

# **Mankind Pharma Limited**

## **Third Party Code of Conduct**

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<b>Policy Title:</b>	<b>Third Party Code of Conduct (TCOC)</b>
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## 1. INTRODUCTION

- 1.1 Mankind Pharma Limited, its subsidiaries, associates and group companies (the “**Company**”) is committed to maintaining sustainability in all its business activities and striving to apply the highest ethical standards across its value chain.
- 1.2 This Supplier Code of Conduct ("Code") sets forth the ethical, environmental, labour, and operational standards expected of all third parties who conduct business with Mankind Pharma Limited, including but not limited to suppliers, service providers, contractors, distributors, consultants, and business partners ("Third Parties").
- 1.3 The Company believes that responsible and sustainable practices across the value chain are essential to its mission. This Code is intended to promote integrity, transparency, and accountability in all business dealings. Third Parties are expected to understand, implement, and uphold the principles outlined in this Code while carrying out business with or on behalf of Mankind Pharma Limited.
- 1.4 While the Company acknowledges that its Third Parties operate in diverse legal and cultural environments, it expects that the standards set forth in this Code will be respected and followed in both spirit and practice.

## 2. SCOPE AND APPLICABILITY

- 2.1 This Code is applicable to:
  - 2.1.1 Suppliers;
  - 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 (CMOs);
  - 2.1.8 Contract Research Organizations (CROs)
- 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 does business.

## 3. COMPLIANCE WITH APPLICABLE LAWS

- 3.1 The Company expects all its Third Parties to not just conduct their business in a responsible way and comply with applicable laws, rules and regulations but also 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 expects its Third Parties to comply with local laws while seeking to uphold the principles mentioned in this Code.
- 3.2 The Company expects 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 individuals, organizations or government officials 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 the Company's Third Parties or representatives in order to influence or reward an action or attempt to influence business decisions for or on behalf of the Company.
- 4.3 **Contractual Compliance Requirements:** Third Parties shall acknowledge and adhere to the following contractual requirements as part of their engagement with the Company:
- 4.3.1 Shall Agree to inclusion of anti-bribery and anti-corruption clauses, audit rights, and termination rights for compliance violations in all contracts.
  - 4.3.2 Shall Avoid acceptance of cash payments under any circumstances. Payments shall be made only in the country of incorporation, headquarters, residence, or service delivery.
  - 4.3.3 Shall cooperate in the Company's Third-Party Due Diligence processes, including completion of questionnaires, background checks, and provision of declarations on conflict of interest.
  - 4.3.4 Shall provide annual or biannual certifications on compliance with anti-bribery and anti-corruption laws applicable in India and other relevant jurisdictions.
  - 4.3.5 Shall maintain and submit records of services rendered, invoices, and proof of performance in line with the contract scope and payment terms.
  - 4.3.6 Shall acknowledge that failure to adhere to these requirements may lead to suspension or termination of the relationship.

## 5. **HEALTH AND SAFETY AT WORKPLACE**

Third parties shall establish and maintain robust Health and Safety management systems to protect the health and well-being of their employees, communities, operational processes, and the environment. The following minimum health and safety requirements are expected of the Third Party:

- 5.1 **Regulatory Compliance:** Must comply with all applicable Health, Safety rules and regulations, and other relevant standard.
- 5.2 **Health & Safety Management System:** Shall develop and maintain an adequate Health and Safety Policy and implement a comprehensive Health and Safety Management System. The Company expects the third parties to obtain and maintain ISO 45001 (Occupational Health & Safety) wherever feasible and applicable.
- 5.3 **Hazard Identification and Risk Assessment:** Shall identify all physical, chemical and biological hazard and potential risk associated with their operations and communicate to relevant stakeholder accordingly.
- 5.4 **Risk Prevention and Control:** Shall have all necessary safety controls and must provide appropriate PPE's to prevent and mitigate the risks associated with:
- 5.4.1 All physical, chemical and biological hazards and potential risk associated with their

- operations.
- 5.4.2 Hazardous installations in the form of chemical releases, catastrophes;
- 5.4.3 Product-related issues and their potential impact during all stages of the production process.
- 5.5 **Emergency Preparedness:** Shall identify and assess possible emergency situations at workplace and minimize their impact by implementing suitable emergency plans and response procedures.
- 5.6 **Safety Culture:** Shall promote safety culture through trainings, capacity building and development programs etc.
- 5.7 **Employee Security:** Shall establish minimum standards for implementation for employee security.

