

SUPPLIER CODE OF CONDUCT

Neuland Laboratories Limited (“**Neuland**”) is committed to doing business with individuals and organizations that operate their businesses with professionalism and integrity. This Supplier Code of Conduct (“**the Code**”) shall apply to individuals/organizations that provide services, raw materials, components, equipment, intermediates, finished goods or any other products or services (“**Suppliers**”) to Neuland. Most of the items covered below are also addressed in Neuland’s internal policies including Code of Ethical Conduct, which all Neuland employees and those associated or working with or on behalf of Neuland are required to follow.

The Code defines non-negotiable minimum standards that are to be adhered by the Suppliers when conducting business with Neuland and our goal is to work with Suppliers who embrace and comply with the principles of the Code, and, in turn, to have these Suppliers encourage compliance with such principles from any suppliers with whom they work in the delivery of goods or services for Neuland.

ADHERENCE TO APPLICABLE LAWS & REGULATIONS

- Suppliers must comply with the applicable laws, rules, regulations, and ethical standards of the Republic of India and the country in which they operate, as well as this Code of Conduct. Suppliers shall use appropriate systems to conduct due diligence on risk and impact, monitor legislation, set priorities, assign responsibility, adopt risk-mitigation measures, and facilitate continual improvement and compliance.
- Supplier shall demonstrate commitment to the concepts described in this Code by allocating appropriate resources with senior leadership oversight, thereby creating a culture of responsible practices.

BUSINESS PRINCIPLES & ETHICS

a. Prohibition of bribes, unlawful payments, money laundering and other corrupt practices

- Suppliers shall uphold the highest standards of integrity and transparency in all their transaction and interactions with Neuland and are prohibited from being involved directly or indirectly in any corrupt, unethical or illegal practices.
- Supplier shall ensure that its directors and employees or any third parties acting on its behalf do not promise, offer, give or accept any bribes, or make or accept improper payments to obtain

new business, retain existing business, or secure any other improper advantage.

- Supplier shall ensure it has adequate systems in place to prevent corruption and comply with applicable laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, Indian Prevention of Corruption Act and Prevention of Money Laundering Act, in the jurisdiction in which they conduct business.
- Suppliers shall not do anything that Neuland's policies prohibit.

b. Insider Trading

- Suppliers are forbidden from using Neuland's inside information to transact in Neuland's shares and should never make any public posting of confidential or proprietary information related to any aspect of Neuland's business.
- Suppliers are prohibited from communicating externally about Neuland's prospects, performance or policies and disclosing any inside information which would affect Neuland's share price, unless they are required under any law or by an order from a competent authority and in such case they should inform Neuland.

c. Intellectual Property and Confidential Information

- Suppliers requiring exchanging confidential information with Neuland are required to execute a confidentiality agreement with Neuland in advance.
- Exchange of confidential information is limited to that required to fulfill contracted performance requirements.
- Suppliers shall safeguard Neuland's intellectual property or confidential information or any other information that they may acquire with respect to Neuland's business.
- Any unauthorized disclosure of Neuland's confidential information, whether inadvertent or not, shall be reported by the Supplier to (email ID: supplierconnect@neulandlabs.com) at Neuland.

d. Fair Competition

- Suppliers must comply with all applicable anti-trust laws and regulations and shall conduct business in line with fair competition.

e. Accuracy of Business Records

- Supplier records must be accurate in all material respects and all relevant records, financial and / or operational, must be made available to Neuland, per the terms and conditions of the agreement with Neuland.

- Suppliers are required to keep accurate and transparent records that reflect actual transactions and payments and all financial books and records must conform to generally accepted accounting principles.

f. Conflict of Interest

- A conflict of interest arises when personal interests or activities influence, or appear to influence, the ability to act in the best interest of Neuland. Neuland's internal Code of Ethical Conduct mandates that all employees be free from actual or potential conflict of interest. Suppliers must disclose any apparent or actual conflicts of interest to Neuland management or Neuland may reserve the right to take any necessary actions for the failure of doing so. If Neuland's management approves an apparent or actual conflict, the approval decision must be documented.

g. Gifts & Entertainment

- Gifts and entertainment are not needed in order to conduct business with Neuland and are strongly discouraged.
- As per Neuland's internal policies, employees should never accept or offer gifts, favors, services, entertainment, money or other items of value that are intended to influence judgment or actions of its suppliers. Suppliers are discouraged from offering any kind of gifts or any other kind of personal benefit to Neuland's employees resulting from the relationships with the Suppliers. The Supplier should be committed to work against all forms of corruption, money, gifts, loans and rebates of unreasonable value which are in noncompliance with all applicable laws, rules and regulations.

h. Product quality

- Supplier shall ensure that management and security systems protect products, components and ingredients from the risks of adulteration, falsification, or theft for the purpose of illegal resale.

i. Compliance Verification

- As per Neuland's Policy, All manufacturers of Key Starting Materials (KSM) and Intermediates will be audited once in 3 years to ensure the compliance of manufacturing facility as per ICH Guidelines.

