



Third Party Code of Conduct October 2022

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Issued on
24/11/2022

Review Committee: Supply Chain Management Team and Heads
Next Review date: 23/11/24

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Introduction

Ajanta requires its Third Parties (TP) (all our direct and indirect suppliers providing raw materials, active pharmaceutical ingredients, components, finished goods and services, and other products) to comply with the standards defined in the TP code. Furthermore, our TP are expected to adopt standards that cover the same principles and content included in our TP code with their own suppliers.

Ajanta believes that society and business are best served by responsible business behaviors and practices. Fundamental to this belief is that business should not only operate in compliance with applicable laws, rules and regulations, but that our behaviors address underlying societal concerns.

The TP code does not replace local law or labor agreements. Ajanta expects TP to operate in compliance with applicable laws, rules, regulations and collective bargaining agreements, in addition to the standards contained herein. TP are expected to comply with local requirements while seeking to uphold the principle underpinning the relevant TP code standard.

Ajanta Third Party Standards

1 Human Rights

Ajanta is committed to conducting our business in a manner that respects the rights and dignity of all people. We will strive to prevent, mitigate and remedy adverse human rights impacts throughout our workplace, business operations and in the communities in which we work.

Ajanta is committed to working with TP who operate in a manner that is consistent with our values and ethical principles, including respect for human rights. In addition to the specific requirements regarding labor-related human rights set out under “Section 2. Labor Rights”,

2 Labor Rights – Fair Employment Practices

TP shall be committed to uphold human rights for workers, as set out in the Universal Declaration of Human Rights, and to treat them with dignity, respect and equal opportunity. The labor elements include:

2.1 Freely Chosen Employment

TP shall not use forced labor, including bonded, indentured or involuntary prison labor, or engage in any form of forced labor or human trafficking.

2.2 Child Labor and Young Workers

TP shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country’s legal age for employment.

2.3 Non-Discrimination

TP shall provide a workplace free of discrimination. Discrimination for reasons such as race, national or ethnic minority status, ethnicity, color, age, sex, sexual orientation, gender, gender identity or expression, social origin, disability, religion, political affiliation, union membership, pregnancy, marital status or any other protected category as defined by local laws is not tolerated.

2.4 Fair Treatment

TP shall provide a workplace free of and with no threat of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

2.5 Wages, Benefits and Working Hours

TP shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. TP shall communicate in a timely manner with workers regarding the basis upon which they will be paid. Freedom of Association and Collective Bargaining

Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

2.6 Hazard Information

TP shall have programs and systems in place to provide workers with safety information relating to hazardous materials and education to protect them from potential hazards. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents and wastes.

2.7 Risks and Process Safety

TP shall have systems and programs in place to identify both and process hazards as well as potential impacts on surrounding communities. They should quantify such hazards, define the risk levels appropriately and have programs and systems in place to prevent or mitigate these risks (e.g. catastrophic releases of chemicals, fumes, dust)

2.8 Worker Protection

TP shall have systems and processes in place to protect workers from exposure to chemical, biological and physical hazards (including physically demanding tasks) in the workplace

2.9 Emergency Preparedness and Response

TP shall develop and distribute emergency plans across their facilities. TP should minimize the potential impact of any emergency by implementing suitable emergency plans and response procedure.

3.0 Environmental Sustainability

TP shall comply with all applicable environmental laws and regulations. They are expected to act beyond legal compliance and actively minimize the environmental impact of their activities and products over their lifecycle, specifically:-

3.1 Environmental Targets and Sustainability Performance

Our ambition is to be a catalyst for change and the leader in environmental sustainability. We shall drive sustainability through our own operations and ultimately across our value chain to become carbon neutral, plastic neutral and water sustainable, before the end of 2030. It is expected that TP actively contribute and support us to achieve our ambitious environmental targets through collaboration with us and implementation of environmental improvement opportunities.

3.2 Environmental Authorizations

TP shall have processes and systems to conform with applicable environmental laws and regulations. Required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

3.3. Waste and Emissions

TP shall have processes and systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste. Any generation and disposal of waste, emissions to air and discharges to water, with the potential to adversely impact human

health or the livelihoods or way of life of surrounding communities or the environment (giving priority to Active Pharmaceutical Ingredients) shall be appropriately minimized, properly managed, controlled and/or treated prior to release into the environment.

3.4 Spills and Releases

TP shall have processes and systems in place to prevent and mitigate accidental and diffusive spills and releases to the environment. They shall remedy any impacts that are caused.

3.5 Sustainability and Efficiency of Resources

TP shall have processes and systems in place to strive for a positive effect on climate, by reducing their carbon footprint, waste and water usage and making efficient use of natural resources. As members of society, we have to protect the environment for future generations.

