbourhood with safe and a secure supply of water.

Education:

SPL believes that education is the passport to a better life. SPL wishes to encourage quality education to the weaker sections and least privileged people in its neighbourhood to enable them to secure functional literacy, develop employable skills and secure good livelihood. SPL grants scholarships to deserving students.

Providing a safe and healthy workplace:

SPL wishes to provide a safe, healthy and conducive work environment for employees and contractors. Our objective is to make occupational safety, security of life and happiness in work, a priority. IT encourages employees to volunteer for CSR activities by fostering the concept of Individual Social Responsibility.

Ethical behavior:

Ethical behavior and adherence to good values is intrinsic to the way SPL conducts its business and is part of SPL work culture and legacy. SPL believes that business must operate in a way that respects the rights of all its stakeholders and creates wealth and economic benefits for society.

SPL intends interalia to undertake the following CSR Projects/programs:

- (a) Promoting preventive health care and sanitation and making available safe drinking water to the communities where SPL operates;
- (b) Promoting education, including special education and employment enhancing vocational skills among children, literacy and digital literacy among women, elderly, and the differently abled and enhance livelihood opportunities through projects.

(c) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources, promotion of art, culture and heritage sites and maintaining quality of soil, air and water.

(d) And such other CSR activities that benefit local communities which the CSR Committee and Board may decide from time to time.

SPL may work on the selected CSR projects and programs by itself or through employee volunteers or with the help of NGOs and established Trusts or Welfare associations to ensure that benefits of CSR activities reach the maximum number of people and communities on time. CSR Committee and Board would monitor and evaluate the results and continuously improve effectiveness of programmes.

X. Information Technology Security Policy (ITSP)

1. Purpose:

To ensure that Soven Pharmaceuticals Limited (SPL) controlled information can be used when required with the confidence that it is accurate, complete, and adequately protected from misuse, unauthorized access, disclosure, use, damage or loss. The policy reinforces the value of data and information to SUVEN.

The IT Security Policy sets out management's information security direction and is the backbone of the SUVEN Information Security Management System (ISMS). The purpose of the ISMS is to proactively and actively identify, mitigate, monitor, detect and manage information security vulnerabilities, threats and risks in order to protect SPL controlled information assets, information and data.

The ITSP sets the intent, establishes the direction and principles for the protection of SPL controlled information IT assets. This is to enable continuous improvement of SUVEN IT security capability and resilience to emerging and evolving security threats.

Creating an effective security policy and taking steps to ensure compliance is a critical step to prevent, detect, mitigate, and remediate security breaches. To make the security policy truly effective, it will be updated in response to changes in the company, newly identified threats, conclusions drawn from previous breaches, and other changes to the security posture.

2. Scope:

This policy applies to all users of SUVEN electronic resources - including IT, Project Management, R&D, Quality team & manufacturing, Project Partners / Associates and conjoint appointments and visitors to SUVEN. This applies to all SPL Controlled information IT Assets and all devices connected to the SUVEN network.

This data security policy applies to all customer data or other company data defined as sensitive by the company's data classification policy. Therefore, it applies to all the servers handling Intellectual Property of Soven & Project Partners / Customers and IT system that handle such data, including any device that is regularly used for email, web access or other work-related tasks.

3. Preamble:

SUVEN Pharmaceuticals Limited values the use of information technology in supporting the mission of the Company. Our business services gain strength and value from our research activities, strong industry links and our international nature. SUVEN has strong engagements and partnerships from both local and global communities allowing SUVEN to share knowledge, debate and research outcomes.

In this context, SPL Controlled information, whether managed and residing on SUVEN resources or held in trust and managed by third parties or business partners, is an important asset that must be protected. Any person or organization that uses or holds in trust these assets has a responsibility to maintain and safeguard them.

SUVEN is committed to preserving the confidentiality, integrity, and availability of information regardless of the form it takes - electronic or non-electronic. Improper use of information resources may result in harm to the SUVEN and its mission of creating value through superior expertise, execution, and service.

4. Policy Statements:

4.1 Data Backup, Retention & Restoration - Encryption policy:

Data Backups are primarily a preventative measure to protect against loss of data resulting from system failure (disaster or other), virus/malware attack, system or human error.

Backups are an essential control and safeguard to ensure availability of SUVEN information being stored, processed or transmitted via information technology communication systems.

Data is always backed up on regular basis, protected from unauthorized access or modification during storage, and available to be recovered in a timely manner in the event of incident or disaster. Suven have defined procedures showing details of backup methodology, systems that are backed up, number, medium, location, their schedules policies, retention policy, restoration test evidences.

Encryption techniques are used for protecting sensitive data during transmission and storage. Suven have standard procedures to follow Encrypted data flow for Email applications

4.2 Data Security:

SUVEN IT systems support an extensively broad and complex data landscape. Based on appropriate data classification and handling guidelines, this policy and associated standard ensures that appropriate controls are implemented for the confidentiality and integrity of sensitive data.

Suven has perimeter Gateway security as a first level of protection for all the IT Systems. Endpoint security at user level is always enabled, protected & monitored. Suven also have backup solution to encrypt the sensitive data for storage.

4.3 Logging and Monitoring

Logging and Monitoring mechanism is done with the help of security devices such as firewall, Intrusion detection / prevention, security event incident management, mail content filters and anti-virus with the feature of generating log data.

Enabled timely detection of information security incidents relies on comprehensive security log data being available at IT communication systems

4.4 Cloud Security

SUVEN utilizes cloud solutions for regular communications to deliver business solutions and functionality which meets security controls and access requirements to ensure all SUVEN information and system controls.

SUVEN sponsored and endorsed cloud-based services are utilized following a formalized risk assessment to identify the necessary security controls.

All assets are allotted with an ID number. When an asset is acquired, an ID will be assigned for the asset and its information shall be entered in the asset tracking list. A list shall be maintained to track assets (i.e., physical device, application (including firmware), database and middleware etc.).

When an asset listed on the Asset list is transferred to a new location or disposed, the IT Asset Transfer Checklist is filled out by the primary person responsible for maintenance or supervision of the equipment/ asset of the item and approved.

4.5 IT System Acquisition and Life Cycle Management

Based on user requirement for IT systems (applications, databases & middleware), which are susceptible to attack, are procured and embedded / loaded with suitable security controls throughout the acquisition and lifecycle.

In conjunction with this and other controls are followed for information security at each layer of the system must be taken, therefore mitigating the security risk.

4.6 Physical Security

Physical security is monitored through CCTV all the entrances of facilities and specified areas to monitor the men & material movement. Security Guards are monitoring around the clock (24 x 7 x 365).

All areas where the sensitive information is handled and maintained are only accessible to authorized personnel through access control device with logging system.

Suven has physical security at IT System User points, such as the Server Room, to ensure critical infrastructure are protected from physical (theft) or environmental (fire, water) damage.

4.7 Mobile Device Policy

Suven authorizes for mobile device with basic features (Incoming & outgoing calls) to the SUVEN key employees. This allows increased personal productivity and improved work experience. What additional policies are in place? Are they on a separate network? Silos help minimize the impact of a breach.

Suven has Endpoint Security which has built-in features of Device Control, Application Privilege control, Application startup control, Desktop Firewall for Detection, Protection to mitigate and control of network security attacks at entry-points. Streamlines centralized security management; Encrypts data to prevent data access on a lost device.

Data Classification:

Restricted Data-

At Suven the highest level of security controls are applied to the access of Restricted data (e.g., Customer Property, New Project / Product Information, Product Technical Information, Research & Development Information) by allowing only authorized and responsible personnel to access. The information sharing is carried through mutually agreed confidential agreements only.

Private Data -

At Suven the second level of security control are applied to access the Private Data (e.g., Personal Employee data, Human Resources related information, Personnel agreements, etc.)

Public Data-

At Suven the third levels of security control are applied to access the Public Data i.e. information related to Quality Manuals; Safety Precautions; Website information; Policies and procedures are being followed.

4.8. Information Security Risk & Compliance Management:

The user requirements considered for IT systems (applications, databases & middleware), which are susceptible to attack, are procured and embedded/ loaded with suitable security controls throughout the acquisition and lifecycle management system.

In addition other controls, a multi-level approach is followed for information security at each layer of the system must be taken, therefore mitigating the security risk.

At Suven information security risks are identified, mitigated and monitored through a formalized risk management process for effective management of information security risks to its information assets that could adversely affect its business.

Suven ensures the IT systems I environment (devices, accessories, applications, databases & middleware) are branded and licensed versions only. Suven IT does not allow the un-authorized applications installation I usage and prevents information security risks.

4.9. Data Privacy:

Suven engages the qualified professionals in respective job profile for handling various activities. The background verification is carried out for the information provided by individuals before the acceptance of candidature. After successful verification, appointment and joining with Confidentiality Agreement, the personnel will undergo training on compliance with SUVENS Dos & Don'ts; Job Responsibilities and IT Systems & Policies.

A re-training is performed need based in connection with administrative, document & system policy changes.

Upon resignation I termination I retirement the privileges and user credentials information related to Job Description are disabled (user access, email ID, etc.), wherever applicable as per the standard operating procedure.

4.10. IT Acceptable Use:

SUVEN embraces and relies on the use of technology, the Internet and digital media to conduct business activities. This Policy and associated Standards outline the acceptable practices in the use of technology and access to information sources and systems for SUVEN.

All users who have access to SUVEN's IT systems and services must adhere to specific rules regarding use of SUVEN resources, their internet and email usage as well as when interacting on social media.

4.11. Third Party Risk Management with Confidentiality Agreement

Suven ensures the confidentiality agreements are in place with all the Services Providers / Outsourced Clients to enforce appropriate information security controls with respect to the nature of the contract (e.g., cloud services engagement), to ensure proper due diligence and risk management.

5. Review

The IT Security Policy is an active document and must be subject to independent review. Management review need based conducted according to SUVEN Governance Support Process. This Policy will minimally be reviewed once in three years after effective date.

6. Acknowledgements

The following sources have been consulted for the development to this policy :
ISO/IEC FDIS 27001:2013

XI. Grievance Redressal Policy

The objective of this policy is to provide a platform facilitating the stakeholders for reporting their concerns, if any. This mechanism helps the Company understand better and gives them an opportunity to address these concerns in a transparent and effective manner. The Company aims to provide all its stakeholders a fair and effective resolution for their grievances.

Any stakeholder such as value chain partners, employees, shareholders and customers has the right to register their grievance with the company in writing, orally or over telephone. Any stakeholder of the company may reach out the company at wbm@suvanpharm.com to report their concern/grievance and the company will scrutinize the concern and then depending upon the nature of the concern/grievance the company will forward it to the relevant department head at relevant site. The relevant department then will reach out the concerned stakeholder, discuss with them to understand the grievance and help them in resolving the grievance by taking a corrective measure within the reasonable timeframe.

Our company has kept the site level administration in-charge to engage with local communities and help to redress such concerns of the communities, if any. The HR manual provides the stepwise procedure to report the grievances by employees of the Company.