GUIDELINES FOR EMPLOYMENT PRACTICES & HUMAN RIGHTS

- Suppliers must comply with all applicable Human Rights policies, including no child labor, no forced/bonded labor, and no discrimination, harassment or retaliation. Suppliers shall ensure that all their employees are hired on their own free will and employed as per their country's minimum legal age for employment or the age established for completing compulsory education.
- Suppliers shall not, discriminate or make distinction, exclude or give preference on the basis of race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status, in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments.
- Suppliers must be committed to a workplace free of harassment and should not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse or unreasonable restrictions on entering or exiting company provided facilities.
 - Suppliers must comply with all applicable employment laws and regulations, including payment to workers according to the applicable wage laws, including minimum wages, overtime hours and mandated benefits and with principle of equal remuneration for men and women workers for work of equal value.
 - Neuland does not tolerate retaliation against those who express concerns or in good faith report real or perceived violations of law, regulation or Neuland's supplier code of conduct.
 - Suppliers shall respect the legal rights of employees to join or refrain from joining worker organizations, such as trade unions.
 - Suppliers shall respect the rights of the local communities around their sites including the right to a clean and healthy environment.

ENVIRONMENT, HEALTH & SAFETY

- Suppliers are expected to comply with all applicable laws and regulations regarding environment, health and safety.
- Suppliers shall ensure a safe and healthy working environment for all employees working at their sites. Suppliers are expected to develop EHS policies, define, implement and follow-up on such policies and their management including compliance with all applicable laws.

- Suppliers will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers should provide adequate training and protect workers from any physical, chemical and biological hazards in the workplace as well as from risks associated with any infrastructures used by their employees.
- Suppliers should comply with all applicable environmental regulations and obtain and maintain all required environmental permits, licenses, information registrations and should follow their operational and reporting requirements. Suppliers should obtain and maintain appropriate certificates and/or permits allowing it to operate and prepare reports in accordance with applicable regulations and should be available at the sites. Supplier shall aim to understand its impacts on biodiversity, reducing and mitigating its footprint wherever possible.
- Suppliers working with Neuland or onsite at Neuland location must work in a way that assures their own safety and the safety of others and in compliance with applicable Neuland's and governmental environmental, health and safety requirements. Any emergencies that may impact Neuland must be reported promptly.

INTERNATIONAL TRADE COMPLIANCES AND SANCTIONS

- Suppliers must comply with the letter and spirit of all applicable import and export controls, sanctions, and other trade compliance laws of the applicable country(ies) where the transaction(s) occur(s).
- Neuland respects the trade, import and export control laws of all countries in which it operates and complies with all applicable laws, rules and regulations and the Suppliers are also expected to do the same. Trade requirements often change and laws in certain region may conflict. Suppliers are responsible for knowing the laws that apply to them and seek expert advice if in doubt.

DATA PRIVACY & PERSONAL DATA PROTECTION

- Neuland may share personal data of its employees, directors or other persons during its normal course of business with its suppliers. Supplier must abide by all applicable data privacy laws and regulations when handling personal information and guarantee that that such personal data is transferred and processed only for the purpose for which consent has been provided and agree to safeguard and ensure protection of data privacy rights of Neuland, its directors, employees or other persons.

- Supplier shall indemnify Neuland and its directors, employees and other persons, whose personal information is shared, against any claim, loss and damages arising out of the breach of any applicable laws with the respect to such personal data.
- Supplier must immediately report any unauthorized processing, use, disclosure, destruction, alteration, access or loss, or suspected or actual breach of Neuland related personal information in a timely manner, and in accordance with applicable data privacy laws to dpo@neulandlabs.com.

RESOURCES

- If you need additional information or guidance on this Code, or wish to report a potential violation, you may contact Neuland at email ID: supplierconnect@neulandlabs.com

RESPONSIBLE PARTY

- The Legal & Secretarial department is responsible for the upkeep and amendment of this Policy. Supply Chain department, Internal Audit and any employee who engages or works with Neuland Suppliers has the responsibility for the administration, compliance, and enforcement of this Policy.

We hereby acknowledge and agree with Neuland's Supplier Code of Conduct and we confirm that we have understood this policy and will adhere to the code while doing business with Neuland.

For

Signature:

Authorized Signatory

Date: