



Sun Pharmaceutical Industries Limited

Corporate Social Responsibility Policy

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Versions Tracking

This CSR Policy was approved by the Board of Directors of Sun Pharmaceutical Industries Limited (“Company”) on August 12, 2014, and thereafter amended on August 11, 2017, and on May 27, 2021.

| Version | Revision Date | Description |
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| 1.0 | August 12, 2014 | 1 st Document |
| 2.0 | August 11, 2017 | 2 nd Document |
| 3.0 | May 27, 2021 | 3 rd Document |

Contents

| | | |
|-----|---------------------------------------|----|
| 1. | CSR vision and mission statement..... | 4 |
| 2. | CSR policy objectives..... | 4 |
| 3. | Stakeholder Engagement..... | 4 |
| 4. | Process | 5 |
| 5. | Monitoring and Evaluation Plan | 12 |
| 6. | Communication and reporting | 13 |
| 7. | CSR Expenditure | 13 |
| 8. | Exclusions | 14 |
| 9. | Conclusion | 14 |
| 10. | Applicability | 14 |

Sun Pharmaceutical Industries Limited

This policy, which encompasses the company’s philosophy towards corporate social responsibility and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large, is titled as the ‘CSR Policy for Sun Pharmaceutical Industries Limited’.

1. CSR vision and mission statement

1.1. CSR vision

“We will strive to bring about the holistic development of underserved communities in a sustainable and impactful manner.”

1.2. CSR mission

“We will leverage our people, expertise and networks to address the needs of the communities that we serve and thereby catalyze overall development.”

2. CSR policy objectives

Drawing from the CSR vision and mission statement of Sun Pharmaceutical Industries Limited the CSR policy has been formulated with the following objectives:

- **Serving the community:** Giving back to the community and addressing their needs is a key priority for the company. The company believes that the progress of the local community should go hand-in-hand with the growth of the company. The company therefore intends to concentrate on the communities immediately around its areas of operation and support their upliftment.
- **Focus on quality:** The Company believes in delivering high quality support to meet the needs of the community.
- **Ensuring sustainability:** The Company wishes to introduce interventions in the communities that address critical needs and can become sustainable over a period of time.
- **Leveraging resources:** Leveraging the company’s internal resources such as research, marketing, financial, human resources and products to maximise impact in social initiatives.

3. Stakeholder Engagement

The Company will impact and engage the following set of stakeholders in their CSR activities. These stakeholders will participate in the CSR initiatives as beneficiaries, participants and/or decision makers.

The following table lists the stakeholders engaged and their roles / functions:

| Stakeholder | | Role / function of the stakeholder |
|-------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Internal | Employees | Employees can volunteer for, champion causes and implement the company’s CSR initiatives. |
| | Management | The management will set the vision for all the CSR initiatives. They will ensure compliance and adherence, encourage innovation and oversee the implementation of the CSR activities. |
| | Shareholders | No active involvement. |

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| External | Community | The community will be the beneficiaries of CSR activities at the initial stage, but, they will be expected to become the owners and drivers of these initiatives over a period of time. |
| | Doctors | Sun Pharma's network of doctors and hospitals will be encouraged to participate in the CSR initiatives by contributing their time and expertise and encouraging positive healthcare practices amongst patients and the masses. |
| | Government | Sun Pharma will collaborate with local and national government agencies to implement the programs and could also provide support to existing government schemes within the causes that the company aims to support. |
| | NGOs and social enterprises | NGOs and social enterprises could help Sun Pharma with conducting community needs assessment studies, feasibility studies, implementing the CSR initiatives as well as providing monitoring and impact evaluation support. |

4. Process

The salient features of the CSR policy comprises of:

- CSR philosophy of the company
- Governance structure
- Causes that the company plans to support over a period of time
- Specific CSR programs and strategic initiatives

4.1 CSR Philosophy

The company intends to undertake its corporate social responsibility in a strategic manner. The company will leverage its financial and human resources, networks and expertise to create maximum impact for its stakeholders.

