

Third Party Code of Conduct

Version 1.1

May 2025

Introduction

We at Lupin (together with our subsidiaries, "Lupin", "Us", "We" or the "Company") are committed to undertaking environmentally responsible and ethically upright practices in our operations. We are committed to engage with third parties who share our passion for excellence and are aligned with our values.

Scope

This Third-Party Code of Conduct ("Code") sets minimum standards applicable to all:

- Supplier
- Vendors
- Distributors
- Wholesalers
- Agents
- Technology Partners
- Contract Manufacturing Organizations (CMO's)
- Contract Research Organizations (CRO's)

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 'Us' or with whom 'We' do business.

Apart from the regulatory requirements in the regions we operate, we comply with the principles of the United Nations Global Compact, UN Guiding Principles on Business and Human Rights, OECD Guidelines as well as the Pharmaceutical Supply Chain Initiative (PSCI) principles. Further, this Code is aligned with Lupin's [Global Code of Business Conduct and Ethics](#).

Compliance with Applicable Law: We expect all our Third Parties to not just conduct their business in a responsible way and comply with applicable laws (Eg. BRSR'S ESG Policy for Value Chain Partners), rules and regulations but apply these standards, or equivalent business standards in their own supply chain. If these standards differ from the applicable laws, rules and regulations, we expect our third parties to comply with local laws while seeking to uphold the principles mentioned in this CODE.

We expect our 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.

1. Labor Rights

Third parties shall treat their employees with dignity, respect and uphold the principles of fundamental human rights and fair working conditions stated below:

1.1 Forced Labor, Anti-Slavery and Anti-Trafficking: Any form of forced and bonded labor should be prohibited, and third parties should ensure that no indentured or involuntary prison labor is present in the supply chain. Further, engaging in slavery or any type of human trafficking is strictly forbidden.

1.2 Child Labor and Young Workers: Third parties shall not engage in any form of child labor as per the applicable regulatory requirement. Additionally, third parties shall create a non-discriminatory and protective workplace for the young workers who are below the age of 18 and above the legal age for employment and ensure that they do not carry out hazardous work, or work overtime or night shifts.

1.3 Discrimination and Harassment: Third Parties shall ensure that the 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, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, maternity or marital status.

1.4 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 appropriate breaks and leaves & ensure safe working condition (physical and mental). 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 of overtime and the wages to be paid for such overtime. Deductions from wages for disciplinary reasons are prohibited, unless they are undertaken in accordance with local laws (for example, deductions due to absence).

1.5 Freedom of Association and Collective Bargaining: Third Parties shall respect the rights of workers to seek representation and join workers councils as well as labor unions where permitted by law. Workers shall be able to communicate openly with management regarding working conditions without threat of retaliation, intimidation or harassment. Third parties shall engage in constructive dialogue and bargain in good faith in a manner that is appropriate and comply with the freedom of association and trade union rights as permitted by local laws.

2. Anti-Bribery and Anti-Corruption

2.1 Third Parties shall not pay or accept bribes, facilitation payments, kickbacks, and/or any other illegal inducements of any kind to anyone, including private individual, organizations or government official in order to gain any improper advantage in relation to performance of its obligation towards Lupin under any contract or otherwise.

2.2 Gifts, Hospitality and Entertainment: Third Parties shall not accept, give, or offer to give any inappropriate gifts or material benefits to any of Lupin's Third Parties or representatives in order to influence or reward an action as well as attempt to influence business decisions for or on behalf of Lupin.

3. Health and Safety

3.1 Protection from Hazardous Material: Third Parties shall have adequate policies and precautionary measures to protect their employees at the workplace while engaging with hazardous pharmaceutical products, including products containing materials that are highly active, toxic or infectious.

3.2 Process Safety: Third Parties shall have appropriate safety requirements to prevent or control the risks associated with:

- (a) Hazardous installations in the form of chemical releases, catastrophes,
- (b) Product-related issues and their potential impact during all stages of the production process

3.3 Emergency Preparedness and Response: Third Parties shall identify and assess possible emergency situations in the workplace and minimize their impact by implementing suitable emergency plans and response procedures including but not limited to fire exits, escape routes and firefighting equipment.

