



BUSINESS RESPONSIBILITY POLICIES

- **BUSINESS ETHICS POLICY**
- **PRODUCT SAFETY AND SUSTAINABILITY POLICY**
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- **ENVIRONMENT HEALTH AND SAFETY POLICY**
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- **INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT POLICY**
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POLICY ON BUSINESS ETHICS

1. INTRODUCTION

This code of business conduct and ethics (the "code") is intended as an overview of the company's guiding principles and not as a restatement of company policies and procedures. The code cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that we must ultimately rely on each person's good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct. Employees should refer to the confidential and proprietary policies contained in the employee manual for a description of the policies and required reporting procedures applicable to them. This code is a statement of goals and expectations for individual and business conduct. It is not intended to and does not in any way constitute an employment contract or assurance of continued employment, and does not create any rights for any employee, client, supplier, competitor, shareholder or any other person or entity. Our ethics are ultimately determined by all of us as we do our daily jobs. Our standard has been, and will continue to be, that of the highest ethical conduct.

2. SYSTEMS AND SOPS

A system is defined as the organisational structure, responsibilities, processes, procedures and resources for implementing various management directives. Such systems are supplemented with written SOPs to ensure the quality and reliability enshrined in our logo, which is the hallmark of our business. SOPs establish a systematic way of doing work and ensure that work is done consistently by all persons required to perform repetitive tasks.

Each employee is responsible for ensuring that his/her work processes are efficient and continually improving. The management will provide training and an appropriate motivating environment to foster teamwork, both within and across organisational units, for employees to improve organisational effectiveness. It is the company's topmost priority to implement and maintain quality assurance and quality control systems with written SOPs to ensure that stated business objectives are met.

Therefore, any attempt to disrupt the laid down systems or an infringement of any nature pertaining to the SOPs will be viewed seriously. Under any circumstances, issues like data fudging, fiddling with data integrity, tampering with data or any such or similar attempt or malpractices threatening the basic core principle of our business



and affecting the health and safety of humanity will not be tolerated, and the same will be treated as an unpardonable act with the strictest of possible measures taken against such employees.

3. OBEYING THE LAW

Unichem strives to be a good corporate citizen in every country and community where it conducts business and complies with all applicable laws and regulations.

4. DUTIES OF THE INDEPENDENT DIRECTOR

Independent directors shall:

1. Undertake appropriate induction programmes and regularly update and refresh their skills, knowledge and familiarity with the company;
2. Seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the company;
3. Strive to attend all meetings of Board of Directors and Board committees of which they are members;
4. Participate constructively and actively in the Board committees in which they are chairpersons or members;
5. Strive to attend the general meetings of the company;
6. Ensure that concerns about the running of the company or a proposed action are addressed by the Board and, to the extent that they are not resolved, insist that their concerns are recorded in the minutes of the Board meeting;
7. Keep themselves well informed about the company and the external environment in which it operates;
8. Not unfairly obstruct the functioning of an otherwise proper Board or committee;
9. Pay sufficient attention and ensure there is adequate deliberation before approving related party transactions and assure themselves that the same are in the interest of the company;
10. Ascertain that the company has an adequate and functional vigil mechanism and ensure that the interests of a person who uses such a mechanism are not prejudicially affected on account of such use;



11. Report concerns about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct or ethics policy;
12. Acting within his authority, assist in protecting the legitimate interests of the company, shareholders and its employees;
13. Not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such a disclosure is expressly approved by the Board or required by law.

5. BUSINESS PARTNERS

Unichem is committed to establishing mutually beneficial relations with customers, suppliers, shareholders, employees and the society at large. Each director, officer and employee of the company shall deal fairly with the business partners of the company.

6. CUSTOMERS

Unichem is committed to providing products and services which are efficacious and safe for their intended use. Products and services are appropriately labelled, advertised and communicated.

7. SUPPLIERS

Suppliers and vendors should be treated in a fair and reasonable manner without undue favour or bias consistent with applicable laws and good business practices.

8. EMPLOYEES CONFIDENTIAL INFORMATION

The company's trade secrets, proprietary information, and other internal information are valuable assets. Protection of this information plays a vital role in the company. It shall be a breach of ethics for any directors, officers, employees or former directors, officers and employees of Unichem to use any confidential information for actual or anticipated personal gain, or for the actual or anticipated gain of any person.

