

DOCUMENT DETAILS

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Effective Date	04/Mar/2024
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SIGNATURES

ROLE	NAME	DESIGNATION	DEPARTMENT	DATE&TIME
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ELECTRONIC SIGNATURE PAGE

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I. PURPOSE:

Vendors, contractors, and Service providers who are giving support shall observe the highest standards of ethical conduct and integrity and shall work to the best of their ability and judgment. Directors, Officer, and employees shall be governed by the rules and regulations of the Company, as are made applicable to them from time to time.

II. SCOPE:

APPLICABILITY

This code of conduct shall apply to all Vendors, contractors, and Service providers of Sai Life Sciences Limited.

III. POLICY:

Supplier Code of Conduct

Sustainability is an integral part of the business and decision-making framework at Sai Life Sciences. The company strives to combine socially responsible practices and environmental sensitivity with economic success across its business operations, thereby enabling its customers meet the current and future needs of society.

This Supplier Code of Conduct (“Code”) is applicable to all ‘Suppliers’ of Sai Life Sciences globally. ‘Supplier’ here refers to suppliers/ service providers/ vendors/ traders / agents/ consultants/ contractors/ joint venture partners/ third parties including their employees, agents, and other representatives, who have a business relationship with and provide, sell, seek to sell, any kinds of goods or services to Sai Life Sciences Limited or any of its subsidiaries, affiliates, divisions (“Sai”).

This Code sets forth the basic requirements that every Supplier of Sai is expected to respect and adhere to when conducting business with the company. Moreover, Sai expects its Suppliers to replicate these standards further down the supply chain. This Code is therefore made available to Suppliers of Sai with

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the aim of strengthening the mutual understanding of how sustainability should be practiced in day-to-day business.

This Code embodies Sai's commitment to internationally recognized standards, including the Core Conventions of the International Labour Organization, United Nations' Universal Declaration of Human Rights, SA 8000 as well as prevalent industry standards, and all other relevant and applicable statutory requirements concerning Environment Protection, Minimum Wages, Child Labour, Forced Labour, Anti-Bribery, Anti-Corruption, Health and Safety, whichever requirements impose the highest standards of conduct. Sai expects its Suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards (ESG standards) & the principles of PSCI (Pharmaceutical Supply Chain Initiative) for Responsible Supply Chain Management.

Labour & Human Rights

Adhering to all labour laws and human rights laws, suppliers shall:

- Comply with all applicable local, state and national laws regarding human rights.
- Comply with the Company's Human Rights Policy. (uploaded on the company website)
- Ensure that all their employees are hired on their own free will and guarantee that all their operations are free from forced, bonded, compulsory, indentured, prison labour or any other form of compulsory labour and child labour.
- Ensure that all its employees are provided equal employment opportunities, an environment conducive to their growth, free from any form of discrimination and harassment.
- Ensure compliance with minimum working hours and minimum wages prescribed by applicable laws and regulations.
- Comply with all slavery and human trafficking laws. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices both internally and within their supply chains and other external business relationships.
- Ensure that employees are not charged any fees or costs for recruitment, directly or indirectly;

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- Not confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation of any of its workers/ employees.

Health, Safety & Environmental Sustainability

- The Supplier shall provide its employees with a safe and healthy working environment and comply with all applicable laws and regulations regarding working conditions.
- Supplier shall follow all Environmental, Health and Safety and other operational policies of the Company while executing any work or contract at the company site.
- Supplier shall follow all laws of the land including laws on Environment sustainability and protection while executing any work for the Company.

Business Integrity - Anti-Bribery

- The Supplier shall not, directly or through intermediaries, take any recourse to any unethical behaviour (implicit or explicit), or offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private, including with any employee of Sai.
- More specifically: Shall not offer or accept bribe or use other means of obtaining undue or improper advantage, offer or accept any kickbacks, and shall not take any actions to violate or cause its business partners to violate any applicable anti-bribery laws and regulations including the Foreign Corrupt Practices Act of USA (FCPA) and Prevention of Corruption Act of India.
- Shall not take any advantage of any family/ social/ political connections to obtain favourable treatment or for the advancement of business or obtaining any favours. Merit shall be the sole attribute of association with Sai.
- Shall not enter into a financial or any other relationship with a Sai employee that creates any actual or potential conflict of interest for Sai. The Supplier is expected to report to Sai any situation where an employee or professional under contract with Sai may have an interest of any kind in the Supplier's business or any kind of economic ties with the Supplier.

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- Shall not offer any gift, hospitality or entertainment for the purpose of obtaining any advantage, order or undue favour.
- Unfair Trade Practices: Supplier shall desist from any unfair or anti-competitive trade practices.

Reporting of Unethical Practices and Grievance Redressal Mechanism

- The Supplier shall ensure that an effective grievance procedure has been established to ensure that any worker/ employee, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.
- Suppliers shall also forthwith report any unethical activity or discrimination if practiced by any Sai employee/other Suppliers as per Sai whistle-blower policy (uploaded on the company website).

Intellectual Property

- The Supplier shall take appropriate steps to safeguard and not infringe any Sai confidential and proprietary information/intellectual property/ technology which come to its knowledge during the course of its business relationship/ dealings with Sai.
- In case of sub-contracting, sharing of confidential information should be made with the consent of SAI.

Third Party Representation

- The Suppliers shall not be authorized to represent Sai or to use Sai's brands without the written permission of Sai.
- Third parties and their employees who are authorized to represent SAI are expected to abide by the Sai's Code of Conduct & Business Ethics Policy in their interaction with, and on behalf of Sai including the confidentiality of information shared with them and to sign a non-disclosure agreement to support confidentiality of information.

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Supplier's Compliance Commitment

- Sai expects the Supplier to adhere to all applicable laws and regulations and particularly, comply with this Code in letter and spirit.
- It is the Supplier's responsibility to read and understand the contents of this Code and Sai's Code of Conduct & Business Ethics Policy.
- As a condition of doing business with Sai, the Supplier must comply with this Code and agree to uphold such values during its business association with Sai.
- The Supplier shall maintain adequate documentation to demonstrate compliance with the principles of this Code and allow Sai access to check compliance upon request with reasonable notice.
- The Supplier shall notify Sai regarding any known or suspected improper behaviour by the Supplier relating to its dealings with Sai, or any known or suspected improper behaviour by Sai employees.

You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. Sai reserves the right to conduct audits or assessments to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern and reserves the right to discontinue any relationship for non-adherence to international principles, failure to correct violations, or displaying patterns of non-compliance with these standards.

ABBREVIATIONS

SCM – Supply Chain Management

PSCI – Pharmaceutical Supply Chain Initiative

FCPA – The Foreign Corrupt Practices Act

-----End of the Policy-----