



SIGACHI INDUSTRIES LIMITED

CIN: L24110TG1989PLC009497

AN EXCiPACT GMP, ISO 9001:2015 & FSSC 22000 CERTIFIED COMPANY

www.sigachi.com

POLICY ON SUPPLIER CODE OF CONDUCT

Version	2
Prepared by	Secretarial & Legal
Document Owner	Vivek Kumar
Reviewed by	Committee of Transformation
Approved by	Board of Directors
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Sigachi Industries Limited ('Sigachi') is committed to sustainability in all its business activities and strives to apply the highest ethical standards. We endeavor to encourage the adoption of our core values, mission and ideology, across our sphere of influence. Our business partners, including suppliers, service providers and subcontractors play an integral role in maintaining the efficiency of our business continuity and growth plan. Our commitment towards implementation of sustainability principles across the value chain enables the convergence of environment, social and economic growth leading to overall success in business. We uphold the highest standards of ethics, integrity, responsible business practices and extend it to our suppliers through the Supplier Code of Conduct. We expect our suppliers to respect, support and commit to the Supplier of Code of Conduct and share details of any internal external audits conducted with this regard.

APPLICABILITY

We expect acknowledgement and strict adherence to the Supplier Code of Conduct by all our direct and indirect suppliers providing raw materials, active pharmaceutical ingredients, components, finished goods and services, and other products.

FAIR COMPETITION AND ANTI – CORRUPTION

Suppliers shall conduct business activities in a fair and resilient manner, as well in accordance with all applicable anti-trust standards.

Suppliers shall incorporate fair business practices by accurate and responsible advertising and prohibiting any kind of bribery, corruption, extortion, embezzlement, or participation in other illegal inducement. Supplier should ensure implementation of effective anti-bribery mechanism to prevent such incidents and comply with the applicable law.

Suppliers should ensure that there are no cases of corruption and illegitimate / illegal payments. If there are any reported cases through their whistleblower or other mechanism, whether raised by internal or external stakeholder, the supplier should be able to demonstrate how the reported matter was assessed.

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PATIENT SAFETY, ACCESS TO INFORMATION AND CONFLICT OF INTEREST

Suppliers shall implement robust management systems to minimize the risk of any adverse impact occurring on patients, subjects, and donors' rights, particularly their rights to health and direct access to information.

Suppliers shall incorporate suitable measures to avoid improper use of any intellectual property, trade secrets, and other confidential, priority and sensitive information of Sigachi, its workers, patients, donors, etc. and abide by all applicable data privacy laws and regulations. Suppliers must promptly report, in case of any unauthorized disclosure of Sigachi's confidential information to investigate in detail and incorporate appropriate remedial actions.

HUMAN RIGHTS AND LABOR

Suppliers shall be committed to protecting the human rights of workers and treating them with dignity and respect. The elements of Human Rights and Labor are:

- **Right to freedom to choose employment**

Suppliers shall prohibit employment of forced, bonded, child labor or indentured labor. Additionally, suppliers should ensure that no worker shall pay for a job or be denied freedom of movement.

- **Working Conditions and Non-Discrimination**

Suppliers shall maintain a conducive work environment for all its employees and workers, additionally undertake appropriate measures to avoid any harassment, harsh or inhumane treatment, which includes inappropriate behavior, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, etc.

Suppliers shall prohibit any kind of discrimination based on race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union member, marriage history, etc.

Suppliers shall comply with all applicable laws and mandatory industry standards pertaining to minimum wages, overtime pay and legally mandated benefits, to ensure acceptable living conditions for its employees and workers.

Suppliers shall maintain clear communication with all its workers being compensated in a transparent and timely manner. If any overtime is required, it must be informed in advance of commencing work and wages to be paid for such overtime consistent with applicable national and international standards.

- **Freedom of Association and Collective Bargain**

Suppliers shall respect workers' rights to associate freely, seek representations and to join labor unions or workers council for bargain collectively, without unlawful interference.

Suppliers shall encourage open and transparent communication with all its employees and workers to resolve issues related to compensation, workplace safety or any other.

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OCCUPATIONAL HEALTH AND SAFETY

Suppliers shall provide a safe and healthy working environment including:

- **Working Conditions and Workers Protection**

Suppliers shall comply with the Company's health and safety rules, practices and report incidents pertaining to accidents, injuries, and unsafe practices.

Suppliers shall implement workplace safety training sessions for all their employees and workers to guide them on the risk of exposure to chemical, biological, physical hazards and physically demanding tasks.

Suppliers shall ensure appropriate measures to provide access to potable water for their employees and workers.

- **Emergency preparedness and response**

Suppliers shall identify and assess any emergency situations for the workplace and correspondingly implement emergency response plans and procedures.

ENVIRONMENT

Suppliers shall operate in an environmentally responsible and efficient manner 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 augment reuse and recycle practices. The environmental elements include:

- **Energy and emissions**

Suppliers shall have systems, policies and procedures to monitor their environmental performance in terms of energy consumption and emissions. Suppliers shall adhere to relevant regulatory requirements for air emissions and shall take appropriate measures to prevent the release of harmful emissions into the environment.

- **Waste and spills**

Suppliers shall ensure safe handling, movement, storage, reuse, recycle, disposal and management of waste generated, wastewater discharges in compliance with relevant regulatory requirements. Suppliers 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.

- **Identification of concerns & communications**

Suppliers shall encourage its workers to report concerns, illegal activities, or breaches of these Principles in the workplace without threat of or actual reprisal, intimidation or harassment. Suppliers shall investigate and make remedial changes if necessary.

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Suppliers shall provide effective frameworks to communicate these Principles to workers, contractors and suppliers.

GENERAL

Suppliers will be requested to provide metrics to enable us to have a clear vision of their ESG performance from a broad perspective. We trust that our suppliers will provide us with accurate and verifiable information. These metrics include, but are not limited to, the following:

1. Carbon footprint, energy and water consumption and recycling metrics;
2. Waste management metrics;
3. Employee gender breakdown;
4. HR, labour and wage policies, etc.; &
5. CSR activities.

Furthermore, Sigachi is committed to regularly and transparently providing our stakeholders with information about our environmental and social risk management and sustainability performance. In line with the same, Sigachi will continue to review the targets set in this document annually and make necessary revisions in accordance with global and national progressions.

- **Resource use**

Suppliers shall take conscious efforts towards the optimal utilization of resources, improving the efficiency of resource consumption.

- **Sustainable sourcing and traceability**

Suppliers shall adhere to responsible sourcing principles and carry out due diligence on the sourcing of raw materials, ensuring traceability of materials.

RESPONSIBLE BUSINESS CONDUCT

Suppliers shall use management systems to maintain business continuity, facilitate continual improvement and compliance with the expectations of these principles. The Management System elements include:

- **Commitment and accountability**

Suppliers shall exhibit commitment and accountability through their policies, objectives, and formal processes.

Suppliers 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.

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- **Risk Management**

Suppliers shall 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.

- **Training & competency and continual improvement**

Suppliers shall provide a training program that accomplishes appropriate level of knowledge, skills and abilities in management and workers to address the expectations in these Principles.

Suppliers 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.

Suppliers shall identify and implement improvement actions, including effective complaint investigation, and undertake internal audits and corrective actions as required.

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