

The Syngene logo is positioned in the upper right quadrant of the page. It features the word "Syngene" in a bold, blue, sans-serif font. The background of the top of the page consists of several overlapping, semi-transparent blue shapes that create a layered, wave-like effect.

# SUPPLIER CODE OF CONDUCT

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## **Vision**

Our vision is to be a world-class partner delivering innovative scientific solutions for healthier lives. As a sustainable company, we are implementing a set of guidelines hereafter called as **Supplier Code of Conduct** for our suppliers.

Our strong portfolio of businesses, geographies, products and services gives us an edge in an increasingly competitive global market and allows us to develop and provide affordable solutions to partners and people across the world, regardless of geographic and socio-economic barriers.

This **Supplier Code of Conduct** is drafted in alignment with our Sustainable Procurement Policy. Syngene expects our suppliers to strictly observe and comply with all the fundamental principles expressed herein, in all its activities and sites worldwide.

## **Ethics**

To meet social responsibilities, all suppliers are expected to conduct their business in an ethical manner and act with integrity.

## **Business Integrity, Bribery and Corruption**

Suppliers must refrain from proposing to any form of corruption, extortion, or embezzlement. Suppliers are expected not to offer any kind of gifts to employees or any other kind of personal benefit resulting from the relationships with the suppliers. The supplier is committed to work against all forms of corruption, money, gifts, loans, and rebates of reasonable value which are in compliance with all applicable laws, rules, and regulations. Suppliers are mandated to comply with SYNGENE's Anti-Bribery Anti-Corruption policy via submission of appropriate documentation sought at the onboarding stage or on formal request.

## **Fair Competition**

Suppliers shall conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

## **Privacy & Intellectual Property**

Suppliers shall safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

## **Identification of Concern**

Suppliers shall provide means for their employees to report concerns or potentially unlawful

activities in the workplace. Any report should be treated in a confidential manner. Suppliers must investigate such reports and take corrective action if needed.

### **Whistle blower protection and anonymous complaints**

Suppliers must create programs to ensure the protection of workers' whistle blower confidentiality and prohibit retaliation against workers, who participate in such programs in good faith or refuse an order that is in violation of the Supplier Code of Conduct. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

### **Labor and human rights**

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

### **Child labor**

Suppliers shall provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labor and for their rehabilitation and social integration.

### **Anti-discrimination**

Suppliers shall not do any discrimination or distinction, exclusion or preference made on the basis of race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments.

### **Termination of employment**

Suppliers shall not terminate the employment of a worker unless there is a valid reason for such termination connected with the worker's capacity or conduct or based on the operational requirements of the undertaking, establishment, or service.

### **Fair treatment**

Suppliers must be committed to a workplace free of harassment and should not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse or unreasonable restrictions on entering or exiting company provided facilities.

### **Employment policy**

Suppliers are expected to declare and pursue an active policy designed to promote full, productive, and freely chosen employment. Such a policy shall aim to ensure that there is work for all who are available for and are seeking work; that such work is as productive as possible; and that there is freedom of choice of employment and the fullest possible opportunity for each worker to qualify for, and to use his or her skills and endowments in a job for which he or she is well suited, irrespective of race, color, sex, religion, political opinion, national extraction or social origin.

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## **Wages and benefits**

Suppliers should ensure that they pay workers according to the applicable wage laws, including minimum wages, overtime hours and mandated benefits. There should be proper communication with the workers about the basis on which they are being compensated in a timely manner. The suppliers are also expected to communicate with the workers about the overtime requirements and the wages to be paid for such overtime.

## **Wages, working hours, and benefits**

Suppliers shall abide the rules in payment to all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. Suppliers must follow a minimum wage fixing system capable of determining and periodically reviewing and adjusting minimum wage rates having the force of law.

Suppliers must ensure the application of the principle of equal remuneration for men and women workers for work of equal value. The workers are duly notified of the method used to calculate wages. Wages are paid in cash, by check or by bank transfer, to the exclusion of any other form of compensation, except in the specific cases. Wages are paid at regular intervals and with reasonable frequency. Deductions from wages for disciplinary reasons are prohibited.

