



# **Environmental, Health, Safety and Sustainability (EHS&S) Policy Document**

## **Version History**

Version: R01

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## 1. Introduction

### Purpose

At Lupin (together with its subsidiaries), our foremost commitment is to ensure a safe working environment for all employees. We are dedicated to managing all Environmental, Health, Safety and Sustainability (EHS&S) risks in compliance with applicable policies, rules, and regulations. This includes addressing operational safety risks, process safety risks, and effectively responding to emergency and crisis situations.

Everyone associated with Lupin, including our employees, contractors, and partners are expected to embrace and uphold the highest standards of EHS&S. Together, we strive for Safety & Healthy working conditions, while minimizing our impact on the environment, ensure health and safety and demonstrate our commitment to sustainable performance.

The policy outlines our approach to effectively managing Environmental, Health, Safety and Sustainability (EHS&S) hazards and risks across all aspects of our business. By doing so, we reaffirm our commitment to upholding internal and external responsibilities for environmental protection, ensuring well-being of our employees, and promoting sustainable performance.

## 2. Scope and Applicability

### Scope

The scope of this policy covers all our operations including our subsidiaries and joint ventures, and extends throughout our value chain, including suppliers.

Furthermore, it ensures that EHS&S policies and requirements are extended to our products, services, distribution and logistics partners, contractors, waste management partners and sites. This alignment guarantees that all aspects of our business operations adhere to the policy.

### Applicability

The EHS&S policy is applicable to all our manufacturing facilities, R&D facilities, subsidiaries, JVs, business operations, as well as our products and services. Collaboratively with our suppliers, service providers, and contractors, we integrate EHS&S processes to enhance our overall performance.

This policy is applicable to all Lupin employees, and contractors. They are expected to comply with the requirements stated in this policy.

### 3. EHS&S Policy Statement

This document is an extension of our EHS&S Policy Statement and details out the key objectives in our Policy Statement.

## ENVIRONMENT HEALTH SAFETY AND SUSTAINABILITY POLICY

Lupin (together with our subsidiaries) is committed to the highest standards of Environmental, Health, Safety and Sustainability (EHS&S) performance. We strive to maximize operational efficiencies while minimizing our impact on the environment and utilizing our resources in a judicious manner. As part of our commitment to ensuring a safe and healthy work environment, Lupin actively takes steps to ensure there are no accidents or incidents.

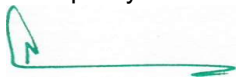
The EHS&S policy is applicable to all our manufacturing facilities, R&D facilities, subsidiaries, JVs, and business operations. We partner with our suppliers, service providers, and contractors to embrace EHS&S processes for improved performance.

This policy is applicable to all Lupin employees, and contractors. They are expected to comply with the requirements stated in this policy.

For the effective implementation of this policy, the leadership and the employees across various locations collaborate and collectively drive the environment, health, safety & sustainability objectives by:

- Complying with the relevant and applicable statutory and regulatory requirements
- Integrating environment, health, safety and sustainability aspects into the planning and decision making of business processes
- Continually improving EHS&S performance through management systems, standard operating procedures, guidelines and deploying the necessary resources to achieve the same.
- Actively identifying and mitigating the environmental and health & safety risks which arise from our business operations, distribution and logistics network and supply chain
- Undertaking environmental and social due diligence for mergers & acquisitions
- Optimizing resources to prevent pollution, conserve energy, water and reduce waste and emissions
- Providing adequate training and capacity building to employees, contractors, partners to raise awareness on EHS&S
- Periodically auditing our systems and processes to ensure continued conformance to the required standards
- Measuring, monitoring, and benchmarking our EHS&S practices and performance on a regular basis and publish a report for general communication
- Encouraging employees to identify and report any unsafe conditions including near miss and implement actions to prevent work related injury or illness

This policy shall be reviewed periodically for its continued suitability and updated as necessary.



Nilesch D. Gupta  
Managing Director

Date: July 08, 2022

## 4. Objectives & Targets

At Lupin, our commitment to EHS sustainability encompasses climate, nature and safety of all individuals. These goals form a crucial part of our overall priorities and ESG approach, reflecting our dedication to creating long-term value for all stakeholders and meeting the needs of patients and society.

In line with our EHS Sustainability Goals and Objectives, we have set targets to drive progress towards a safer and more sustainable future:

- Zero Fatalities: Ensuring the safety and well-being of every individual is our utmost priority.
- Zero Notice of violations for Environment, Health, and Safety: We strive for compliance with EHS regulations and standards
- 10% Reduction in LTIFR & TRIFR: Targeting a significant decrease in Lost Time Injury Frequency Rate and Total Recordable Injury Frequency Rate, building upon a strong base (Base year FY19-20)
- 10% Reduction in Number of Accidents (including First Aid Cases): Enhancing workplace safety by lowering the number of accidents (Base year FY19-20))
- 10% Reduction in Number of Incidents including Fires and Spills: Promoting incident-free operations for a safer environment (Base year FY19-20)
- 100% Plastic Waste Circularity for India Operations by FY23: Advancing our circularity efforts to eliminate plastic waste.
- 70% Incinerable Hazardous Wastes Generated to be sent for Co-processing by FY27: Advancing waste management practices for a circular economy.
- Reduce 15% GHG emissions by FY30 (base year FY20): Mitigating our carbon footprint in support of climate action.
- Reduce Specific Scope 1 & Scope 2 Emissions by Adopting Biomass Fuel Boilers by FY25: Transitioning to sustainable energy sources.
- Achieve 10% of Renewable Energy in Overall Energy Mix by FY25: Promoting the use of renewable resources for sustainable energy.
- Adopting Green Chemistry, where applicable: Promoting environmentally friendly practices in our processes.
- Maintain our Water Positive Status: Ensuring responsible water usage and conservation.
- All our India sites to be ISO 14001 & ISO 45001 Certified by FY25: Emphasizing our commitment to environmental and occupational health and safety management

By setting these robust targets, we embrace accountability and transparency in our journey towards a more sustainable and resilient future. Through collective efforts, we are determined to achieve these goals, positively impacting the environment, society, and our organization.

## 5. Principles

Lupin is committed to the following principles, aligned with the EHS&S Policy statement:

### Principle 1: Comply with Local laws and regulations, and conformance to internal requirements

- Establish a robust EHS&S Management System, conducting regular audits, reviews, and self-inspections to ensure conformance to internal requirements, as well as compliance with applicable local laws and regulations
- Integrate environment, health, safety and sustainability aspects seamlessly into the planning and decision-making processes, leaving no room for non-compliance with laws and regulations

- Complying with internal EHS Management Standards, processes, along with meeting external requirements, including customer implied requirements, remain at the core of our operations
- Participate in industry networks to exchange best practices, fostering alignment with industry standards and expectations

#### **Principle 2: Protect the health and safety of our employees & contractors**

- Foster and continuously improve the EHS&S culture where safeguarding the health and safety of our employees, contractors, others, and the environment stands as the highest priority
- Provide our employees, contractors and third parties with safe working conditions to protect them from potential health hazards and injuries
- Encourage and empower employees to identify and report any unsafe conditions, including near misses and implement actions to prevent work related injuries or illnesses
- Conduct Comprehensive risk assessments and ensure implementation of adequate controls before engaging in any potentially hazardous work
- Promote and support various programs that prioritize physical, mental health, and social well-being of our employees and contractors

#### **Principle 3: Protect the environment and promote sustainability throughout our operations**

- Commit at all levels within the organization to set and review environmental targets and objectives aimed at reducing adverse environmental impacts
- Implement and maintain processes and procedures that guarantee compliance with relevant environmental regulations, and obligations
- Support the endeavor to minimize the environmental impact of our business and workplaces, with dedicated focus on reducing GHG emissions
- Support initiatives to reduce the carbon footprint, waste, energy consumption, and water usage within our workplaces and throughout the supply chain.
- Actively identify and mitigate the environmental and health & safety risks arising from our business operations, distribution and logistics network, and supply chain.

#### **Principle 4: Consider EHS&S implications in the development of products, services, & processes**

- Ensure that EHS&S aspects are integrated into product, activities, operations and services encompassing process development, procurement, manufacturing, and capital investment projects at every stage
- During product development, optimize resources to prevent pollution, conserve energy, water and minimize waste and emissions.
- Embrace green chemistry principles during product development processes. Furthermore, actively integrate sustainable packaging into packaging design processes, as appropriate

#### **Principle 5: Build a network of responsible business partners**

- Undertake environmental and social due diligence for mergers & acquisitions to ensure responsible business practices.
- Uphold high standard of EHS&S and hold our Third-Party suppliers accountable to the requirements outlined in the Lupin Third-Party Code of conduct
- Promote good management practices among our supply chain partners and work with them where required to ensure adherence of EHS&S standards

- Engage with preferred suppliers that exceed legal compliance requirements and actively minimize the environmental impact of their activities
- Prioritize suppliers that drive environmental impact reduction and sustainability in the supplier selection criteria
- Conduct supplier audits on a risk basis, to ensuring conformance with good industry practice, thereby reinforcing our commitment to responsible and ethical business partnerships

#### **Principle 6: Drive continual improvement in our EHS&S management systems and performance**

- Continue to improve EHS&S performance through robust management systems, standard operating procedures, and guidelines to deploy the necessary resources to achieve continual improvement
- Conduct regular system and process audits to ensure sustained conformance to the required standards, providing us regular insight to drive progress
- Obtain annual management endorsement of EHS&S objectives and targets with regular measurement of performance against these objectives and targets, fostering a culture of accountability
- Draw upon lessons and learnings from incidents and events, for implementing suitable corrective actions and preventing the recurrence of accidents and incidents
- Prioritize EHS&S competence through appropriate recruitment, training and development

#### **Principle 7: Transparent EHS&S communication**

- Share EHS&S results transparently and accurately through internal and external communication channels
- Report EHS&S performance consistently with international public reporting standards
- Proactively engage with employees, investors, suppliers, government organizations, and local communities

#### **Principle 8: Engaging employees and contractors for EHS&S support**

- Understand local EHS&S requirements relevant to their work activities
- Conduct regular workshops and training for employees, contractors/suppliers, and partners to raise awareness about EHS&S aspects and issues, emphasizing the significance of their actions in influencing environmental impacts.
- Actively report any EHS&S accident, incidents/unsafe conditions
- Participate in relevant EHS&S hazard identification and risk assessment processes
- Look out for colleagues and speak up respectfully if they observe unsafe behaviors or conditions.
- Report EHS&S key performance indicators accurately
- Work in an environmentally responsible manner to assist Lupin in achieving Environmental Sustainability targets

### **6. Adhering to our Commitments through PDCA Implementation**

To ensure the effective implementation and adherence to the commitments made across the 8 principles, we follow the Plan, Do, Check, Act (PDCA) approach, in alignment with ISO 14001 and ISO 45001 standards.

#### **Plan**

- Conduct a baseline assessment to determine the current EHS&S status

- Set EHS&S objectives and procedures aligned with the principles

### Do

- Identify potential hazards in the workplace, evaluate the EH&S risks
- Implement necessary preventive and protective measures

### Check

- Track and evaluate actions, procedures as well as KPIs, related to the EHS guiding principles and goals
- Report outcomes and compare the outcomes against benchmarks

### Act

- Learn from accidents and incidents, analyze EHS performance
- Review policies, strategies, and risk assessments to identify and address gaps
- Continuously improve the EHS performance to achieve desired results



## Roles and Responsibilities

Roles	Key Responsibilities
<b>Board</b>	<ul style="list-style-type: none"> <li>● Oversee the implementation of the EHS&amp;S policy.</li> <li>● Review and update the EHS&amp;S policy, principles, systems and process annually.</li> <li>● Provide strategic guidance and support for EHS&amp;S initiatives</li> </ul>
<b>Executive Leadership</b>	<ul style="list-style-type: none"> <li>● Effectively implement and regularly review the policy.</li> <li>● Foster a senior management-driven culture focused on continuous-improvements</li> <li>● Define and monitor KPIs for EHS&amp;S.</li> <li>● Present performance and findings to the board.</li> <li>● Continuously monitor and review the policy, our systems, and processes.</li> </ul>
<b>EHS&amp;S team</b>	<ul style="list-style-type: none"> <li>● Identify EHS&amp;S training needs and ensure training is provided.</li> <li>● Stay updated on EHS&amp;S requirements and codes of practice.</li> <li>● Track KPIs, identify performance gaps, and report to the executive leadership.</li> <li>● Conduct monthly meetings with key internal stakeholders and the executive leadership.</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>● Use work tools provided by the Group/Organization correctly, including personal protective equipment, in accordance with training or instructions.</li> <li>● Take reasonable care for their own health and safety, as well as that of others</li> <li>● Report any injuries, accidents, or dangerous occurrences at work at the earliest.</li> </ul>

## 7. Training

At Lupin, promoting safety and protecting is a shared responsibility among all employees and contractors. Each role, whether on the ground, in the office, or in a managerial position, carries specific EHS responsibilities. We hold high expectations for our employees, vendors, suppliers and to pursue EHS excellence. As part of this commitment, everyone is expected to complete all EHS training as assigned promptly. Our EHS trainings are designed to help you understand and comply with various EHS requirements. This includes corporate, business, and any specific requirements relevant to you.

The training aims to enhance your competency and is specific to your assigned responsibilities.. Compliance with the training calendar will be monitored at each facility to ensure its effectiveness in promoting a safer and environmentally conscious workplace.

## 8. Measuring, Monitoring, and Benchmarking

The Board, supported by the Executive Leadership, regularly monitors and tracks the EHS&S performance across the organization. A comprehensive report is published for general communication.

To ensure continuous improvement, we conduct regular benchmarking checks, comparing our performance to industry expectations and best practices. These assessments are conducted by the EHS&S team and third-party consultants.

Additionally, meetings of the EHS&S Committee are held at the corporate and plant level to review performance and promote ongoing development. The Committee oversees the governance and management of risks, including the achievement of sustainability goals and adherence to environmental, health, and safety standards across our business units

#### **9. Grievance and Feedback System**

If you witness any violations or have any feedback regarding the EHS&S policy, please report it through the appropriate Speak Up channels.

#### **10. Approval of EHS&S Policy**

This EHS&S Policy Statement is approved by Managing Director, who is a member of the ESG Committee and is also a member of Board of Directors.