4.2 Governance Structure

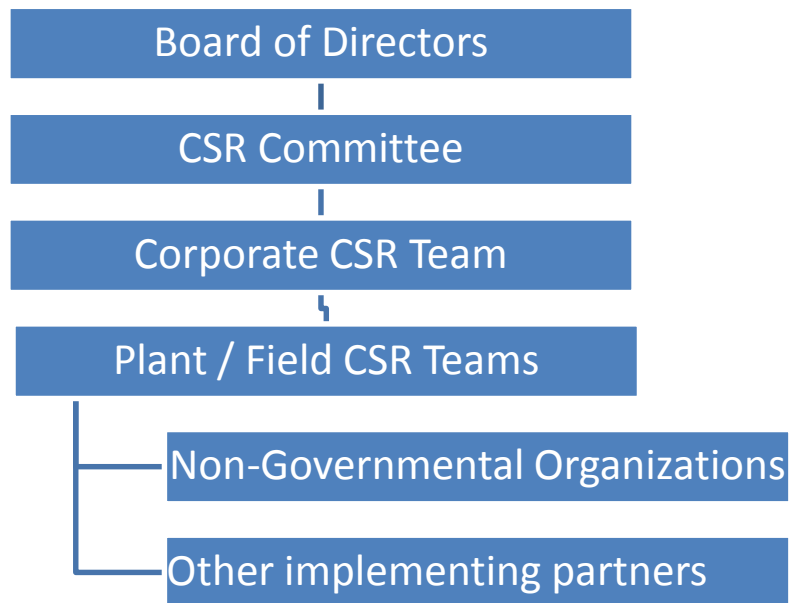
This sub - section describes the governance structure that the Company will adopt to implement its CSR activities in line with the Companies Act.

For Sun Pharmaceutical Industries Limited, the Governance Structure includes the following –

- Board of Directors
- CSR Committee
- Corporate CSR Team
- Plant / Field CSR Teams
- Non-Profit Organizations (NGOs)

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The governance structure and the team members are given below:



Each of the above constituents has a specific role to play with clearly defined roles and responsibilities. These are as under:

4.2. 1. Board of Directors

The Board of Directors will be responsible for the following:

- Approve causes that the company proposes to support, programs to be undertaken by the company, modalities of operation and the Annual budget for the activities.
- Ensure that activities included by a company in its Corporate Social Responsibility Policy are related to the activities included in Schedule VII of the Companies Act, 2013
- Ensure that the activities included in Corporate Social Responsibility Policy of the company are undertaken by the Company
- Ensure that the company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years, in pursuance of this policy
- The Board's Report issued under clause (o) of sub-section (3) of section 134 shall include an annual report on CSR containing particulars specified in Annexure to the CSR Rules.
- If the company fails to spend such amount, specify the reasons for not spending the amount in its annual report mentioned above.
- To approve the Annual Plan and Projects of the Company relating to CSR activities the Annual Plan and Projects of the Company relating to CSR activities, the manner in which such programmes or projects shall be executed, the modalities of utilisation of funds and implementation, monitoring and reporting mechanism and details of impact assessment.

Sun Pharmaceutical Industries Limited

4.2. 2. CSR Committee

The CSR Committee will be responsible for the following:

- To recommend to the Board the Annual Plan and Projects of the Company relating to CSR activities, the manner in which such programmes or projects shall be executed, the modalities of utilisation of funds and implementation, monitoring and reporting mechanism and details of impact assessment.
- Recommending the amount of expenditure to be incurred on the activities referred above.
- Monitoring the Corporate Social Responsibility Policy of the company on a regular basis, ensuring that it is updated for any change or enhancement in scope and the same is recommended to the board for approval.
- Defining the modalities and monitoring the progress of the activities being undertaken under the policy.

4.2. 3. Corporate CSR Team

The CSR Corporate Team which will:

- Be the first point of contact for the operating CSR teams for advice and guidance.
- Provide guidelines and framework for the rest of the organisation to work within.
- Recommend programs, modality of operation and monitoring mechanism.
- Ensure availability of adequate resources.
- Support the CSR committee to ensure full compliance of the regulation.

4.2. 4. Plant / Field CSR Team

All the CSR activities of the company will be overseen by the CSR Department. The company may also implement some initiatives through external partners or may even implement certain interventions directly through its own local team.

The company may also choose to implement some or all of its CSR activities through its Social arm as follows:

1. Sun Pharma Community Healthcare Society
2. Sun Pharma Science Foundation
3. Foundation for Disease Elimination and Control in India (FDEC)

All organisations/Implementing Agencies through which the Company conducts its CSR activities should be registered as a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, and also possess CSR Form-I Registration Certificates required under Ministry of Corporate Affairs as per CSR Rules mentioned under clause 4 (2).

