

SOCIAL ACCOUNTABILITY MANAGEMENT SYSTEM MANUAL

(Based on Requirements of SA 8000:2014 Standard)

Shilpa Pharma Lifesciences Limited.

Innovating for Affordable Healthcare


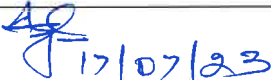

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Shilpa Pharma Lifesciences Limited

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0.1 Revision History

Manual/ Section No.	Rev. No. & Eff. Date	Brief Description of Changes	Change Approver
Whole Document	Rev. 00 Eff. Date: 16-01-2023	First issue of manual to address SA 8000:2014 requirements.	WTD
Section 5.0	Rev. 01 17.07.2023	POSH Policy included as reference document.	WTD

0.2 Abbreviations

Abbreviations	Full Form
API	Active Pharmaceutical Ingredients
CSR	Corporate Social Responsibility
Eff.	Effective
EHS	Environment Health Safety
ESI	Employees State Insurance
HOD	Head of Department
HR	Human Resources
ILO	International Labour Organization
LIC	Life Insurance Corporation
No.	Number
OHS	Occupational Health & Safety
PF	Provident Fund
POSH	Prevention of Sexual Harassment
PSCI	Pharmaceutical Supply Chain Initiatives
PSMS	Process Safety Management System
SAMS	Social Accountability Management System
SDG	Sustainable Development Goals
SPL	Shilpa Pharma Lifesciences Limited
SSC	Secondary School Certificate
TA	Travel Allowance
TDS	Tax Deducted at Source

UNGC	United Nations Global Compact
WTD	Whole Time Director

0.3 Manual Distribution

MASTER COPY

Master Copy is the one, which is duly approved (signed) and authorized for use.

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Soft Copy of the Master Copy will be made accessible (READ only) through intranet in shared folder for READ only access and use by all employees.

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Old version of the Master Copy of the document, which is not in use but kept for knowledge preservation, shall be referred to as "Obsolete Copy".

0.4 Profile of Shilpa Pharma Lifesciences Limited

Shilpa Pharma Lifesciences Limited (SPL), a subsidiary of Shilpa Medicare Limited, established in 1987, produces and exports consistently high-quality active pharmaceutical ingredients, fine chemicals, intermediates, herbal products, and specialty chemical products using sophisticated technology, meticulously following international specifications and good environment, health, and safety practices. Currently SPL is one of the leaders in the oncology market and offer a complete range of products in this segment spanning across APIs, Formulations and are striving to put in our efforts in field of novel drug delivery systems and biotech products along with widening our focus to other therapy areas. SPL provides high-quality, affordable medicines trusted by healthcare professionals and patients in over 100 countries worldwide.

SPL is committed to integrate relevant SDGs & PSCI Principles in the business processes within the context of our Vision “Innovating for Affordable Healthcare” by formulating and implementing this Social Accountability Policy adopting a systematic approach to contribute for the Social Pillars of Sustainability as described in the manual.

SPL recognizes its commitment to the community in which it operates through its Corporate Social Responsibility initiatives. We reach out to underserved communities and work towards making a meaningful difference to them. SPL's CSR programs are focused on education, health, environment, and women empowerment.

OUR VISION

Innovate for providing affordable healthcare.

Beyond any discrimination or boundaries, so as to bring a pleasant difference to patient's lives.

OUR MISSION

Making the medicines affordable by inclusive participation of the stakeholders, with minimum impact on environment, social accountability & exceed customer expectations.

OUR VALUES

Assuring compliance by continuously improving the systems by adhering to Environment, Health, safety & Social accountability Practices.

0.5 Normative Elements & Interpretation

SPL shall comply with applicable national, local, and other laws, industry standards, other requirements to which SPL subscribes and SA 8000 requirements.

SPL shall also respect the ILO conventions as per the policy of the Government of India and the respective State Governments.

List of key national and local regulations on Social Aspects are as follows:

- a) Factories Act, 1948
- b) Labour Welfare Fund Act, 1987
- c) Factories & Establishments (National, Festival & Other Holidays), Act 1974
- d) Payment of Wages Act, 1936
- e) Employment Exchange (Compulsory Notification of Vacancies) Act 1959
- f) Contract Labour Act (Regulation & Abolition) Act, 1970
- g) Employees State Insurance Act 1948
- h) Employees Provident Fund & Miscellaneous Provisions Act 1952
- i) Apprenticeship Act 1961:
- j) Payment of Bonus Act 1965
- k) Payment of Gratuity Act 1972
- l) Minimum Wages Act 1948
- m) Child Labour Act 2016
- n) Maternity Benefit Amendment Act 2017

List of key ILO Conventions on Social Aspects are as follows:

- a) ILO Convention 1 (Hours of Work - Industry) and Recommendation 116 (Reduction of Hours of Work)
- b) ILO Conventions 29 (Forced Labour) and 105 (Abolition of Forced Labour)
- c) ILO Convention 87 (Freedom of Association)
- d) ILO Convention 98 (Right to Organise and Collective Bargaining)
- e) ILO Conventions 100 (Equal Remuneration) & 111 (Discrimination-Employment)
- f) ILO Convention 102 (Social Security - Minimum Standards)
- g) ILO Convention 131 (Minimum Wage Fixing)
- h) ILO Convention 135 (Workers' Representatives)
- i) ILO Convention 138 and Recommendation 146 (Minimum Age)
- j) ILO Convention 155 and Recommendation 164 (Occupational Safety and Health)
- k) ILO Convention 159 (Vocational Rehabilitation and Employment - Disabled Persons)
- l) ILO Convention 169 (Indigenous and Tribal Peoples)
- m) ILO Convention 177 (Homework)
- n) ILO Conventions 181 (Private Employment Agencies)
- o) ILO Convention 182 (Worst Forms of Child Labour)
- p) ILO Convention 183 (Maternity Protection)
- q) ILO Code of Practice on HIV/AIDS and the World of Work
- r) Universal Declaration of Human Rights
- s) The International Covenant on Economic, Social and Cultural Rights

- t) The International Covenant on Civil and Political Rights
- u) The UN Convention on the Rights of the Child
- v) The UN Convention on Elimination of All Forms of Discrimination Against Women
- w) The UN Convention on the Elimination of All Forms of Racial Discrimination
- x) UN Guiding Principles on Business and Human Rights

0.6 Terms & Definitions

Attendance: Physical presence of the employee or Contract Personnel concerned at the place or places where he or she is required to work or report for duty remain on duty/work after making or getting the attendance marked.

Child: Any person under 15 years of age, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality.

Child Labour: Any work performed by a child younger than the age(s) specified in the above definition of a child.

Collective Bargaining Agreement: A contract specifying the terms and conditions for work, negotiated between an organisation (e.g., employer) or group of employers and one or more worker organisation(s).

Corrective Action: Action to eliminate the cause(s) and root cause(s) of a *detected* non-conformance. Corrective action is taken to prevent recurrence.

Preventive Action: Action to eliminate the cause(s) and root cause(s) of a *potential* non-conformance. Preventive action is taken to prevent occurrence.

Forced or Compulsory Labour: All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation or that is demanded as a means of repayment of debt.

Home Worker: A person who is contracted by the organisation or by its supplier, sub supplier or subcontractor, but does not work on their premises.

Human Trafficking: The recruitment, transfer, harbouring or receipt of persons, by means of the use of threat, force, deception, or other forms of coercion, for the purpose of exploitation.

Interested Parties: An individual or group concerned with or affected by the social performance and/or activities of the organisation.

Living Wage: The remuneration received for a standard work week by a worker in a place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.

Management Representative: A member of the management appointed by the Top Management of SPL to establish and implement the requirements of the standard and report the performance to the top management.

Muster Roll: Includes any Register or Registers or other records maintained by SPL and the suppliers / sub-contractors for the purpose of keeping a list of employees employed by SPL and the Contract personnel deployed in the company for the purpose of making attendance of said employees and contract personnel.

Non-conformance: Non-compliance with a requirement.

Notice: Official communication in writing given or exhibited on the "Notice Board" or any other place specified by the Management for the purpose disseminating information.

Notice Board: Designated location specially maintained in a conspicuous place at or near the entrance to the work area, canteen and/or administrative office for the purpose of displaying notices required to be posted or affixed.

Personnel: All individuals employed or contracted by an organisation, including but not limited to directors, executives, managers, supervisors, workers, and contract workers such as security guards, canteen workers, dormitory workers, and cleaning workers.

Worker: All non-management personnel.

Private Employment Agency: Any entity, independent of the public authorities, which provides one or agency: more of the following labour market services: Matching offers of and applications for employment, without the agency becoming a party to the employment relationship(s) which may occur; Employing workers with a view to making them available to a third party entity, which assigns their tasks and supervises the execution of these tasks.

Remediation of Child Labourers: All support and actions necessary to ensure the safety health education and development of children who have been subjected to child labour, as defined above, and whose work has been terminated.

Risk Assessment: A process to identify the health, safety and labour policies and practices of an organisation and to prioritise associated risks.

Worker Representative(s): One or more worker representative(s) freely elected by workers to facilitate communication with the management representative(s) and senior management on matters related to social concerns.

Social performance: An organisation's achievement of full and sustained compliance with SA8000 requirement while continually improving.

Stakeholder engagement: The participation of interested parties, including but not limited to the organisation, trade unions, workers, worker organisations, suppliers, contractors, buyers, consumers, investors, NGOs, media, and local and national government officials.

Standard Workday/Shift: 8 ½ Hours with a tolerance of 15 minutes including rest/lunch period of 30 minutes.

Supplier/Contractor: Any entity or individual(s) in the supply chain that directly provides

the organisation with goods or services integral to, utilised in or to produce the organisation's goods or services.

Sub-supplier/Sub-contractor: Any entity or individual(s) in the supply chain that provides the supplier with goods and/or services integral to, utilised in or to produce the supplier's or the organisation's goods or services.

Worker organisation: An autonomous voluntary association of workers organised for the purpose of furthering and defending the rights and interests of workers.

Work Premises/Workplace: Includes premises and precincts of the factory / establishment / departments / plants / go-downs / sheds procurement centres and offices including ancillary departments owned, hired and/or managed by the Company and includes place or places where any employee is required to be present and/or work whether within or outside the factory premises.

Young worker: Any worker under the age of 18 but over the age of a child, as defined above.

0.7 Organogram for Social Accountability Management System

Attached as Annexure 1.

0.8 Scope

The scope of the Social Accountability Management System of SPL covers meeting the requirements of SA 8000:2014 with respect to its activities related to:

"Manufacture and Supply of Active Pharmaceuticals Ingredients (APIs) and Intermediates."

This scope is applicable for SPL's manufacturing sites located at the following addresses:

Shilpa Pharma Lifesciences Limited

Unit 1, Plot No: 1A to 5B, Deosugur Industrial Area
Deosugur, Raichur 584170, Karnataka, INDIA.

Shilpa Pharma Lifesciences Limited

Unit 2, Plot Nos: 33, 33A & 40-47, Raichur Industrial Growth Centre
Wadloor Road, Chicksugur Pots, Raichur 584134, Karnataka, INDIA

0.9 Social Accountability Policy

Shilpa Pharma Lifesciences Limited, a subsidiary of Shilpa Medicare Limited, established in 1987, produces and exports consistently high-quality active pharmaceutical ingredients, fine chemicals, intermediates, herbal products, and specialty chemical products using sophisticated technology, meticulously following international specifications and good environment, health, and safety practices. Currently SPL is one of the leaders in the oncology market and offer a complete range of products in this segment spanning across APIs, Formulations and are striving to put in our efforts in field of novel drug delivery systems and biotech products along with widening our focus to other therapy areas. SPL provides high-quality, affordable medicines trusted by healthcare professionals and patients in over 100 countries worldwide.

SPL is committed to integrate relevant UNGC, SDG & PSCI Principles in the business processes within the context of its Vision “Innovating for Affordable Healthcare” by formulating a Social Accountability Policy and implementing same adopting a systematic approach to adopt a proactive and risk-based approach towards social accountability management through:

- Complying with the applicable national, local, other subscribed statutory social obligations related to labour, human rights, and ethics,
- Ensuring no engagement of or support to use of child labour, forced or compulsory labour,
- Preventing ill health and injury to personnel at workplace,
- Respecting freedom of association, right to collective bargaining and preventing discrimination,
- Respecting all personnel with dignity, implementing ethical work practices, engaging with stakeholders, and ensuring minimum wages to the personnel,
- Setting social objectives to improve working standards of employees and continual improvement of social performance.

We believe that implementation of this policy in our facilities and supply chain will support in meeting expectations of our stakeholders and business.

We engage and work with our supply chain partners to understand each other's expectations on social aspects and adopt good practices.

This policy applies to all SPL sites. It is made available to relevant stakeholders on request and periodically reviewed, as necessary.

Mr. K Sharath Reddy
Technical-Director

01 CHILD LABOUR

SPL does not engage or support Child Labour and does not tolerate Child Labour engagement by the Suppliers/Contractors.

Personnel, at the time of employment should sign a letter of appointment or any other form declaration required to be signed in accordance with the terms and conditions of service specified, and give correct, unambiguous, and undistorted personal particulars as required for the purpose of record and thereafter, notify SPL promptly of any change in such particulars.

If on verification, the personal particulars such as age, educational qualifications, experiences, caste community where reservation is claimed, etc, are found to be incorrect at any time subsequently, the concerned personnel is liable to be discharged from service.

The age of the personnel is assessed based on the certificate submitted and ensured that persons below 18 years are not employed/engaged in the company. Where, the person is not able to submit the certificate to establish his age, the person is judged by his physical appearance and as appropriate, certificate from Chief Surgeon from Government Hospital is obtained on the age of the person to ensure that persons above 18 years of age only are employed by SPL or deployed by the sub-contractors.

Any one of the following is considered as a valid record for Proof of Age:

- a) SSC Certificate
- b) Passport
- c) Aadhar Card with Date of Birth
- d) Certificate issued by the Chief Surgeon of Government Hospital on the Age of the Person with Photo Identification
- e) Affidavit issued by the Magistrate on the age of the person

Every person is given an appointment letter at the time of his / her appointment setting out the terms of the post and on promotion. In case of contract personnel, the company ensures that the employment letter with terms is issued by the contractor for every person and is reviewed by SPL for its compliance with SPL's employment policy.

Labour Contractors/Employment Services/Recruiters are utilised by SPL. It is ensured that they possess a valid license as per local law during the currency of the engagement and a copy of license is maintained. SPL ensures that the service is continued only with valid license. SPL verifies relevant documents with respect to contract and sub-contract

personnel.

Policy and Procedure for Remediation of Child Labour has been established and is communicated to the supplier / contractor.

As part of due diligence, declaration from the Suppliers /Contractors is taken stating that child labour is neither employed by them nor employed by their suppliers/contractors (i.e., sub-suppliers/sub-contractors).

"No Use of Child Labour" Clause is included as one of the Purchase Order/Service Contract conditions. During periodical review/tracking of the supplier performance, if SPL observes use of Child Labour, the contract gets terminated and procedure for Remediation of Child Labour gets invoked by the Supplier/Contractor.

Where, SPL observes that the Supplier/Contractor is using Young Worker aged between 15 to 18 years, SPL verifies:

- a) Whether Young Workers are subject to compulsory education, and they work only outside of school hours.
- b) The record of attendance/utilization of Young Worker to assess the combined time spent at School, Work and Transportation. In case the combined time is either more than 10 Hours/day or the work hours is more than 8 hours/day, initiates necessary action to control the utilization of young worker by the supplier / contractor.
- c) No use of Young Worker in night hours. Initiate action in case of deviation.
- d) Whether the young person is exposed to any situations that are hazardous or unsafe to their physical and mental health and development. In case of any deviation, initiate necessary action.

References

Procedure: Child Labour & Human Trafficking Policy

Procedure: Child Labour Remediation

02. FORCED OR COMPULSORY LABOUR

The policy on Forced or Compulsory Labour is implemented for all personnel including the workers deployed by suppliers/contractors.

SPL prohibits any form of Forced Bonded Labour or Compulsory Labour that Includes human trafficking. Holding of original identity papers. Personnel are free to leave the premises after their standard workday / shift. The personnel are allotted work based on their skill and ability and are not forced to work.

As a policy, deposits are not taken from the personnel upon commencing employment. Benefits to the personnel are given as per the employment letter and does not tolerate any form of withholding personnel's salary, property, or documents to force personnel to continue working.

Workers are free to move within the premises to fulfil their duties and responsibilities considering the health and safety, hygiene and product safety practices that are laid out by SPL.

Workers are free to use the canteen, take breaks, use rest room, and drink water based on the need, have access to necessary medical attention and practice any religious tenets.

SPL ensures:

- a) All the committed remuneration and benefits due to the personnel are distributed in a timely manners except for the permissible deductions and transferred to their Bank Account.
- b) The remuneration to the contract personnel is dispersed in the presence of SPL's staff or through electronic transfer to the contract employee's bank account.
- c) Any fees to be paid to the Private Recruiting Agencies (if utilised) are given by SPL and that the Private Recruiting Agencies does not take any employment fees or costs from the personnel. Undertaking to that effect is taken from the agency.
- d) The personnel are free to terminate their employment on providing reasonable notice period as per the signed employment agreement.
- e) The personnel are provided notice period in case of any termination of employment by SPL as agreed in the employment letters. Any compensation due to them are provided as agreed in the employment letter.
- f) Security measures implemented does not intimidate or unduly restrict the movement of workers.
- g) All overtime hours are voluntary and monitors the implementation of the overtime to prevent any forced duty by the personnel.
- h) Terms of employment outlined at the time of recruitment are same or better than the terms offered, during employment.
- i) Personnel are empowered to remove themselves from imminent danger at workplace.
- j) The personnel are not compelled to continue the employment based on pending loans or advances.
- k) Personnel who have resigned are relieved within the agreed/committed notice period and the relieving from employment is not linked with the non-availability of reliever.
- l) Workers are not forced to continue the shift in the absence of reliever.
- m) SPL neither engages nor supports Human Trafficking. The contractor supplying labour does not engage nor support Human Trafficking.

References:-

Procedure: Forced Labour Control

03 HEALTH & SAFETY

SPL provides a safe and healthy workplace environment and takes effective steps to prevent potential health and safety incidents and occupational injury or illness arising out of, associated with or occurring in the course of work. Practices and procedures are established to minimize or eliminate, to the extent it is reasonably practicable, the causes of all hazards in the workplace environment, based upon the prevailing safety and health knowledge of the industry.

SPL assesses all the workplace risks to new, expectant, and nursing mothers including those arising out of their work activity, to ensure that all reasonable steps are taken to remove or reduce any risks to their health and safety. To enable the implementation of the controls, the women employees (both employed by SPL and its Suppliers/Contractors) are

requested to inform the organisation on their status to Head HR or Women Representation in HR.

Where hazards remain after effective minimization or elimination of the causes of all hazards in the workplace environment, SPL provides personnel with appropriate personal protective equipment, as needed at its own expense. In the event of a work-related injury, SPL provide first aid and assist the worker in obtaining follow-up medical treatment. Personnel Training in First Aid, for both Men and Women, is conducted in all the shifts to render first aid. Contract has been signed with hospital in the proximity of the SPL's premises for treatment.

At SPL, the Site Head/Factory Manager ensures a safe and healthy workplace environment for all personnel as required by the national and local laws. Head EHS supports the Site Head/Factory Manager in this regard by implementing the Occupational Health & Safety Management System requirements.

A Health and Safety Committee as per the requirement of factories act, with proportional representation from the management and workers has been established. SPL is a unionised organisation. The workmen/workwomen representatives in the Health and Safety Committee are elected by the workmen. The details of the members in the Health and Safety Committee are communicated to the workers through display at the general notice board and at canteen notice board. The current list of Health & Safety committee members is given in Annexure 2.

The Health and Safety Committee members are trained in their roles and responsibilities and retrained periodically to be competently committed to continually improving the health and safety conditions in the workplace. The Health and Safety Committee conducts the Occupation Health and Safety Risk Assessment as per the relevant procedure outlined in the SPL's EHS manual to identify and address current and potential health and safety hazards and the output is recorded in the form of OHS Risk Register.

The OHS Risk Register is periodically reviewed at department (monthly), unit (quarterly) and corporate (yearly), based on any change in the workplace or occurrence of OHS incident.

SPL provides effective health and safety training every year, including on-site training and, where needed, job-specific training. The training is provided at the time of induction of new personnel, reassignment of personnel (transfer for one process to another / one department to another), on occurrence of any incident, when there are changes in technology and/or the when introduction of new machinery presents new risks to the health and safety of personnel.

SPL has established procedures to detect, prevent, minimize, eliminate or otherwise respond to potential risks to the health and safety of personnel that are part of EHS Management System documentation. Procedure to report and investigate OHS incidents that occur in the workplace has been established as part of the EHS Management System.

All the personnel have been informed/ trained on the Health and Safety risk at their workplace so that they can remove themselves from imminent danger without seeking permission from their reporting authority and report the danger to the concerned supervisor/ERT Members for prompt action.

References

04 FREEDOM OF ASSOCIATION & RIGHT TO COLECTIVE BARGAINING

SPL is a unionised organisation.

SPL provides the worker with the right to collective bargaining or elect their representatives for the purpose of collective bargaining with the management.

SPL does not interfere or restrict, discriminate, or retaliate against workers exercising their right of representation. The company does not interfere in any way with the establishment, functioning or administration of worker organisation(s) or collective bargaining arrangement.

SPL respect the right of all personnel to form and join trade unions of their choice and to bargain collectively.