4. Environment

4.1 Environmental Authorizations: Third Parties shall adhere to the applicable environmental laws and regulations which includes obtaining the required permits, licenses, information registrations, etc. for its operational and reporting purposes. Further, third parties should also monitor the same and update as required.

4.2 Pollution Prevention and Waste Management: Third Parties shall implement processes for the safe handling, movement, storage, recycling, reuse, or management of hazardous/nonhazardous and other categories of waste, air pollutants (like SO_x, NO_x), and wastewater discharges. Before releasing the waste and other pollutants if any, the risks should be identified, and effective control measures should be implemented.

4.3 Sustainability, Resource Efficiency and Conservation: Third Parties shall efficiently use water, energy and other available natural resources to avoid any adverse impact on the environment or its surrounding communities. Third parties should continuously seek opportunities to enhance their environmental performance by regularly reviewing and updating their environmental policies and practices and engaging in training and capacity-building activities to improve their understanding and implementation of sustainable practices.

4.4 Biodiversity and No deforestation: Third parties should ensure “no deforestation in their operations. They should actively protect and promote natural habitats and biodiversity by prohibiting operations in areas close to critical biodiversity areas. Additionally, third parties shall not engage with any negative land conversion activities. They should manage soil responsibly to prevent nutrient loss, erosion, and land pollution as applicable.

4.5 Sustainable Sourcing of Minerals: Third Parties shall source their raw materials including conflict materials/minerals in an ethical and responsible manner. Third parties shall conduct appropriate due diligence on the source of critical raw materials to promote legal and sustainable sourcing. Subsequently, any use of conflict minerals from a country that has directly or indirectly financed or benefited armed groups if relevant for the functionality of the final product manufactured by Lupin, should be reported.

4.6 Reporting on Environmental Incidents: Third Parties shall notify Lupin of any significant environmental incidents concerning the manufacturing and/or transportation of products for Lupin.

4.7 Substances of high concern or restricted substance list: Third parties shall minimize/replace the use of any substances deemed to be of high concern throughout their value chain with less hazardous alternatives where practically possible for its operations related to Lupin.

4.8 GHG emission and energy consumption: Third parties shall track and report Greenhouse Gas (GHG) emissions with an aim to reduce emissions. Third parties shall implement strategies to minimize GHG emissions through adoption of renewable energy, utilization of low-emission technologies and regular maintenance and upgrading of equipment to ensure optimal performance. Third parties are expected to manage their energy consumption responsibly by prioritizing the use or production of energy from renewable sources. Additionally, third parties shall adopt energy-efficient practices, minimize waste and energy loss by upgrading equipment and infrastructure to reduce energy consumption.

5. Ethics

5.1 Animal Welfare: Third Parties are required to comply with all applicable local and national laws and regulations relating to animal welfare. The entities should perform animal testing after due consideration and alternatives for replacing and reducing animals. Further procedures to minimize distress trials that are

scientifically valid and acceptable to regulators should act as alternatives for animal testing. In the cases where the use of animals for testing is required, they should be treated with the utmost respect and care.

5.2 Trade Sanctions: Third Parties shall comply with applicable national and international export control laws, trade, economic or financial sanctions or embargoes applicable to them. Third Parties are responsible for knowing the laws that apply to them as each country may have different requirements, and they must maintain complete and accurate import/export records.

5.3 Anti-Competitiveness and Anti-Trust: Third parties shall compete fairly and follow applicable anti-trust, anti-competitiveness laws.

5.4 Conflict of Interest: Third Parties are responsible for avoiding situations that present or create the appearance of a conflict between their interests and their obligations to Lupin and in turn our obligations to our business partners. Additionally, our third parties should notify any actual, apparent or potential conflict of interest that may affect the performance of tasks or provision of services to Lupin.

