

# Mankind Pharma Limited

## Third Party Code of Conduct

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## 1. INTRODUCTION

- 1.1 Mankind Pharma Limited, its subsidiaries, associates and group companies (the “Company”) is committed to maintain sustainability in all its business activities across value chain partners and committed to strive to apply the highest ethical standards.
- 1.2 The Company’s endeavour supply chain partners shall adopt its core values, vision & mission. All business partners including contractors, sub-contractors, service providers and suppliers to play an integral role in maintaining the sustainability all over their operations to have business continuity and align with the Company’s growth plan.
- 1.3 The Company’s commitment towards implementation of all sustainability principles across the value chains to cover Environmental, Social & Economic Growth leading to overall success in business we do with. The Company uphold the highest standards of responsible business practices, integrity & ethics and extend the same to all suppliers through this Third Party Code of Conduct (“Code”). The Company expect suppliers to support, respect and commit to this Code, including complying with Company’s Code of Conduct & Policies and major applicable statutory rules/regulations set forth. The Company’s goal is to create value for all stakeholders and the Company is committed to responsible sourcing of goods & services.

## 2. SCOPE & APPLICABILITY

- 2.1 This Code is applicable to:
  - 2.1.1 Supplier;
  - 2.1.2 Vendors;
  - 2.1.3 Distributors;
  - 2.1.4 Wholesalers;
  - 2.1.5 Agents;
  - 2.1.6 Technology Partners;
  - 2.1.7 Contract Manufacturing Organizations (CMO’s);
  - 2.1.8 Contract Research Organizations (CRO’s)
- 2.2 This includes but is not limited to those individuals and/or organizations that directly or indirectly provide services, raw materials, active pharmaceutical ingredients, components, finished goods or other products and services (hereinafter together referred to as “Third Parties” ) who are registered with the Company or with whom the Company do business.

## 3. COMPLIANCE WITH APPLICABLE LAWS

- 3.1 The Company expect all its Third Parties to not just conduct their business in a responsible way and comply with applicable laws, rules and regulations but apply these standards, or equivalent business standards in their own supply chain. If these standards differ from the applicable laws, rules and regulations, the Company expect its Third Parties to comply with local laws while seeking to uphold the principles mentioned in this Code.

3.2 The Company expect its Third Parties to take responsibility for establishing effective communication and improvement processes within their own organization and that of related supply partners to meet the standards outlined in this Code. Apart from the standards mentioned in this Code, any additional Third Party-specific sustainability requirements and targets as applicable, may be defined in their respective commercial agreements.

## 4. ANTI-BRIBERY AND ANTI-CORRUPTION

4.1 Third Parties shall not pay or accept bribes, facilitation payments, kickbacks, and/or any other illegal inducements of any kind to anyone, including private individual, organizations or government official in order to gain any improper advantage in relation to performance of its obligation towards the Company, under any contract or otherwise.

4.2 Third Parties shall not accept, give, or offer to give any inappropriate gifts or material benefits to any of Company's Third Parties or representatives in order to influence or reward an action as well as attempt to influence business decisions for or on behalf of the Company.

## 5. HEALTH & SAFETY AT WORKPLACE

5.1 The Company's Environment Health & Safety ("EHS") Department works on building a 360-degree EHS operating system across all business functions by implementing various programs and driving a safety culture to have 'zero' impact on people, processes, and environment. The EHS Department ensures compliance with various regulatory and legal requirements with respect to prevention of pollution, safety of the plant and personnel, and the health of both, its employees and Third Parties. It also provides strategic support to the business on reducing, reusing, and recycling of waste.

5.2 Third Parties shall have adequate policies and precautionary measures to protect its employees at the workplace while engaging with hazardous pharmaceutical products, including products containing materials that are highly active, toxic or infectious.

5.3 Third Parties shall identify and assess possible emergency situations 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.

5.4 Third Parties shall have appropriate safety requirements to prevent or control the risks associated with:

5.4.1 Hazardous installations in the form of chemical releases, catastrophes;

5.4.2 Product-related issues and their potential impact during all stages of the production process.

## 6. HUMAN RIGHTS & LABOUR STANDARDS AT WORKPLACE

6.1 Third parties shall treat their employees with dignity, respect and uphold the

principles of fundamental human rights and fair working conditions stated below:

