



## HUMAN RIGHTS POLICY

**Introduction:** At Lupin, our stakeholders attribute immensely to our growth and success, thus, it is imperative to nurture an environment that empowers and uplifts them. With the 'Spirit of Lupin' as a foundation, we strive to create a culture of respect and care where the dignity of our people is upheld across all levels.

Since the inception, human rights protection has been at the core of our business and is reinforced through its integration in the [Global Code of Business Conduct and Ethics \(CODE\)](#), Lupin's wider framework. However, through this Human Rights Policy, we aim to strengthen our commitment towards respecting the key values of human dignity, equality and independence.

**Scope and Applicability:** This Policy applies to all Lupin employees (Full time, Part time, Sub contractors working in our site) including its affiliates, subsidiaries and Joint Ventures globally. This policy will also be extended to the suppliers and business partners as outlined in the Third Party Code of Conduct.

We promote and uphold the fundamental human rights in accordance with international standard norms and principles as stated in:

- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- The International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprise
- International Bill of Human Rights

**Regulatory Compliance:** Whilst the Lupin headquarters are in Mumbai, India, we have an extensive footprint across the globe. We understand that regulatory as well as statutory requirements with respect to human rights across geographies may vary significantly and have undertaken adequate measures to accommodate the same. In situations where there is a direct conflict between the local law and dictates of international requirements for human rights, Lupin will ensure compliance with the law of the land while actively seeking methods to adhere to the global guidelines. In situations where the local laws are more lenient than those of the international ones, Lupin shall comply with the provisions of the latter.

For the effective implementation of the policy, the leadership and the employees will collaborate and collectively drive this agenda through the incorporation of the following principles:

**Non-Discrimination:** We respect every individual and do not discriminate on the basis of race, color, religion, creed, gender, age, social status, physical or mental disability or sexual orientation.

**Diversity and Inclusion:** As an innovation-led, transnational pharmaceutical company, our workforce is naturally diverse. We are committed towards building a diverse talent pool that brings together unique perspectives,

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backgrounds, and experiences. We foster an inclusive workplace culture where differences are valued and expressed freely, where employees have the support needed to learn and collaborate.

**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 suppliers are prohibited from engaging in this practice. Our employees can request for termination of their employment voluntarily.

**Child Labor:** We prohibit any form of child labor in our operations and value chain through ensuring compliance with minimum working age of the applicable regulatory requirements of the region.

**Freedom of Association and the Right to Collective Bargaining:** We respect the rights of our employees to form or join a labor union without the fear of retribution, harassment or intimidation, in situations where the employees may be legally represented, Lupin will engage in a constructive dialogue and bargain in good faith in a manner that is appropriate and comply with the freedom of association and trade union rights as permitted by local laws.

**Fair Wages, equal remuneration and benefits:** We provide fair and equal and remuneration to all our employees without any discrimination as per their merit, experience and qualification. We are committed to ensure that we comply with the applicable wages, working hours, overtime and social security norms without any discrimination.

**Anti-Harassment:** We are committed to provide a work environment that is free of all kinds of harassment or any other inappropriate disrespectful conduct. 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.

**Environment, Health & Safety:** Achieving the highest standards of Health and Safety in the workplace is an integral part of our business activities. We strive to provide safe working conditions, where accidents are minimal, to all employees (permanent as well as contractual), vendors, suppliers, business associates and the communities around us. Our commitment to Environment, Health and Safety is set forth in our CODE and we encourage employees to highlight any health/security hazards or concerns noticed within the workplace to the management.

**Community Engagement:** At Lupin, 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. Further, we support community building initiatives across agriculture, education, health, women empowerment amongst others to support local communities in a manner that respects their rights and dignity.

**Reporting Concerns:** In case of any concerns with regards to the policy, employees are encouraged to reach out to their immediate supervisor, Head of Department or Human Resource Department. Additionally, the employees can also directly report their grievances to the Compliance and Ethics Office at [ombudsperson@lupin.com](mailto:ombudsperson@lupin.com).

To create a transparent process and maintain anonymity, Lupin also has a 24/7 independent third party service that routes inquiries and concerns to the Compliance and Ethics Office. They can be reached through:

[Lupinglobal.ethicspoint.com](http://Lupinglobal.ethicspoint.com) (India & APAC)

[Lupin.ethicspoint.com](http://Lupin.ethicspoint.com) (Americas & EMEA)

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**Non-Retaliation:** Lupin 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.

**Changes to the Policy:** Within an ever-evolving regulatory and business landscape, Lupin will periodically review and update this policy to ensure that we are aligned with the local regulations in the regions of our operation and international best practices.

**Nilesh D. Gupta**  
Managing Director

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