5.5 Product Communication: Third parties shall promote Lupin products in fair and ethical manner, use materials and product information provided by the company and should not communicate directly with patients, consumers investors, media and others in the form of promotional or non-promotional event/activity/material unless authorized by Lupin and allowed by local laws.

5.6 Anti-Tax Evasion: Third Parties shall abide by all the relevant laws that prohibit tax evasion and its facilitation to its employees, agents and any other associations.

5.7 Fraud Prevention: 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 Lupin, regardless of materiality, must be reported to us immediately as mentioned in the segment "Identification and Reporting of Concerns."

6. Data Privacy, Confidentiality and Information Protection

6.1 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 person.

6.2 Third Parties must enter into approved confidentiality agreement or non-disclosure agreement if they foresee any confidential information to be shared.

6.3 Third Parties 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.

6.4 Third Parties shall respect Lupin's intellectual property rights, including processes, information, copyrights, trademarks, patents, in-house developed software, trade secrets, decision rights, logos and brands and know-how.

6.5 Third Parties must immediately notify Lupin upon any breach of security in accordance with applicable laws and regulations.

6.6 Third Parties shall ensure that the personal information of Lupin employees and its Third Parties are protected and remains confidential. This information must only be used for legitimate and authorized business purposes only.

6.7 Third parties shall have appropriate measures to prevent disclosure or unauthorized use of Lupin's confidential information.

7. Management Systems

7.1 Risk Identification and Management: Third Parties shall have adequate control mechanisms and processes to identify and manage risks in all areas addressed in this Code.

7.2 Documentation: Third Parties shall allocate appropriate resources and maintain adequate documentation to demonstrate conformance with the principles within this Code as well as compliance with all laws, regulations and standards.

7.3 Business Continuity and Disaster Recovery: Third Parties shall implement and maintain the process required for Business Continuity and Disaster Recovery plans for all operations which support any goods or services provided to Lupin.

7.4 Communication, Training, and Competency: Third Parties shall have adequate training programs that provide appropriate knowledge, skills, and abilities to their employees, workers, and contractors, etc., to understand the requirements of this Code and the applicable laws and regulations.

7.5 Audits and Assessments: Lupin reserves the right to audit its Third Parties or engage a Third Party to audit on their behalf with or without notice to ensure compliance with the standards in this Code. Any findings inconsistent with this Code must be promptly corrected. In situations where the Third Party fails to meet these standards and cannot agree or implement an improvement/corrective action plan, Lupin reserves the right to terminate the contract or disqualify the third party.

8. Identification and Reporting of Concerns

8.1 Speak Up: Third Parties are encouraged to raise concerns and to report suspected or known violations of law, regulation or this Code. Lupin has a 24/7 independent third party service that routes the inquiries and concerns to the Compliance and Ethics Office. This service also allows one to be anonymous, to the extent permitted by law. Concerns may be raised by accessing the below links from within or outside Lupin's network:

India & APAC: [Lupinglobal.ethicspoint.com](https://lupinglobal.ethicspoint.com)

Americas & EMEA: [Lupin.ethicspoint.com](https://lupin.ethicspoint.com)

Additionally, any concerns with respect to this policy can be directly reported to the Compliance and Ethics Office at ombudsperson@lupin.com

8.2 Non-Retaliation: Lupin does not tolerate any retaliation or reprisals of any form against an individual who report concerns in good faith or provide relevant information when required. All concerns are taken seriously, and reports of misconduct are thoroughly investigated.

Implementation

The implementation of this Policy is undertaken by Global GTO and Global Supply Chain and Procurement. We shall take into consideration the scope and applicability of the requirements in relation to the nature of the business and the associated risks when evaluating any Third Parties compliance with this Code.

Changes to the Policy

Lupin will periodically review and update this policy to ensure that we are aligned with the local regulations in the regions of our operation and are guided by international best practices.



Approved by

Ramesh Swaminathan
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Date: 29th May 2025