- 6.1.1 **Non-Discrimination:** Third Parties are expected to treat people with dignity and respect. Third Parties shall ensure that their workplace is free from any form of harassment, discrimination and there is no distinction, exclusion or preference on the basis of race, color, age, gender, sexual orientation, ethnicity, pregnancy, HIV status, COVID status, health status, sexual orientation, disability, religion, political affiliation, union membership, maternity or marital status.
- 6.1.2 **Forced Labor, Anti-Slavery and Anti-Trafficking:** Any form of forced and bonded labor should be prohibited. Further, engaging in slavery or any type of human trafficking is strictly forbidden.
- 6.1.3 **Freedom of Association:** Third Parties shall respect worker's rights to bargain collectively without unlawful interference. Further, Third Parties shall respect the rights of workers to seek representation and join labor unions, where permitted by law, without threat of retaliation, intimidation or harassment.
- 6.1.4 **Child Labor and Young Workers:** Third parties shall not engage in any form of child labor, as per the applicable regulatory requirement. Additionally, Third Parties shall create a non-discriminatory and protective workplace for the young workers who are below the age of 18 (eighteen) and above the legal age for employment and ensure that they do not carry out hazardous work, or work overtime or night shifts.
- 6.1.5 **Wages, Benefits and Working Hours:** Third Parties shall comply with the applicable regulatory requirements which includes payment of minimum wages, payment for overtime hours, mandated benefits, and appropriate breaks and leaves. Third parties shall implement a formal system and maintain records to accurately record the regular and overtime working hours of all workers. Third Parties shall communicate in a timely manner with workers regarding the basis upon which they will be paid, including any requirement of overtime and the wages to be paid for such overtime. Deductions from wages for disciplinary reasons are prohibited, unless they are undertaken in accordance with local laws (for example, deductions due to absence).

## 7. ETHICS & BUSINESS CONDUCT

- 7.1 The Third Parties are expected to behave ethically & with integrity in all their business transactions, in the manner as stated here-in below:
  - 7.1.1 Third Parties shall maintain atmosphere of transparency, innovation & collaboration;
  - 7.1.2 Third Parties are required to comply with all applicable local and national laws and regulations relating to animal welfare. The entities should perform animal testing after due consideration and alternatives for replacing and

reducing animals. Further procedures to minimize distress trials that are scientifically valid and acceptable to regulators should act as alternatives for animal testing. In the cases where the use of animals for testing is required, they should be treated with the utmost respect and care.

- 7.1.3 Third Parties shall compete fairly and follow applicable anti-trust and competition laws.
- 7.1.4 Third Parties are responsible for avoiding situations that present or create the appearance of a conflict between their interests and their obligations to the Company and in turn our obligations to our business partners. Additionally, our Third Parties should notify any actual, apparent or potential conflict of interest that may affect the performance of tasks or provision of services to the Company.
- 7.1.5 Third Parties are expected to have internal control systems in place to detect, prevent and respond to fraud and money laundering. Any potential fraud that may have an impact on the Company, regardless of materiality, must be reported to the Company immediately.
- 7.1.6 Third parties shall promote the Company's products in fair and ethical manner, use materials and product information provided by the company and should not communicate directly with patients, consumers investors, media and others in the form of promotional or non-promotional event/activity/material unless authorized by the Company and allowed by local laws.
- 7.1.7 Third Parties shall abide by all the relevant laws that prohibit tax evasion and its facilitation to its employees, agents and any other associations.
- 7.1.8 Third Parties shall preserve integrity & confidentiality of all information which they received as a part of conducting business with the Company.
- 7.1.9 Third Parties shall provide relevant means to their employees to confidentially report concerns or potential unethical activities in the workplace; any concerns should be duly investigated in detail and appropriate corrective actions should be taken post that the action report must be shared with the Company for issues of direct or indirect consequence to it.

## **8. ENVIRONMENT & SUSTAINABILITY APPROACH**

- 8.1 The Company expect its Third Parties to operate in a sustainable and responsible manner;
- 8.2 The Company shall identify & assess critical & Strategic suppliers for its effective ESG management.
- 8.3 Third Parties should reduce the environmental burden of their operations, including natural resource consumption, materials sourcing, waste generation, wastewater

discharges and air emissions.

- 8.4 Third Parties should handle and dispose the hazardous/Non-hazardous waste in an environmentally responsible way, and in compliance with applicable regulations.
- 8.5 The Company encourage its Third Parties to use natural resources (e.g. water, sources of energy, raw materials) in a judicious and sustainable manner and to promote the use of renewable energy sources wherever possible and feasible.
- 8.6 Third Parties shall prevent accidental release of hazardous materials into the environment and adverse.
- 8.7 Third Parties shall implement programs to ensure products do not contain restricted or banned materials.
- 8.8 Third Parties shall implement programs that recognize, respect and invest in the local community.

## **9. DATA PRIVACY, CONFIDENTIALITY AND INFORMATION PROTECTION**

- 9.1 Third Parties shall operate in a manner that is consistent with applicable data protection/privacy laws for the protection and security of all information, including personal information, which refers to any information associated with an identifiable individual person.
- 9.2 Third Parties must enter into approved confidentiality agreement or non-disclosure agreement if they foresee any confidential information to be shared.
- 9.3 Third Parties must enter into approved confidentiality agreement or non-disclosure agreement if they foresee any confidential information to be shared.
- 9.4 Third Parties shall respect the Company's intellectual property rights, including processes, information, copyrights, trademarks, patents, in-house developed software, trade secrets, decision rights, logos and brands and know-how.
- 9.5 Third Parties shall ensure that the personal information of the Company's employees and its Third Parties are protected and remains confidential. This information must only be used for legitimate and authorized business purposes only.
- 9.6 Third Parties shall have appropriate measures to prevent disclosure or unauthorized use of the Company's confidential information.

