T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

ETHICS POLICY

1. Preamble

Company is committed to maintain highest ethical standards and follow best corporate governance practices. The key elements of the Policy are integrity, transparency and accountability. For this purpose, company has laid down Code of Conduct for Employees, Whistle Blower Policy etc., which ensures ethical conduct.

2. Objective

- 2.1. Ensure ethical business practices and zero-tolerance towards unethical conduct.
- 2.2. Guide employees to act with integrity in all business dealings of the Company.
- 2.3. Monitor and investigate instances of alleged unethical practices and take actions against those involved in the same.
- 2.4. Provide information and training on ethics to employees, supply chain and business partners at different levels and locations.

3. Scope

This Policy covers all employees, supply chain & business partners of the Company.

4. Policy

Company is committed to:

- 4.1. Ensure that the ethical principles & practices are understood, adopted and implemented throughout the operations of the company.
- 4.2. Promote governance with ethical principles, prevention of any violations to the same and taking appropriate action against any transgressions to these principles.
- 4.3. Promote adoption of principle of ethical conduct across the value chain of the Company.
- 4.4. Strive to disclose and communicate transparently about the policies, procedures, ESG performance and decisions of the company that impact the stakeholders.
- 4.5. Take responsibility for meeting all statutory obligations in line with the spirit of law.
- 4.6. Ensure that business does not engage in illegal and abusive practices, bribery and corruption and address conflicts of interest involving employees and business partners.
- 4.7. Ensure timely and complete payment of all applicable taxes as per the laws and regulations governing such payments.
- 4.8. To create awareness about Company's emphasis on ethical business practices and its zero-tolerance approach towards conduct.

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

T +91 22 6606 1000

POLICY ON PRODUCT SUSTAINABILITY

1. Preamble

Company is committed for developing and manufacturing sustainable products by sourcing sustainable inputs and raw materials that offer best in class quality to meet customer needs and expectations.

2. Objective

- 2.1. To lay down principles to ensure responsible sourcing and sustainable production.
- 2.2. To strive for sourcing marked by sustainability principles.

3. Scope

The Policy covers all the employees associated with product related activities like R&D, product development, raw & packing material sourcing, product manufacture, upkeep of plant and machinery, product marketing and sales. The policy also covers the value chain partners who are associated with the operations under overarching principle of sustainable sourcing.

4. Policy

It is committed to:

- 4.1. Ensure resource-efficient and low-carbon processes and technologies deployment to minimize adverse environmental and social impacts during the process of designing, producing and making available goods to customers.
- 4.2. Provide adequate information and guidance to the value chain partners and other concerned stakeholders, about environmental and social issues and its impact across product life cycle, from design to consumption.
- 4.3. To progressively incorporate relevant social and environmental considerations in product / service development processes.
- 4.4. Comply with regulatory requirements pertaining to marketing and promotion of products.
- 4.5. Work towards ensuring that all goods and services are procured, manufactured and delivered by observing good labour welfare practices, respecting human rights, ethics, occupational health, safety and environment protection.
- 4.6. Work towards sourcing significant raw materials and products in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- 4.7. Endeavour to use resources judiciously and substitute them wherever possible, with eco-friendly alternatives.
- 4.8. To work towards safe and optimal resource use over the life-cycle of its products and services, including recycling of resources wherever possible.

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

T +91 22 6606 1000

EMPLOYEE POLICY

1. Preamble

Company believes that employees are the most important resource and recognizes that valuable contribution and commitment from employees play key role for sustainable growth and development of Company. Accordingly, it strives to create a highly conducive and motivated work environment aimed at growth and development of employees and in turn the organization.

2. Objective

- 2.1. To provide high quality work environment.
- 2.2. To enrich the quality of life of employees.
- 2.3. To inculcate core values viz., excellence, integrity, discipline, transparency & enterprism.
- 2.4. To develop employee potential.
- 2.5. To provide equal opportunities and adhere to human rights principles.

3. Scope

This Policy covers all Employees of the Company where "Employee" means any person, (other than an apprentice engaged under the Apprentices Act, 1961), employed on wages to do any skilled, semi-skilled or unskilled, manual, operational, supervisory, managerial, administrative, technical or clerical work for hire or reward.

