



SUPPLIER CODE OF CONDUCT

Version (1.0)

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Divi's Laboratories Limited



VERSION CHANGE HISTORY

Version	Date	Approver	Brief Description
1.0	01.03.2023	Director-Commercial	Supplier Code of Conduct



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INTRODUCTION

Divi's Laboratories Ltd (Divi's) is among the largest manufacturing company with focus on high quality generic Active Pharmaceutical Ingredients (API), custom synthesis of APIs, Intermediates and Nutraceutical Ingredients with strong customer relationships across the world. Divi's is committed to sustainable chemistry and strives to attain leadership through Chemistry. Over the past three decades Divi's laid a strong foundation that has been built on trust, technology, and sustainability.

This Supplier Code of Conduct (SCOC) is focused on ethical conduct of business with focus on environment, sustainability, governance and compliance to all applicable law.

1 Ethics

All suppliers and value chain partners are expected to conduct themselves in an ethical manner which includes

- **1.1 Fair Competition and Anti-Trust.** All suppliers are to compete fairly and follow applicable anti-trust and competition laws.
- **1.2 Business Integrity.** All suppliers are to be transparent in all their transactions with Divi's and are not to involve in any form of corruption, money laundering and thereby maintain business integrity.
- **1.3 Public Disclosure.** All suppliers should not communicate with regard to Divi's performance and are not to make any public posting of information with regard to agreement / purchase orders relating to Divi's.
- **1.4 Conflict of Interest.** All suppliers are to avoid situations of conflict of interest between their interests and their obligation to Divi's. Suppliers should notify any potential areas of conflict of interest to Divi's.
- **1.5 Complaint Mechanism.** Supplier shall provide an anonymous complaint mechanism for whistleblowers to report concerns on potential unethical activities in workplace and must ensure confidentiality and retaliation against the persons who participate in such programs, in good faith.
- **1.6 Acceptance of gifts.** Suppliers are not to offer any kind of gifts - irrespective of value to employees of Divi's.

2 Human Rights and Labour

All suppliers are to adhere to human rights and treat people with respect and dignity which includes.

- **2.1 Child and forced labour.** Suppliers are not to use Child, bonded, indentured or involuntary prison labour either directly or indirectly.
- **2.2 Nondiscrimination and harassment.** Suppliers should not discriminate based on race, color, age, gender, sexual orientation, religion, health status, HIV status, political affiliation or marital status in employment practices. Suppliers shall maintain conducive work environment and take measures to avoid any harassment, harsh or inhumane which shall include sexual harassment, sexual abuse, mental coercion etc.
- **2.3 Fair treatment.** Suppliers should treat employees in a humane manner avoiding any kind of verbal or sexual abuse and shall respect the right of workers to associate freely and negotiate collectively as permitted by and in accordance with applicable law and regulation.
- **2.4 Wages.** Suppliers shall pay wages for all hours worked complying with all applicable laws pertaining to minimum wages, overtime pay, leaves and legally mandated benefits.



3 Environment, Health and Safety

All Suppliers should provide a safe and healthy working environment and shall

- **3.1 EHS programs.** Organize programs to identify chemical and biological hazards in the workplace and take steps towards safety of employees.
- **3.2 Emergency response.** Evaluate possible emergency situations in the workplace and implement emergency response plans and train all employees to handle such possible emergencies.
- **3.3 Waste and Emission.** Ensure safe handling, movement, storage, recycling, reuse and put best practices in place for air and waste emissions.
- **3.4 Restricted substances.** Ensure that products supplied do not contain restricted or banned materials.
- **3.5 Environmental impact.** Use water, energy and other natural resources to minimize impact on environment and climate through change in processes, material substitution, recycling and reduction of usage.
- **3.6 Adherence to environmental laws.** Adhere to applicable environmental regulations and laws and keep in place systems to monitor the same.

4 Sustainable Sourcing and Traceability

All suppliers should adhere to the sustainable sourcing / procurement policy of Divi's. Suppliers shall adhere to responsible sourcing and carry out due diligence on the sourcing of raw materials, ensure traceability of procured materials.

5 Management Systems

All suppliers are expected to establish a management system to comply with the laws for business continuity and to mitigate operational risks which will include

- **5.1 Risk Assessment and Management.** Identify, determine and manage risks through policies and processes.
- **5.2 Training, Competency building and documentation.** Establish competency building through training of employees and demonstrate the same through appropriate documentation.
- **5.3 Assessment and Verification audits.** Keep verifiable systems in place so as to be able to be assessed by the Divi's team.

6 Anti-Corruption and Bribery

Suppliers shall sensitize and train their employees with regard to anti-corruption and anti-bribery so as to uphold the best business practices.



SUPPLIER CODE OF CONDUCT - POLICY ISSUE AND CHANGES TO POLICY

This policy is issued by Director – Commercial who has been tasked with the responsibility of providing strategic direction to the company in commercial aspects. Director Commercial will periodically review and update this policy and ensure that it is consistent with changes in the regulatory environment.



REVISION HISTORY

Version No.	Author	Reviewer	Approver	Published Date	Sections Changed	Description of changes