## **10. WASTE AND SPILLS**

- 10.1 The Third Parties shall ensure safe handling, movement, storage, reuse, recycle, disposal and management of waste generated, wastewater discharges in compliance with relevant regulatory requirements. The Third Parties shall ensure prior treatment of the waste before its direct release into the environment to prevent and mitigate potential adverse impact on human or environmental health.

## **11. COMMITMENT AND ACCOUNTABILITY**

- 11.1 The Third Parties shall exhibit commitment and accountability through its policies, objectives, and formal processes. The Third Parties shall identify and comply with applicable laws, regulations, guidelines, norms and relevant customer requirements. Suppliers shall incorporate comprehensive processes to control documents and records of its business activities.

## **12. RISK MANAGEMENT**

- 12.1 The Third Parties shall implement processes to manage non-conformity, incident response and emergency situations related to products, business operations/continuity, including reporting of certain events to applicable regulatory authorities.

## **13. TRAINING & COMPETENCY AND CONTINUAL IMPROVEMENT**

- 13.1 The Third Parties shall provide a training program that accomplishes appropriate level of knowledge, skills and abilities in management and workers to address the expectations in this Code.
- 13.2 The Third Parties shall implement a comprehensive approach to continually improve by setting performance objectives, executing implementation plans and taking essential restorative actions for deficiencies identified by internal or external assessments, inspections, and management reviews.
- 13.3 The Third Parties shall identify and implement improvement actions, including effective complaint investigation, and undertake internal audits and corrective actions as required.

## **14. IDENTIFICATION OF CONCERNS & COMMUNICATIONS**

- 14.1 The Third Parties shall encourage its workers & suppliers, if any to report concerns/ grievances, illegal activities or breaches of this Code without threat of or actual reprisal, intimidation or harassment. Third Parties shall investigate and make remedial changes, if necessary.
- 14.2 The Third Parties shall provide effective frameworks to communicate this Code to its workers, contractors and suppliers.

## **15. MANAGEMENT SYSTEMS**

- 15.1 The Third Parties are expected to manage their activities systematically in order to maintain business continuity, meet the standards set forth in this Code and to improve their operations continually. As such, they should:
- 15.1.1 Demonstrate top management commitment and accountability through policies, objectives, and formal processes;
  - 15.1.2 Implement processes to control documents and records;



- 15.1.3 Provide resources, including competent personnel and appropriate infrastructure, to ensure conformance to these standards;
- 15.1.4 Implement processes to control the production of the Company products and/or materials, manage change effectively and ensure customer requirements are satisfied;
- 15.1.5 Implement processes to manage non-conformity, incident response and emergency situations related to products, business operations/continuity and these standards, including reporting of certain events to applicable regulatory authorities and the Company as appropriate;
- 15.1.6 Provide advance notification of all anticipated supply disruptions to the Company, irrespective of their underlying factors being expected to rise to a standard of force majeure or otherwise; and
- 15.1.7 Identify and implement improvement actions, including effective complaint investigation, internal audit and corrective action processes.

## **16. TRANSPARENCY AND DISCLOSURE**

- 16.1 The Company's Third Parties are expected to make reasonable efforts to disclose (for example, on a website or a publicly available report) topics and goals that are important to the organization's impact on the environment and social issues. Among the issues that the Company encourages its Third Parties is to review and be transparent about:
  - 16.1.1 Energy, Waste and Water Use/Reduction and Environment protection measures
  - 16.1.2 Employee Health, Safety and Wellness Programs
  - 16.1.3 Community and Human Rights Investments

## **17. MONITORING AND COMPLIANCE**

- 17.1 Third Parties shall review their operations to ensure their compliance to all applicable legal requirements and their conformance to these standards and/or comparable industry-approved standards. If a regulatory agency, auditor, the Company or a supplier identifies areas of non-compliance, the Third Party is expected to develop, document and implement plans to remedy such non-compliance.
- 17.2 The Company may engage in monitoring activities to confirm Third Party's compliance to this Code, including on-site assessments of facilities, use of questionnaires, review of available information, or other measures necessary to review Third Party's performance. The Company reserves the right to disqualify any potential Third Party or terminate any relationship with a current Third Party that has failed to conform to these standards.

## **18. AMENDMENT IN THE POLICY**

- 18.1 The Company reserves the right to amend this Policy, as it may deem fit.