



ANTI HUMAN TRAFFICKING & MODERN SLAVERY POLICY

Policy Name	Anti Human Trafficking & Modern Slavery 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 will be collectively referred to as (“Company/Matrix Pharma”).

Matrix Pharma is one of the major contributors in manufacturing and marketing of Active Pharmaceutical Ingredients (APIs). We believe every person matters and deserves the opportunity to live a healthy life. Matrix markets varied products in the majority of regions. This policy statement is applicable to all subsidiaries, associates and affiliates of Matrix Pharma. It is made pursuant to all the applicable laws of India including Criminal Laws, which require public disclosures regarding our efforts to eradicate slavery and human trafficking from our supply chain and businesses.

Our company's policy strictly adheres to the Child Labour (Prohibition and Regulation) Act of 1986 and Article 23 of the Indian Constitution, which prohibits trafficking in human beings and any form of forced labor. We are committed to upholding the highest ethical standards and legal requirements, ensuring that our business practices foster a fair, safe, and equitable working environment for all.

2. Our commitment in combatting Modern day slavery & Human trafficking

Matrix Pharma is committed to upholding human rights and strictly prohibits all forms of [human trafficking](#)¹, [modern slavery](#)², [forced labour](#)³, [servitude](#)⁴, [child labour](#)⁵, [debt bondage](#)⁶ and any other exploitation of individuals within its operations and supply chains.

This commitment is also reflected in our Code of Business Conduct and Ethics, which outlines the ethical standards we follow to conduct business and in Supplier Code of Conduct (the “Supplier Code”).

The Supplier Code prohibits our suppliers from using forced, bonded, indentured or illegal child labour; requires suppliers to respect workers’ freedom of association; and requires adherence to all applicable laws regarding wages, benefits, hours of work and working conditions. The Supplier Code also prohibits our suppliers from supporting, promoting or engaging in slavery or human trafficking.

Verification

Matrix Pharma continuously works to verify that we do not promote or engage in slavery and human trafficking. We require employees to certify that they have read, understood & agreed to comply with the COBE- Code of Business Conduct and Ethics.

We actively monitor and track both direct and indirect suppliers who are required to acknowledge and adhere to the Supplier Code.

Our standard supply agreements include provisions related to sustainability, human rights, and compliance with the *Supplier Code*. The agreements clearly state our right to monitor and follow up with suppliers to ensure they adhere to these obligations.

Supplier Audits

As part of our commitment to ethical practices, Matrix Pharma collaborates with other pharmaceutical companies to conduct supplier audits using a standardized audit process. We conduct audits based on risk assessments, and suppliers may be subject to audits when deemed necessary. Third parties may be engaged to assist in these audits to ensure compliance with our Supplier Code and relevant regulations.

Certification

Suppliers must comply with the terms of contracts and purchase orders with Matrix Pharma. By doing business with us, each supplier agrees to adhere to all relevant laws and regulations.

Matrix Pharma reserves the right to assess suppliers' compliance with our Supplier Code of Conduct. This may involve audits conducted by Matrix Pharma personnel or third-party auditors to ensure adherence to ethical standards.

3. Internal Accountability

Matrix Pharma holds its employees and stakeholders accountable for adhering to this policy, the Code of Business Conduct and Ethics, the Supplier Code of Conduct, and other related policies.

Any violation of these laws or policies may result in disciplinary action, including termination of employment or contracts.

Employees are encouraged to report concerns about potential violations. Multiple reporting tools are available as outlined in the Code of Business Conduct and Ethics, and the Supplier Code, ensuring that all individuals understand their responsibilities to report violations.

4. Employee Accountability

Matrix Pharma employees must-

- **Not engage in human trafficking:** This includes recruiting, transporting, or exploiting individuals for forced labour or commercial sex through force, fraud, or coercion.
- **Not use forced labour or child labour:** Forced labour is any work extracted under threat or coercion, and child labour is the employment of workers below the legal age as per local laws.
- **Not confiscate or conceal identity or immigration documents:** Colleagues' rights to their personal identification, such as passports or driver's licenses, must never be denied.
- **Not engage in fraudulent recruitment practices:** All recruitment must transparently disclose wages, benefits, work locations, housing costs, and health and safety factors.
- **Ensure third-party agents comply with labour laws:** Suppliers and recruiters must adhere to local labour laws, and no recruitment fees should be charged to employees.
- **Provide legally sufficient contracts:** Employment contracts or appointment letters must be consistent with applicable laws.
- **Not hinder freedom of employment:** Charging fees to employees for ending employment is prohibited. (unless notice pay for notice period is clearly specified in the employment contract)
- **Must promptly report** any violations whether potential or verified.

GLOSSARY

1. 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.

2. 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.

3. 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.

4. Servitude

A condition where an individual is forced to work for someone without the ability to leave, often in exchange for minimal or no pay, and without the freedom to make their own choices.

Example: A domestic worker who is forced to stay with an employer and work in exchange for food and shelter but is not allowed to leave or interact with others outside of the household.

5. Child Labour

The employment of children in work that deprives them of their childhood, education, and is harmful to their physical or mental development.

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

6. Debt Bondage

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 and is forced to work long hours, often under unsafe conditions, without ever being able to pay off the debt.

7. Indentured Labour

A system where people are contracted to work for a specific period of time in exchange for something of value, like transportation or shelter. However, when this system is abused, it can result in exploitation, where the worker's freedom is restricted, and the terms are manipulated.

Example: A person is brought to work in a country under a contract but is forced to work beyond the agreed terms and is not allowed to leave the employer's premises.

ANNEXURE

Frequently Asked Questions (FAQ's)

➤ **What is the purpose of the Anti-Human Trafficking Policy?**

The purpose of this policy is to ensure that Matrix Pharma operates free from human trafficking, modern slavery, forced labour, servitude, and other forms of exploitation. It establishes a commitment to ethical practices across the company and its supply chain, creating a safe environment for all employees.

➤ **Does the Anti-Human Trafficking Policy apply to all employees and contractors?**

Yes, this policy applies to all employees, contractors, vendors, suppliers, and business partners associated with Matrix Pharma, regardless of location or role. All parties are required to comply with the policy to prevent human trafficking and exploitation within the organization and its operations.

➤ **What actions should I take if I suspect human trafficking or forced labour in the workplace?**

If you suspect human trafficking or forced labour, you should report it immediately through the designated reporting channels, such as HR, the Ethics Hotline, or directly to the Compliance Officer. Your report will be confidential and will be thoroughly investigated.

➤ **How does Matrix Pharma ensure its supply chain is free from human trafficking?**

Matrix Pharma conducts regular audits and assessments of its suppliers and partners to ensure they comply with this Anti-Human Trafficking Policy. Suppliers must demonstrate adherence to ethical labour standards and be proactive in preventing exploitation, with training provided to help identify and address trafficking risks.

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

Matrix Pharma has a zero-tolerance policy towards forced labour, bonded labour, [indentured labour](#)⁷, and child labour. The company does not tolerate these practices in any part of its operations or supply chain. Violations will result in immediate action, including termination of contracts and legal measures.

➤ **What happens if a violation of the Anti-Human Trafficking Policy is found?**

If a violation is found, Matrix Pharma will take immediate corrective action, which may include disciplinary measures, termination of employment, or the severance of business relationships. Legal action will be pursued if necessary, and the company will cooperate fully with law enforcement agencies.

➤ **What should I do if I feel that I am being forced into labour or exploited?**

If you feel you are being exploited or forced into labour, you should report it to your manager, HR, or the Compliance Officer. You will be supported and protected under the policy, with immediate steps taken to address your concerns.

➤ **Are there any protections in place for whistleblowers who report human trafficking violations?**

Yes, whistleblowers who report suspected violations of the policy are protected from retaliation. Confidentiality is maintained throughout the process, and any form of retaliation will not be tolerated. Reports will be handled in accordance with company procedures and the law.

➤ **How can I help raise awareness about human trafficking within the company?**

Employees are encouraged to take part in training sessions and discussions about human trafficking and related issues. By staying informed and vigilant, you can help identify potential risks and ensure a safer, more ethical work environment for all.

➤ **What happens if a supplier or partner does not comply with the Anti-Human Trafficking Policy?**

Suppliers or partners who fail to comply with the policy may face consequences, including suspension or termination of their contracts. Matrix Pharma may seek alternative suppliers who meet the company's ethical standards and demonstrate a commitment to preventing human trafficking and exploitation.