A person leaving the employment of the company has an obligation to protect the company's trade secrets and proprietary information until the information becomes publicly available or until the company no longer considers it a trade secret or proprietary. Departing team members should note that correspondence in any form – printed matter, software files and programs, documents, or records of any kind are all property of the company and must remain with the company.



Unichem recognizes trade secrets of others and discourages divulging such information.

9. TRUST AND RESPECT

Unichem is committed to a working environment in which there is mutual trust and respect, and where everyone feels responsible for the performance and reputation of the company.

10. WORKING CONDITIONS

Unichem is committed to safe, healthy and non-exploitative working conditions for all employees. Specifically, we do not use any form of child labour.

11. CONFLICTS OF INTEREST

Directors, officers and employees being 'agents' of shareholders of Unichem have a duty to avoid conflict of interest with the company.

12. USE OF INSIDE INFORMATION

It is the company's goal to protect shareholder investments through strict enforcement of prohibition against insider trading set forth in Securities Exchange Board of India guidelines and the securities laws and regulations. Insider trading is both unethical and illegal and will be dealt with firmly. To review the policy and for specific employee reporting procedures, employees should refer to the company's policy regarding code on insider trading.

13. PROTECTION AND USE OF COMPANY ASSETS

Company assets including intellectual property and software are valuable resources owned, licensed, or otherwise belonging to the company. Safeguarding company assets is the responsibility of all directors, officers and employees.

14. ACCOUNTING PRACTICES

It is the policy of Unichem to fully and fairly disclose the financial condition of the company and communicate events or developments that significantly impact the financial position in compliance with applicable accounting principles, laws, rules and regulations.

15. ANTI-CORRUPTION POLICY FOR VENDORS

Unichem strives to maintain high ethical standards and has adopted policies that require its employees and vendors to comply with all applicable anti-corruption laws



and regulations, both, foreign and domestic. Violation of such laws may include, but are not limited to:

- (a) Directly or indirectly giving and/or offering, promising, or authorizing the giving of anything of value to government officials, agents, employees or political parties (including political candidates) to influence or induce to influence on any act or decision of such individual or entity or to secure any improper advantage in order to obtain or retain business for or with Unichem, its vendors or agents, and
- (b) Failing to properly, fully and correctly record all expenditures undertaken on behalf of Unichem, its vendors or agents.

16. HR POLICIES

The company has developed various HR and administrative policies. All officers and employees will adhere to these policies.

17. SHAREHOLDERS

Unichem is committed to conduct its operations in accordance with principles of good corporate governance.

18. SOCIETY AT LARGE

Unichem ensures that its operations do not have an adverse environmental fallout while pursuing the long-term goal of developing a sustainable business. Unichem complies with all statutory and other legal requirements relating to the environmental impacts of their business.

19. SAFETY AND HEALTH

Unichem ensures safety and health of people, and protection of property and the environment while performing their professional duties and exercises its obligation to advise employees, clients, or appropriate authorities about the hazards to people, property or the environment.

20. COMPLIANCE

Compliance with these principles is an essential element in our business success. The Board of Directors and corporate officers of Unichem are responsible for ensuring that these principles are communicated to, and understood and observed by all employees. Day-to-day responsibility is delegated to the senior management of all regions and operating companies. They are responsible for implementing these



principles and if necessary through more detailed guidance tailored to local needs. Assurance of compliance needs to be obtained and monitored each year.

21. DUTY TO REPORT AND CONSEQUENCES

Every director, officer and employee has a duty to adhere to the Code of Business Conduct and Ethics and all existing company policies, and report to the company any actual or suspected violation in accordance with applicable procedures. Employees shall report suspected violations of company policies contained in the employee manual by following the reporting procedures for that specific policy. All other suspected violations of the code must be reported to that party or telephone number stated in the code. If no specific reporting procedures are stated, the violation must be reported to the Legal Department in India on +91 (22) 66474100. The company forbids retaliation against employees who report violations of the Code of Business Conduct and Ethics in good faith.

- *This policy has been amended, approved and adopted by the Board of Directors at their meeting held on October 21, 2016.*



POLICY ON PRODUCT SAFETY AND SUSTAINABILITY

PHILOSOPHY

Unichem recognizes that all stages of product manufacturing, beginning from the conception of an idea till the use and final disposal of the same has an impact on society and the environment. Keeping these aspects in mind Unichem endeavors to be efficient and responsible at every stage of the product life cycle to improve the quality of products offered to its customers.

POLICY

To maximize efficient utilization of resources in the manufacturing process.

- To avoid over-exploitation of resources. Endeavour to use resources judiciously and substitute them wherever possible, with eco-friendly alternatives.
- To explore ways for reducing the environmental impact of the products manufactured by the Company.
- To continuously improve the effectiveness of the quality management system. This shall be achieved by implementing processes and systems which conform to applicable regulatory requirements and constantly improve them, keeping abreast of the latest technological developments and incorporating the same effectively.
- To comply with the relevant environmental laws and regulations applicable to its business operations.
- Endeavour to reduce, reuse and recycle the Company's resources.
- To continuously improve the quality of products offered by the Company.
- Endeavor to give due regard to social, ethical, and environmental considerations in the manufacturing process.
- To ensure that the manufacturing processes and technologies required to produce various products are sustainable.
- Work towards minimizing the adverse effect on the environment by adopting various green practices such as the usage of renewable and energy-efficient resources.
- To make continuous efforts to dispose of waste in a responsible manner.
- To make efforts to initiatives that work towards the conservation of the environment.

IMPLEMENTATION

1. This policy is available on the Company's website www.unichemlabs.com
2. The policy will be reviewed by the Board of Directors at regular intervals as it may deem fit

- *Version 2 of this policy was approved by the Board of Directors on 9th August 2023*



POLICY FOR WELL BEING OF EMPLOYEES

PHILOSOPHY

This policy strives to create a highly conducive and motivated work environment aimed at the growth and development of employees and in turn the organization. The objective of is to have fair policies for recruitment, retention of talent and overall well-being of employees that contribute to the development of Unichem Business.

POLICY

- To provide equal employment opportunities at the time of recruitment as well as during employment without discrimination based on age, region, caste, creed, race, colour, gender, religion, national origin, social groupings, disability, and marital status, in accordance with applicable local, state, and national laws.
- All employment and promotion decisions will be based solely upon individuals' qualifications, experience, prior contribution and demonstrated capacity to perform at higher or improved levels of performance and will be in accordance with the principal of equal employment opportunity. The Company will take affirmative action wherever necessary to attract and retain talent.
- To ensure timely payment of wages, as per applicable labour laws.
- To ensure well-being of employees by enrolling them for various employee benefit policies such as group Medclaim, personal accident and workmen compensation and provide assistance to avail cover for dependent parents of the employees.
- To keep the workplace environment safe, hygienic, and humane upholding the dignity of all employees.
- To prohibit use of child labour, forced labour or any form of involuntary labour whether paid or unpaid.
- Aim at ensuring transparency, a climate of openness, mutual trust, teamwork, fairness, and equity in all its dealings with employees.
- To take cognizance of work life balance of its employees.
- To ensure continuous skill and competence upgrading of employees by providing access to necessary learning opportunities on equal and non-discriminatory basis.
- Engage its employees through various events and programs, group interactions, webinars, and cultural events.
- Ensure compliance with all regulatory requirements pertaining to its employees.



IMPLEMENTATION

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POLICY ON STAKEHOLDERS' ENGAGEMENT

PHILOSOPHY

To provide and create value for all stakeholders.

POLICY

- To systematically identify the stakeholders and understand their expectations and concerns.
- To respect the interest of and be responsive towards all stakeholders.
- To work towards those stakeholders who are disadvantaged, vulnerable and marginalized through its corporate social responsibility activities.
- To strive towards resolving differences with stakeholders in a just, fair, and equitable manner.
- To ensure that freedom of choice and free competition is not restricted by the Company.
- Ensure compliance with respect to disclosure requirements for engaging stakeholders.
- Enable stakeholders to benefit fairly from the value generated by the Company's business.

IMPLEMENTATION

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- *Version 2 of this policy was approved by the Board of Directors on 9th August 2023*



POLICY ON HUMAN RIGHTS

PHILOSOPHY

Company recognizes and respects human rights and the dignity of people. We are committed to promoting the human rights of our workforce and communities with whom we conduct our operations to help create a safe and discriminate free environment.

POLICY

- To prevent violations/abuse of human rights in all its operations and dealings.
- To bring a diverse talent pool with unique talents and ideas.
- To respect every individual and not discriminate against them on the basis of race, colour, caste, creed, religion, gender, age, social status, and physical or mental disabilities.
- To provide access to grievance redressal mechanisms for all individuals whose human rights are impacted by the Company or its operations.
- Strive to adhere to recognized Human Rights charter/Regulations.

IMPLEMENTATION

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 2. The policy will be reviewed by the Board of Directors at regular intervals as it may deem fit.
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- *Version 2 of this policy was approved by the Board of Directors on 9th August 2023*



POLICY ON ENVIRONMENT HEALTH AND SAFETY

Unichem is committed to bringing in and maintaining continual improvement of high standards of environment, health & Safety (EHS) management as an integral part of the business.

THE ORGANIZATION SHALL

- Provide, maintain, and upgrade facilities, operations, and working conditions which are safe for all employees, visitors, contractors, and the public.
- Integrate environment, process safety, health, and occupational safety aspects during the planning and decision-making of business processes.
- Protect the health and well-being of employees and encourage them to adopt practices for the maintenance of good health.
- Operate a business in an environmentally and socially responsible manner to minimize the impact on the environment for long-term sustainable growth.
- Comply with all applicable EHS regulations and obligations and review them periodically.
- Encourage to adopt the measures for continual improvement of Environment, Health, and Safety parameters.
- Consider consultation & participation of workers for the improvement of the Environment, Health, and Safety management system.
- Provide necessary information, train, and motivate all employees for conducting operations effectively & responsibly
- Design and maintain appropriate emergency response plans, procedures & business continuity capabilities.
- Interact & co-operate actively with all key stakeholders both internal and external regarding EHS matters, performance, and progress, as necessary.
- Determine issues and requirements related to Internal and external stakeholders and evaluate risks and opportunities related to them.
- Effectively implement controls to manage the risk and execute the opportunities.
- Account for the health and safety performance of individuals at different levels while considering their career advancement.



- Provide a resume of the health and safety performance of the company in its Annual Report.
- Follow relevant techniques and methods, such as safety audits and risk assessments for periodical assessment of the status on health, safety, and environment, and take all the remedial measures.

"THIS POLICY IS APPLICABLE TO ALL SITES AND OFFICES."

- **Approved by the Board of Directors at its meeting held on 9th August, 2023**



POLICY ON PUBLIC ADVOCACY

PHILOSOPHY

To represent and engage with the public authorities and trade organizations on matters which concern the pharmaceutical industry. This engagement will address all the concerns and various operational issues of the pharmaceutical industry and balance the needs and expectations of key stakeholders.

POLICY

- To address key matters concerning any changes and development in the pharmaceutical industry including changes in law, through trade and industry chambers and associations and other similar collective platforms.
- Ensure that while taking up various issues at the industry forums and associations, the right balance is maintained between the interest of the company and other stakeholders.
- Maintaining integrity and transparency while representing industry concerns before such associations.

IMPLEMENTATION

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 2. The policy will be reviewed by the Board of Directors at regular intervals as it may deem fit.
- **Version 2 of this policy was approved by the Board of Directors on 9th August 2023**



POLICY ON INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

1. OBJECTIVES:

Unichem has engaged in Corporate Social Responsibility (CSR) activities for decades and much before the same became a mandatory responsibility of Corporates. Our philosophy of giving back has always been a priority. Unichem being a pharmaceutical Company is naturally inclined to improve the health of the general public at large and is well known for its Quality and Reliability over the years. Unichem focuses on varied CSR activities in line with the provisions of Schedule VII of the Companies Act, 2013 (The Act).

2. APPLICABILITY:

The Policy is applicable across Unichem Laboratories Limited.

3. CSR ACTIVITIES:

As a Policy, the Company will focus its activities that are included in Schedule VII of the Act but have primarily identified the following areas:

- Promoting health care including preventive health care and sanitation;
- Promoting education with a primary focus on underprivileged children in backward areas and girls who cannot afford to enroll in schools and colleges;
- Making available safe drinking water;
- Promoting projects under Swachh Bharat Abhiyan;
- Women's Empowerment;
- Infrastructure Projects mainly being construction and repairs of schools and hospitals and
- Environmental sustainability

The CSR activities shall be primarily conducted in and around the areas where the Company operates. It will however not include the activities which are not allowed under the Companies (Corporate Social Responsibility Policy), Rules, 2014, and Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021. (Collectively referred to as the "Rules.")