Sun Pharmaceutical Industries Limited

4.3 Roles and Responsibilities

4.3.1 The role of the Corporate CSR will include:

- Helping conceptualize the programs that Sun Pharmaceutical Industries Limited intends to support.
- Executing the programs through its employees or in collaboration with other partners such as NGOs, the government, and community based organizations, sector experts and any other partners as are deemed necessary.
- Collecting and analyzing data for monitoring and reporting of all programs.
- Providing capacity building support to the program team and implementation partners.
- Providing periodic reports to the CSR Task Force and CSR Committee.

4.3.2 Roles of Local Unit CSR Teams

Every location of the company may have its own CSR team comprising of either dedicated resources or employees fulfilling this role along with their other responsibilities. The responsibility of each such local team will include –

- Collecting requests from the community for CSR programs.
- Verifying the authenticity of these requests.
- Sending proposals to the CSR Department for approvals.
- Helping all relevant partners to get requisite permissions from the community and the government to implement the CSR activities.
- Engaging the employees in the CSR initiatives.
- Monitoring the progress and submitting periodic reports to the corporate office

4.3.3 Roles of Non-Profit Organization(s) as Partners

The company may implement some or all of its CSR programs through social organisations with at least three years of track record. The company may support such organisations in their existing programs or may co-develop new programs with them. The Company may collaborate with other companies for undertaking the CSR projects/programmes subject to fulfilment of separate reporting requirements as prescribed in the Rules.

Social organizations will help the company in the following ways:

- a) Assisting the CSR Department, Sun Pharma NGOs and Local CSR teams in conceptualizing and implementing their CSR programs.

Sun Pharmaceutical Industries Limited

- b) Providing capacity building support to all the partners.
- c) Providing periodic reports and updates to the company / Foundation.
- d) Collecting and analyzing data for monitoring and reporting of all programs
- e) Monitoring the progress made by the program partners.
- f) Tracking, measuring and communicating the impact that the programs have created to relevant stakeholders.

4.4 Principal causes supported by CSR activities and Proposed Programs

This sub – section contains the potential causes the company may take up as a part of its CSR activities. The table also contains the programs that the company is wishes to undertake alongwith the expected objectives of each program.

The scope of CSR activities of the Company will inter-alia cover the below mentioned key thrust areas. The CSR activities shall not include any activity undertaken by the Company in pursuance of the normal course of business of a Company. The company may conduct a pilot for each of the selected programs, identify issues, if any and address them before scaling up to the desired level. All the programs will be implemented by the company in collaboration with program management consultants and vendors for providing products/services.

| Sector | Cause | Issue addressed | Proposed Program | Expected Outcomes |
|------------|-----------------------------------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Healthcare | Ophthalmology | Lack of treatment seeking behaviour despite high prevalence of eye diseases across the country | School and community eye care program | <ul style="list-style-type: none"> ▪ Increased treatment seeking behaviour ▪ Better visual health outcomes |
| | Oncology | Lack of awareness especially regarding non-medical information, lack of screening | Cancer helpline | <ul style="list-style-type: none"> ▪ Increased access to credible information that is not easily available ▪ Increased access to referrals of counselling services |
| | | | Clinical breast examination and breast self examination | <ul style="list-style-type: none"> ▪ Increased chances of survival due to early detection ▪ Increased awareness on breast cancer |
| | Health Infrastructure Development | Lack of Cancer Treatment Facilities, Lack of Eye-care facilities, | Construction, Renovation and Upgradation of Hospital, Provision of medical equipments | <ul style="list-style-type: none"> ▪ Affordable cancer treatment, ▪ Better eye care services |