Where surrounding communities rely on ecosystem services for their sustenance or livelihoods, TP shall ensure that their use of natural resources does not adversely impact community members rights to water and an adequate standard of living and they shall remedy any impacts that are caused.

4 Animal Welfare

Animals shall be treated respectfully, with pain and stress minimized. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimize distress. Alternatives should be used wherever scientifically valid and acceptable to regulators.

Animals are treated respectfully and cared for in accordance with the particular needs of the given species and individual, as defined by current veterinary care and practice guidelines for animals used in experiments.

5 Anti-Bribery and Fair Competition

5.1 Anti-Bribery

TP shall not bribe any public official or private person & APL person and shall not accept any bribes. No intermediaries, such as agents, advisers, distributors or any other business partners, shall be used to commit acts of bribery.

TP shall comply with applicable laws & regulations and industry standards related to anti-corruption.

5.2 Fair Competition

TP shall conduct their business consistent with fair competition. Shall employ fair business practices, including accurate and truthful advertising.

TP shall comply with all fair competition and antitrust laws and regulations.

6 Data Privacy and Information Protection

TP shall establish and maintain adequate personal data and information security protection or the information that they, and any TP acting on their behalf, process.

TP shall operate in a manner that is consistent with applicable data protection/privacy laws and aligned with industry standards for the protection and security of all information, including personal information.

6.1 Compliance with Cross-Border Transfer Restrictions:

TP must have adequate safeguards, rules and procedures to ensure that they remain in compliance with all applicable laws that govern cross-border data transmissions, where applicable.

6.2 Data and/or Information Breach Notification:

TP shall notify Ajanta for any suspected or actual data breach concerning the services/deliverables/goods provided. TP shall appropriately assist Ajanta in any investigations in response to a data or information breach.

7 Quality (Good Manufacturing Practices)

TP shall ensure that they are providing materials, products and services that comply with applicable laws, regulations, health authority standards, industry guidance and any additional customer requirements.

TP shall, where applicable, abide by the Quality Contract in place governing Good Manufacturing Practices (GMP) activity, expectations and requirements.

8.0 Management Systems

TP shall use management systems to facilitate continual improvement and compliance with these standards. Elements of the management systems include:

8.1 Commitment and Accountability

TP shall demonstrate commitment to the concepts described in this document by allocating appropriate resources.

8.2 Legal and Customer Requirements

TP shall identify and comply with applicable laws, regulations, standards and relevant customer requirements.

8.3 Risk Management

TP shall have mechanisms to determine and manage risk in all areas addressed by this document.

8.4 TP Relationships

TP do not sub-contract or otherwise engage with TP on behalf of Ajanta or represent Ajanta to TP, without the prior written consent of Ajanta. Similarly, there is no assignment of the contract, without prior written consent of Ajanta

8.5 Audit Right

Ajanta may audit (or engage a TP to audit on their behalf) the TP at any time upon reasonable prior notice, to ensure its compliance with the standards in the TP Code, and to confirm all payments made by Ajanta and to TP on behalf of Ajanta. Supplemental audit provisions may also apply as agreed between the parties.

9.0 Standard:

9.1 Documentation

TP shall maintain documentation necessary to demonstrate conformance with these standards and compliance with applicable regulations

9.2 Training & Competencies

TP shall educate their employees to make ethical decisions in compliance with laws, regulations and contract requirements. If requested by the TP, Ajanta has the right to train.

9.3 Continual Improvement

TP are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, audits, inspections and management reviews.

9.4 Business Continuity Management

TP should consider having Business Continuity measures in place for products and services being provided to Ajanta, in the case of a disruptive incident.

9.5 Acknowledgement

The TP acknowledges that their engagement is not used by Ajanta to create an incentive or reward for prescribing Ajanta products or to secure any improper business advantage for Ajanta

Disclaimer

Ajanta may, in its sole discretion, provide guidance, documents, information, advice, best practice sharing, know-how, insights and/or examples (“**Guidance**”) to the TP for the purpose of its compliance with this TP Code.

The TP acknowledges and agrees that any such Guidance is provided by Ajanta for information purposes only and is not a substitute for professional advice and/or compliance with applicable legal requirements.

The TP places reliance on Ajanta Guidance at its own risk and any consequences of decisions relating to, or the implementation of, such Guidance are the sole responsibility of the TP.

Ajanta does not warrant and makes no representations as to the accuracy or completeness of such Guidance and will not be held responsible by any person, including the TP, in any manner whatsoever, for any consequences of the TP’s reliance on or implementation of such Guidance.



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