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| SHILPA PHARMA LIFESCIENCES LIMITED | |
| STANDARD OPERATING PROCEDURE | |
| Document No: SOP/PR/GEN/001/01 | Issue Date: 08/07/23 |
| | Effective Date: 17/07/23 |
| Supersedes: SOP/PR/GEN/001/00 | Next Review: June-2025 |
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| TITLE: SUPPLIERS ENVIRONMENTAL & SOCIAL ASSESSMENT | |

1.0 Purpose:

The purpose of this procedure is to identify and evaluate Key Suppliers and Service Providers (KSPs) to discuss with the current sustainable procurement requirement related to EHS, Labor, Human Rights and Ethics, vis-à-vis our “Code of Conduct” through periodic assessments to encourage good supply chain practices by integrating environmental and social sustainability in our procurement processes.

2.0 Scope:

This procedure is applicable to KSPs of Shilpa Pharma Lifesciences Limited.

3.0 Definitions/ Abbreviations:

3.1 Definitions:

3.1.1 Procurement: Activity of acquiring goods and/or services from suppliers.

3.1.2 Sustainable procurement: Procurement that has the most positive environmental, social, and economic impacts possible over the entire life cycle. It involves the sustainability aspects related to the goods or services and to the suppliers along the supply chains. Sustainable procurement contributes to the achievement of organizational sustainability objectives and goals and to sustainable development in general.

3.1.3 Key Suppliers & Service Providers (KSPs): KSPs are critical, strategic, and high-potential suppliers who contribute significantly to the procurement process in terms of transaction values or numbers of orders in the last two years. SPI strives to work collaboratively with the KSPs to continually improve the supply chain capabilities and competitiveness in the areas of environmental and social current good practices besides cost, quality, time, and technology for the mutual benefit of both the customer and the supplier.

3.1.4 Life Cycle: Consecutive and interlinked stages of goods and/or services system, from raw material acquisition or generation from natural resources to final disposal. The word “product” includes “goods or services”.

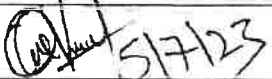
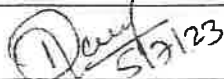
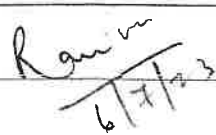
3.1.5 Life Cycle Approach: Consideration of life cycle in decision-making or development processes.

3.2 Abbreviations:

SOP : Standard Operating Procedure

HoD : Head of Department

EHS : Environment Health and Safety

| | Prepared by | Reviewed by | Approved by |
|-------------|--|---|--|
| Name | Ravikumar D | Raghavendra Kumar | Ram Nivas Lahoti |
| Designation | Executive-PR | Sr. Executive-PR | Sr. GM-PR |
| Sign & Date |  5/7/23 |  5/7/23 |  6/7/23 |

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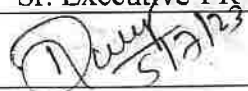
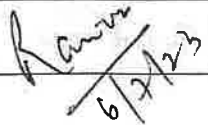
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| | |
|------|---|
| SCM | : Supply Chain Management |
| SAQ | : Self-Assessment Questionnaire |
| P&A | : Personnel and administration |
| CAP | Corrective Action Plan |
| KSP | Key Suppliers & Service Provider |
| PO | Purchase Order/Service Order/Work Order |
| PSCI | Pharmaceutical Supply Chain Initiatives |
| MoCA | Ministry of Corporate Affairs |
| GoI | Government of India |
| PR | Purchase Department |