4. Policy

It is committed to:

- 4.1. Ensure compliance with all regulatory requirements pertaining to its employees and encourage value chain partners to do the same.
- 4.2. Provide equal opportunities in recruitment, during the course of employment and at the time of separation without any discrimination.
- 4.3. Prevent the practice of child labour, coercive or forced labour, or any form of involuntary labour and abuse of human rights.
- 4.4. Ensure a humane workplace free from violence and harassment (including sexual harassment); a workplace where employees feel safe and secure, with adequate provisions for grievance redressal.
- 4.5. Provide work environment that will attract and retain right talent and help them attain their full potential.
- 4.6. Provide necessary training and learning programs thereby enhancing personal growth & development, skill enhancement, increase in productivity, foster team spirit and overall employee satisfaction.
- 4.7. Engage the employees through various events and programs, group interactions, webinars, sports and cultural events.
- 4.8. Aim at ensuring transparency, a climate of openness, mutual trust, teamwork, fairness & equity in all its dealings with employees.
- 4.9. Promote safe and healthy working environment by ensuring compliance with safety rules, regulations, relevant laws & regulations in various countries it operates.



T +91 22 6606 1000
F +91 22 6606 1200
E info@ajantapharma.com
W www.ajantapharma.com

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

POLICY ON STAKEHOLDERS' ENGAGEMENT

1. Preamble

Company recognizes that various stakeholders viz., employees, customers, distribution channel partners, vendors, supply chain partners, bankers, government and community at large etc. are an essential component of its business operations and effective stakeholder engagement is key to sustainable development and growth. Company strives to provide long term value to its stakeholders through collaboration and regular interaction.

2. Objective

- 2.1. To enhance stakeholders' trust and confidence in organization.
- 2.2. To enhance the communication with stakeholders to understand their needs and expectations.
- 2.3. to identify the opportunities to be harnessed and concerns to be addressed of stakeholders.
- 2.4. To add value to stakeholders by meeting their expectations.

3. Scope

This Policy covers all the key departments/functions for carrying out stakeholder engagement with the identified stakeholders. Each department at different location is required to carry out stakeholder engagement in accordance with this policy to nurture the Company's stakeholder relationships.

4. Policy

It is committed to:

- 4.1. Develop mechanisms to identify the stakeholders, understand their expectations and concerns.
- 4.2. Be aware and responsible towards the impact of our policies, decisions, products and associated operations on all stakeholders and the natural environment.
- 4.3. Enable stakeholders to benefit fairly from the value generated by our business.
- 4.4. Resolve any differences/concerns arising from the impact of business operations and redress grievances in an appropriate manner.
- 4.5. Give special attention and treatment to stakeholders who are disadvantaged, vulnerable and marginalized.
- 4.6. Ensure legal compliance and disclosure requirements applicable pertaining to stakeholder engagement.

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

POLICY ON HUMAN RIGHTS

1. Preamble

Company recognises the importance of human rights. It is its firm belief that business should be conducted in a manner that respects the human rights and dignity of people. It is committed to promote the human rights of its workforce, communities and those associated by its business operations to help create a better world with empathy.

2. Objective

- 2.1. To promote, respect and create awareness for human rights within the organization as well as while dealing with outsiders.
- 2.2. To prevent violations / abuse in the area of human rights in all its operations and dealings.
- 2.3. To adhere to internationally recognized Human Rights charter/declarations.

3. Scope

This policy covers all employees, people in the value chain and people associated with the business operations, activities and processes of the company.

4. Policy

It is committed to:

- 4.1. Prohibit in the organization and its value chain all forms of child labour, forced labour, human trafficking, discrimination, harassment and violation of other human rights as enumerated in various laws, charters and declarations.
- 4.2. Promote protection of human rights and dignity of people, across its value chain and ensure compliance with human rights enshrined in national laws & Policies.
- 4.3. Deploy systems and processes that demonstrate respect for the human rights of all stakeholders associated with the business operations.
- 4.4. Provide access to effective grievance redressal mechanisms to individuals and groups whose human rights are impacted by the company and take corrective actions.

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

POLICY ON ENVIRONMENT MANAGEMENT

1. Preamble

Company is a responsible corporate citizen and accords high importance to Environment conservation. It is aware that various initiatives such as creating a low-carbon entity, preserving biodiversity and the global environment, using energy, water and resources sustainably, preventing pollution and controlling waste emissions are the most important environmental aspects for business organizations and conducts business operations in a responsible manner.

2. Objective

- 2.1. To protect and promote environment conservation by minimising adverse impact of its business operations on environment.
- 2.2. To strive for low carbon emission.
- 2.3. To conserve natural resources and promote 3Rs –Reduction, reuse and recycle.

3. Scope

This policy covers all the operations and activities of the organization which has a potential impact on environment.

4. Policy

It is committed to:

- 4.1. Establish processes to assess and address adverse impacts on the environment, if any, due to our business activities.
- 4.2. Endeavour efficient use of natural resources for preservation of environment.
- 4.3. Establish performance indicators to monitor performance on environmental aspects such as water, air, energy, materials, waste and other environment related aspects.
- 4.4. Contribute to address climate change through development of both mitigation and adaptation measures, as applicable to our business operations.
- 4.5. Strive towards reduction, reuse, recycling and recovery of material & resources and encourage relevant stakeholders to do the same.
- 4.6. Improve environmental performance by adopting innovative, resource-efficient and low-carbon technologies and solutions resulting in lower resource footprint, lesser material consumption and more positive impact on environment, economy and society.
- 4.7. Implement and maintain environment management systems across operations.
- 4.8. Use renewable energy sources towards meeting overall energy demand as far as it becomes practicable.
- 4.9. Create environmental awareness amongst employees and other stakeholders including surrounding communities through training and communication.
- 4.10. Develop green belt at all plants/offices for maintaining ecological balance.
- 4.11. Encourage suppliers and service providers to develop and employ environmentally superior processes to improve environmental performance.



T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

POLICY ON PUBLIC ADVOCACY

1. Preamble

Company believes that it is necessary to represent and engage with authorities on matters concerning the industry in which it operates. Its engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

2. Objective

To lay down principles governing the Company and its senior management's conduct while engaging with authorities on various matters as also while taking up various issues at public forums.

3. Scope

This policy covers all the employees who undertake matters with different authorities, associations, forums, trade bodies in the area of public advocacy.

4. Policy

It is committed to:

- 4.1. Undertake policy advocacy, to the extent possible, through trade and industry chambers and associations and other similar collective platforms.
- 4.2. Ensure that its advocacy positions are consistent with the Principles contained in the National Guidelines for Responsible Business Conduct Guidelines and the same are publicly disclosed.
- 4.3. Ensure that while taking up various issues at industry forums and associations, right balance is maintained between the interest of company and of that of the society at large.
- 4.4. Uphold ethical standards of integrity and probity in matters of public advocacy.
- 4.5. Form partnerships wherever possible, in taking up various issues concerning society at large before appropriate forums and platforms.

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.

T +91 22 6606 1000 F +91 22 6606 1200 E info@ajantapharma.com W www.ajantapharma.com

POLICY ON CUSTOMER SERVICE

1. Preamble

Company believes that the customer is the reason for its organizational existence and their satisfaction is of vital importance for sustainable growth of the Company. Thus, it is committed to achieve excellence in customer service by extending high level of services on a consistent basis to the customers.

2. Objective

To lay down guiding principles for excellence in customer service and building sound and long-term customer relations and bonding.

3. Scope

This policy covers all the functions/departments associated with customer service which includes R&D, product development, production, sales & marketing, dealers & distributors etc.

4. Policy

It is committed to:

- 4.1. Develop innovative products based on identification of unmet patient needs to achieve customer satisfaction for value creation in the Company.
- 4.2. Ensure stringent quality assurance checks and controls to deliver superior quality products.
- 4.3. Minimize and mitigate any adverse impact of its products on consumers, natural environment and society at large.
- 4.4. To disclose all the statutory information and the potential risks accurately through labelling etc. to the individual from the use of the products.
- 4.5. Educate & brief on continuous basis about safety and usage of products to customers through regular visits, programmes and drives.
- 4.6. Ensure adequate grievance handling mechanisms for customer to address all customer complaints expeditiously and diligently.
- 4.7. To uphold the highest standards of fair and ethical business practices in the customer related activities i.e. sales, marketing, promotion, market driven competition etc.

5. Review

This policy will be reviewed by the Board and necessary amendments will be carried out as and when required due to changes in applicable factors like law and regulations of the land or any other reason necessitating change in the policy.