



matrix pharma
corp

SUPPLIER CODE OF CONDUCT POLICY

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1. Introduction

Matrix Pharmacorp Private Limited and all its holding/subsidiary/associate/group companies/entities including Tianish Laboratories Private Limited hereinafter collectively will be referred to as (“Company/Matrix Pharma”).

Matrix Pharma is one of the major contributors in manufacturing and marketing of Active Pharmaceutical Ingredients (APIs). We value and uphold the principles of sustainability, fairness, and transparency in every facet of our operations & we are committed to conducting business with the highest standards of ethics, integrity, and responsibility.

This **Supplier Code of Conduct** establishes the framework of expectations for all our suppliers, subcontractors, and service providers, incorporating the principles of the **Pharmaceutical Supply Chain Initiative** (PSCI) to promote responsible and ethical business practices. We encourage our suppliers to embrace these principles and promote them throughout their own supply chains, as per what is feasible and applicable.

2. Applicability

This **Supplier Code of Conduct** applies to all **suppliers, subcontractors, and service providers** involved in supplying **goods, and services** to **Matrix Pharma**.

All direct and indirect suppliers, regardless of location, must adhere to the principles outlined in this Code.

Matrix Pharma expects suppliers to comply with all relevant **local, national, and international laws** and follow the higher standard when local laws differ from this Code.

Matrix Pharma expects all suppliers to review, acknowledge, and comply with this Code. We are committed to monitoring supplier adherence to these principles, and we take any violation of these standards seriously.

3. Ethical Business Conduct

Matrix Pharma expects all suppliers to maintain the highest standards of ethical conduct and business practices. As a leading API manufacturer, we depend on the integrity and quality of our suppliers to ensure compliance with regulatory standards and contribute to patient safety. All suppliers must uphold the following principles-

Fair Competition & Anti-Corruption

- Suppliers must conduct business in compliance with all applicable competition and antitrust laws. They should not engage in any unfair practices, including price fixing, collusion, or other forms of anti-competitive behaviour.
- Suppliers are prohibited from offering or accepting bribes, kickbacks, or other corrupt practices.
- Suppliers must promptly report any instances of corruption or unethical behaviour and take necessary actions to mitigate such risks.

Intellectual Property & Confidential Information

- Suppliers must protect Matrix Pharma's intellectual property, trade secrets, and other confidential information, using them only for purposes agreed upon.
- Any unauthorized sharing or misuse of proprietary information is strictly prohibited.
- Suppliers must ensure compliance with data privacy laws and regulations in all jurisdictions where they operate.

Accurate documentation

- Suppliers must maintain accurate and complete documentation of all processes, transactions, and activities to ensure compliance with the Supplier Code of Conduct.
- Documentation must be readily accessible and audit-ready, demonstrating adherence to legal, regulatory, and contractual obligations.
- Suppliers should ensure that records are properly stored, protected, and retained in accordance with applicable laws and Matrix Pharma requirements.
- As part of our oversight process, we may review our key suppliers to assess compliance with our policies, regulatory obligations, and industry best practices.

Anti-Boycotting laws

- Suppliers must comply with all applicable anti-boycotting laws and regulations in the jurisdictions where they operate.
- Suppliers should avoid engaging in or supporting any form of discriminatory or illegal boycott practices against any country, entity, or individual.
- Any actions or agreements that could violate anti-boycotting laws must be promptly reported to Matrix Pharma for review.

4. Human Rights & Labour rights

Matrix Pharma upholds a strong commitment to human rights and the well-being of all workers throughout its supply chain. We expect all suppliers to support the following principles to ensure dignity, respect, and fairness-

Right to Freedom of Employment

- Matrix Pharma prohibits the use of **forced**¹, **bonded**², or **child labour**³ in any form. Suppliers must not engage in or support **human trafficking**⁴, **slavery**⁵, or the exploitation of any worker.
- All workers must be employed voluntarily, and no worker should be required to pay for employment or be denied freedom of movement.
- Workers must not be required to deposit identification documents or other personal items as a condition of employment. Workers should have the right to leave the job at any time without penalty.

Child Labor

- Suppliers shall not employ children under the legal minimum age for employment as defined by local law or international standards (whichever is higher). The use of child labour is strictly prohibited in all aspects of our supply chain.
- Suppliers must ensure proper documentation and verification of the age of their workers to avoid any unintentional engagement of minors in employment.

Forced Labor

- Matrix Pharma maintains a zero-tolerance policy toward any form of forced labour.
- Suppliers are required to ensure that no worker is subject to coercion, violence, or threats to force them into employment.

Working Conditions & Non-Discrimination

- Suppliers must maintain a safe and healthy working environment in compliance with applicable laws and industry standards.
- Discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political beliefs, or union affiliation is strictly prohibited.

Fair Compensation

- Suppliers must pay workers a fair wage that meets or exceeds local minimum wage standards and ensures an acceptable standard of living.
- All compensation, including overtime, should be paid in a timely and transparent manner, with clear communication regarding wages, hours, and work expectations.

Freedom of Association & Collective Bargaining

- Suppliers must respect the right of workers to freely associate, organize, and engage in collective bargaining without interference, intimidation, or retaliation.
- Suppliers should encourage open communication between workers and management to address workplace concerns, including health and safety, compensation, and working conditions.

Harassment & Abuse

- Suppliers must prohibit any form of harassment, abuse, or bullying in the workplace, including physical, verbal, or sexual abuse.
- Appropriate disciplinary action should be taken against those who engage in such behaviour.
- Clear reporting mechanisms must be available for employees to report concerns regarding workplace abuse or mistreatment.

5. Health and Safety

Matrix Pharma expects its suppliers to uphold the following health and safety standards:

- Suppliers must identify and communicate hazards, ensuring protection from ergonomic, chemical, biological, and physical risks.
- Suppliers must assess and identify potential emergency situations in the workplace.
- Suppliers must have emergency response plans and regular drills to address potential workplace emergencies.
- Suppliers should engage qualified people & authorized vehicles for delivery of goods.
- Suppliers should assign trained staff in case their employees are required to stay in Matrix Pharma premises till completion of the job.

6. Environment

Matrix Pharma expects its suppliers to uphold the following environmental standards:

- Suppliers should reduce natural resource consumption, enhance resource efficiency, and prioritize recycling and reusing materials.
- Suppliers must safely manage and dispose off waste, following relevant environmental regulations. Waste treatment should minimize harmful impacts on health and the environment.
- Suppliers should monitor emissions, reduce air, and water pollution, ensuring compliance with environmental standards to protect human and environmental health.
- Suppliers must adhere to all environmental laws and regulations relevant to their operations, including maintaining necessary permits for emissions and waste disposal.
- Key suppliers are expected to engage in reducing greenhouse gas (GHG) emissions and actively participate in our supply chain sustainability engagement programs (such as annual ESG assessment)

7. Governance and Management Systems

Suppliers are expected to implement strong governance frameworks that promote ethical business practices, regulatory adherence, and continuous improvement such as:

- **Supply Chain Traceability** – Establish and maintain systems that promote responsible sourcing
- **Continuous Improvement** – Set performance goals, conduct assessments, and implement corrective actions.
- **Training and Competency** – Provide ongoing training to enhance employee skills and compliance awareness.
- **Grievance Mechanisms** – Establish confidential channels for reporting concerns without fear of retaliation.
- **Incident Response** – Investigate, correct, and remediate violations of this Code.
- **Risk Management** – Implement processes to assess, prevent, and mitigate operational risks, including managing changes effectively.

8. Anti-Retaliation

Matrix Pharma maintains a strict non-retaliation policy. Employees, suppliers, workers, or partners who report violations of the Supplier Code of Conduct in good faith will be protected from any form of retaliation.

Any punitive actions or retaliation against individuals who raise concerns will not be tolerated and will result in severe disciplinary measures against the responsible parties.

9. Policy Review

This policy will be reviewed on a periodic basis and updated as necessary to ensure its continued relevance and effectiveness.

10. References

Suppliers are encouraged to explore the available guidance and tools provided by the Pharmaceutical Supply Chain Initiative (PSCI). A comprehensive overview of the PSCI Principles can be found [here](#)

GLOSSARY



1. Forced Labour

Work that people are compelled to do against their will, usually under threat or punishment. This could include physical force, coercion, or threats of harm.

Example: An employee who is forced to work long hours without pay because they are threatened with being harmed or punished.

2. Bonded Labour

A form of exploitation where a person is forced to work in order to repay a debt, but the conditions of the work and the terms of the debt are manipulated to ensure that the individual is never able to repay what they owe, often leading to a life of perpetual labour.

Example: A worker is told they owe money to an employer for “Hand loan” as an alternative the worker is forced to work long hours, often under unsafe conditions, without ever being able to pay off the debt.

3. Child Labour

The employment of children in work that interferes with their childhood, education, and causes harm to their physical or mental development.

Example: Children working in factories or fields instead of attending school, often under hazardous conditions.

4. Human Trafficking

The illegal trade of people for exploitation or commercial gain. It involves the recruitment, transportation, or harbouring of individuals through force, fraud, or coercion, often for the purpose of forced labour, sexual exploitation, or slavery.

Example: A person being tricked or forced into working in a factory under poor conditions with no pay.

5. Modern Slavery

A situation where people are forced to work against their will, under threat, or in circumstances where they cannot leave. It includes practices like forced labour, servitude, and human trafficking.

Example: A worker in a factory who is not allowed to leave their job, receives no wages, and is threatened with violence if they attempt to escape.



ANNEXURE

Frequently Asked Questions (FAQ's)

➤ **What is the purpose of Matrix Pharma's Supplier Code of Conduct?**

The Supplier Code of Conduct establishes the ethical expectations and standards that all suppliers, subcontractors, and service providers must follow when engaging in business with Matrix Pharma. It ensures that suppliers uphold principles of sustainability, fairness, transparency, and operate with the highest standards of ethics and responsibility.

➤ **Who is required to follow the Supplier Code of Conduct?**

All suppliers, subcontractors, and service providers who provide goods and services to Matrix Pharma are required to adhere to the principles outlined in the Supplier Code of Conduct, regardless of their location. Both direct and indirect suppliers are expected to comply.

➤ **What are the key ethical expectations from suppliers?**

Matrix Pharma expects suppliers to maintain fair competition, engage in anti-corruption practices, and protect intellectual property. Suppliers must also comply with all relevant laws, avoid unethical business practices, and ensure the confidentiality of Matrix Pharma's proprietary information.

➤ **How does Matrix Pharma ensure compliance with human rights and labour rights?**

Matrix Pharma is committed to human rights and the well-being of all workers in its supply chain. The company prohibits forced labour, bonded labour, child labour, and human trafficking in any form. Suppliers must provide safe and non-discriminatory working conditions, fair compensation, and respect workers' rights to freely associate and engage in collective bargaining.

➤ **What is Matrix Pharma's stance on child labour?**

Matrix Pharma has a zero-tolerance policy for child labour. Suppliers must not employ children under the legal minimum age for employment, as defined by local law or international standards. Suppliers must also verify the age of their workers to prevent any inadvertent use of child labour.

➤ **How does Matrix Pharma ensure occupational health and safety in its supply chain?**

Matrix Pharma requires suppliers to identify and address potential hazards in the workplace, including ergonomic, chemical, biological, and physical risks. Suppliers must have emergency response plans, conduct regular safety drills, and maintain a safe, healthy working environment in compliance with relevant laws and industry standards.

➤ **What environmental standards must Matrix Pharma's suppliers meet?**

Matrix Pharma expects suppliers to minimize environmental impacts by reducing resource consumption, conserving energy, and managing waste responsibly. Suppliers must comply with all environmental regulations, reduce pollution, and ensure proper waste disposal practices to protect human health and the environment.

➤ **What actions should a supplier take if they become aware of a breach of the Supplier Code of Conduct?**

Suppliers must report any violations of the Supplier Code of Conduct immediately. If they detect unethical behaviour such as corruption, human rights violations, or any other breach of the Code, they should report it using the designated channels, such as the Ethics Hotline or directly to the Compliance Officer.

➤ **What consequences will suppliers face if they violate the Supplier Code of Conduct?**

Suppliers who violate the Supplier Code of Conduct may face immediate corrective actions, including suspension or termination of contracts, legal actions, and other measures to address the violation. Matrix Pharma takes these breaches seriously and enforces its standards strictly.

➤ **How can suppliers contribute to reducing environmental impact?**

Suppliers can reduce their environmental impact by improving resource efficiency, reducing waste, prioritizing recycling, and minimizing emissions. Matrix Pharma expects its suppliers to monitor their environmental footprint, reduce pollution, and comply with all relevant environmental laws and regulations.

➤ **What should a supplier do if they encounter a situation of forced labour or human trafficking in their operations?**

If a supplier encounter forced labour or human trafficking in their operations, they are required to immediately report it to Matrix Pharma through the designated reporting channels. Matrix Pharma has a zero-tolerance policy for such practices and will take immediate action to investigate and address the situation.

➤ **Can suppliers be held accountable for violations committed by their subcontractors or other third parties?**

Yes, Matrix Pharma expects suppliers to ensure that their subcontractors, vendors, and other third parties also comply with the Supplier Code of Conduct. Suppliers may be held accountable for any violations committed by parties within their supply chain, and Matrix Pharma will take appropriate action to address these violations.

➤ **What is Matrix Pharma's policy on retaliation against workers who report violations?**

Matrix Pharma has a strict anti-retaliation policy to protect workers who report violations of the Supplier Code of Conduct. Workers are encouraged to report concerns without fear of retaliation. The company ensures that all reports are handled confidentially, and any retaliation or punitive actions against whistleblowers will result in severe consequences for the responsible parties.