4.0 Responsibility:**4.1 Responsibilities:**

| S No | Activity | Responsibility |
|------|--|--------------------|
| a | Identify KSPs for environmental and social assessment. | PR(SCM)/P&A/EHS |
| b | Share Self-Assessment Questionnaire (SAQ) to KSPs, collect the duly filled SAQ from KSPs and share the same with P&A/EHS. | PR(SCM) |
| c | Review of duly filled SAQ by P&A/EHS and reverting back to PR(SCM) with review comments for further assessment/audit. | P&A/EHS |
| d | Arrange virtual/on-site assessment on mutually agreed dates and communicate the same to concerned team. | PR(SCM) |
| e | Virtual/On-site assessment of KSPs by P&A/EHS and reverting back to PR(SCM) with assessment report along with recommendations for improvement, if any. | P&A/EHS |
| f | Share assessment report to KSPs and collect corrective action plans (CAPs) with supporting documents for closed CAPs. | PR(SCM) |
| g | Periodic review of CAPs implementation by KSPs and revert back to KSPs through PR(SCM) on CAPs closure status. | P&A/EHS/PR (SCM) |
| h | REACH requirement for imports/exports of chemicals to the EU countries. | Marketing/PR(S CM) |
| i | Periodic internal audit and management reviews. | PR(SCM)/P&A/EHS |

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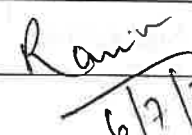
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5.0 Accountability:

- 5.1 The accountability for implementing this SOP lies with the HoDs of PR (SCM)/P&A/EHS as per their responsibilities.
- 5.2 The accountability for the effective implementation of this SOP lies with the Top Management.

6.0 Procedure:

- 6.1 Sustainable procurement involves the sustainability aspects related to the goods or services and to the suppliers along the supply chains. It contributes to the achievement of sustainability objectives, goals and to sustainable development in general. The process followed for sustainable procurement is as described in the following sections.
- 6.2 Identify and shortlist KSPs to be assessed as per the definition mentioned in 3.1.3. Depending on the nature of business, the buying team will coordinate with EHS/P&A to freeze the final list of KSPs to be assessed.
- 6.3 KSPs will be assessed once every alternate year. Qualification for any repeat order to KSPs in subsequent year should consider last year's assessment report and CAPs closure status.
- 6.4 Buying team will share the SAQ with KSPs for providing relevant information along with supporting documents. Duly filled SAQ to be sent to Buyer by KSP at least one week before the assessment date.
- 6.5 Assessment can be virtual or on-site depending on business criticality and nature of business as mutually agreed and agenda for assessment will be shared by PR(SCM) in advance.
- 6.6 Assessment report with recommendations will be shared to KSPs within seven working days of assessment completion by PR(SCM) and follow-up reviews will be done annually.
- 6.7 Buying team should follow-up and collect the action plan for closure of observations within one month of sharing the assessment report.
- 6.8 Training of Buying Team on Sustainable Procurement will be carried out once a year.
- 6.9 Training of KSPs on Sustainable Procurement will be carried out in alternate years through virtual mode.
- 6.10 Assessed KSPs who fail to comply with the recommendation within the reasonable time frame may be moved to non-preferred category/delisted after ensuring supply chain continuity through alternate approved KSPs.

| | Prepared by | Reviewed by | Approved by |
|-------------|---|--|--|
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| Sign & Date |  05/7/23 |  5/7/23 |  6/7/23 |

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6.11 The commitment for meeting Environmental and Social aspects shall be integrated in the purchase order (PO) along with Code of Conduct.

6.12 Compliance with REACH Regulations: SPL's marketing and PR (SCM) departments check and ensure that REACH compliance requirements are met while importing any chemicals from the EU countries or exporting any product to the EU countries.

6.13 The effectiveness of the implementation of the sustainable procurement practices shall be periodically assessed through internal audits and management reviews to identify good practices and continual improvement opportunities.

6.14 KPIs & Objectives

KPI 01: Training of Buyers on Sustainable Procurement

Objective 01: 100% of Buyers to be trained on Sustainable Procurement by FY2324.

KPI 02: Training KSPs on Sustainable Procurement.

Objective 02: 100% of KSPs to be trained on Sustainable Procurement by 2030.

KPI 03: Key Suppliers CSR Assessment

Objective 03: 100% of KSPs to be assessed on Sustainable Procurement by 2030.