Sun Pharmaceutical Industries Limited

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| | Neurology: Epilepsy | Lack of diagnosis and social stigma attached to epileptic patients | Epilepsy | <ul style="list-style-type: none"> ▪ Increased awareness regarding Epilepsy ▪ Better mental health outcomes |
| | Psychiatry: mental health | Lack of diagnosis, lack of care giving facilities for patients | Mental health support for children in institutions | <ul style="list-style-type: none"> ▪ Better mental health outcomes ▪ Increased support to care-givers |
| | Primary Health Care Services | Poor infrastructure and healthcare services at PHCs | Strengthening PHC outreach and services | <ul style="list-style-type: none"> ▪ Better health outcomes ▪ Better healthcare delivery ▪ Increased number of institutional deliveries |
| | School health services | Poor infrastructure and healthcare services at schools | School health services | <ul style="list-style-type: none"> ▪ Decrease in absentee rate and school dropout rates |
| | Hygiene and sanitation | High prevalence of open defecation, poor infrastructure to address sanitation issues at the community level | Construction of household toilets and community toilets | <ul style="list-style-type: none"> ▪ Decrease in prevalence of open defecation ▪ Better health outcomes ▪ Increased awareness regarding sanitation issues |
| | De-addiction | High prevalence of addiction: substance and / or alcohol abuse | De-addiction | <ul style="list-style-type: none"> ▪ Better health outcomes ▪ Decrease in unemployment level among youth |
| | Vector-borne disease | Lack of treatment, timely diagnosis and awareness in the areas of high incidence of malaria | Malaria Eradication Programme | <ul style="list-style-type: none"> ▪ Increased awareness regarding vector-borne disease issues. ▪ Treatment and examination support for project communities |
| Environment | Waste management | Poor waste recycling system and disposal | | |
| | Plantation and Afforestation | Lack of awareness towards environment conservation | Road-side plantation, Green Belt development and Orchard Development | <ul style="list-style-type: none"> • Environment Conservation • Better greenery in the area • Socio-economic development |
| Education | School transformation and remedial education, Educational Infrastructure Up-gradation and Development, Animal Welfare Centres, | Lack of technology-based learning solutions Poor facilities for slow learners at schools Poor quality of education in government schools Poor enrolment rates | Anganwadi and school transformation; Construction of school and its classroom, Supporting causes towards educational development in College/ Universities, Animal Welfare Centres | <ul style="list-style-type: none"> ▪ Better infrastructure in schools and Anganwadis ▪ Holistic development of beneficiaries ▪ Improvement in quality education ▪ Animal Welfare |

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| | | | Remedial education | <ul style="list-style-type: none"> ▪ Enhanced support to underperforming students ▪ Better performance among students |
| Water | Rainwater harvesting, Integrated water management system, provision of water filters | Poor quality of water Poor access to source water and clean drinking water Poor water availability | School based water dispenser | <ul style="list-style-type: none"> ▪ Increased availability and accessibility of clean drinking water ▪ Decreased water-related health issues |
| | | | Rainwater harvesting (public buildings level and household level) | <ul style="list-style-type: none"> ▪ Increased availability of water ▪ Increased awareness regarding water conservation methods household water storage methods |
| | | | Integrated water management | <ul style="list-style-type: none"> ▪ Increased availability and accessibility to clean drinking water ▪ Better health outcomes for the community as a whole |
| | | | Provision of water purifiers (household level) | <ul style="list-style-type: none"> ▪ Increased accessibility to clean drinking water ▪ Increased awareness regarding water conservation and household water storage methods |
| Livelihood | Vocational training to youth, women and children | Lack of facilities for vocational training, high prevalence of youth unemployment | Vocational training to the youth, school students and for women | <ul style="list-style-type: none"> ▪ Increased employment rates, enhanced incomes for the community ▪ Empowerment of the youth and its positive impact on development of the community ▪ Empowerment of school students ▪ Empower women to attain self-sufficiency financially |
| Disaster Support | Natural calamities like earthquake, landslide, flood situations and Pandemic like Covid-19, | Lack of medical treatment, Lack of support towards immediate relief, Lack of important commodities, Lack of drinking water, Lack of medicines, masks, sanitizer etc. for prevention of pandemic Covid-19. | Provision of medical –aid including medicines, important commodities, drinking water, relief support items. Provision of Covid-19 related | <ul style="list-style-type: none"> ▪ Relief and support towards community ▪ Covid-19 Relief work. |

Sun Pharmaceutical Industries Limited

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| | | | medicines, masks, sanitizers etc. required for prevention of pandemic like Covid-19 | |
| Rural Development | Rural Infrastructure Support | Lack of proper and inadequate infrastructure in rural areas | All types of need-based Infrastructural development and upgradation in rural areas | <ul style="list-style-type: none"> ▪ Better socio-economic condition ▪ Better Rural Infrastructure |
| Sports | Training for Sports Promotion | Lack of training for sports | Supporting the cause of training for sports development as per Schedule VII of the Companies Act, 2013 | <ul style="list-style-type: none"> ▪ Sports development |