## 6. HUMAN RIGHTS AND LABOUR STANDARDS AT WORKPLACE

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 **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, ethnicity, pregnancy, HIV status, COVID status, health status, sexual orientation, disability, religion, political affiliation, union membership, maternity or marital status.
- 6.2 **Forced Labor, Anti-Slavery and Anti-Trafficking:** Any form of forced or bonded labor is prohibited. Further, engaging in slavery or any type of human trafficking is strictly forbidden.
- 6.3 **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.
- 6.4 **Child Labor and Young Workers:** Third parties shall not engage in any form of child labor, as per the applicable regulatory requirements. Additionally, Third Parties shall create a non-discriminatory and protective workplace for young workers who are below the age of 18 (eighteen) and above the legal age for employment and ensure that they do not perform hazardous work, or work overtime or night shifts.
- 6.5 **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 Provision of 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 for overtime and corresponding wages. Deductions from wages for disciplinary reasons are prohibited, unless they are undertaken in accordance with local laws (for example, deductions due to absence).
- 6.6 **Diversity equity and inclusion:** Third parties shall adopt practices that promote diversity, equity, and inclusion within its operations and workforce. Third parties shall provide equal employment opportunities, ensure a safe and inclusive workplace, and, where feasible, support

women-led, minority-owned businesses within its own supply chain.

## **7. ETHICS AND BUSINESS CONDUCT**

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 Third Parties shall maintain an atmosphere of transparency, innovation & collaboration;
- 7.2 Third Parties are required to comply with all applicable local and national laws and regulations relating to animal welfare. Animal testing should be performed only after thoroughly evaluating alternatives that can replace or reduce the use of animals. If testing on animals is unavoidable, procedures must be designed to minimize pain and distress, and must be scientifically valid and acceptable to regulators. In all cases, animals must be treated with the utmost respect and care.
- 7.3 Third Parties shall compete fairly and follow applicable anti-trust and competition laws.
- 7.4 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 or in turn the Company's obligations to its business partners. Additionally, our Third Parties should notify the Company of any actual, apparent or potential conflict of interest that may affect the performance of tasks or provision of services to the Company.
- 7.5 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.
- 7.6 Third parties shall promote the Company's products in fair and ethical manner, use materials and product information provided by the company and shall not communicate directly with patients, consumers investors, media or others in the form of promotional or non-promotional event/activity/material unless authorized by the Company and permitted by local laws.
- 7.7 Third Parties shall comply with all applicable laws prohibiting tax evasion and shall not facilitate or enable such evasion by their employees, agents, or any other associated persons.
- 7.8 Third Parties shall preserve integrity & confidentiality of all information received in the course of conducting business with the Company.
- 7.9 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, thereafter, the action report must be shared with the Company for issues that have direct or indirect consequences for it.

## **8. ENVIRONMENT AND SUSTAINABILITY**

The Company expects the third-parties to operate in Responsible and Sustainable manner, aligned with their commitment to environmental stewardship. We encourage the third-parties to achieve the same through below mentioned followings:

- 8.1 **Environment Management System:** Shall develop and maintain an adequate

Environment/Climate Change Policy and implement a comprehensive Environment Management System. The Company expects the third parties to obtain and maintain ISO 14001 wherever feasible and applicable.