4. TERMS OF REFERENCE OF THE COMMITTEE:

- a. The CSR Committee shall formulate a CSR policy and recommend the same for the approval of the Board which shall indicate the CSR activities to be undertaken by the Company;
- b. To recommend the amount of expenditure to be incurred on the CSR activities;
- c. To monitor the CSR Policy of the Company from time to time;
- d. To monitor the CSR initiatives undertaken by the Company directly or through implementing agencies;
- e. To formulate and recommend to the Board, an Annual Action Plan in pursuance of its CSR policy

The Annual Action plan shall include the following:

- i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - ii. the manner of execution of such projects or programmes;
 - iii. the modalities of utilization of funds and implementation schedules for the Projects or programmes;
 - iv. monitoring and reporting mechanism for the projects or programmes; and
 - v. details of need and impact assessment, if any
- f. To consider any other matter which is ancillary to the aforementioned Terms of Reference or as mandated under the regulatory provisions or as may be directed by the Board of Directors from time to time

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

5. TOTAL OUTLAY:

The Company shall endeavor to spend a minimum of two (2%) of the Average Net Profits of the Company made during 3 (three) immediately preceding financial years for its CSR activities or as specified under the Act from time to time.



The Company may spend up to 5% of the total CSR expenditure in one financial year on administrative expenses related to general management and administration of the CSR functions of the Company or as permitted under the Act from time to time.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company and shall be ploughed back into the same project, or shall be transferred to the Unspent CSR Account and it should be spent in pursuance of this CSR policy and Annual Action Plan of the Company, or the Company may transfer such surplus amount to a Fund specified in Schedule VII of the Act, within 6 (six) months of the financial year.

Any unspent amount, other than the unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within 6 (six) months of the expiry of the financial year. Further, unspent CSR funds of ongoing projects will be transferred within 30 (thirty) days from the end of the financial year to a special account opened by the Company in any scheduled bank called the "Unspent Corporate Social Responsibility Account". Such amount shall be spent by the Company towards CSR within 3 (three) financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII of the Act or as specified under the Act from time to time.

Where the Company spends an amount in excess of requirement, such excess amount may be set off against the requirement to spend up to immediate succeeding 3(three) financial year's subject to conditions as may be prescribed.

6. IMPLEMENTATION:

The CSR activities shall be undertaken directly by the Company or through various implementing agencies or such entities and in the manner as stipulated in the said Rules. The CSR committee shall ensure that such implementing agencies have obtained due registration under the Income Tax Act, 1961, and have fulfilled the requirements of registrations as stipulated under the said Act or Rules.

7. GOVERNING AND MONITORING PROCESS:

The CSR Committee of the Company shall be responsible for formulating and recommending to the Board the CSR Policy and a CSR Annual Action Plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect. The CSR Committee reports to the Company's Board of Directors.



The CSR committee will meet at such intervals to monitor and review the progress of the CSR projects and thereafter recommend the progress of the CSR projects for the review of the Board in terms of the Act and the Rules.

8. UPLOADING OF THE CSR POLICY AND CSR ACTIVITIES:

The CSR Policy, the composition of the CSR Committee, and the CSR projects as approved by the Board shall be uploaded on the Company's website for information of all stakeholders and shall be periodically reviewed and appropriately revised by the CSR Committee from time to time.

Version 4.0- 9th August, 2023



POLICY ON CUSTOMER

PHILOSOPHY

To repose trust and confidence in its customers by providing the best customer services towards building long-term sustainable relationships.

POLICY

- To make factual disclosure about the products by following the applicable standards for packaging and labelling.
- Minimize and mitigate any adverse impact of its products on customers, environment, and society at large.
- To uphold the highest standards of fair and ethical business practices in its customer-related activities i.e. sales, marketing, market-driven competition, etc.
- The Company shall refrain from restricting freedom of choice or free competition while manufacturing and selling its products.
- To be professional, fair, and transparent with its customers
- Facilitating appropriate mechanisms for customer feedback and addressing grievances for improving the quality of the Products
- To educate wherever required on the safe and responsible usage of the Product.
- Not to engage in any unfair trade practices or anti-competitive behavior.

IMPLEMENTATION

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2. The policy will be reviewed by the Board of Directors at regular intervals as it may deem fit.