Most of the CSR activities of the company aim to improve the lives of the local community and the company will continue to be responsive to the needs expressed by the community, either explicitly or otherwise. To cater to local, short term and unforeseen needs the company will empower the local CSR team to decide suitable programs. However the local team has to ensure that the programs comply with the following conditions:

- The program has to support the cause, focus areas and address issues listed in clause 4.3, which should always be focused and prioritized, but any other CSR project or programme could also be taken-up on community need-based basis as per items listed under Schedule VII of the Companies Act, 2013.
- The cost of each program and such cumulative spend in the financial year cannot exceed pre-determined limits.
- The beneficiaries have to be among the stakeholders mentioned in in this policy vide sub-point No. 3. The program should not have any conflict with any other CSR program run by the company nor should it duplicate the benefit received by the beneficiaries.

4.5 Project Execution

1. CSR Team shall prepare and propose the CSR plan with the implementation modalities and schedules to the Board.
2. CSR Team shall appraise the Board on the status of the CSR Projects from time to time.
3. CSR Team will set-up a monitoring mechanism for effective implementation of the CSR projects, programmes or activities undertaken by the Company.

5. Monitoring and Evaluation Plan

The monitoring plan for Sun Pharma's CSR programs will include the following:

Sun Pharmaceutical Industries Limited

5.1 Targets to be achieved

The company will decide certain targets to be achieved for impact generation, which will also be in line with the broader company mission and vision.

5.2 Monitoring Process

For each of the programs, the standard monitoring and evaluation framework would be developed. The CSR team would submit monthly performance reports in the format and manner that has been agreed at the beginning of the project execution.

The CSR team will review the reports and engage with the implementing agency, if required to ensure that the programs are on track. The CSR team will submit a quarterly report to the CSR Committee which in turn will submit it to the Board. The report will cover –

- Progress of each program vis-à-vis the timelines, plan and budget
- Beneficiaries covered
- Performance of the external partners
- Problems encountered and solutions if implemented
- Estimated amount that will be spent till the end of the year.

The CSR Team will review the progress at least once in 3 months and provide the Board with a report on the CSR initiatives. The Committee will also review the CSR policy and ensure that it is current and relevant. Changes, if any, will be placed before the Board of Directors for approval.

5.3. Impact assessment

Sun Pharma shall conduct Impact Assessment for measuring specific metrics and its comparison with the baseline metrics as a process of field assessment and shall carry on Impact assessment, through an independent agency, of their Completed CSR projects and shall comply with Section 135 of the Act and the CSR Rules prescribed.

6 Communication and reporting

The Company will ensure that it communicates program details and social impact created for the upliftment of the community. CSR program details would be communicated in the public domain through the annual report in the reporting format as mandated by Section 135 of the Companies Act, 2013.

7 CSR Expenditure

7.1 Every year the Company shall spend at least 2% of its average Net profit as defined under the CSR Rules during the three immediately preceding financial years on the CSR Activities according to the CSR Plan approved by the Board.

Sun Pharmaceutical Industries Limited

7.2 The programs that the company intends to implement will not give rise to any surplus. However, in case a surplus is earned, then such surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company. and shall be utilized towards the eligible CSR Activities as per CSR Rules.

8 Exclusions

Following activities shall be excluded from CSR expenditure

- a) Any activity in normal course of business,
- b) Donation to Political parties,
- c) Any activity that derives marketing benefit under CSR,
- d) Activities in pursuance to any other Act and Rules in India,
- e) One-off events such as sponsoring Exhibition, Seminar, Conference, Advertisements in Newspaper and Electronic Media are considered as one-off activities, hence, will not eligible under CSR ,
- f) CSR Activity exclusively benefitting our Employees,
- g) CSR Activity outside India.

9 Conclusion

Sun Pharmaceutical Industries Limited is committed to ensuring the implementation of the proposed CSR programs in order to bring meaningful and sustainable development of underserved communities. The company will leave no stone unturned in ensuring that it contributes to the society, which is an integral stakeholder for it.

10 Applicability

This CSR Policy shall also be applicable to all the subsidiaries of the Company in India.

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