- 8.2 **Responsible and Sustainable use of Natural Resources:** Shall reduce their environmental impact through optimum utilization of all naturally available resources such as water, minerals, plants, and other raw materials. Adopt measures for recycling, reuse and recovery of raw materials within operations.
- 8.3 **Responsible and Sustainable Material Sourcing:** Shall source materials from environmentally and socially responsible suppliers; Optimize supply chain with lesser emission footprints; Prioritize certified sustainable materials wherever possible; Implement programs to ensure products do not contain any restricted/banned materials or conflicted materials.
- 8.4 **Climate Change and Emission:** Shall measure and monitor greenhouse gases (GHG) emissions and release of other air emission; Implement measures and targets for energy consumption, efficiency and GHG emissions reduction from their operations. Promote use of ecofriendly designed products/services with lower environmental footprints.
- 8.5 **Water and Wastewater Management:** Shall measure and monitor water withdrawal, consumption and discharge; Implement measures and targets for water conservation, reduction, recycle and reuse in their operations.
- 8.6 **Sustainable Waste Management:** Shall measure and monitor waste generation and disposal; Implement procedures and targets for safe handling, movement, management and disposal of Hazardous and Non-Hazardous waste; Promote integration of circular economy including reduction, recycle/reuse and coprocessing rather than landfilling and incineration.
- 8.7 **Waste & Spills:** Shall implement procedures for preventing accidental release of hazardous material into environment and/or ensure prior treatment of any type of waste before its direct release/discharge into the environment to prevent and mitigate potential adverse impact on human or environmental health.
- 8.8 **Biodiversity:** Shall understand operations impacts on biodiversity, and take appropriate measures to reduce and mitigate their ecological footprint wherever possible.
- 8.9 **Regulatory compliance:** The Company expects the third-parties to must comply with all environment related applicable rules, regulations and any other regulatory requirements.

## **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.
- 9.2 Third Parties must enter into approved confidentiality agreement or non-disclosure agreement if they foresee that any confidential information will be shared.
- 9.3 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.



9.4 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.

9.5 Third Parties shall have appropriate measures to prevent unauthorized access, disclosure, or misuse of confidential and personal information.

## **10. TRAINING AND COMPETENCY AND CONTINUAL IMPROVEMENT**

10.1 Third Parties shall develop training programs that ensures an appropriate level of knowledge, skills and abilities related trainings for management and workers to address the expectations outlined in this Code. Additionally, shall maintain training record and track performance for the purpose of continual improvement.

10.2 Third Parties shall implement a comprehensive approach to continual improvement by setting performance objectives, executing implementation plans and taking essential corrective actions for deficiencies identified through internal or external assessments, inspections, and management reviews.

## **11. IDENTIFICATION OF CONCERNS AND COMMUNICATIONS**

11.1 Third Parties shall effectively communicate their relevant grievance redressal framework/policy/means to their employees, workers, contractors and suppliers.

11.2 Third Parties shall encourage its employees, workers, contractors & suppliers, if any to report concerns/ grievances, illegal activities or breaches of their Code/standards without threat of or actual reprisal, intimidation or harassment. Third Parties shall investigate and make remedial changes, if necessary.

## **12. MANAGEMENT SYSTEMS**

Third Parties are expected to manage their activities systematically in order to maintain business continuity, meet the standards set forth in this Code and continually improve their operations. As such, they should:

12.1 Demonstrate top management commitment and accountability through policies, objectives, and formal processes;

12.2 Implement processes to control documents and records;

12.3 Provide resources, including competent personnel and appropriate infrastructure, to ensure conformance to these standards;

12.4 Implement processes to control the production of the Company's products and/or materials, manage change effectively and ensure customer satisfaction;

12.5 Implement Risk management 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;

- 12.6 Provide advance notification of all anticipated supply disruptions to the Company, regardless of whether the underlying factors are expected to qualify as force majeure or otherwise;
- 12.7 Identify and implement improvement actions, including effective complaint investigation, internal audit and corrective action processes.

## **13. TRANSPARENCY AND DISCLOSURE**

- 13.1 The Company expects the third-parties to make reasonable efforts to transparently disclose (for example, on a website or a publicly available report) their material issues, goals and targets as it is important to understand the company's impact (including its value chain) on the environment and society.
- 13.2 The Company encourages the third-parties to annually review and be transparent about: Footprints and measures of energy, waste, water, biodiversity, emission and discharge, environment and community protection, employee health and safety Trainings, Labor and Human rights, Diversity & inclusion and other relevant material topics.

## **14. MONITORING AND COMPLIANCE**

- 14.1 Third Parties shall review their operations to ensure fulfillment of all latest compliances and comply with 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.
- 14.2 The Company may engage in monitoring activities to confirm Third Party's compliance to this Code and ensure sustainability across value chain 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.
- 14.3 In case of any inconsistencies or contradiction in the third-party code of conduct with Mankind's Business Ethics Policy, the later will take precedence over the third party's code of conduct policy.

## **15. AMENDMENT IN THE POLICY**

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