



BUSINESS PARTNER CODE OF CONDUCT

Version 1.1

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’ are sacrosanct.”

Shreehas P Tambe
CEO & 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, service providers, vendors, and other third parties doing business with Biocon Biologics (each a "**Business Partner**" and collectively "**Business Partners**").
2. The above 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, this 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.
3. Business Partners are encouraged to uphold human rights of their workforce as well as of their respective Partners, and all the stakeholders they may work (directly and indirectly) with them.

D. Hazardous Work

1. Business Partner should not, and should ensure that its Partners do not, support or engage in, or require any hazardous operations to be performed by any person under the age of 18 or minimum age prescribed under applicable law.
2. Hazardous process 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 applicable income tax withholding and those deductions which are legally allowed as per applicable statutory requirement.
2. Business Partner should maintain proper documentation of wage payments for their internal records and / or as may be required as per the applicable law.

F. Work Hours

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 including latrine & urinal accommodation and reasonable lunch breaks, in accordance with applicable law.

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 tolerate such behavior by its Partners.
4. Business Partner shall respect the rights of its workers to freely associate and bargain collectively and not disadvantage workers or their representatives so that they can openly communicate with other workers regarding working conditions without fear of retaliation or discrimination. If this is a legal requirement, then the associations and collective bargaining must be in accordance with the applicable legal requirements.

H. Equality, Diversity and Inclusion:

Business Partner shall promote an environment of equality, diversity and inclusion with regards its employees, contractors, officers and Partners.

I. 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.
4. Business partners are expected to identify and assess all emergency situations in all their facilities and have emergency response plans. Business Partners should provide necessary training to employees. To minimize the impact of emergency, Business Partner must ensure that all required supplies, equipment are available in its facility.

5. Business Partner shall have implemented an accessible, effective and transparent channel where workers (including contractors and third parties' employees) can report their questions, doubts, concerns or activities contraries to any laws or Business Partner commitment on Health and Safety while working. Business Partner to ensure that any such person who raised a concern in good faith based on verifiable evidence and without malicious intent shall not suffer or subject to any retaliation due to the mere reporting act and shall be treated with respect.

J. 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 Section H " Health and Safety"and as mandated by applicable laws. Business Partner should obtain and maintain all food preparation permits, health certificates and / or any such other licenses / permission, as may be required by applicable law.

K. 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.
5. Where applicable, Business Partners are expected to monitor and reduce their Greenhouse gas (GHG) in their operations and emissions and support their suppliers and their Partners with the same. Business Partners may implement suitable GHG emission reductions and managements practices and document the same.
6. Business partners are encouraged to reduce the usage of energy, have a management programs towards energy reduction and where applicable switch over to renewable or alternative clean energy sources for their operations.
7. Where applicable, Partners may consider having recycling, reuse, reduce approach towards wastes and safe disposal of both hazardous, non-hazardous pollutants and waste streams as per available scientific methods. It is encouraged that partners have circular economy concepts implemented in the operations and products.
8. Where applicable, Business Partners are encouraged to protect and promote biodiversity.
9. Where applicable, Business Partners are expected to use natural resources (e.g. water, sources of energy, raw materials) in an economical way. Negative impact on the environment and climate shall be minimized or eliminated at their source by practices such as the modification of production maintenance and facility processes, material substitution, conservation, recycling, and material reutilization.

L. Conflict of Interest

1. Business Partners are expected to avoid all conflicts of interest or situations giving the appearance of any 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 Business Partner (including its Partners) with that of Biocon Biologics and personal interests or those of close relatives, friends, or associates.

M. 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.

N. 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: 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.

O. 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, including without limitation, as sanctioned entity or sanctioned persons, terrorists or terrorist organizations compiled by the any national or international body.

P. Clinical Trial

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.

Q. 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 and / or as may be required as per the applicable law.
 - 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.

R. 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, etc. to protect patients and products.
3. Business Partners are encouraged to implement processes like supplier monitoring and also communicate about their requirements to all their value chain partners/ Partners. Business Partners are encouraged to ensure adoption and set for the principles set in this Business partners Code of Conduct further down their value chain and ensure these principles are adhered in their value chain and partners.
4. Business Partners are encouraged to provide opportunities to small and diverse businesses in their supply chains while providing products/ goods and services to Biocon Biologics. Biocon Biologics recognize that a strong, diverse supplier chain is essential to economic vitality and business continuity, and Biocon Biologics seek opportunities to conduct business with competitive, diverse business partners and indigenous businesses.

S. Marketing and promotional practices

1. All marketing and promotional materials and activities pertaining 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), Healthcare Organizations (HCOs), or patients, all Business Partners must adhere to relevant industry code that apply to them.
2. Business Partners should not provide HCPs/HCOs anything that could be perceived as an inducement to prescribe such as financial benefit or benefit-in-kind which could include scholarships, subsidies, consulting contracts, educational items, or practice-related items, that can be alleged to have an inappropriate influence on HCP's prescribing practice. Any such benefit in kind should be modest, fit for purpose and allowed as per local regulations.
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, HCOs, etc.
4. Where applicable, Business partners should ensure that promotional items and activities are compliant as per local regulations and should have internal systems to allow for approvals of these items by cross functional teams including legal, regulatory, medical, etc, as mandated by local authorities and / or as per applicable laws.
5. Where applicable, Business partners are encouraged to maintain local promotional/medical messaging in line with and aligned to global messaging as communicated by Biocon Biologics.

T. Risk Management

Biocon Biologics encourages that the Business Partner implement risk management process, which would enable the Business Partner to regularly identify, assess, and manage risks in all areas addressed by this Code of Conduct and as required under all applicable legal requirements. The risk management process should be extended to contractors and companies carrying out operations on behalf of the Business Partner.

U. Business Continuity

Where applicable, Business Partners are responsible for the development and implementation of appropriate business continuity plans and management systems for operations supporting our business.

V. 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 endeavors to provide necessary training / awareness.

W. 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.

X. Social Media

1. Freedom of Expression with Responsibility:

Business Partners are encouraged to express themselves freely on social media platforms, including blogs, wikis, chat rooms, and comment forums. However, they must exercise caution to ensure that their posts do not negatively impact the perception or reputation of both themselves and Biocon Biologics. This includes avoiding any content that could be seen as defamatory, obscene, or offensive.

2. Confidentiality and Proprietary Information:

It is crucial to protect Biocon Biologics' confidential and proprietary information. Business Partners must not disclose any confidential information about Biocon Biologics, its products, customers, or business operations on social media. This includes avoiding the use of Biocon Biologics' logo, trademarks, or other intellectual property without prior authorization.

3. Professionalism and Accuracy:

All social media communications related to Biocon Biologics should be conducted with professionalism, accuracy, and honesty. Business Partners should avoid making any claims about Biocon Biologics' products or services that are not verified or approved by the company. They should also refrain from engaging in discussions about "off-label" or unapproved uses of Biocon Biologics' products.

4. No Representation without Authorization:

Business Partners are not authorized to speak on behalf of Biocon Biologics or represent Biocon Biologics in any capacity on social media unless they have taken explicit permission from the Global Communications through their Biocon Biologics Point of contact. If they are contacted for comments about Biocon Biologics from any Media Journalist, they must direct the inquiry to the Biocon Biologics Global Communications team. If they wish to make any public statement or announcement related to their association or business with Biocon Biologics they must contact Biocon Biologics Global Communications through their contact.

5. Reporting Negative Content:

Business Partners are encouraged to promptly notify Biocon Biologics if they come across any social media content that negatively impacts the Biocon Biologics reputation. This proactive approach helps Biocon Biologics address and mitigate any potential damage swiftly.

6. Global Applicability:

Biocon Biologics Social Media Policy is applicable to its employees as well as to consultants, trainees, interns, partners, as well as Business Partners and agencies working on behalf of the company. It is mandatory for all these constituents to be familiar with Biocon Biologics' Code of Conduct and comply with the social media guidelines outlined here.

7. Compliance with Social Media Platforms' Terms of Use:

Business Partners must ensure that their use of social media complies with the terms of use of the respective platforms. This includes adhering to restrictions on advertising, marketing, and the use of intellectual property. They should also respect the privacy rights and responsibilities outlined by the social media sites.

Y. Continual Improvement

Where applicable, Business Partners are encouraged to continually improve themselves by setting objectives, goals, targets and implementing them and taking appropriate corrective actions for gaps identified by internal or external assessments, inspections or management reviews.

Z. Termination

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

AA. Reporting Violation

1. All workers of Business Partner (including 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 the Business Partner to report any concerns or illegal activities in the workplace. This should be done without threat of reprisal, intimidation or harassment. Business Partner are responsible for investigating and taking corrective action as needed.
2. Any individual can report concerns regarding suspected unethical / non-compliant activities as soon as possible, in accordance with our Whistle Blower & Integrity Policy (<https://www.bioconbiologics.com/docs/BBL-Whistleblower-and-Integrity-Policy.pdf>). Business Partner's workers can also report any concerns about work conducted for or on behalf of Biocon Biologics to: integritybiologics@biocon.com.
3. Biocon Biologics respect and value your opinions and encourage you to reach out to us with complete confidence.