## **Health and safety**

The Supplier provides a safe and healthy working environment for all employees working at their sites. The supplier develops a Health and Safety (HS) organization to define, implement and follow-up on an HS policy and HS Management System that includes compliance with local and national regulations.

## **Workers health and safety protection**

Suppliers shall identify and protect workers from any physical, chemical and biological hazards in the workplace as well as from risks associated with any infrastructures used by their employees. Safety information for any identified workplace risks shall be made available to inform and train workers to protect them from the risk. This includes safety information about hazardous substances used: chemicals, pharmaceuticals active ingredients, intermediate products, etc.

## **Protection from chemical exposure**

Suppliers should adopt and implement a coherent policy on safety in the use of chemicals at work, which includes the production, the handling, the storage, and the transport of chemicals as well as the disposal and treatment of waste chemicals, the release of chemicals resulting from work activities, and the maintenance, repair and cleaning of equipment and containers of chemicals. In addition, it allocates specific responsibilities to suppliers and exporting states.

## **Response to emergency**

Supplier's shall identify and assess possible emergency situations in the workplace and minimize their impact inside and/or outside the site by implementing emergency response plans and procedures. Suppliers will identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

## **Process safety**

Suppliers will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process. For hazardous installations the supplier will conduct specific risk analyses and implement measures that prevent the occurrence of incidences such as chemical releases and or explosions.

## **Social security**

Suppliers must lay down a minimum standard for the level of social security benefits and the conditions under which they are granted. It covers the nine principal branches of social security, namely medical care, sickness, unemployment, old age, employment injury, family, maternity, invalidity, and survivors' benefits.

## **Environment**

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

## **Waste and emissions**

Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any of these activities which have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled, and treated prior to release of any substance into the environment. Suppliers will have systems in place to prevent or mitigate accidental spills and releases into the environment.

## **Resource conservation and climate protection**

Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impacts on the environment and climate will be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling, and material reutilization. Suppliers will engage in the development of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

## **Compliance with legal and regulatory requirements**

The supplier ensures compliance with all country regulations and recommendations relating to environmental protection in force within the countries where it carries out its activities.

The supplier has the appropriate certificates and/or permits allowing it to operate.

Environmental reports are prepared in accordance with country regulations. They are available at the sites.

## **Management Systems**

Suppliers must adopt or establish a management system designed to ensure compliance with this code and applicable laws and regulations, identify and mitigate related operational risks, and facilitate continuous improvement.

## **Risk Management**

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Conduct and all applicable legal requirements.

## **Documentation**

Suppliers are expected to develop adequate documentation to demonstrate that they share the principles and values expressed in this Supplier Code of Conduct. This documentation may be reviewed by company staff upon mutual agreement.

## **Training and competency**

Suppliers will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards.

## **Audits and assessments**

Periodic self-evaluations are done to ensure that the supplier and its subcontractors and its next-tier suppliers are complying with this code and with applicable laws and regulations. Company personnel may visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with this code and to audit supplier's wage, hour, payroll, and other worker records and practices.

## **Consequence management**

In case the supplier is found to be non-compliant as per the terms mentioned in this **Supplier Code of Conduct**, Syngene reserves the right to take the appropriate course of action as per the severity and criticality of the violation indicated by the "Levels" (severity and criticality ranges from Level 1 being the lowest to Level 4 being the highest) mentioned below:

- Level 1: Continue business with warning issued for redressal as per a timeline suggested by Syngene
- Level 2: Penalize 50% of the order value
- Level 3: Terminate business/order
- Level 4: Blacklist the supplier from any further association

The decision taken by Syngene in this regard shall be final and binding.

Syngene's Supplier Code of Conduct has been drafted in alignment with its Sustainable Procurement Policy. Syngene expects its suppliers to adhere to the standards outlined in this Code of Conduct and agree to the terms and conditions in case of non-conformance.