SPL ensures that representatives of worker and any personnel engaged in organising workers are not the subject to discrimination, harassment, intimidation, or retaliation.

Head HR is responsible to implement the above policy on Freedom of Association & Right to Collective Bargaining

References:

Collective Agreement with Employees Union

05 DISCRIMINATION

SPL's Policy of non-Discrimination is to provide equal employment and advancement opportunities to all individuals based on merit irrespective of race, colour, religion, gender, national origin, age, or disability.

SPL:

- a) Provides equal opportunity with respect to recruitment, remuneration, compensation, access to training, promotion, termination, or retirement to all the employees and the contract personnel without any discrimination.
- b) Ensures that discrimination is not practiced in the organisation based on race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other condition.
- c) Does not interfere with the exercise of personnel's rights to observe tenets or practices or to meet needs relating to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinions or any other condition.
- d) Does not allow any behaviour that is threatening, abusive, exploitative, or sexually coercive, including gestures, language, and physical contact, in the workplace.

e) Does not subject personnel to pregnancy or virginity tests under any circumstances. However, to ensure the safety of expectant mothers and nursing mothers at workplace, the personnel all requested to inform such status to the company for allocation of appropriate activity/work to eliminate/reduce the health risk, if any.

f) Documents the incidents of discrimination and reviews periodically in the Management Review.

g) In case of any incident related to discrimination, the remediation plan is documented, implemented and the results are reviewed during the Management Review.

SPL ensures that:

- All the personnel have the same opportunity to apply for and considered for the same job.
- All the personnel are treated fairly regarding benefits and canteen cafeteria privileges.
- Worker, without distinction, has the right to join or form a trade union of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Employees with questions or concerns about discrimination in the workplace are encouraged to bring these issues to the attention of their HOD/HR. Employees can raise concerns and report without fear of reprisal. Anyone found to be engaging in unlawful discrimination will be subjected to disciplinary action, including termination of employment.

References

Procedure: Code of Conduct

Procedure: Prevention of Sexual Harassment at Workplace (POSH Procedure)

Procedure: Human Rights Policy

Procedure: Grievance Policy

06 DISCIPLINARY PRACTICES

SPL treats all personnel with dignity and respect, does not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel, harsh or inhumane treatment.

The following acts are treated as misconduct:

- a) Wilful insubordination or disobedience, whether alone or in combination with others, to any lawful and reasonable order of a superior.
- b) Theft, fraud, or dishonesty in connection with the employer's business or property.
- c) Wilful damage to or loss of employer's goods or property.
- d) Taking or giving bribes or any illegal gratification.

- e) Habitual absence without leaves of absence without leave for more than 10 days.
- f) Habitual late attendance.
- g) Habitual breach of any law applicable to the establishment.
- h) Riotous or disorderly behaviours during working hours at the establishment or any act subversive of discipline.
- i) Habitual negligence or neglect of work.
- j) Striking work or inciting others to strike work in contravention of the provision of any law, or rule having the force of law.

No disciplinary action would be taken against any personnel for the misconduct other than warning or censure unless he has been issued a copy of the charge or charges levelled against him and after holding domestic enquiry and giving an opportunity of defending himself.

If a personnel present on duty refuses to take delivery of the letter or the charge in the presence of at least one witness, it is deemed to have been served the notice and a copy is exhibited on the company's notice board.

As safety related deviations have potential to cause work related injuries/illnesses, a **disciplinary action process for safety related deviations by any individual** has been implemented as per the following norms:

- **First time safety deviation:** Inform concerned HoD and HR head. Provide counselling by Safety Officer. Responsibility - Safety Officer.
- **Second time safety deviation:** Inform concerned HR Head and Unit Head/Factory Manager. Concerned HoD issues warning letter to the concerned individual and intimate same to the concerned HR Head. Responsibility – Concerned HoD.
- **Third time safety deviation:** Inform concerned Unit Head/Factory Manager and Head-API Operations. Concerned HR Head discussed the repeat deviations with Concerned Unit Head/Factory Manager and Head API Operations and takes appropriate disciplinary action on concerned persons. Responsibility – Concerned HR Head.

References

Procedure: Code of Conduct

Procedure: Anti-Bribery & Anti-Corruption Policy

07 WORKING HOURS

SPL abides by the work week stipulated by the national & local laws, any Collective Bargaining Agreement and Industry Standard applicable to its operating sector.

Adequate number of toilets are provided for use by the personnel that are in the proximity of the workplace. At a minimum. One urinal for every 25 employees and One toilet for every 50 employees separately for men and women employees are provided. Potable Water is provided at the proximity of the workplace and in the canteen.

The employees and contract personnel are eligible to use Canteen for their meal break. The

requirements of Food Safety and Standards Regulation is implemented during the preparation and storage of food to prevent ill health to the personnel consuming the food.

Neither SPL nor its Suppliers/Contractors provide any dormitory facilities provided for personnel.

SPL operates six days a week in general shift between 9.00am to 5.30pm, Sunday weekly off. The operations and its support departments work on all days in three shifts of eight hours duration with staggered weekly off. The personnel in shift work 6 days (48 Hours) and seventh day are an off day which could fall on any of the weekday including Sunday on a rotational basis as agreed with the personnel through service rules and collective bargaining agreement. The personnel in operations and its support departments may be transferred from one shift to another as per the agreement.

Lunch break of 30 minutes and two Tea Breaks of 15 minutes each are provided. The personnel are free to choose their tea break as per their convenience. Staggered Lunch Break is planned to prevent undue rush in the canteen.

SPL entertains overtime by employees/ contractor's personnel voluntarily only and is not forced upon. The compensation for the overtime is the normal work hour wages. The overtime is limited to 50 Hrs. in a quarter. While planning the shifts, it is ensured that overtime is not on regular basis. Being a manufacturing establishment, under exceptional circumstances, the personnel may be required to work more than 6 days in a week, and they will be compensated with a Compensatory Off day.

In cases where overtime work is needed to meet short-term business demand and it is agreed with the personnel as part of collective bargaining process, the requirements are implemented as per the agreed terms and conditions.

Policies on Attendance, Workday & Timing, Holiday, Leave and Grievance have been established and implemented.

References

Procedure: Attendance Procedure
Procedure: Leave Policy
Procedure: Holiday Policy
Procedure: Workday & Timing Procedure
Procedure: Compensatory Off/Over Time Policy

08 REMUNERATION

SPL recognises and respects the right of personnel to a living wage and ensure that wages for a normal work week, not including overtime, always meets at least legal or industry minimum standard as per applicable collective bargaining agreements and laws. It is ensured that wages are sufficient to meet the basic needs of personnel and to provide some discretionary income.

SPL does not make any deductions from wages for disciplinary purposes until and unless

the deduction falls under the provision of Section 7 of the Payment of Wages Act or agreed with the personnel as part of the employment/collective bargain process.

SPL communicates the wages of the personnel and benefits composition through pay slip for each pay period. In case of Suppliers/Contractors, it could be in the form of Wages Register/Pay Slip as per their practice. The wages for SPL's Employees are distributed through Online Transfer to the personnel's Bank Account. The wages for Suppliers/Contractors are distributed as per their procedure. However, the mode of distribution of wages is identified and agreed as part of the Purchase Order/ Contract and is monitored. It is ensured that all wages and benefits are distributed before 10th Day of each month or earlier working day and paid in the form of Cheque / Bank Transfer only. Payment in the form of vouchers, coupons or promissory notes is prohibited except for food allowance.

