

Business Responsibility and Sustainability Policy

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1. BACKGROUND

In today's world, large corporate entities, such as Wockhardt Limited ('Wockhardt' or 'the Company'), are seen as critical components of the social system in recent times, they are accountable not merely to their shareholders from a revenue and profitability perspective but also to the larger society which is also its stakeholder. Hence, adoption of responsible business practices in the interest of the social set-up and the environment are as vital as their financial and operational performance.

Wockhardt assumes far-reaching responsibility for its own operations and the impact they have on all people, the environment and wider society in a longer-term perspective. Wockhardt's Business Responsibility and Sustainability Policy ('Policy') defines the Company's view on and overall ambitions in the sustainability segment, which serves as a broad framework for the whole group.

The Policy includes Health, Safety, Environment and Quality (HSEQ) issues and is based on nine principles enunciated in the National Guidelines on Responsible Business Conduct (NGRBC) by the Ministry of Corporate Affairs (MCA).

The Business Responsibility Policy have been formulated by the management of the Company in consultation with the relevant stakeholders and are approved by the Board of Directors of the Company.

2. OBJECTIVE

The objective of this policy is to

- ensure a unified and common approach to the dimensions of Business Responsibility across Wockhardt Limited,
- act as a strategic driver that will help Wockhardt Limited respond to the complexities and challenges that keep emerging and to align ourselves with the best of global business conduct principles.
- ensure that not only do we follow these guidelines in business contexts directly within our control or influence, but that we also encourage and support our suppliers, vendors, distributors, business partners/associates and other stakeholders to follow them.

3. SCOPE

This Policy is supplementary to all existing Policies of the Company and does not over-ride the more subject specific Policies which may also be map to one or more Principles enshrined under this Policy. In the event of any conflict between such subject specific policies with this Policy, the position stated under such subject specific policy shall sustain.

The subsidiary companies may participate in the Business Responsibility Initiatives of the Company to the extent required under the laws of the country in which they operate.

3. IMPLEMENTATION

The Managing Director or an Executive Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy. The Managing Director/ Executive Director may designate a Senior Management Personnel of the Company as the **Head of ESG**, who shall, *inter alia*, be responsible for implementing this Business Responsibility and Sustainability initiatives. The Business Responsibility & Sustainability Policy shall be appropriately communicated within the Company across all levels and shall also be displayed on the Company's website.

Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy. Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the **Head of ESG**.

4. GUIDING PRINCIPLES

Principle 1: The Company shall conduct and govern itself with integrity in a manner that is ethical, transparent and accountable

Philosophy:

Wockhardt is committed to conducting its business in accordance with the applicable laws, rules and regulations and with highest standards of business ethics. The Company has in place the Code of Conduct (“Code”) for its Directors and Senior Management Personnel and also for other employees. Their confirmations to the Code is obtained by the Company on periodical basis.

This principle intendeds to provide guidance and help in recognizing and dealing with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability. The objective is to ensure the highest standards of ethical conduct, transparency and accountability while dealing with the stakeholders.

Policy:

- i. The Company shall develop and strive to put in place training and awareness programmes that promote the principle of ethical conduct at all levels including value chain partners, prevents its contravention and effect prompt and fair actions against any transgressions.
- ii. The Company shall disclose and communicate transparently and assure access to information about the policies, procedures, performance (financial and non-financial) and their decisions, that impacts the relevant stakeholders form the fundamental basis of operationalizing responsible business conduct.
- iii. The Company shall put in place appropriate Standard Operating Procedures (“SOP’s”) to ensure that the business does not engage in illegal and abusive practices, bribery, anti-competition and corruption, and ensure timely and fair and corrective action in case such transgressions are detected.
- iv. The Company shall put in place appropriate process to address conflicts of interest involving its Directors, Key Managerial Personnel, employees, workers and business partners.
- v. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism/ Whistle Blower Mechanism and corrective actions are being undertaken.

Principle 2: The Company shall strive to provide goods and service in a manner that is sustainable and safe.

Philosophy:

Wockhardt has intertwined the principles of safety and sustainability into its processes and products throughout its lifecycle which covers various stages beginning from procurement of raw material, product design and manufacturing till its delivery to the customers.

Policy:

- i. The Company shall strive to integrate R&D and capital expenditure in technology at the design and development stages for all our products and processes to improve the environmental and social impacts of product and processes.
- ii. The Company shall work towards sourcing significant raw materials, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- iii. In designing the products, the Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
- iv. The Company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling and safely disposal of resources wherever possible.

Principle 3: The Company shall respect and promote the well-being of all employees, including those in their value chains.

Philosophy:

Wockhardt is committed to professional development and growth of employees through selecting the right candidate for right job, monitoring performance for optimum utilization of their potential, providing growth opportunities growth and inculcating the culture of mutual faith and accountability. Wockhardt is also committed to the holistic growth of employees by motivating them to perform at the peak of their potential by imparting necessary guidance and training at all levels and providing them with opportunities for enhancing their knowledge and honing their skills.

The policies, procedures and practices in the Company are aligned to meet employees' well-being, diversity, non-discrimination, safety and health so as to have a healthy, cordial and harmonious relationships and value enhancement at all levels.

Policy:

- i. The Company shall ensure that all regulatory requirements pertaining to its employees are complied with.
- ii. The Company shall provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
- iii. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- iv. The Company shall ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work.
- v. The Company shall put systems and processes in place to support the work-life balance of its employees, especially that of women.
- vi. The Company shall provide facilities for the wellbeing of its employees or workers including those with special needs. The Company shall ensure fair, timely and transparent payment of statutory wages of all employees, including contract and casual labor without discrimination.
- vii. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.

- viii. The Company shall ensure continuous up gradation of skill and competence of all employees by providing access to necessary learning opportunities on an equal and non-discriminatory basis.
- ix. The Company shall promote employee morale and career development through enlightened human resource interventions.
- x. The Company shall provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment.
- xi. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities and a workplace with adequate provisions of Grievance Redressal.

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.

Philosophy:

Wockhardt gives utmost importance to the healthy engagement with its various stakeholders like employees, suppliers, stockists, dealers, customers, shareholders / investors, communities surrounding the operations and government / regulatory authorities.

Policy:

- i. The Company shall acknowledge, assume responsibility and is transparent about the impact of their policies, decisions, products, operations, and practices on all stakeholders and the natural environment.
- ii. The Company shall develop systems, processes and mechanism to identify its stakeholders, understand their concerns, define purpose and scope of engagement, consult with them in developing policies and processes that impact them, and commit to resolving any differences with stakeholders in a just, fair and equitable manner.
- iii. The Company shall strive to enable all stakeholders to benefit fairly from the value generated by the businesses, and any conflicts or differences arising from the impact of business operations or the sharing of the value generated by the businesses should be resolved in a just, fair and equitable manner.

Principle 5: Respect and promotion of human rights

Philosophy:

Wockhardt believes that human rights are fundamental, inherent, universal, indivisible and interdependent in nature and hence, continuously strive to ensure that employees' basic human rights are protected.

Policy:

- i. The Company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations and ensuring all individuals impacted by the business have access to grievance mechanisms.
- ii. The Company shall take periodic make its employees aware of the human rights, relevant laws and policies.
- iii. The Company shall recognize and respect the human rights including right to minimum wages, remuneration, salary, of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- iv. The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.
- v. The Company shall ensure that where it is causing, contributing or otherwise linked to adverse human rights impacts, takes corrective actions to address such impacts and also take corrective actions to address such impacts.
- vi. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 6: The Company respects and shall make efforts to protect and restore the environment

Philosophy:

Wockhardt also believes in conservation of natural resources and minimizing hazardous impact on the ecological environment. The Company is cognizant of the responsibility etched to its business activities and its consequent impact on the environment and society at large. The Company conducts periodic risk and opportunity assessments to identify any adverse impact of its products and services on the environment with an object to strategically implement targeted initiatives that would help reduction of the Company's environmental footprint and augment resource conservation.

Policy:

- i. The Company should ensure that appropriate policies, procedures and structures are formulated to assess, measure and address any adverse impacts on the environment and natural resources at all business locations, at all stages of life cycle from establishment to closure.
- ii. The Company shall develop appropriate strategies for sustainable and efficient use of natural resources and manufactured material, giving due consideration to expectations and concerns of all stakeholders and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- iii. The Company shall take measures to check and prevent pollution. The Company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- iv. The Company shall assess the energy consumption, water consumption or any other natural resources.
- v. The Company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- vi. The Company shall continuously seek to improve their environmental performance by adopting cleaner production methods, promoting reduction, reuse, recycling and recovery of material and resources, promoting use of energy efficient, low-carbon technologies, environment friendly technologies and use of renewable energy.
- vii. The Company shall develop Environment Management Systems (EMS) and contingency plans and processes that help them in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to their operations or that of a member of its value chain.

- viii. The Company shall report their environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
- ix. The Company shall proactively persuade and support its value chain to adopt this principle.

Principle 7: The Company, when engaging in influencing public and regulatory policy, shall do so in a manner that is responsible and transparent

Philosophy:

Wockhardt believes that to protect overall interest of its business and the diverse stakeholders, the Company has to express its fair views, opinions, representations, concerns etc. on the policies framed by the competent authorities. The Company, may either itself or through various association/forums/chambers make such representations etc. before the competent authorities. The Company's engagement with the relevant association/forums/chambers etc. is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

Policy:

- i. The Company, while pursuing policy advocacy, must preserve and expand public good and shall not advocate any policy change to benefit the Company or select few alone.
- ii. The Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy in a responsible manner.
- iii. The Company shall ensure that corrective actions to be taken based on adverse orders from regulatory authorities, if any.
- iv. The Company shall ensure that policy advocacy is conducted ethically.

Principle 8: The Company shall strive to promote inclusive growth and equitable development

Philosophy:

Wockhardt's philosophy for delineating its responsibility as a corporate citizen is covered through its CSR policy which encompasses guidelines and mechanism for undertaking socially relevant programs for welfare and sustainable development of the community at large.

The Company has in place a Corporate Social Responsibility Policy framed as per the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility) Rules, 2014 and is carrying out various CSR Activities in accordance with the Schedule VII to the Companies Act, 2013.

Policy:

- i. The Company ensure that the business take appropriate actions to minimize any adverse impacts that it has on social, cultural and economic aspects of society including arising from land acquisition and use, construction of facilities and operations.
- ii. The Company shall assess, measure and understand their impact on social and economic development, and respond through appropriate action to minimize the negative impacts on society.
- iii. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society, including vulnerable and marginalized groups.
- iv. The Company shall make efforts to complement and support the development priorities at local and national levels, and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
- v. The Company shall respect all forms of intellectual property and traditional knowledge and make efforts to ensure that benefits derived from their knowledge are shared equitably.
- vi. The Company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013 and as per the CSR policy of the Company.

Principle 9: The Company shall engage with and provide value to their customers in a responsible manner

Philosophy:

Customers are one of the most important stakeholders. The foundation of the Company is based on the trust, satisfaction and loyalty of our consumers across the world. The Company's products are industrial chemical products and hence, it continuously strive to make available its products that are safe and competitively priced for the benefits of its customers / end users.

Policy:

- i. The Company ensure that the business take appropriate actions to minimize and mitigates any adverse impacts that it has on public, the natural environment and society at large.
- ii. The Company shall take into account the overall well-being of the clients and that of society and ensure that the Company do not restrict the freedom of choice, free competition and do not infringe their right to privacy in any manner.
- iii. The client satisfaction is essential for growth and success. The Company continually strive to provide better products to clients at large.
- iv. The Company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- v. The Company shall provide adequate grievance redressal mechanisms that are transparent and accessible, to address client concerns and feedback.

5. REVIEW & AMENDMENT

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.

If, due to subsequent changes in the Act or/and Regulation, a particular Standard or any part thereof becomes inconsistent with the Act or/and Regulation, the provisions of the Act or/and Regulation shall prevail.