

Sandoz Private Limited

Corporate Social Responsibility Policy

This Policy provides guidance on the vision, principles and governance of Corporate Social Responsibility (“CSR”) initiatives to be implemented by the Company.

Our commitment: Improving health

We aim to improve the health of all people. Through our business, we make an important contribution to society, through our innovative healthcare products, targeting unmet medical needs.

CSR guiding principles:

Our Company's CSR efforts are at the core of our business and underscore our purpose of caring and curing.

- We apply our expertise in science and innovation to society's biggest health challenges.
- We take a long-term view and commitment to address health priorities where we can lead and make a significant impact.
- We are guided by a central philosophy and programs are conceived of and implemented where the required expertise and infrastructure is strongest.
- We apply business principles to investments — talent and capital — where the potential for joint value creation is the greatest; philanthropy plays a useful, but limited role.
- We understand that partnerships are key to success and improving health is a goal we share with all stakeholders including governments, international agencies, foundations and non-governmental organizations.
- We measure and communicate the results of our efforts and the impact on patient and societal health.

The focus areas of the Company's CSR program would mainly be on health, education and environment and sports. The CSR Committee may add other focus areas in compliance with Section 135 and Schedule VII of the Companies Act, 2013 (“Act”)

CSR governance:

- CSR is endorsed and ingrained at the highest level in our Company; it is central to how we run our business.
- The CSR Committee constituted by the Board of Directors will oversee our Company's strategy and governance of CSR. The details of the CSR Committee are as mentioned in Exhibit 1.

- The CSR Committee has taken on the mandate to advance strategy and programs in two key areas of CSR at Novartis: first, expanding access to healthcare and second, doing business responsibly. The CSR Committee will be responsible for administering the CSR activities in accordance with the directions laid down in the Act and the Rules for CSR promulgated thereunder, as in force from time to time.
- The CSR Committee will make recommendations to the Board on matters related to strategy, targets, policies, and stakeholder engagement in areas of CSR.
- The CSR Committee will formulate and recommend to the Board an annual action plan consisting of approved CSR projects for the year, the manner of their execution, modalities of fund utilization, implementation schedules, monitoring and reporting mechanism and details of impact assessment, if any and if applicable.
- Our Company's shared commitment to CSR rests with every Novartis associate. Across the Company, we aim for transparent reporting of annual targets and long-term objectives, as well as to incentivize management and associates to create sustainable value for Novartis in all areas of our business, including CSR.

Budgeting:

The overall budget for CSR shall be calculated as per the relevant provisions of the Act and the Rules promulgated thereunder, and shall be made available by the Chief Financial Officer of the Company. The CSR Committee will allocate funds to individual projects within the overall budget.

The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company and thereafter will be ploughed back into the projects or will be transferred to the unspent CSR account or to the fund specified under Schedule VII.

Any unspent CSR funds at the end of the financial year shall be allocated toward an ongoing project and will be transferred to the unspent CSR account or will be transferred to the fund specified under Schedule VII.

Any excess expenditure made over and above the prescribed CSR budget shall be utilized to set off the spending requirement in 3 subsequent years.

The Chief Financial Officer of the Company shall certify the utilization of the funds as approved by the Board of Directors of the Company.

Identification of CSR initiatives:

Our Company aims to address needs of the community by adopting a long-term vision and commitment in areas where it has the ability to make a difference.

The CSR Committee shall identify projects that shall be implemented by the Company, taking into consideration the relevant portions of the Act as in force from time to time.

Execution of CSR initiatives and selection of partner(s):

The Managing Director of the Company shall be responsible for nominating one or more persons to lead the overall CSR initiatives of the Company, under the supervision and direction of the CSR Committee.

The approved CSR initiatives shall be implemented by the Company itself or through implementing partner(s) selected by the Company taking into consideration the eligibility criteria of the Act and any amendments introduced from time to time.

Evaluation, Monitoring and Reporting:

The CSR Committee shall set guidelines for each of the identified projects to ensure optimum results. Quarterly progress reports and an Annual project report shall be obtained from the implementing partner(s) with details of project activities completed, funds utilized and impact achieved.

The person(s) responsible for overseeing CSR initiatives at the Company shall prepare and submit an implementation report on a quarterly basis to the Managing Director. Reports for the quarter ending March 31, June 30, September 30 and December 31 shall be submitted within ten days of the quarter end in the format detailed as Exhibit 2 forming part of this policy.

The Managing Director shall circulate the quarterly report to members of the CSR Committee either at the CSR Committee or prior to / after the meeting using email or any other communication mode. The Chairman of the CSR Committee shall in turn update the Board on the status of the various CSR initiatives at each meeting of the Board.

The Directors' Report of the Company will include a section on CSR reporting as specified in the Companies (CSR Policy) Rules, 2021 and amended from time to time.

The CSR Committee Composition, CSR Policy, Approved CSR Projects (Exhibit 3) and Annual Report on CSR shall be displayed on the website of the Company.

Notes:

Approved by Board of Directors on August 19, 2014

Reviewed and approved by the Board of Directors in its Meeting held on May 10, 2018

Reviewed and approved by the Board of Directors through Circular Resolution, amendments effective from January 22, 2021.

Exhibit 1

Composition of the CSR Committee

Name of the Director	Category
Mr. Sudhir Bhandare	Director
Mr. Sanjeev Shrivastav	Director

Exhibit 2

Quarterly Report Structure

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
S. No	CSR Project or activity identified	Sector in which the project is covered	Project Location: State and District	Project Duration	Amount Allocated (across years)	Amount spent during the reporting period	Cumulative CSR Spend up to the reporting period (across years)	Amount spent: Direct or through implementing partner(s)	Implementing Partner(s): Name and CSR Registration Number

Exhibit 3

List of Approved Projects for FY 2020-21

CSR Project or activity	Focus Area	Description of the project
Medical Equipment to rural hospital	Health	Provided various medical equipment to a government rural hospital in Thane district, Maharashtra to upgrade the health care services
Awareness and Access to Malaria	Health	The project was aimed to create awareness about Malaria through screening camps; diagnosis and referring to diagnosed malaria patients for treatment to healthcare facility. The Project was conducted in the state of Odisha
Improving education in schools	Education	Sandoz supported various schools in Maharashtra for improve school infra structure, drinking water and sanitization facilities and digital learning
Provision of Masks, Hand Sanitizers and Ration	Covid-19 Support	Provided Face Masks and Hand Sanitizers to Navi Mumbai Police force. Food grains for laborers in Thane, Maharashtra were provided through District collector office.
IT Support for COVID-19 Management	Covid-19 Support	Provided Laptops, Desktops and Printers to Police office for effective management of COVID-19 situation -mainly enforcing social distancing, implementing lock down and providing the essential supplies to needy people and maintaining the law order situation under control