7.0 Related References/Documents :

7.1 GRI 308: Supplier Environmental Assessment, 2016

7.2 GRI 414: Supplier social assessment, 2016

7.3 Suppliers Code of conduct

7.4 The PSCI Principles

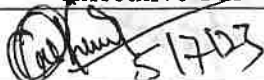
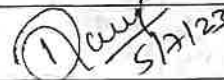

7.5 Sustainable Procurement Policy

7.6 SAQ for Environmental & Social Assessments : FM-PR-001

7.7 KSP's Environmental & Social Assessment Report : FM-PR-002

8.0 Distribution record:

| S.no | Department/Block | No. of copies | Remarks |
|------|---------------------|---------------|---------|
| 1. | Purchase department | 01 | - |
| 2. | EHS | 01 | - |
| 3. | P&A | 01 | - |

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|-------------|---|--|---|
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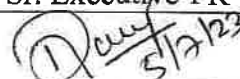

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| S No | Revision Status | Details of Revision | Effective date | Remarks |
|------|-----------------|---|----------------|---------|
| 1 | 00 | First Issue | 27.01.23 | --- |
| 2 | 01 | SOP revised by updating section 7.0 related documents | | --- |

| | Prepared by | Reviewed by | Approved by |
|-------------|--|---|--|
| Name | Ravikumar D | Raghavendra Kumar | Ram Nivas Lahoti |
| Designation | Executive-PR | Sr. Executive-PR | Sr. GM-PR |
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Self-Assessment Questionnaire (SAQ) for Suppliers Environmental & Social Assessments

The questions in this SAQ pertain to supplier's commitment, policies and management systems related to Corporate Social Responsibility (CSR) concerns. The objective is to evaluate the CSR management systems put in place by the suppliers in their workplaces.

Please note the following points before filling the SAQ with the responses along with relevant supporting documents:

- a) Sections marked in yellow need to be filled in by the supplier before the assessment/audit.
- b) Sections marked in light blue will be filled by the buyer as part of the assessment/audit.
- c) Supplier and auditor are required to complete all questions that apply.
- d) If a question does not apply, please mark it NA (Not Applicable).
- e) Our dealings with all stakeholders is guided by our "Code of Conduct" and the same is attached for your reference.

If you need further information or explanations, please contact the following officials:

Level 1: Mr. Raghavendra <raghavendra@vbshilpa.com>

Level 2: Mr. Amrut Lahoti <amrut@vbshilpa.com>

Level 3: Mr. K. Sharath Reddy <sharath@shilpapharma.com>

1. FACILITY INFORMATION

- a) Company Name & Address:
- b) Site Name & Address:
- c) Respondent's Name:
- d) Respondent's Role:
- e) Respondent's Email:
- f) Respondent's Tel:

2. ASSESSMENT / AUDIT REPORT INFORMATION

- a) Assessment/Audit Report Number:
- b) Assessment/Audit Report Owner:
- c) Date of Assessment/Audit:
- d) Type of Assessment/Audit: Initial / Follow up / Other (please specify)
- e) Date and Type of Previous Assessment/Audit (if applicable):
- f) Type of Assessment/Audit: Initial / Follow up / Other (please specify)

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g) Lead Assessor/Auditor (Name, Title, Phone Number & Email Address):

h) Co-Assessor/Co-Auditor (Name, Title, Phone Number & Email Address):

| S.No | Self-Assessment Questions | Self-Assessment Response | Please provide relevant additional information | Auditor review comments |
|--|------------------------------|--------------------------|---|-------------------------|
| 3. Management System - General | | | | |
| 3.1 Has your facility been audited on-site by a third party auditor with regard to CSR issues during last three years? | | | | |
| a) | Occupational health & safety | Yes/No | If yes, you may attach the on-site audit report. | |
| b) | Environment | Yes/No | | |
| c) | Labor & human rights | Yes/No | | |
| d) | Business ethics | Yes/No | | |
| e) | Sustainable procurement | Yes/No | | |
| 4. Management System - Commitment | | | | |
| 4.1 Does the facility have a policy endorsed by the top management pertaining to occupational health & safety, environment, labor, human rights, ethics and sustainable procurement? | | | | |
| a) | Occupational health & safety | Yes/No | If yes, please attach a copy of the policy. | |
| b) | Environment | Yes/No | | |
| c) | Labor & human rights | Yes/No | | |
| d) | Business ethics | Yes/No | | |
| e) | Sustainable procurement | Yes/No | | |
| 4.2 Does the facility have any occupational health & safety, environment, labor, human rights, ethics and sustainable procurement related management system implemented, certified or received any award? | | | | |
| f) | Occupational health & safety | Yes/No | If yes, please attach the list of procedures related to the management system, a copy of the | |
| g) | Environment | Yes/No | | |
| h) | Labor & human rights | Yes/No | | |
| i) | Business ethics | Yes/No | | |

