

#POLICY@STRIDES

POLICY MANUAL

Human Rights Policy





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Policy Title	Human Rights Policy		
Policy Number		Version	Version 1
Effective from	1 st April 2023	Amendment Date	29 July, 2025
Review History (Dates)	First review – 22 May 2024	Next Review Date	
Process Owner	HR Business Partner	·	

In case of any doubts or clarifications on this policy, please reach out to your HR POC.

1. Introduction:

At Strides Pharma Science Limited (Strides Pharma), we recognize, respect, uphold and promote the highest standards of Human Rights. We are committed to respecting internationally recognized human rights principles. This includes a commitment to respecting the rights contained in multiple United Nations Charters including The Universal Declaration of Human Rights, ISO guideline, and Rights at Work set out by the International Labour Organization. Strides Pharma is also a signatory to the UN Global Compact.

We recognise the valuable role that a business can play in the longer-term protection of human rights. Given our global presence, we recognize our duty to uphold human rights and address adverse impact impacts on these rights. We are committed to respecting human rights through our interactions including but limited to employees, contractual staff, business partners, vendors & suppliers, patients, and the communities that surround us.

2. Objective:

Our commitment is towards promoting and respecting human rights and avoiding even remote involvement in any kind of human rights abuses, by identifying, assessing, and minimising potential adverse impacts through necessary due diligence and management of the issues, and resolving the grievances of all affected stakeholders, both internal and external, effectively. We will continue to monitor our human rights practices on a periodic basis and will update this policy as and when warranted.

3. Scope and Applicability:

This policy is applicable to all subsidiaries of Strides Pharma (together referred to as "Strides Pharma"). Leveraging this Human Rights Policy, Strides Pharma strives to create a positive work environment, conducive to safeguarding human rights. The policy focuses on and expects all including but not limited to employees, contractual staff, business partners, vendors & suppliers of Strides Pharma to abide by this code and value system as laid down herein.

We will also encourage our third parties to apply the same approach in line with our expectations.

4. Regulatory Compliance:

Strides Pharma is strictly committed to adhering to human rights principles laid down in the code. Further, Strides Pharma shall ensure compliance with all local regulatory requirements and laws for protecting human rights. Should there be any conflicts between the local laws and the directives of international standards for human rights, Strides Pharma will comply with the local laws while seeking ways to ensure alignment with the global guidelines. For effective implementation of the policy, the leadership and the staff will work together to collectively drive this agenda through various means such as regular training, familiarization sessions, contractual adherence, etc. Training programs in web-based or in-person format are conducted with



employees to strengthen their knowledge and increase vigilance towards human rights issues such as child labor, slavery, and other human trafficking issues within the company operations.

5. Human Rights Due Diligence & Assessment:

We intend to undertake periodic Human Rights Due Diligence & Impact Assessment involving our employees, workers, vulnerable communities (women & children), management and contractual workforce periodically. Our due diligence processes are continually evolving and include assessing and identifying potential risks within our operations, evaluating our value chain and related business activities for human rights concerns, and scrutinizing new business relationships such as mergers and joint ventures.

6. Policy:

We expect all our workforce and business associates globally to adhere to the human rights principles and values we endeavour to protect through this policy, namely:

- a) Equality, inclusivity & right to non-discrimination: We acknowledge that all human beings are born free and equal in dignity, rights and are equal before the law and are entitled without any discrimination (such as race, caste, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status) to equal protection of the law, workplace opportunities, growth, and development. This right sets out non-discrimination against women and vulnerable groups and mandates inclusivity in the workplace based on opportunities, growth, development, and participation irrespective of individual attributes. Strides has a zero-tolerance policy to any form of negative unlawful discrimination or harassment of any kind.
- b) <u>Non-discrimination</u>: We do not discriminate basis of gender, sexual orientation, race, religion, caste, creed, ethnicity, age, nationality, disability, social status, HIV status, political opinion amongst others. We believe in giving equal opportunities, without discrimination, to all employees and applicants. A transparent and merit-based process is followed for recruitment, hiring, compensation, development, etc.
- c) Right to dignity and self-respect of the individual: Strides Pharma commits to uphold the highest standards and levels of dignity and respect for each of their employees, workers, contractors, and those associated with the functioning and performance of the company without subjecting them to inhumane treatment, abuse and any actions or deeds or verbal communication that degrades their being as a human.
- d) Right to family life, social security, and well-being at the workplace: We continuously strive to encourage a healthy work-life balance, and comply with the laws related to employee benefits e.g., working hours, leaves (including parental leaves as per law), holidays, wages, etc. At the workplace, employees have access to benefits such as reasonable healthcare facilities, access to pensions, retirement benefits, gratuity (as applicable) and protective mechanisms that safeguard their well-being in various situations.
- e) Right to participate in public life including elections: Strides Pharma is committed to upholding the rights of its employees to actively participate in public life, including exercising their right to vote. The company provides necessary leave to enable employees to take part in elections and related civic duties. We strongly support each individual's freedom to make independent choices without any undue influence, coercion, or pressure in matters of public or political participation.



- f) <u>Freedom of Work:</u> Strides Pharma acknowledges everyone individual's right to work, to freely choose their employment, to just and favourable working conditions, and to protection against unemployment. Additionally, all people have the right of self-determination, allowing them to freely pursue their economic, social, and cultural development.
- g) Forced Labor & Human Trafficking: We have zero-tolerance for any forms of forced or bonded labor which includes modern-day slavery as well as and human trafficking. We are committed to ensuring that our operations as well as those of our business partners are prohibited from engaging in this practice. Employment is voluntary and employees can voluntarily ask for discontinuation of employment at any time.
- h) <u>Child Labour</u>: We prohibit any form of child labor in our operations and value chain by ensuring that minimum working age requirements are always met as per local regulations. Strict protocols and procedures such as verification of age through credible certificates, self-authorization of age, maintaining evidence trail, etc. are followed to ensure that no underage workers or employees are hired in the system.
- i) <u>Diversity and Inclusion</u>: We are a progressive global pharmaceutical company, that believes that diversity fosters innovation and development. We are committed to building a diverse talent pool and fostering an inclusive work culture that brings unique perspectives, backgrounds, and experiences. We are committed to treating our employees and stakeholders with utmost dignity, respect, and fairness.
- j) Right to freedom of speech, expression and opinion (Freedom of Association and Collective Bargaining): Our employees are free to join or refrain from joining employee collectives without fear of retaliation, intimidation, or harassment. We comply with all local legislation affecting employees, ensuring the right to fair wages, freedom of association, participation, and collective bargaining across the value chain.
- k) Fair Wages, Equal Remuneration and Benefits: We provide fair remuneration to all our employees, as per merit, experience, and qualification, without any discrimination. We closely monitor and support the development of any wage related framework by governmental authority(ies). We are committed to comply with the regulations on applicable wages, working hours, overtime, and social security benefits without any discrimination.
- Right to fair appraisal & career progress: Strides Pharma commits to meritocracy for the appraisal and ensure that positive/ negative bias does not influence the appraisal process. all employees are encouraged to develop their own annual goals, have access to discuss these with their reporting managers, and participate in periodic performance reviews. additionally, Strides also provides equal opportunity for everyone to be promoted in their employment to an appropriate higher level as per their merit and competence.
- **m)** <u>Human capital development</u>: Strides Pharma prioritizes workplace training focussed on human capital development based on diverse topics as deemed relevant for a given position, alongside training on human rights issues, safety, security, amongst others.
- n) Workplace Security: We are committed to maintaining a workplace that is free from violence, harassment, intimidation or any other unsafe or disruptive conditions due to internal and external threats. In compliance with the local laws in India, we have institutionalized POSH (Prevention of Sexual



Harassment at the Workplace) policy and have formulated an Internal Complaint Committee to address such incidents as and when reported.

- o) Right to life, health, safety & humane conditions of work: Strides Pharma acknowledges that every human being has an inherent right to life, which is protected by law. Everyone has the right to favourable working conditions that ensure safe and healthy working conditions and the implementation of adequate measures to ensure the safety of individuals. This also calls for adequate workplace safety training, safety audit and remediation plans. As a manufacturing company, Strides Pharma is committed to providing a safe, healthy, and clean working environment for everyone and encourage reporting of any unsafe or hazardous conditions in the workplace to the management. We encourage the development and implementation of environmentally friendly practices.
- **p)** Right to prohibition of inhumane treatment: No one shall be subjected to torture or to cruel, inhumane, or degrading treatment. Additionally, no one shall be subjected to medical or scientific experimentation without their free consent.
- q) <u>Drug Safety and Pharmacovigilance:</u> Strides takes appropriate measures to detect and assess any adverse effects of our medicines on patients. We believe that our business supports the promotion of human prosperity through our products but also acknowledge that without proper oversight, it can present risks to human rights. We ensure that we conform to all regulatory requirements and our products have a favourable risk-benefit profile. We have a global pharmacovigilance system for the redressal of drug safety-related complaints as per well-defined SOPs. This is complemented by a dedicated phone line and mailbox to receive safety related complaints from consumers, patients and healthcare professionals. Assessment of the safety profile of a drug is done on a regular basis by requesting relevant information from patients. We also organize awareness sessions for our field team to sensitise them about the importance of patient health and safety.
- r) <u>Data Privacy</u>: At Strides, we respect the privacy of all individuals (employees, workers, suppliers & customers, vendors and business partners and other value-chain partners) and maintain the confidentiality of personal data by taking measures prescribed by the law to protect and secure personal data. We do not disclose anyone's personal, medical, or financial information to any unrelated external party unless legally mandated. Strides is committed to safeguarding personal information across all facets of its business activities, ensuring that privacy practices extend beyond internal processes to encompass third-party relationships. All associates, contractual staff, suppliers, and other value chain partners are expected to adhere to this Privacy Policy, which is integral to our group-wide commitment to privacy and compliance. For more detailed information on our privacy policy, please visit our <u>policy/website</u>.

7. Community Engagement:

At Strides Pharma, we actively undertake steps to reduce, prevent, and mitigate the negative impact that our operations may have on the local communities in the regions we operate in. We undertake active efforts to support local communities in a manner that respects their rights and dignity.

8. Human Rights Governance - Reporting a Concern and Grievance Redressal:

There are multiple channels of communication and remediation viz. mailing at ethics@strides.com or call at toll free number: 1800 270 1020 or report to the senior management or board of directors to report any instances of negative human rights impact on any stakeholders. We are committed to dealing with stakeholder concerns, made in good faith, in a prompt and fair manner and safeguarding the human rights of all stakeholders, internal and external, to our best capacity. Human Rights Due Diligence shall be



periodically conducted to identify & assess human rights risk situations through comprehensive risk assessments. Additionally, we also commit to adequate oversight related to human rights practices, along with safeguarding and remedial measures.

Additionally, as per the expectations presented in the UN Guiding Principles on the Business and Human Rights, any violations, risks, or concerns can be reported through the whistleblower channel at whistleblower@strides.com. Any such complaint will be redressed by the concerned authority in accordance with the process laid down in the Company's policy.

9. Non-Retaliation:

Strides does not tolerate any retaliation or reprisals of any form against employees who report concerns in good faith or provide relevant information when required. All concerns are taken seriously and reports of misconduct are thoroughly investigated.

10. Corrective Action:

Any violations, even if reported anonymously, will be handled with strict, appropriate, and timely action as per the Company policy. If Strides determines that corrective action is necessary, the same would be undertaken to reduce the potential impact and the likelihood of event occurrence.

Internal investigations are carried out to devise remediation measures against reported incidents and potential violations of this Code. Appropriate disciplinary action, as per the degree of the violations, to the extent permissible by law will be taken. This may include termination of employment and legal proceedings, as necessary.

11. Amendment to the Policy:

The Head of HR and/ or CEO's office are severally authorized to amend this policy from time to time as relevant. Strides will periodically review and update this policy to ensure alignment with the local regulations in the regions of operation and international guidelines.

Policy References:

- Code of Conduct and Ethics;
- Business Partner/Supplier Code of Conduct;
- Strides Whistle blower and integrity policy;
- TA playbook