SPL pays overtime at a premium rate i.e., double the hourly wage for the personnel or as agreed part of service condition/collective bargaining agreement or at a premium rate equal to prevailing industry standards, whichever is higher.

SPL does not use labour-only contracting arrangements, consecutive short-term contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to personnel under applicable labour laws & regulations and social security laws & regulations.

The overtime to meet the business requirement/maintenance activity are decided during the previous shift and communicated at least two hours prior to shift closure. Any planned overtime to meet the business exigency is discussed with the personnel and communicated a week in advance.

SPL ensures that overtime work for an individual does not exceed 16 hours per month, is not demanded other than in exceptional and short-term business circumstances and is always remunerated at a premium rate. Any exceptional circumstances arise that require personnel to put extra hours is intimated through display in notice board or discussion with the personnel. At no circumstances the personnel would be forced to do overtime.

Weekly off is given to the personnel after six days of work. For any reason, if the personnel must continue the duty even on the weekly off day, the off day is taken either five days before or after the weekly off.

If the personnel have worked continuously for 10 days, the 11th day would be the weekly off day. For the duty done on the weekly off days, the personnel are either paid the overtime wages or given two days compensatory off to comply with Payment of Wages Act.

Minimum Wages:

The Minimum Wage is computed as per the established procedure. Action Is taken to ensure that at least the minimum wage is paid. Gap between the current wage and the revised minimum wage is periodically assessed and addressed. The minimum wage is re-calculated as and when necessary to make necessary adjustment in the wages.

The Company ensures that all worker whether hourly, salaried, temporary, seasonal or otherwise are paid the Minimum Wages. The Head HR from time to time collect the

minimum wages gazette from the department, reviews the order and initiates action to comply with the requirement and updates the database.

SPL ensures that wages and benefits are rendered in full compliance with all applicable laws and that compensation is rendered either in cheque or transferred to bank account in a manner convenient to personnel.

SPL uses only licensed labour or employment services which operates by the local or national government as a labour provider and does not give any piece work contract or assignment to work. The company does not encourage any piece-rate work.

Deductions from Wages:

Standard deduction such as PF, ESI, TDS, and LIC Premium Payments are implemented as permitted by Payment of Wages Act. Any loan / advances application from the SPL's personnel is received and processed by HR and recovered in in equal monthly instalments. Before sanctioning the loan / advance, the current deductions are reviewed. If the due from the proposed loan / advance results in monthly deduction of more than 50% of the salary, the loan advance is not sanctioned. The Payroll Documents of the Contractors is verified every month and deduction done is also verified for compliance.

If ten or more personnel acting in concert themselves or strike work without prior notice and without reasonable cause, they will at the discretion of the Management, be liable to deductions from their earned wages of an amount not exceeding eight days earnings in each case under the proviso to Sub-Section (2) of Section 9 of the Payment of wages Act, 1936.

In accordance with Section 7, Sub-Section 2 (c) of the Payment of Wages Act, deductions may be made for any damage to, or loss of goods expressly entrusted to a worker for custody or for loss or money for which he is required to account for, where such damage/loss is directly attributable to his neglect or default.

Payroll Documentation:

a) The personnel are provided with a documented Pay Statement other than Payroll for each month that contains wage calculation, earned wages, regular and overtime pay, deduction, final total wages and ensures that the payment is accurate and accountable. Separate statements are given for the bonus payment.

b) The pay is given only to the personnel, and it is ensured that no one receives the wages on his/ her behalf unless authorisation is received in writing from the personnel.

c) All personnel are included in the payroll and other social security records such as PF, ESI, and Gratuity etc. Where, contract employees are hired, the Payroll Record and Social Security Records are verified for compliance every month. It is ensured that the payroll documents and reports are completed, accurate and up to date.

Transfers:

The personnel are liable to be transferred from one job to another or from one department/section to another or from one shift to another or from one unit to another unit

(existing or future) of the company, provided his status and emoluments are not adversely affected.

Transfer allowance (TA) is paid as per Company's rules wherever applicable except in the case of transfer at the request of the personnel.

References

Procedure: Recruitment of New Employees

Procedure: Minimum Wages as per Karnataka Govt. Notification

Procedure: Compensatory Off & Overtime Procedure.

9 MANAGEMENT SYSTEMS

9.1 Policies, Procedures and Records:

The leadership has established a Social Accountability Policy (SA Policy) and is documented in Section 0.9 of this manual.

SA Policy communicates the intent of the organisation to implement requirements of the SA8000 Social Accountability Standard, comply with national & local laws and other applicable laws, to respect the government ratified international conventions such as ILO and, improve the Social Performance.

SA Policy is published in English and Local language that is understood by majority of the workforce. Wherever required, SA Policy is also published in other languages to enable effective communication to the personnel.

SA Policy is displayed at various locations in the organisation for communicating the policy to the personnel.

SA Policy is briefed to the personnel to ensure that they understand the policy and they contribute to achieve the policy. The current applicable SA 8000 standard is also made available to the personnel at various locations for their use. SA Policy is also communicated to the contractors/suppliers. SA Policy is made available to public through display of the policy on the Website. The policy is also made available to the interested parties on request.

Leadership reviews the SA Policy during the management review to continuously improve the Social Performance and to assess the adequacy and suitability of the policy.

SPL has developed policies and procedures to implement the SA 8000 requirements. The policies and procedures are communicated to the personnel and ensure that they understand the requirements and are aware of their roles and responsibility to comply with the requirements.

The policies and procedures are made accessible to the personnel through display at the

workplace in a language they can understand i.e. in English and Local language spoken by majority of workers. The policies and procedures are translated in Local language. The applicable policies and procedures are communicated to suppliers/contractors. The policies, procedures and communication on the subject are shared with the customers, as per their request.

The records required to demonstrate compliance to the implemented SA 8000 standard is established, maintained, and retained for the defined period. Written or oral summaries on the requirements are given to the SA8000 worker representative.

The list of Policies / Procedures established and implemented are mentioned in Reference Section.

9.2 Management Representative:

SPL has appointed “Arvind Kumar Singh-DGM-HR” a member of Senior Management who, irrespective of other responsibilities, ensures that the requirements of this standard are met.

9.3 Social Performance Team

A Social Performance Team (SPT) is established to implement all elements of SA 8000 Standard. The Team includes a balanced representation of:

- a) SA 8000 worker representative(s) and
- b) Management

The list of current SPT Members attached in Annexure 3.

The SPT consist of at least two members representing the Management and two SA 8000 Worker Representatives. The management members of the SPT are nominated by the Leadership.

It is ensured that the SPT team contains at least one women member from the employee and one women member from the Contractor's Personnel.

9.4 Roles and Responsibility of SPT are:

- a) Conduct the Social Risk Assessment and document the risks.
- b) Prioritise the risk based on its severity and establish control methods including recommendation to eliminate or reduce the risk
- c) Monitoring the workplace activities for compliance with SA 8000 Standard, implementation of action to address the risk and for effective implementation of Policies and Procedures
- d) Liaise with other departments to study, define, analyse and/or address any possible non-conformance(s) to the SA8000 Standard
- e) Facilitate routine internal audits of SA 8000 requirements.
- f) Submit Internal Audit Reports to Leadership on the performance and benefits of actions taken to meet the SA8000 Standard
- g) Maintain records of Corrective and preventive actions identified during Internal Audit.

- h) Hold periodic meetings i.e., once in three months to review progress and identify potential actions to strengthen implementation of the SA 8000 requirements.
- i) Review the effectiveness of the Corrective Action and Preventive Action

9.5 Authority of SPT:

To collect information from personnel and stakeholders as part of monitoring activities.
To direct the personnel to improve compliance to the SA 8000 requirements.

9.6 Identification and Assessment of Social Risks:

The SPT conducts social risk assessments to identify and prioritise the areas of actual or potential non-conformance to SA 8000 Standard based on the severity or where a delay in responding to the risk would make it impossible to address the risk.

The SPT conducts the risk assessments based on the data gathered and in consultation with interested parties i.e., Contractor's Personnel, employees and where applicable with customers and regulatory authorities. The risk is assessed for the internal business operation and processes, supplier activities, contractor activities.

Social Risk Assessment Procedure

The following are considered while assessing the social risks:

- a) All elements of SA 8000 standards
- b) All persons having access to the workplace (including contractors, suppliers, and visitors) covered
- c) Human Behaviour, Capabilities, and other Human Factors such as Nursing Mothers, expecting mothers considered
- d) Identified social aspects within the workplace, under the control of the company, and outside the workplace, under the influence of the company, capable of adversely affecting the compliance
- e) Changes or proposed changes at the company, changes in the applicable laws

The criteria for social risk assessment are established as part of the SA Management System. The assessed social risk is documented in the form of Social Risk report in Annexure 4. The "Significant Risks" are prioritised for action to reduce the risk to "Acceptable Risks".

The existing control measures are determined. The Risk is assessed based on the existing controls. Additional controls to reduce the "Significant Risk"/meet the Compliance Obligations are determined. Action Plan with target is established to reduce the Risk Rating.

The SPT reviews the Social Risk Register at least once in six months for any change in the workplace and updates the Risk Register

9.7 Monitoring the implemented Social Accountability Management System:

The SPT monitors the workplace activities for:

- a) Compliance with SA 8000 Standard

- b) Implementation of actions to effectively address the risks identified by the SPT
- c) The effectiveness of systems implemented to meet the Social Accountability Policy, other policies, and the requirements of SA 8000 Standard
- d) Identifying potential non-conformances to the SA 8000 requirements
- e) Compliance to the Stakeholders and customer requirements related to Social Accountability

The SPT plans and conducts routine Internal Audit once in six months and produces reports to Leadership on:

- a) The Social Performance
- b) Benefits of actions taken to meet the SA8000 Standard requirements
- c) The Corrective and Preventive actions identified, action initiated and its effectiveness

Trained Auditors are used to conduct the Internal Audit. At times, external auditors are used to conduct the Internal Audit. All the processes are audited during the Internal Audit. An Audit Schedule is prepared and communicated to the HODs for smooth conduct of the audit. While selection the auditors, it is ensured that the auditor does not audit their own process i.e., impartiality is maintained. The nonconformity and observations are recorded. The nonconformances are resolved by the HOD in a timely manner that addresses Correction, Root cause, Corrective Action, and its effectiveness. The SPT reviews the action taken on the non-conformances and their effectiveness.

The SPT conducts periodic management review meetings i.e., once in three months to review progress and identify potential actions to strengthen implementation of the SA 8000 requirements.

9.8 Employee Engagement & Communication:

SPL ensures that the personnel understand the requirements of SA8000 through:

- a) Training to the personnel on the SA 8000 requirements.
- b) Briefing on OHS and social risks in the workplace.
- c) Communication on any additional requirement to be followed based on the changes in the activities/workplace.
- d) Communication on any OHS & social incidents at workplace and the actions required to prevent recurrence.
- e) Communication of any OHS & social incidents in the industry sector and the actions required to prevent occurrence of the incident at workplace.
- f) Communication of any new requirements or changed requirements received from customer or other interested parties related to Social Performance and Obligations.
- g) Communication on Employee's obligation for effective implementation of the SA 8000 requirements.
- h) Communication on the roles of Social Performance Team and SA 8000 Worker Representatives.

9.9 Complaint Management and Resolution:

SPL has documented a grievance redressal procedure that is unbiased, non-retaliatory and accessible and available to personnel and interested parties to make comments,

recommendations, reports, or complaints concerning the workplace and/or non-conformances to the SA8000 Standard.

The Grievance Redressal Process and Prevention of Sexual Harassment - Prohibition and Prevention Policy enables the investigation, follow up on and communication of the outcome of complaints concerning the workplace and/or non-conformances to this standard or of its implementing policies and procedures. These results are available to all personnel and, upon request, to interested parties.

SPL does not discipline, dismiss, or otherwise discriminate against any personnel or interested party for providing information on SA8000 compliance or for making other workplace complaints.

9.10 Stakeholder Engagement

SPL has identified the Stakeholders in the community towards its Social Compliance and are listed below:

- Worker and the Worker Organisation
- Local and National Government Officials
- Customers
- Contractors
- Suppliers
- Sub-Contractors
- Sub-Suppliers
- Investors

SPL participates in stakeholder engagement to attain sustainable compliance with the SA8000 Standard in one or more of the following means:

1. Consultation during Internal and External Audit
2. Meeting with the Stakeholders to discuss SA 8000 Compliance Issues separately with the Customer, relevant Local and National Government Authorities
3. Consultation with the Suppliers, Contractors, Sub-Suppliers and Sub-Contractors
4. Co-training of Contractor's personnel and management personnel on SA 8000 compliance Issues
5. Consultation with the SA Worker Representatives on SA 8000 Compliance issues, if any
6. Reporting on complaints and resolutions regarding SA 8000 compliance issues to Labour Commissioner, District Complaints Committee on Sexual Harassment incidents, customer and so on
7. Customer Survey on SA 8000 Compliance
8. Worker Survey on SA 8000 Compliance

Leadership reviews the outcome of the Stakeholder Engagement activities and initiates necessary action to improve Social Performance.

9.11 Training and Capacity Building:

SPL implements Training and Capacity Building Program to:

- a) Improve the awareness on the SA 8000 requirements
- b) To manage Fire Emergency and Evacuation
- c) Administer First Aid to the victims
- d) Recognise Hazards, Emergencies, and initiate actions
- e) Select and use appropriate PPE based on the risk and storage of PPE
- f) Store and Use of Tools, Equipment and Machinery
- g) Give Awareness on the DO's and DONT's related to Tools, Equipment, process
- h) Handle and Store Chemicals and medical treatment in case of any emergency
- i) Provide induction / Orientation Training to the personnel
- i) Train personnel to operate High Hazard equipment such as elevators, forklift, trucks, boilers, and welding equipment
- k) Train Canteen Personnel on the Hygienic Food Preparation
- l) Train personnel on Hazard Identification and Risk Assessment
- m) Train personnel for handling of chemicals

Training Plan for each financial year and the training material is prepared considering the competence of the personnel and the literacy level. Training is conducted as per plan and records of training are maintained. In case training is deferred, the plan is updated with the reason for updating.

The effectiveness of the training is evaluated by the user department and records are maintained. Based on the results of evaluation, where needed, the training material and training plan are revised / updated.

The effectiveness of the training is evaluated through tests, surveys, interviews or observing the activities and performance of the personnel / team.