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| S.No | Self-Assessment Questions | Self-Assessment Response | Please provide relevant additional information | Auditor review comments |
|--|---|--------------------------|--|-------------------------|
| j) | Sustainable procurement | Yes/No | certificate and award | |
| 4.3 Has your company appointed one or more persons at managerial level to be responsible for compliance with the policy commitment? | | | | |
| a) | Occupational health & safety | Yes/No | If Yes, please provide name, title, contact details and scope of responsibility | |
| b) | Environment | Yes/No | | |
| c) | Labor & human rights | Yes/No | | |
| d) | Business ethics | Yes/No | | |
| e) | Sustainable procurement | Yes/No | | |
| 5. Management System - Compliance | | | | |
| 5.1 Has your facility currently having any regulatory compliance issues with regards to occupational health & safety, environment, labor, human rights, ethics and sustainable procurement regulations? | | | | |
| a) | Does your facility evaluate compliance with occupational health & safety, environment, labor, human rights, ethics and sustainable procurement issues on an on-going basis? | Yes/No | If Yes, please elaborate | |
| b) | Does your facility have processes in place to communicate and enforce your policy commitments with your suppliers? | Yes/No | If Yes, please provide details | |
| c) | Does the facility have the required environmental permits or authorizations? | Yes/No | If yes, please list the name of the permit, the issuing authority and the validity date. | |
| d) | Does the facility have an | Yes/No | If Yes, please provide | |

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| S.No | Self-Assessment Questions | Self-Assessment Response | Please provide relevant additional information | Auditor review comments |
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| | authorization/permit for water intake from groundwater, river or a public system? | | details | |
| 6. Management System - Risk Management | | | | |
| a) | Has your facility identified risks within own organization/facility and in supply chain with regards to occupational health & safety, environment, labor, human rights, ethics and sustainable procurement regulation? | Yes/No | If Yes, please elaborate | |
| b) | Is there a formal process in place for assessing the business risks for the facility routinely for occupational health & safety, environment, labor, human rights, ethics and sustainable procurement? Do the assessments include: | Yes/No | If Yes, please provide details | |
| c) | Identified risks in own operations | Yes/No | If Yes, please elaborate | |
| d) | Identified risks in the supply chain - first tier | Yes/No | If Yes, please elaborate | |
| e) | Identified risks in the supply chain - beyond first tiers | Yes/No | If Yes, please elaborate | |
| f) | Is there a formal public report where overview of the risks management process is published (like sustainability report, BRSR Report, etc) | Yes/No | If Yes, please elaborate | |
| g) | If any potential or actual risks have been identified, which steps have been taken to | Yes/No | Please describe steps taken | |

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|---|--|--------------------------|--|-------------------------|
| | mitigate and/or prevent identified risks related to occupational health & safety, environment, labor, human rights, ethics and sustainable procurement? | | | |
| h) | Does the facility have a process to manage all HSE critical changes (e.g. raw materials, processes, equipment, personnel, facilities, etc.) for Occupational health & safety? | Yes/No | If Yes, please elaborate | |
| i) | Does the facility have a process to manage all HSE critical changes (e.g. raw materials, processes, equipment, personnel, facilities, etc.) for Environment? | Yes/No | If Yes, please elaborate | |
| j) | Does the facility have Business Continuity Plan in place to minimize the impact of potential business disruptions due to emergencies and natural disaster for the following areas? | Yes/No | If Yes, please elaborate | |
| 7. Management System - Documented Information | | | | |
| 7.1 Does the facility maintain following documented information? | | | | |
| a) | Injury and Illness Logs | Yes/No | If Yes, pls provide last two years summary data. | |
| b) | Environmental sustainability data | Yes/No | If Yes, pls provide last two years summary data. | |
| c) | Worker Benefits and Pay Information | Yes/No | If Yes, pls provide last | |

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| S.No | Self-Assessment Questions | Self-Assessment Response | Please provide relevant additional information | Auditor review comments |
|--|------------------------------------|--------------------------|---|-------------------------|
| | | | two years summary data. | |
| d) | Inspections by Regulatory Agencies | Yes/No | If Yes, pls provide last two years summary data. | |
| e) | Grievances/Suggestions Summary | Yes/No | If Yes, pls provide last two years summary data. | |
| f) | Training Records | Yes/No | If Yes, pls provide last two years summary data. | |
| g) | Minutes of CSR Committee Meetings | Yes/No | If Yes, pls provide last two years summary data. | |
| h) | Emergency Drill Records | Yes/No | If Yes, pls provide last two years summary data. | |
| i) | Audit findings | Yes/No | If Yes, pls provide last two years summary data. | |
| j) | Management reviews | Yes/No | If Yes, pls provide last two years summary data. | |
| 8. Management System - Competence and Awareness | | | | |
| 8.1 Are employees including contractors made aware of relevant policies and procedures including emergency procedure and are they trained accordingly in the following areas? | | | | |
| a) | Occupational health & safety | Yes/No | If Yes, please attach relevant training summary record. | |
| b) | Environment | Yes/No | If Yes, please attach relevant training summary record. | |

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| c) | Labor & human rights | Yes/No | If Yes, please attach relevant training summary record. | |
| d) | Business ethics | Yes/No | If Yes, please attach relevant training summary record. | |
| e) | Sustainable procurement | Yes/No | If Yes, please attach relevant training summary record. | |
| f) | Are visitors made aware of relevant policies and procedures including emergency procedure? | Yes/No | If Yes, please attach relevant training summary record. | |
| 9. Management System - Continual Improvement | | | | |
| a) | Does the facility have a formal process to assess the effectiveness of its occupational health & safety, environment, labor, human rights, ethics and sustainable procurement practices through periodic internal audits/management reviews to identify/implement corrective actions/recommendations/track corrective actions for continual improvement? | Yes/No | Please describe steps taken. | |

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| b) | At what frequency is the effectiveness of occupational health & safety, environment, labor, human rights, ethics and sustainable procurement practices assessed through periodic internal audits and management reviews ? | Yes/No | Please mention frequency of reviews. | |
| 10. Labor & Human Rights | | | | |
| 10.1 Does the facility have policy(ies) or statement of commitment regarding the following labor practices? | | | | |
| a) | Prohibition of child labor/forced labour | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| b) | Freedom of Association | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| c) | Non-discrimination | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this | |

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| | | | questionnaire | |
| d) | Non-harassment | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| e) | Grievance redressal mechanism | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| f) | Whistle blower | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| g) | Recruiting and termination | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |

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| h) | Wages and benefits | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| i) | Working hours and leave | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| j) | Employees and visitors safety | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| k) | Does the facility ensure that no child labor is employed in their operations? | Yes/No | Please provide a web link to the policy on your web site, or alternatively attach a copy of the policy to this questionnaire | |
| l) | Mention the age of the youngest worker | | | |

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| | employed. | | | |
| m) | Does the facility have implemented a process with an objective of preventing employment of child labour covering remediation measures in case any child labor is detected? | Yes/No | Please elaborate. | |
| n) | Do policies of the facility align with relevant local legislation and/or ILO guideline? | Yes/No | Please elaborate. | |
| o) | Does the facility ensures that persons under the age of 18 years are not engaged in hazardous or physically demanding work? | Yes/No | Please elaborate. | |
| 11. Business Ethics | | | | |
| 11.1 Does the facility have formal Policies or Codes of Conduct that govern ethical business practices? | | | | |
| If yes, please indicate if the following are included: | | | | |
| a) | Business integrity and fair competition | Yes/No | If Yes, please provide relevant web of your company's website or attach copy of the policy. | |
| b) | Anti-corruption | Yes/No | If Yes, please provide relevant web of your company's website or attach copy of the policy. | |
| c) | Investigation of employee concerns | Yes/No | If Yes, please provide relevant web of your company's website or | |

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|--|--|--------------------------|---|-------------------------|
| | | | attach copy of the policy. | |
| d) | Prevent corruption and facilitation payments? | Yes/No | If Yes, please provide relevant web of your company's website or attach copy of the policy. | |
| e) | Data Privacy | Yes/No | If Yes, please provide relevant web of your company's website or attach copy of the policy. | |
| f) | General Data Protection Regulation (GDPR) | Yes/No | If Yes, please provide relevant web of your company's website or attach copy of the policy. | |
| g) | Does the facility work with animals as a part of its business? | Yes/No | | |
| h) | If yes, do you follow an industry standard like Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC). | Yes/No | If yes, please indicate the standard in use. | |
| 12. Occupational Health & Safety | | | | |
| 12.1 Does the facility have documented written safe operating procedures for the following? | | | | |
| a) | General safety | Yes/No | If yes, provide a list of the | |

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| | | | procedure. | |
| b) | Process safety | Yes/No | If yes, provide a list of the procedure. | |
| c) | Biological safety | Yes/No | If yes, provide a list of the procedure. | |
| d) | Industrial hygiene | Yes/No | If yes, provide a list of the procedure. | |
| e) | Emergency preparedness and response | Yes/No | If yes, provide a list of the procedure. | |
| f) | Does the facility have provided adequate fire safety systems like fire hydrant, fire alarm, fire suppression, etc. | Yes/No | Please elaborate | |
| g) | Does the facility have documented OH&S objectives and targets and metrics? | Yes/No | If yes, provide a list of the objectives and metrics. | |
| 12.2 Indicate the number of significant OH&S incidents that occurred at this facility over the past three years? | | | | |
| a) | Fatalities | Mention number of incidents | | |
| b) | High severity injuries | Mention number of incidents | | |
| c) | Major fire | Mention number of incidents | | |
| d) | Explosion | Mention number of incidents | | |
| e) | Fines or major violations | Mention number of | | |

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| | | incidents | | |
| 13. Environmental Sustainability | | | | |
| a) | Does the facility have documented written environmental procedures for significant environmental aspects? | Yes/No | Please elaborate | |
| b) | Does the facility have documented environmental objectives and metrics? | Yes/No | If yes, provide a list of the objectives and metrics. | |
| c) | Has the facility developed a strategy for water sourcing and management? | Yes/No | Please elaborate | |
| d) | Does the facility have provided adequate waste water treatment facility as per the prescribed norms? | Yes/No | Please elaborate | |
| e) | Does the facility have provided adequate storage facilities for Hazardous and Non-Hazardous wastes as per the prescribed norms? | Yes/No | Please elaborate | |
| 14. Does the facility have taken reduction program for the following environmental sustainability aspects: | | | | |
| I. | Water consumption: | Yes/No | If Yes, please mentions reduction target. | |
| II. | Energy consumption: | Yes/No | If Yes, please mentions reduction target. | |
| III. | Greenhouse gas emissions: | Yes/No | If Yes, please mentions reduction target. | |
| IV. | Hazardous waste: | Yes/No | If Yes, please mentions | |

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| | | | reduction target. | |
| V. | Non-Hazardous waste: | Yes/No | If Yes, please mentions reduction target. | |

Declaration by the Supplier:

I hereby declare that all the information shared above are true and supported with verified documents available with the company.

We acknowledge the receipt of your company's "Suppliers Code of Conduct".

Signature of Authorized Respondent:

Date:

Place:

