



BUSINESS PARTNER CODE OF CONDUCT

Biocon Biologics Limited

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TO OUR BUSINESS PARTNERS

Message from Management



“At Biocon Biologics, our culture is driven by our core values. ‘Integrity & Ethical behavior’ along with ‘Quality through Compliance & Best Practices’ is sacrosanct.”

Shreehas P Tambe

Chief Executive Officer & Managing Director

A. Introduction

1. Corporate integrity, responsible sourcing, and workers' safety and well-being across the global supply chain are of paramount importance to Biocon Biologics Limited and its subsidiaries (“**Biocon Biologics**”). These principles apply to all aspects of the Biocon Biologics business, and encompass all manufacturers, distributors, vendors, and other third parties doing business with Biocon Biologics (each a "**Business Partner**" and collectively "**Business Partners** ").
2. These principles are reflected in this Business Partner Code of Conduct ("**Code of Conduct**"), which establishes the minimum standards that must be met by any Business Partner doing business with Biocon Biologics, regarding:
 - Fair treatment of workers.
 - Providing a safe workplace for workers.
 - Complying with applicable law and regulation.
 - Impact of activities on the environment.
 - Ethical business practices.
3. In addition, the Code of Conduct encourages Business Partners to go beyond legal compliance, drawing upon internationally recognized standards, to advance in social and environmental responsibility, and business ethics.

B. Applicability

1. This Code of Conduct applies to all Business Partners doing business with Biocon Biologics. Business Partner is responsible for compliance with the standards set out in this Code of Conduct ("**Standards**") throughout its operations and throughout its entire supply chain.

2. Without limiting Business Partner's obligations hereunder, Business Partner should comply with these Standards in:
 - all its facilities; and
 - all its operations, including with respect to manufacturing, distribution, packaging, sales, marketing, product safety and certification, intellectual property, labour, immigration, health, worker safety, and the environment.
3. Without limiting Business Partner's obligations hereunder, Business Partner is responsible for compliance with the Standards by all its business partners, vendors, agents, and subcontractors and their respective facilities ("**Partners**").

C. Slavery and Human Trafficking

1. All labour must be voluntary. Business Partner should not support or engage in slavery or human trafficking in any part of its supply chain.
2. Business Partner should not, and should ensure that its Partners do not, support or engage in, or require any:
 - compelled, involuntary, or forced labour.
 - labor to be performed by children or individual underage as per applicable law.
 - bonded labour.
 - indentured labour.
 - prison labour.

D. Hazardous Work

1. Business Partner should not, and should ensure that its Partners do not, support or engage in, or require any hazardous labour to be performed by any person under the age of 18 or minimum age under applicable law.
2. Hazardous labour involves any work, that by its nature or the circumstances in which the work is undertaken, involves the substantial risk of harm to the safety or health of the worker or coworkers, if adequate protections are not taken.

E. Compensation and Benefits

1. Business Partner must compensate all workers with wages, including overtime premiums, and benefits at a minimum, meet the minimum wage and benefits established by applicable law. Business Partner should not make any deductions from wages, except income tax withholding and those that are legally allowed.
2. Business Partner should maintain proper documentation of wage payments for their internal records.

F. Work Hours

1. Business Partner should not require or allow workers to work more than the maximum legally permitted number of regularly paid hours. Business Partner should allow workers to take reasonable rest breaks, in accordance with applicable law including bathroom breaks and reasonable lunch breaks.

G. No Discrimination, Abuse, or Harassment

1. Business Partner should treat workers with respect and dignity.
2. Business Partner should not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, sexual

orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

3. Business Partner should not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Business Partner must not condone or tolerate such behavior by its Partners.

H. Health and Safety

1. Business Partner should provide a safe, healthy, and sanitary working environment. Business Partner must implement take measures to reasonably procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards, and work-related accidents and injuries, that are not specifically addressed in these Standards.
2. General and industry-specific procedures and safeguards to be complied by Business Partner, include those relating to:
 - health and safety inspections.
 - equipment maintenance.
 - maintenance of facilities.
 - worker training covering the hazards typically encountered in their scope of work.
 - fire prevention.
 - documentation and recordkeeping.
3. Business Partner should provide workers, adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

I. Facilities

1. Business Partner should:
 - ensure that all facilities, meet all applicable building codes and industrial design and construction standards.
 - Obtain and maintain all construction approvals required by law.
 - Obtain and maintain all zoning and use permits required by law.
 - without limiting Business Partner's obligations hereunder, ensure that all facilities have:
 - An adequate evacuation plans.
 - Adequate, well-lit (including emergency lighting), clearly marked, and unobstructed emergency exit routes, including exits doors, aisles, and fire-rated enclosed stairwells.
 - sufficient number of emergency exit doors.
 - visible and accurate evacuation maps posted in the local language.
 - adequate ventilation and air circulation.
 - Adequate lighting.
 - Adequate first aid kits and stations.
 - Adequate fire safety, prevention, alarm, and suppression systems.
 - Adequate access to potable water; and
 - Adequate access to private toilet facilities.
 - Post safety rules, inspection results, incident reports, and permits, in each case, as required by law.

2. If Business Partner provides dining facilities for its workers, it should provide safe, healthy, and sanitary facilities (including food preparation and storage areas) that comply with all the standards set out in the Health and Safety section of this Code of Conduct and as mandated by applicable laws. Business Partner should obtain and maintain all food preparation permits and health certificates as may be required by law.

J. Environmental Protection

1. Operation of Business Partner's facilities: Business Partner should operate its facilities in compliance with all applicable environmental laws, including laws relating to:
 - Waste disposal.
 - Emissions.
 - Discharges.
 - Hazardous and toxic material handling.
2. Inputs and Components: Business Partner must ensure that the goods that it manufactures (including the inputs and components that it incorporates into its goods) for Biocon Biologics, comply with all applicable environmental laws and treaties.
3. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health must be appropriately managed, controlled and treated prior to release into the environment.
4. Where applicable, Business Partners must have systems in place to prevent and mitigate accidental spill and/or release of hazardous waste into the environment.

K. Conflict of Interest

1. Business Partners are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Conflict of Interest is a situation that has the potential to undermine an individual's ability to perform one's professional duties independently and objectively.
2. Business Partners are expected to provide notification and make necessary disclosure to all affected parties if an actual or potential conflict of interest arises. This includes a conflict between the interests of Biocon Biologics and personal interests or those of close relatives, friends, or associates.

L. Anti-Bribery and Anti-Corruption

1. Bribery is offering, giving, promising, soliciting, or accepting anything of value (financial or non-financial) to a government official or any other person, directly or indirectly, to improperly influence that person in the performance of a duty or to obtain or retain business or any undue business advantage. Corruption is the abuse of entrusted power for personal gain. Bribery and fraud are considered corrupt practices.
2. All corruption, bribery, extortion and embezzlement, whether direct or indirect, are prohibited. Business Partners should not pay or accept bribes or participate in other illegal inducements in business or government relationships. Business Partner must not condone or tolerate such behavior by its Partners. Business Partners should conduct their business in compliance with all applicable anti-money laundering laws.
3. Business Partners are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

M. Antitrust and Fair Dealing Policy

1. Business Partner will strictly comply with all applicable antitrust laws, trade practice laws and any other laws, rules, and regulations, for example, with monopolies, unfair competition, restraints of trade and competition, and relationships with competitors and customers.
2. Business Partner should deal fairly with all customers and competitors and should not take unfair advantage of any company, through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

N. Trade Restriction and Export Controls

1. Business Partner must abide by all applicable economic sanctions or trade embargoes that are applicable to doing business with Biocon Biologics.
2. Business Partner must not directly or indirectly engage in or support any terrorist activity. Neither Business Partner nor any of their affiliates, nor any officer or director of the Business Partner or any of its affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the any national or international body.

O. Clinical Trial

1. Business Partners conducting clinical trials on behalf of Biocon Biologics, should perform such services in accordance with the global standards of Good Clinical Practices, applicable local regulatory requirements. The trials must be conducted with utmost regard to health and safety of volunteer participants.

P. Data Privacy and Information Protection

1. Information is one of Biocon Biologics' most valuable business assets. Biocon Biologics is committed to safeguard and protect information (both personal and others) entrusted to it by relevant stakeholders, especially those that are subject to regulatory exposures.
2. Business Partner should:
 - a. establish and maintain adequate personal data and information security protection for the information that they, and any third parties acting on their behalf, process.
 - b. operate in a manner that is consistent with applicable data protection/privacy laws and aligned with industry standards for the protection and security of all information, including personally identifiable information.
 - c. make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.
 - d. take reasonable measure to address all identified information security and privacy risks that pertain to the information provided by Biocon Biologics.
 - e. comply to rules and procedures that Biocon Biologics may put in place to allow access, process, store, communicate, or provide IT infrastructure for information resources.
 - f. communicate promptly to Biocon Biologics about significant changes that may affect the agreed upon information security and privacy controls that are in place.
 - g. apply adequate information security controls through a formal auditable program.

Q. Product Quality & Supply Chain Integrity

1. Business Partners involved in the supply, manufacturing, packaging, re-packaging, testing, storage and distribution of materials /products for Biocon Biologics must comply with applicable Quality regulations and Good Manufacturing Practice, Good Distribution Practice and Good Laboratory Practice requirements for the markets in which the products are manufactured, registered and distributed.
2. Business Partners must also ensure the integrity of their supply chain, avoiding counterfeiting and adulterations to protect patients and products.

R. Marketing and promotional practices

1. All marketing and promotional materials and activities pertaining relating to Biocon Biologics business, must conform to high ethical, medical and scientific standards, and comply with all applicable laws and regulations. When engaging with healthcare professionals (HCPs), health care organizations (HCO), patients or animal health care professionals, all Business Partners must adhere to relevant industry standards of conduct that apply to them.
2. Business Partners should not provide HCPs/HCOs anything such as financial benefit or benefit-in-kind including grants, scholarships, subsidies, consulting contracts, educational items, or practice-related items, that can be alleged to have an inappropriate influence on HCP's prescribing practice or that may be construed as an inducement to prescribe.
3. Business Partner should not interact with HCPs in a manner that may adversely impact Biocon Biologics' reputation. Business Partners should adhere to applicable ethical codes of practice, local industry codes, and legal and regulatory requirements that apply to interactions with HCPs.

P. Compliance with Law

1. Business Partners must conduct their business in compliance with all applicable laws and regulations, including, but not limited to, those relating to corruption, bribery, money laundering, tax evasion, competition, export controls, modern slavery (and human trafficking), and health, safety, and environment.
2. Business Partner should not carry out any conduct or activity that would expose Biocon Biologics to a risk of penalties under any laws and regulations: or make any act or omission that will cause or lead Biocon Biologics to breach any applicable laws or regulations.
3. Business Partner acknowledges that, upon reasonable prior notice, Biocon Biologics may in its discretion conduct inspections of the facilities to confirm Business Partner's compliance with this Code of Conduct. However, Biocon Biologics has no obligation to conduct inspections.
4. Business Partners should educate their workers (includes any employee, director, officer, staff, or personnel engaged or employed by a supplier, including agency workers, whether on a permanent, temporary or casual basis) to make ethical decisions in compliance with laws, regulations and contract requirements. If required, Biocon Biologics reserves has the right to train.

Q. Compliance Audit

1. Business Partners are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

2. As necessary and upon reasonable notice, Biocon Biologics reserves the right to conduct audits to verify compliance with this Business Partner Code of Conduct. Business Partners should keep original and accurate records to prove compliance, provide Biocon Biologics the necessary access and information pertaining to the business with Biocon Biologics as required, and act in good faith to improve and/or correct any deficiencies discovered during such an audit.

R. Social Media

1. Biocon Biologics supports the rights of its Business Partner to express themselves freely through social networks, blogs, wikis, chat rooms, comment forums, and other online locales (“Social Media”).
2. However, Business Partner must remember to be cautious when such activity involves information that may affect the perception or reputation of Biocon Biologics.
3. Business Partners should not make any comment or remarks on behalf of Biocon Biologics in Social Media.
4. Business Partners are encouraged to notify, if they come across any contents shared in Social Media that negatively impacts the reputation of Biocon Biologics.

S. Termination

1. Biocon Biologics may immediately terminate its business relationship (including any purchase order(s) and purchase contracts) if Business Partner fail to meet the Standards.

T. Reporting Violation

1. All Business Partner workers (includes any employee, director, officer, staff or personnel engaged or employed by a supplier, including agency workers, whether on a permanent, temporary or casual basis) should be encouraged by Business Partner to report concerns or illegal activities in the workplace, without threat of reprisal, intimidation or harassment. Business Partner should investigate and take corrective action if needed.
2. Business Partner’s workers may also report any concern about work being done for or on behalf of Biocon Biologics to: integritybiologics@biocon.com.
3. We respect and value your opinions and encourage you to reach out to us with complete confidence.