The competence of the personnel is assessed at least once a year, and the result becomes the input for identifying the training needs and for formulating the training plan.

9.12 Management of Suppliers/Contractors and Due Diligence:

SPL conducts due diligence on its existing key suppliers/contractors' compliance with the SA8000 Standard. The same due diligence approach is applied when selecting new suppliers/contractors. SPL does not engage home worker.

The due diligence activities that SPL takes include:

- a) Effectively communicating the requirements of SA 8000 Standard's requirements to senior leadership of suppliers/subcontractors and sub-suppliers.
- b) Assessing significant risks of non-conformance by suppliers/subcontractors and sub-suppliers.
- c) Making reasonable efforts to ensure that these significant risks are adequately addressed by suppliers/contractors and by the organisation where and when appropriate and prioritized according to the organisation's ability and resources to influence these entities.
- d) Reasonable effort means suppliers and contractors take actions to reduce significant risk or reduce the probability of occurrence of the risk.
- e) Establishing monitoring activities and tracking performance of suppliers/contractors to ensure that these significant risks are effectively addressed.

Retain records related to the due diligence activities.

9.13 Internal Audit:

Periodic internal audits of SAMS shall be conducted by trained internal auditors. Internal audit findings shall be recorded as per the SA internal audit report in Annexure 5. Nonconformities, if any, found in the SA internal audits shall be addressed through necessary corrective and prevention actions in Annexure 6.

9.14 Management Review:

Leadership reviews once in six months the adequacy, suitability, and continuing effectiveness of SPL's Social Accountability Policy, procedures, and performance results vis-a-vis the requirements of SA 8000 Standard and other requirements to continually improve the social performance and other requirements.

The following would be the inputs to the Management Review:

- a) Status of actions from previous management reviews
- b) Results of the Audit - Internal, Customer and Certification Body
- c) Health and Safety Incidents and Near Miss
- d) Incidents of Discrimination and results of implementing Remediation Plan
- e) Company's performance relative to the set Goals and Targets for complying with the SA 8000 Standard
- f) Review of the Social Policy, Procedures related to SA 8000 requirements
- g) Results of the Social Performance including Supplier/Contractor performance
- h) Changes in External and Internal requirements including customer, Statutory and Regulatory and Interested Party requirements that could affect the Social Performance
- i) Customer Feedback and Complaints
- j) Internal Complaints and Grievances
- k) Status of Corrective Action and Preventive Actions taken
- l) Adequacy of resources
- m) Effectiveness of actions taken to address the risks
- n) Opportunities for improvement.

The outputs of the management review include decisions and actions related to:

- a) Opportunities for improvement
- b) Any need for changes to the SA 8000 system for improvement
- c) Any resource needs

The decision taken during the management review is recorded, retained, and communicated to the relevant personnel for initiating necessary action. Social Performance Team follows-up for the actions and communicates the status to Leadership.

9.15 Corrective and Preventive Actions

SPL has formulated the procedure for the prompt implementation of corrective and

preventive actions and provides adequate resources for them. The SPT ensures that these actions are effectively implemented.

The SPT maintains records, including timelines, that list, at minimum, non-conformances related to SA8000, their root causes, the corrective and preventive actions taken and implementation results.

9.15.1 Corrective Action:

SPL investigates, addresses, and responds to the concerns of employees, contractor's personnel and other interested parties regarding non-conformance with the company's policy and/or the requirements of SA 8000 standard. The company does not initiate any disciplining. Dismissing or otherwise discriminating against any personnel for providing information concerning observance of the standard.

Remedial and corrective actions are implemented, and necessary resources are allocated appropriate to the nature and severity of any non-conformance identified against the company's policy and/or the requirements of the SA 8000 standard.

The actual cause(s) for the nonconformities is analysed through any one or more of the following:

- a) Review of Records reports and data.
- b) Why-Why Analysis.
- c) Questioning and Brainstorming
- d) Review of audit observation and results of Evaluation of Compliance Obligation
- e) Review of Complaints
- f) Results of Monitoring and Measurement of the Social Performance
- g) Assessment / investigation of the incident through the committees

For all the non-conformances/incidents/complaints, concerned HOD/ Incident Investigation Committee identifies the root cause, initiates necessary corrective actions to eliminate the causes identified to ensure that the nonconformities do not recur and records the actions taken.

Concerned HOD identifies any need for resources (equipment, facilities, competent human resource. and training) to effectively implement the corrective actions and forwards the request to Leadership, who in turn initiates appropriate action.

SPT monitors the effectiveness of the implemented Corrective Actions and maintain records. The result of evaluation is communicated to Top Management, HOD, and Investigation Committee. Where the action taken is not effective, the concerned HOD/Investigation Committee initiates alternative actions.

9.15.2 Preventive Action

Leadership reviews the Social Performance of the organisation and compliance to the obligations and proposes their concerns identify any potential non-conformance and communicate their concerns to respective HODs and SPT.

Concerned HOD in their respective area review the performance and identifies any potential non-conformance and initiates action to prevent its occurrence.

Concerned HOD identifies any need for resources (equipment, facilities, competent human resource, and training) to effectively implement the preventive actions and forwards the request to Leadership, who in turn initiates appropriate action.

SPT monitors the effectiveness of the implemented Preventive Actions and records the result. Where the action taken is not effective, concerned personnel initiates alternative action.

References

Procedure: Training of Employees
Procedure: Site Administrative Manual
Procedure: Corporate Social Responsibility Policy
Procedure: Grievance Redressal Procedure
Procedure: Employee Personal Record Policy
Procedure: Exit Interview

10.00 Related Policies, Procedures & Annexures.

The following Procedures are integral part of this SAMS:

1. CHILD LABOUR

Procedure: Child Labour & Human Trafficking Policy
Procedure: Child Labour Remediation

2. FORCED OR COMPULSORY LABOUR

Procedure: Forced Labour Control

3. HEALTH & SAFETY

Procedures for OHS Management System

4. FREEDOM OF ASSOCIATION & RIGHT TO COLECTIVE BARGAINING

Collective Agreement with Employees Union

5. DISCRIMINATION

Procedure: Code of Conduct
Procedure: Prevention of Sexual Harassment at Workplace (PoSH Procedure)
Procedure: Human Rights Policy
Procedure: Grievance Policy

6. DISCIPLINARY PRACTICES

Procedure: Code of Conduct
Procedure: Anti-Bribery & Anti-Corruption Policy

7. WORKING HOURS

Procedure: Attendance Procedure
Procedure: Leave Policy

Procedure: Holiday Policy
Procedure: Workday & Timing Procedure
Procedure: Compensatory Off/Over Time Policy
Procedure: Employee Personal Record Policy
Procedure: Exit Interview

8. REMUNERATION

Procedure: Recruitment of New Employees
Procedure: Minimum Wages as per Karnataka Govt. Notification
Procedure: Compensatory Off & Overtime Procedure.

9. MANAGEMENT SYSTEM

Procedure: Training of Employees
Procedure: Site Administrative Manual
Procedure: Corporate Social Responsibility Policy
Procedure: Grievance Redressal Procedure
Procedure: Employee Personal Record Policy
Procedure: Exit Interview

10.01 List of Annexures:-

- Annexure 1: Organogram for Social Accountability Management System
- Annexure 2: Current List of Health & Safety Committee (HSC) Members/Safety committee members
- Annexure 3: Current List of Social Performance Team (SPT) Members
- Annexure 4: Social Risk Assessment Format
- Annexure 5: Social Internal Audit Format
- Annexure 6: Corrective & Preventive Actions Format.

ANALYSIS OF THE DATA




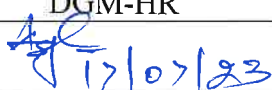
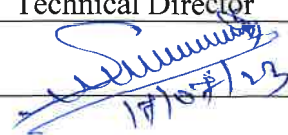
SHILPA PHARMA LIFESCIENCES LIMITED

ANNEXURE-2

CURRENT LIST OF HEALTH & SAFETY COMMITTEE (HSC) / SAFETY COMMITTEE MEMBERS

Page 1 of 1



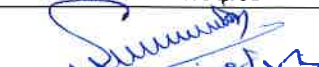
S.No	Name	Designation	Position
1.	K H Honneshaiiah	Head Operations	Safety Advisor
2.	K.Sharath Reddy	Tech Director	Chairman
3.	Jayakumar Kotwal	GM-Engineering	Member
4.	Arvind Kumar Singh	DGM-HR	Member
5.	Govindappa Galagali	AGM-Production Non-Onco	Member
6.	D P.Singh	AGM-Production	Member
7.	Sasidhar Avula	Manager-Production	Member
8.	G. Ramakrishna	Shift Incharge	Member
9.	Sandeep VG	Assistant Manager	Member
10.	Linga Reddy	Sr. Assistant	Member
11.	G. Subramanyam Reddy	Sr. Executive	Member
12.	D.V. Subbareddy	Sr. Executive	Member
13.	K. Rajasekhar Reddy	Sr. Executive	Member
14.	Shivappa	Sr. Electrician	Member
15.	Ahmed Pasha	Assistant	Member
16.	G. Nagarjuna	Shift Incharge	Member
17.	Ravindra Reddy	Shift Incharge	Member
18.	Vaibhav Vilas Deshpande	Senior Executive	Member
19.	Gopalam Sridhar	Executive	Member
20.	Mallikarjun	Executive	Member
21.	Pradeep	Sr. Chemist	Member
22.	Prashant Gundure	Sr. Chemist	Member
23.	G. Venkatesh	Chemist	Member
24.	Naga Sai	Chemist	Member
25.	Jagadeesh	SS-Security	Member
26.	Shalam	Fitter	Member
27.	Moula	Helper	Member
28.	Vijay Kumar	Helper	Member
29.	Karan	Helper	Member
30.	Prabhu	Helper	Member
31.	Sharnappa	Helper	Member
32.	V. Swamy	Helper	Member
33.	Fakruddin	Helper	Member
34.	V. Basava	Helper	Member
35.	Nasser Pasha	Helper	Member
36.	Basavaraj	Helper	Member

	Prepared by	Reviewed by	Approved by
Name	Kapil Khandelwal	Arvind Kumar Singh	K. Sharath Reddy
Designation	Asst. Manager-HR	DGM-HR	Technical Director
Sign.& Date	 17/07/23	 17/07/23	 17/07/23

SHILPA PHARMA LIFESCIENCES LIMITED**ANNEXURE-3**

CURRENT LIST OF SOCIAL PERFORMANCE TEAM (SPT) MEMBERS | Page 1 of 1

Name	Department	Designation
Arvind Kumar Singh	HR	Deputy General Manager
Veereshappa	Production	Sr. General Manager
Jaya Kumar Kotwal	Engineering	General Manager
Bijay Ketan Mangaraj	Quality Control	Sr. General Manager
Chandrasekhar D	Warehouse	Sr Manager
Eranna Swamy	Civil Engg	Sr.Supervisor
Chandrasekhar	Electrical Engg	Supervisor
Ahmad Pasha	Assistant	Warehouse
Ramakrishna K	Shift Incharge	EHS
M Veerendra Kumar	Senior Shift Incharge	SAP Production

	Prepared by	Reviewed by	Approved by
Name	Kapil Khandelwal	Arvind Kumar Singh	K. Sharath Reddy
Designation	Asst. Manager-HR	DGM-HR	Technical Director
Sign.& Date	 17/07/23	 17/07/23	 17/07/23

Raichur, Karnataka, India

Reviewed by:

[illegible]

change in any relevant operational aspects and effective risk control measures will be implemented to manage the risk adequately to create business opportunity.

IPPL has also established required processes to identify and assess social, business ethics and ESG governance related risks arising out of its operations and manage them adequately to create business opportunities.

Prepared by (Head EHS):

Reviewed by (Head HR):

Approved by (Technical Director):

SHILPA PHARMA LIFESCIENCES LIMITED	
ANNEXURE 5	
SOCIAL INTERNAL AUDIT FORMAT	Page 1 of 3

Standard: SA 8000:2014

The Internal Audit of Social Accountability (SA) standard conducted on DD-MM-YYYY and following processes assessed as part of the Social Internal Audit:

Process / Department	Auditees	Auditors
Production		
Engineering		
Warehouse		
Supply Chain		
QA & QC		
EHS		
HR & Admin		
Management Representative		

Part A: Strengths:

The summary of the effectiveness of the implemented management system against each of the elements of the SA 8000 standard is as under:

1-Child Labour:

2-Forced Labour:

3-Health and Safety:

SHILPA PHARMA LIFESCIENCES LIMITED (UNIT-2)

ANNEXURE-5

Page 2 of 3

4-Freedom of Association & Right to Collective Bargaining:

5-Discrimination:

6-Disciplinary Practices:

7-Working Hours:

8-Remuneration

9-Management Systems

Part B: Identified Opportunities for Improvements (OFIs) are listed below:-

Area of Concern (e.g., Working hours, Health & Safety, Management System, etc.)

SHILPA PHARMA LIFESCIENCES LIMITED (UNIT-2)**ANNEXURE-5**

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Signature of Auditees

Process / Department	Lead Auditees	Signature / Date
Production		
Engineering		
Warehouse		
Supply Chain		
QA & QC		
EHS		
HR & Admin		
Management Representative		

Signature of Auditors

Process / Department	Lead Auditors	Signature / Date
Production		
Engineering		
Warehouse		
Supply Chain		
QA & QC		
EHS		
HR & Admin		
Management Representative		

Head EHS
Signature
Date :

Head HR
Signature
Date:

Tech Director
Signature
Date:

SHILPA PHARMA LIFESCIENCES LIMITED

ANNEXURE-6

CORRECTIVE & PREVENTIVE ACTIONS OF INTERNAL AUDIT

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CORRECTIVE & PREVENTIVE ACTION PLAN REPORT

Standard: SA 8000:2014

Date of Internal Audit:

Date of Review:

Process/ Department	Auditee	Auditor
Production		
Engineering		
Warehouse		
Supply Chain Management		
QA & QC		
EHS		
HR & Admin		
Management Representative		

SHILPA PHARMA LIFESCIENCES LIMITED (UNIT-2)

ANNEXURE-6

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The internal audit is carried out as per SPL'S Code of Conduct, Local Labour Laws and SA8000 Management System (SAMS) requirements. The audit findings and corrective & preventive action plant report is given below:-

SAMS Element	Findings	NC/OFI	CAPA Plan	Responsibility	Target Date	CAPA Status (Open/Close)

Signature of Head EHS

Date

Signature of Head HR

Date:

Signature of Director

Date: