NOVARTIS

Novartis India Limited
Inspire – BKC, 7th Floor,
Bandra Kurla Complex
Bandra East
Mumbai 400 051
Tel:0091 22 50243000
Website : www.novartis.in
CIN – L24200MH1947PLC006104
Email: india.investors@novartis.com

July 04, 2025

To,
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Scrip Code: 500672

Sub.: Business Responsibility and Sustainability Report for the financial year 2024-25:

Dear Sir/ Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), Please find enclosed the Business Responsibility and Sustainability Report ("BRSR") of the Company for the financial year ended 31st March 2025 describing the initiatives taken by the Company from an Environmental, Social and Governance perspective.

The BRSR forming part of the Annual Report of the Company for F.Y 2024-25 can be accessed on the website of Company at the given link: -
www.novartis.com/in-en/investors/novartis-india-financials

This is for your information and records.

Thanking you

Yours Sincerely,

For **Novartis India Limited**

Maru Chandni

Digitally signed by Maru Chandni
DN: dc=com, dc=novartis, ou=people, ou=LE, serialNumber=3190945, cn=Maru Chandni
Date: 2025.07.04 21:33:05 +05'30'

Chandni Maru
Company Secretary and Compliance Officer
ACS 60291

Encl: as above

Business Responsibility and Sustainability Reporting

About this Report

Novartis India Limited ("Novartis India/ Company") is deeply committed to advancing and enriching people's lives. Guided by the principles of integrity and quality, we continue to foster a culture that embraces innovative strategies to expand access to our medicines, thus serving patients more effectively.

This Business Responsibility and Sustainability Report (BRSR) aims to disclose our performance against the nine principles of the 'National India Guidelines on Responsible Business Conduct' (NGBRCs). The BRSR will help the investors and other stakeholders understand the sustainable business practices adopted by Novartis India which prioritises the environment, people and society. Each principle of the BRSR is further divided into Essential Indicators and Leadership Indicators. Essential Indicators must be reported on a mandatory basis, while the reporting of Leadership Indicators is voluntary. As this is our third year, we have disclosed all Essential Indicators and opted for a few Leadership Indicators.

As Novartis India is a trading entity, many indicators do not apply to us. Therefore, we have appropriately labelled them as "not applicable."

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L24200MH1947PLC006104
2.	Name of the Listed Entity	Novartis India Limited
3.	Year of Incorporation	1947
4.	Registered office address and Corporate Office Address	Inspire BKC, 7th Floor, Bandra Kurla Complex, Bandra (East), Mumbai, Maharashtra, India, 400051.
5.	Email	india.investors@novartis.com
6.	Telephone	+91 22 50243000
7.	Website	https://www.novartis.com/in-en/
8.	Financial year for which reporting is being done	1st April 2024 – 31st March 2025
9.	Name of the Stock Exchange(s) where shares are listed	BSE Limited
10.	Paid–up Capital	₹ 123,453,985
11.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:	Ms. Chandni Maru Company Secretary and Compliance Officer Email ID: india.investors@novartis.com Contact No: +91 22 50243000
12.	Reporting Boundary	Standalone
13.	Name of assurance provider	This year we have not obtained assurance.
14.	Type of assurance obtained	

II. Products/services

15. Details of business activities *(accounting for 90% of the turnover)*:

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Pharmaceuticals	Trading	100%

16. Products/Services sold by the entity *(accounting for 90% of the entity's Turnover)*:

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Wholesale of pharmaceutical and medical goods	46497	100%

III. Operations

17. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	—	3*	3*
International	—	—	—

**The Company is operating through 22 states in India. However, it operates from three offices only.*

18. Markets served by the entity:
    a. Number of locations

Locations	Number
National (No. of States)	22*
International (No. of Countries)	—

**The number is based on GST registrations.*

b. What is the contribution of exports as a percentage of the total turnover of the entity?

Nil

c. A brief on types of customers

Our customer base includes distributors, private hospitals and Government Institutions to whom we sell our products.

IV. Employees

19. Details as at the end of the Financial Year:
    a. Employees and workers (including differently abled):

S. No.	Particulars	Total A	Male		Female	
			No. B	B/A %	No. C	C/A %
Employees						
1.	Permanent	56	48	86%	8	14%
2.	Other than Permanent	5	0	0%	5	100%
3.	**Total employees**	61	48	79%	13	21%
Workers						
4.	Permanent	—	—	—	—	—
5.	Other than Permanent	—	—	—	—	—
6.	**Total workers**	—	—	—	—	—

b. Differently abled Employees and workers:

S. No.	Particulars	Total A	Male		Female	
			No. B	B/A %	No. C	C/A %
Differently abled Employees						
1.	Permanent	—	—	—	—	—
2.	Other than Permanent	—	—	—	—	—
3.	**Total differently abled employees**	—	—	—	—	—
Differently Abled Workers						
4.	Permanent	—	—	—	—	—
5.	Other than permanent	—	—	—	—	—
6.	**Total differently abled workers**	—	—	—	—	—

20. Participation/Inclusion/Representation of women

	Total	No. and percentage of Females	
		No.	%
Board of Directors	6	3	50.00%
Key Management Personnel	3	2	66.67%

21. Turnover rate for permanent employees and workers:

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	7%	—	7%	11%	10%	11%	21%	9%	19%
Permanent Workers	—	—	—	—	—	—	—	—	—

V. Holding, Subsidiary and Associate Companies (including joint ventures)

22. (a) Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Novartis AG	Holding	70.68%	No*

* *Novartis AG, being a foreign entity is governed by laws of host country. However, Novartis AG has aligned its practices to global sustainability standards.*

VI. CSR Details

23. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/~~No~~)

(ii) Turnover (in ₹) (for FY 2024-25) – 3562.7 million

(iii) Net worth (in ₹) (for FY 2024-25) – 7849.6 million

VII. Transparency and Disclosures Compliances

24. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) *(If Yes, then provide web-link for grievance redress policy)*	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Refer Note 1	—	—	—	NIL	—	—
Investors (other than shareholder)	Refer Note 1	—	—	—	NIL	—	—
Shareholders	Refer Note 1	24	—	—	15	—	—
Employees and workers	Refer Note 1	3	—	—	4	3	The pending case was closed during the current financial year
Customers	Refer Note 1	26	—	All the Complaints have been addressed and closed	25	8	The pending cases were closed during the financial year
Value Chain Partners	Refer Note 1	—	—	—	NIL	—	—
Other (please specify)	Refer Note 2	4	1	The open case is under investigation and shall be closed in due course	NIL	—	—

Note

1. *Novartis India has Vigil Mechanism & Whistle–Blower Policy which allows any of the stakeholders to raise concerns. The same is available at https://www.novartis.com/sites/novartis_in/files/Vigil%20Mechanism%20%26%20Whistle%20Blower%20Policy_.pdf. Associates may also access the Chairperson of the Audit Committee of the Company, in appropriate and exceptional cases, by writing to vigil.india@novartis.com*
2. *These are Global Security/ Legal/ Finance Cases*

25. Overview of the entity's material responsible business conduct issues

At Novartis India, we are committed in meeting the expectations of all those who are influenced by our operations or impact them directly. To achieve this, we diligently identify key areas where we can generate substantial value for both our stakeholders and society at large. These key areas are stated below:

S. No.	Material issue identified	Subtopic	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Business Ethics	Professional practices	Risk	Any deviation from the standards of ethical business conduct can adversely impact the trust placed in us by patients and society. Non-compliance with professional practices may result in penalties, fines and may impact the business continuity.	We are committed to upholding the same high standards of ethical business conduct where we operate. Engaging ethically and acting with integrity have a profound impact on our ability to discover new ways to expand patient access to our treatments and build trust with society.	Negative
2.	Business Ethics	Data Privacy	Risk	Non-compliance with General Data Protection Regulation ('GDPR') Laws can lead to fines and penalties, operational inefficiencies and reputational damage.	Novartis India will adhere to its Data Privacy principles and ensure that its external service providers also commit to these principles.	Negative
3.	Business Ethics	Information and Cyber Security	Risk	Misuse of Patients' and Partners' confidential information which can result in reduced productivity and reputational damage	• To protect our data and technology, and to ensure that information is safeguarded against theft, loss, misuse or disclosure. • We will take responsibility for the information and technology we manage.	Negative

S. No.	Material issue identified	Subtopic	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4.	Business Ethics	Anti Bribery/ Fair Competition	Risk	It erodes trust with stakeholders and limits access to public services, including health and education.	To ensure that our business judgement remains free from personal interests, we will not tolerate any form of Bribery and Corruption. Furthermore, we will not engage in agreements or conduct that unlawfully prevent or restrict competition. We will also refrain from using external parties to carry out acts of bribery or corruption on our behalf.	Negative
5.	Access and Affordability	Access to medicine	Opportunity	To bring more of our medicines to more people, regardless of where they are.	NA	Positive
6.	Product Quality and Patient Safety	Drug Safety/ Patient Safety	Risk	The safety of medicines and treatment of patients worldwide are of critical importance. Medicines and treatments may have potentially undesirable effects, and reporting such adverse events is essential to enable appropriate actions that safeguard patient safety.	• Patient health and safety are fundamental to our business. Our efforts focus on three key areas: product quality, pharmacovigilance, and the fight against falsified medicines. • Our objective is to ensure high quality of our products by continuously evaluating their safety profiles and promptly assessing reports of adverse events. Additionally, we communicate the risks associated with our medicines to stakeholders accurately and transparently.	Negative

S. No.	Material issue identified	Subtopic	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7.	Regulatory Compliance	Regulatory Environment	Risk	Non-compliance could result in monetary penalties, reputational damage to Novartis India.	Complying with customs regulations, export controls, and DCGI/State regulatory policies enables us to deliver our medicines promptly to patients who need them, whilst also building trust with society.	Negative
8.	People and Culture	Promotion of Diversity, Equity and Inclusion	Opportunity	Creating an equitable environment and being inclusive of all individuals helps us to generate new ideas, drive innovation, better understand our stakeholders, and stay closer to patients.	NA	Positive
9.	People and Culture	Employee Health & Safety and Employee Well Being	Risk	Adverse impacts on employee health, safety and wellbeing could lead to regulatory consequences, reputational damage, and negatively affect the long term sustainability.	• We are committed to protecting and promoting the health and safety of our associates, visitors, patients and the communities in which we operate. • We maintain a rigorous process to identify and mitigate health and safety risks, while promoting best practices in health and safety. • Our goal is to create a safe and inclusive workplace, where all our associates have an equal opportunity to succeed. • We do not tolerate discrimination, harassment, retaliation, bullying or incivility. • We value the contributions of our associates and encourage them to express themselves and their opinions freely in a professional way.	Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1.	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs? (Yes/ No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/ No)[1]	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available[2,3]	Please refer to foot-note 2,3 below.								
2.	Whether the entity has translated the policy into procedures? (Yes/ No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/ No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4.	Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle	All the Company's policies are aligned with Novartis AG's global best practices and are in compliance with Indian laws and regulations.								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Novartis India follows guidance received from Novartis AG on ESG principles.								
6.	Performance of the entity against specific commitments, goals and targets along with reasons in case the same are not met.	Performance against goals is provided in this report under respective principles.								

Governance, leadership and oversight

7. **Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements**

Novartis India is committed to improve and extend people's lives. We are enabling a culture to find efficient ways of increasing access to our medicines, to help patients. We operate with the highest values, integrity and quality standards. Novartis India Limited is aligned to our parent company, Novartis AG's Global Sustainability Commitments for 2025.

From an ESG perspective, several initiatives have been implemented at our offices. These include the installation of energy efficient lighting system consisting of LED lights, which reduce the energy consumption up to 90 per cent. Occupancy and motion-based sensor LEDs have been installed at all workstations and meeting rooms to minimize energy use when not in operation. Additionally, the office space has been designed to maximise the use of natural light.

Similarly, a comprehensive Standard Operating Procedure (SOP) has been developed, outlining the processes for the retrieval and safe disposal of expired or defected products. These products are disposed or incinerated in accordance with the government protocol and at government approved waste disposal facilities.

In our continued commitment to environmental stewardship, the company undertook a major shift in its logistics strategy by transitioning from air freight to more sustainable freight options. This change has delivered significant environmental benefits, by reducing the CO_2 emissions by over 70 per cent in 2024 compared to 2022 levels. Despite consistent import volumes, our emission intensity dropped from 1.37 kg CO_2/kg to as low as 1.02 kg CO_2/kg by early 2025. This strategic move aligns with our ESG goals and highlights our proactive approach to minimizing our carbon footprint while maintaining operational efficiency.

All our people and culture-centric initiatives are also in line with our global policies and are tailored as per local laws that take precedence.

We are also extending these practices to our external service providers and spearheading the implementation of ESG practices for third-party partners. All new contracts and amendments will mandatorily include the Environment Sustainability criteria as an annexure.

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	DIN: 09775615 Name: Shilpa Shashank Joshi Designation: Whole-Time Director and CFO								
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes/ No). If yes, provide details.	DIN:00369790 Name: Christopher David Snook Designation: Chairman & Non-Executive Director								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action.	Performance against policies is reviewed periodically or on a need basis and necessary changes are implemented.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances.	The Company is in compliance with the regulations, as applicable. The Board reviews the compliance status of various laws on a quarterly basis.																	

		P1	P2	P3	P4	P5	P6	P7	P8	P9
11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	NO However, there is an internal monitoring mechanism in place.								

Name of Policy/ Code	Linkage to principle	Web link
Code of Ethics	P1, P2, P3, P4, P5, P6, P7, P8, P9	https://www.novartis.com/sites/novartis_com/files/code-of-ethics-english.pdf
Anti-Bribery Policy	P1	https://www.novartis.com/sites/novartis_com/files/p3-professional-practices-policy.pdf
Professional Practices Policy	P1	https://www.novartis.com/sites/novartis_com/files/p3-professional-practices-policy.pdf
Conflicts of Interest Guideline	P1	https://www.novartis.com/sites/novartis_com/files/conflict-of-interest-guideline.pdf
Fair Disclosure Code	P1	https://www.novartis.com/in-en/sites/novartis_in/files/2022-02/code-of-practices-and-procedures-for-fair-disclosure-of-unpublished-price-sensitive-information.pdf.

Name of Policy/ Code	Linkage to principle	Web link
Health, Safety & Environment Policy	P2, P3, P6	https://www.novartis.com/sites/novartis_com/files/health-safety-environment-policy.pdf
Global Parental Leave Guideline	P3	https://www.novartis.com/sites/novartis_com/files/global-parental-leave-guideline-public.pdf
Human Rights Commitment Statement	P3, P5, P7, P8, P9	https://www.novartis.com/sites/novartis_com/files/novartis-human-rights-commitment-statement.pdf
Third Party Code	P5	https://www.novartis.com/sites/novartis_com/files/novartis-third-party-code-v-3.pdf
CSR Policy	P8, P4	https://www.novartis.com/sites/novartis_in/files/CSR%20 Policy-%20Novartis%20India%20Limited.pdf.
Novartis Privacy Hub	P9	https://www.novartis.com/privacy

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated: NA

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)	NA								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	NA								
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA								
It is planned to be done in the next financial year (Yes/No)	NA								
Any other reason (please specify)	NA								

Notes:

1. *Standards and Policies adopted by the Company's global parent have been in India implemented and daily noted by the Board, Committees and Head of Departments. The statutory policies have been approved by the Board, Committee or Head of Department as per statutory requirements.*
2. *All the policies and Procedures are derived from Code of Ethics which is a document for conducting business of the Company. The same is available at https://www.novartis.com/sites/novartis_com/files/code-of-ethics-english.pdf.*

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

1. Percentage coverage by training and awareness programs on any of the principles during the financial year:

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	%age of persons in respective categories covered by the awareness Programs
Board of Directors	1	Code of Ethics	100%
Key Managerial Personnel	7 Programs were conducted for all employees across all levels	Code of Ethics, POSH, Adverse Events, Compliance, TPRM for value chain partner, Sustainability and safety trainings[1]	100%
Employees other than Board of Directors and KMPs			100%
Workers	0	NA	NA

Notes:

1. *The training programs were focused on compliance requirements under various policies and codes of the Company. Apart from the above, the Board of Directors are also provided with an update on the economic outlook, industry, business trends etc. These trainings help the Board, employees and workers stay updated and agile.*

2. Details of fines/ penalties/ punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors/ KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (LODR) Regulations, 2015 and as disclosed on the entity's website):

	NGRBC Principle	Name of the regulatory / enforcement agencies/judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Monetary					
Penalty/ Fine	NA	Assistant Commissioner of State Tax, Orissa	50,000	Penalty u/s 125 of GST Act-Penalty Procedural lapses	No
Penalty/ Fine@	NA	Assistant Commissioner of CGST & Central Excise	15,03,762	Order Ref No: OIO No. CGST/ME/Div. IV/AC/SCH/Novartis/166/2024-25 dt. 17.02.25 DIN No. 20250267VM000081823E 1. Order passed under Section 73(1) and Section 75 of the Finance Act, 1994 for demand and recovery including Interest. 2. Imposition of Penalty under Section 77 of the Finance Act, 1994 3. Imposition of Penalty under Section 78 of the Finance Act, 1994 read with Rule 15 of the Cenvat Credit Rules, 2004.	Yes

	NGRBC Principle	Name of the regulatory / enforcement agencies/judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Settlement**	NA	Deputy Commissioner (Arrear Recovery) Office of Joint Commissioner, Taxpayer Services, Ernakulam	95,175	Tax demand was raised on the grounds of Pending Declaration Forms and Tax on PAP Free goods supplies.	NA
Settlement**	NA	Deputy Commissioner (Arrear Recovery) Office of Joint Commissioner, Taxpayer Services, Ernakulam	30,775	Tax demand was raised on the grounds of Pending Declaration Forms.	NA
Compounding Fee	—	—	—	—	—
Non-Monetary					
Imprisonment	—	—	—	—	—
Punishment	—	—	—	—	—

@ *the company has not paid/ deposited the said penalty amount since it has preferred an appeal in the said matter.*

** *the settlement amount mentioned above is with respect to the tax amount only and is not a penalty.*

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed:

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Appeal is filed on 09.04.2025	Commissioner of Central Goods & Services Tax & Central Excise, Appeals-II, Mumbai

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

   Yes, the company has in place an Anti-Bribery Policy that addresses a variety of context in which bribery issues may arise. Other aspects of business ethics and corruption, including conflict of interest, passive bribery (e.g. receipt of a bribe), and insider trading, are regulated separately.

   Aligned to best practices within Novartis globally, the policy prohibits its associates from engaging in bribery or corruption, including the use of intermediaries such as agents, consultants, advisers, distributors, or any other business partners to commit acts of bribery and corruption.

   The Policy is also available at website of the company and can be accessed at https://www.novartis.com/sites/novartis_com/files/anti-bribery-policy-en.pdf

   The aspects of anti-corruption are covered in the Code of Ethics which is also available at https://www.novartis.com/sites/novartis_com/files/code-of-ethics-english.pdf

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption: **Nil**

6. Details of complaints with regard to conflict of interest: **Nil**.

All the transactions with Related Parties are governed by Policy for Dealing with Related Party Transactions. All the transactions with Related Parties are approved by the Audit Committee as a part of omnibus approval mechanism and Board, if required under the applicable law and Material Related Party transactions, if any, are approved by the shareholders of the Company.

	FY 2024-25 (Current Financial Year)		**FY 2023-24 (Previous Financial Year)**	
	Number	**Remarks**	**Number**	**Remarks**
Number of complaints received in relation to issues of Conflict of Interest of the Directors	—	NA	—	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	—	NA	—	NA

7. Provide details of any corrective action taken or underway on issues related to fines/ penalties/ action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.– **NA**

8. Number of days of accounts payables (Accounts payable *365)/ Cost of goods/ services procured) in the following format:

Particulars	**FY 2024-25 (Current Financial Year)**	**FY 2023-24 (Previous Financial Year)**
Number of days of accounts payables	76.28	92.50

9. Open-ness of business

   Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	**Metrics**	**FY 2024-25 (Current Financial Year)**	**FY 2023-24 (Previous Financial Year)**
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	—	—
	b. Number of trading houses where purchases are made from	—	—
	c. Purchases from the top 10 trading houses as % of total purchases from trading houses.	—	—

Parameter	Metrics	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Concentration of Sales	a. Sales to dealers/ distributors as % of total sales	97.61%	96.10%
	b. Number of dealers/ distributors to whom sales are made	1978	2134
	c. Sales from top 10 dealers/ distributors as % of total sales to dealers/distributors	63.70%	63.90%
Share of RPTs in	a. Purchases (Purchases with related parties/ total Purchases)	41.31%	40.50%
	b. Sales (Sales with related parties/ total Sales)	—	—
	c. Loans & advances (Loans & advances given to related parties/ total loans & advances	—	—
	d. Investments (Investments in related parties/ total Investments made)	—	—

Leadership Indicators

1. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/ No) If yes, provide details of the same.

   Yes, Novartis India has in place a comprehensive 'Code of Ethics for the Board of Directors and Senior Management' ('Code') and a Related Party Transaction Policy ('RPT'), which has been formulated to address potential conflicts of interest. All transactions involving related parties are governed by these policies. The policies are also available at: https://www.novartis.com/sites/novartis_com/files/code-of-ethics-english.pdf https://www.novartis.com/in-en/media/document/8141.

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	Current Financial Year	Previous Financial Year	Details of Improvements in environmental and social impacts
R&D	—	—	—
Capex	—	—	—

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes / ~~No~~)

   b. If yes, what percentage of inputs were sourced sustainably?

   We are in process of setting up standard operating procedure to track the percentage of inputs that were sourced sustainably. Novartis India is spearheading the implementation of ESG practices for third–party partners. To promote sustainable and environmentally compliant partnerships, Novartis India has developed an Environmental Sustainability Criteria, which aligns with Novartis' Global Sustainability commitments for 2025. Environmental and Sustainability clauses are also included in the purchase order terms and conditions & contractual purchases, which further reinforce the Company's commitment to ESG.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

   As a pharmaceutical company, Novartis India has established rigorous procedures for the retrieval and safe disposal of its expired or defective products through incineration. Any such products undergo comprehensive analysis before disposal. A detailed Standard Operating Procedure (SOP) has been developed, outlining the specific responsibilities of each person involved in the supply chain, as well as the precise steps for safe disposal of these products. This policy is periodically reviewed to ensure continued effectiveness and compliance.

   The SOP includes training programs for individuals responsible for handling expired or defective products, ensuring that they are equipped with the necessary skills to carry out this task safely and effectively. Novartis India's commitment to safe and responsible product disposal underscores the Company's dedication to upholding high standards of ESG in its operations.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

   Yes, the waste collection plan is in line with the Extended Producer Responsibility plan submitted to Pollution Control Boards.

Leadership Indicators

1. Has the entity conducted Life Cycle Perspective/ Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

   No, as the Novartis India is a trading entity, it has not carried out Life Cycle Assessment of the products sold by it.

2. If there are any significant social or environmental concerns and/ or risks arising from production or disposal of your products/ services, as identified in the Life Cycle Perspective/ Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

   Not Applicable.

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

   Not Applicable.

4. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

   Not applicable.

PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

1. a. Details of measures for the well-being of employees:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities[1]	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	48	48	100%	48	100%	—	—	48	100%	—	—
Female	8	8	100%	8	100%	8	100%	—	—	—	—
Total	56	56	100%	56	100%	8	100%	48	100%	—	—
Other than Permanent employees[2]											
Male	—	—	—	—	—	—	—	—	—	—	—
Female	5	5	100%	5	100%	5	100%	—	—	—	—
Total	5	5	100%	5	100%	5	100%	—	—	—	—

Notes:

1. *Company provides its employees (both male and female) an allowance upto the age of two years of the child to compensate the daycare facility or creche charges. This provides flexibility to the associates to balance their work along with the caregiving responsibilities and facilitates their ability to meet both personal and professional obligations. By prioritizing the needs of its employees in this way, the Company demonstrates its commitment to fostering a supportive and inclusive work environment that enables individuals to thrive both in and out of the workplace.*
2. *The category 'Other than permanent employees' are not being governed by Company's policies.*

b. Details of measures for the well-being of workers:

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	—	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Other than Permanent workers[1]											
Male	—	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

Notes:

1. *The category 'Other than permanent workers' are governed by the third-party vendors who are providing services. The Company validates the compliances provided to them. The workers are covered under the Employee State Insurance Act.*

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format –

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company	0.36%	0.07%

2. Details of retirement benefits, for Current Financial Year and Previous Financial Year.

Benefits	FY 2024-25 (Current Financial Year)			FY 2023-24 (Current Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
Provident Fund	100%	—	Y	100%	100%	Y
Gratuity	100%	—	NA	100%	100%	NA
Employee State Insurance	NA	NA	NA	—	100%	Y
Others, if any	—	—	—	—	—	—

3. Accessibility of workplaces: Are the premises/ offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

   The premises/ offices of the Company including the registered and corporate offices are easily accessible to differently abled employees and workers.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

   Yes, Novartis India has Equal Opportunity Policy as per Rights of Persons with Disability Act, 2016. The Policy outlines the Company's commitment to practice of non-discriminatory employment. https://www.novartis.com/sites/novartis_in/files/Equal%20Opportunity%20Policy%20.pdf

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention Rate	Return to work rate	Retention Rate
Male	NA	NA	NA	NA
Female	NA	NA	NA	NA
Total	NA	NA	NA	NA

Note:

There were no employees who were due to return during the year 2024-25.

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

	Yes/ No (If Yes, then give details of the mechanism in brief)	
Permanent Workers	Yes	The Speak Up Office, established in accordance with the Whistle-Blower Policy, serves as a dedicated channel for employees, workers, and external individuals to voice their grievances or report instances of misconduct. This channel is available 24/7 and can be accessed from anywhere. The same can be accessed at https://www.novartis.com/esg/ethics-risk-and-compliance/ethical-behavior/speakup line from Whistle-Blower Policy. Associates may also access the Chairperson of the Audit Committee of the Company, in appropriate and exceptional cases, by writing to vigil.india@novartis.com
Other than Permanent Workers	Yes	
Permanent Employees	Yes	
Other than Permanent Employees	Yes	

7. Membership of employees and worker in association(s) or Unions recognized by the listed entity: **Nil.**

8. Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent Employees										
Male	48	48	100%	48	100%	52	52	100%	52	100%
Female	8	8	100%	8	100%	10	10	100%	10	100%
Total	56	56	100%	56	100%	62	62	100%	62	100%
Permanent Workers – NA										
Male	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

9. Details of performance and career development reviews of employees and worker:

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Permanent Employees						
Male	48	48	100%	52	52	100%
Female	8	8	100%	10	10	100%
Total	56	56	100%	62	62	100%
Permanent Workers – NA						
Male	—	—	—	—	—	—
Female	—	—	—	—	—	—
Total	—	—	—	—	—	—

10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (*Yes/ No*). If yes, the coverage of such system?

Yes, we have a health and safety management system which provides for reporting, tracking and action taken on any of the health and safety incidents across Novartis India. The system covers 100% of Novartis India employees.

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

The Management of Novartis India is actively committed to providing a safe and a healthy working environment. The Management evaluates the potential work-related hazards through incidents that are reported through health and safety management systems as well as through the analysis of day-to-day operations and industry. Key processes and tools like HSE (Healthy Safety Environment) Handbook for offices, Enablon tool, Komrisk tool are used majorly for mapping HSE (Healthy Safety Environment) activities.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/ No)

Yes, Novartis India is committed to ensuring the health and safety of employees and workers. Periodic training is provided to employees and workers to enable them to identify and report the work-related hazards and remove themselves from such potentially risky situations. Employees and workers are encouraged to report work related hazards through various channels of communication including reporting to Human Resources, reporting managers or reporting online. The top 5 risks are proactively identified along with the general common risks. For incident investigation, Enablon reporting system is used in accordance with the HSE (Healthy Safety Environment) guidelines.

d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

Yes, all the employees are provided with comprehensive health insurance or medical insurance, which provides them access to medical and healthcare services for both non-occupational and occupational health issues.

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	FY 2024-25 (Current FY)	FY 2023-24 (Previous FY)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	—	—
	Workers	—	—
Total recordable work-related injuries	Employees	—	—
	Workers	—	—
No. of fatalities	Employees	—	—
	Workers	—	—
High consequence work-related injury or ill-health (excluding fatalities)	Employees	—	—
	Workers	—	—

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

    Novartis India is dedicated to providing a safe and healthy workplace for its employees and workers. The Company has implemented the Corrective and Preventive Action Plan based on the lessons learned from previous incidents. This approach helps prevent recurring injuries by sharing past learnings with employees and workers. In addition, Novartis India regularly conducts trainings based on Standard Operating Procedures (SOPs) to ensure that its workplace remains safe and healthy. The incident investigation program is well established, with corrective and preventive actions fully embedded into the process.

13. Number of Complaints on the following made by employees and workers:

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	—	—	Nil	—	—
Health & Safety	Nil	—	—	Nil	—	—

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks/ concerns arising from assessments of health & safety practices and working conditions.

    The assessment of health and safety practices and working conditions did not identify any significant risks or concerns. Novartis India employs a Corrective and Preventive Action Plan for all safety incidents. This includes conducting thorough investigations and generating detailed reports to determine the root cause of each incident. The insights gained are then integrated into training modules to help prevent similar incidents in the future.

Leadership Indicators

1. Provide the number of employees/ workers having suffered high consequence work-related injury/ ill-health/ fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment.

   There were no work-related injuries reported during the year. Enablon HSE (Healthy Safety Environment) reporting system is used for mapping the work-related injury.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

   In selecting the stakeholder groups, we have identified individuals, firms, and entities that are most crucial to our business operations and form an integral part of our business ecosystem. These includes both internal and external stakeholders. These stakeholder groups are identified after thorough analysis and deliberation by leaders across Novartis India.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Groups	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website, Other)	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Patients and caregivers	Yes	Website, Patient assistance Program, Pharmacovigilance Helpline.	Periodic and Event based	To provide awareness about the products and understand their needs.
Healthcare professionals	No	Website, Seminars, Sales Representatives	Periodic and Event based	To disseminate information about the products, take feedback and understand patient needs.
Employees	No	Employee Engagement Survey, Townhalls, Awards and Recognitions, Performance Evaluation.	Daily, Event based	To understand the needs, communicate performance of Company, engage them and recognize them for their performance.
Suppliers/ Service providers	No	Audits, Supplier Meetings.	Periodic and Event based	To provide periodic trainings about the products and safety, conduct audits to ensure they are meeting standards set out by Novartis India and to understand their concerns.
Government, Regulatory Authorities and Policy makers	No	One-to-one or group meetings.	Periodic and Event based	To submit application for drug approvals/ holding marketing authorizations, represent the Company on various matters.
Shareholders and Investors	No	Results through Stock Exchange, General Meetings, e-mails, Newspaper Advertisements, notices, Annual Report, Website.	Annual, Half yearly, Quarterly and Event based	Intimation of the business performance of the Company and understanding stakeholders' expectations from the Company.
Local Community	Yes	Non-Governmental Organizations/ implementation partner.	Periodic and Event based	To understand the needs of the community around the business eco system and support the marginalized and vulnerable groups as per Company's CSR Policy

Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

   Novartis India believes that consistent communication with key stakeholders is essential for enhancing its performance and strategic decisions. Stakeholder consultations are typically conducted by the Company executives and functional heads who regularly seek feedback through various platforms. These engagements provide invaluable insights that plays a vital role in supporting the Company's commitment to sustainability. The feedback obtained from these interactions is then escalated to the Board to ensure that stakeholders' concerns are given due consideration. Novartis India has a well-defined process for addressing suggestions, complaints, and grievances which are carefully evaluated based on their significance. Depending on the nature and scope of the issues, they are referred to by the appropriate committee of the Board.

2. Whether stakeholder consultation is used to support the identification and management of environmental and social topics (Yes/ No). If so, provide details of instances as to how the input received from stakeholders on these topics was incorporated into policies and activities of the entity.

   Yes, as outlined in response to question 1 of leadership indicators in Principle 4, the management regularly engages with stakeholders to identify key environmental and social topics. As part of local materiality assessment, the Management of the Company considers the feedback of the internal stakeholders, industry benchmark and global standards to identify material Environmental, Social and Governance (ESG) topics. Novartis India continually strives to make changes in its policies, strategies, business practices, and operations based on the stakeholders' feedback and suggestions. These practices are reflected in the Company's disclosures under relevant principles.

PRINCIPLE 5: Businesses should respect and promote Human Rights

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	56	56	100%	62	62	100%
Other than permanent	5	5	100%	7	7	100%
Total Employees	61	61	100%	69	69	100%
Workers						
Permanent	—	—	—	—	—	—
Other than permanent	—	—	—	11	—	—
Total Workers	—	—	—	11	—	—

2. Details of minimum wages paid to employees and workers, in the following format:

Category	FY 2024-25 (Current Financial Year)					FY 2023-24 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
					Employees					
Permanent	56	—	—	56	100%	62	—	—	62	100%
Male	48	—	—	48	100%	52	—	—	52	100%
Female	8	—	—	8	100%	10	—	—	10	100%
Other than Permanent										
Male	—	—	—	—	—	—	—	—	—	—
Female	5	—	—	5	100%	7	—	—	7	100%
					Workers					
Permanent										
Male	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—
Other than Permanent										
Male	—	—	—	—	—	9	—	—	9	100%
Female	—	—	—	—	—	2	—	—	2	100%

3. Details of remuneration/ salary/ wages, Financial Year for 2024-25 in the following format:

   a. Median remuneration/ wages

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)				
Executive Board of Directors	1	86,51,263	1	98,13,586
Non-Executive Board of Directors	1	15,00,000	2	15,00,000
Key Managerial Personnel	1	86,51,263	2	57,45,735
Employees other than BoD and KMP	47	14,05,522	6	13,50,844
Permanent Workers	—	—	—	—

   b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Gross wages paid to females as % of total wages	17.58%	15.27%

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/ No)

   Yes, access to remedy is a core human rights principle, as articulated in Article 8 of the Universal Declaration of Human Rights (UDHR) and Article 2 of the International Covenant on Civil and Political Rights (ICCPR). Novartis India is committed to provide adequate access to a grievance mechanism for all affected rightsholders, in line with the “Effectiveness Criteria” in the UN Guiding Principals, and to remediate harms consistent with the UNGPs. Our **Speak Up** channel is an independent platform for addressing all issues related to Human Rights, among the others concern line from vigil mechanism policy. Associates may also access the Chairperson of the Audit Committee of the Company, in appropriate and exceptional cases, by writing to vigil.india@novartis.com

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

   As stated above, our **Speak Up** channel is an independent platform for addressing all issues related to Human Rights, amongst the others. The Speak Up Office helps employees of Novartis India to act with the highest ethical standards in the following ways:

   - Empowering associates to speak up without fear.
   - Treating those that trust us with their concerns with respect, fairness, confidentiality and protection against retaliation.
   - Establishing the facts and trying to understand the truth with a sense of urgency.
   - Ensuring fair and consistent remedial actions.
   - Providing feedback to those courageous enough to raise concerns.

6. Number of Complaints on the following made by employees and workers:

	FY 2024-25 (Current Financial Year)			**FY 2023-24 (Previous Financial Year)**		
	Filed during the year	**Pending resolution at the end of year**	**Remarks**	**Filed during the year**	**Pending resolution at the end of year**	**Remarks**
Sexual Harassment	—	—	—	—	—	—
Discrimination at workplace	—	—	—	—	—	—
Child Labour	—	—	—	—	—	—
Forced Labour / Involuntary Labour	—	—	—	—	—	—
Wages	—	—	—	—	—	—
Another human rights related issues	—	—	—	—	—	—

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	FY 2024-25 (Current Financial Year)	**FY 2023-24 (Previous Financial Year)**
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	—	—
Complaints on POSH as a % of female employees/ workers	—	—
Complaints on POSH upheld	—	—

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

   Novartis India has established the Speak Up Office as a grievance mechanism, enabling both employees and external parties to report potential misconduct confidentially, without fear of reprisal. Additionally, we provide tailored training to employees in high-risk functions or locations and fosters awareness across the organization regarding the importance of respecting human rights. Novartis India actively engages with stakeholders to listen to their concerns, collaborates on collective actions when necessary, and provides regular updates on its progress.

9. Do human rights requirements form part of your business agreements and contracts?

   Yes, Novartis India contractually binds third-party to abide by the standards on quality, ethics, and human rights and applicable laws.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	—
Forced Labour	—
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%

11. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 10 above.

    There were no significant risks/ concerns identified during the year.

Leadership Indicators

1. Details of a business process being modified/ introduced as a result of addressing human rights grievances/ complaints.

   Not Applicable, as there were no complaints related to Human Rights during Financial Year 2024-25.

2. Details of the scope and coverage of any Human rights due diligence conducted.

   The scope of assessment included wellbeing of employees, discrimination at workplace, any kind of harassment and wages which covered 100% of Novartis India operations.

3. Is the premise/ office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

   Yes. The Company has ensured accessibility for people with disabilities by implementing the following measures:

   - **Elevators** are available on all floors to facilitate easy movement.
   - **Ramps** have been provided as alternatives to staircases, enabling barrier-free access throughout the premises.
   - **Dedicated washrooms** have been designed to meet the specific needs of people with disabilities, ensuring comfort and compliance with accessibility standards.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

Parameter	FY 2024-2025 (Current Financial Year)	FY 2023-2024 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	—	—
Total fuel consumption (B)	—	—
Energy consumption through other sources (C)	—	—
Total energy consumed from renewable sources (A+B+C)	—	—
From non-renewable sources		
Total electricity consumption (D)	1310 GJ	1105 GJ
Total fuel consumption (E)	—	—
Energy consumption through other sources (F)	—	—
Total energy consumed from non-renewable sources (D+E+F)	1310 GJ	1105 GJ
Total energy consumed (A+B+C+D+E+F)	1310 GJ	1105 GJ
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations)	0.00000036770	—
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/ Revenue from operations adjusted for PPP)	0.0000075966	—
Energy intensity in terms of physical output	—	—
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

Note: This has been only compiled for the Corporate Office situated at BKC.

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/ No) If yes, name of the external agency. **No**

2. Does the entity have any sites/ facilities identified as Designated Consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Yes/ No) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any-

   None of the sites/ facilities of the Company comes under PAT Scheme of the Government of India.

3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	—	—
(ii) Groundwater	—	—
(iii) Third party water	—	—
(iv) Seawater/ desalinated water	—	—
(v) Others Municipal	320.955	514.413
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	320.955	514.413
Total volume of water consumption (in kilolitres)	320.955	514.413
Water intensity per rupee of turnover *(Water consumed/ turnover)*	0.0000009009	0
Water intensity *(optional)* – the relevant metric may be selected by the entity	**NA**	**NA**

Since the Company does not have its own manufacturing facility and has taken the office space on lease, the data has been extrapolated by calculating 15 liters per person per working day till December 31st, 2024. From January 1st to March 31st, 2025 the same has been calculated adhering to the guidelines issued by the CGWA i.e. 45 liters per person per working day.

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/ No) If yes, name of the external agency: **No**

4. Provide the following details related to water discharged:

   Since the offices of the Company are in commercial buildings, the water discharged is not tracked by the Company.

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

   Since the Company is a trading entity and does not own any premises, this is not applicable.

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format: Since the Company is a trading entity and does not own any premises, this is NA

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Nox	—	—	—
Sox	—	—	—
Particulate matter (PM)	—	—	—
Persistent organic pollutants (POP)	—	—	—
Volatile organic compounds (VOC)	—	—	—
Hazardous air pollutants (HAP)	—	—	—
Others – please Specify	—	—	—

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/ No) If yes, name of the external agency: **No**

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	*Metric tonnes of CO2 equivalent*	Not tracked	Not tracked
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	*Metric tonnes of CO2 equivalent*	277.36	253.00
Total Scope 1 and Scope 2 emissions per rupee of Turnover		0.0000000779	0.000
Total Scope 1 and Scope 2 emission intensity (*optional*) – the relevant metric may be selected by the entity		NA	NA
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)		0.0000016084	—
Total Scope 1 and Scope 2 emission intensity in terms of physical output		NA	NA
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		NA	NA

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/ No) If yes, name of the external agency: **No**

8. Does the entity have any project related to reducing Green House Gas emission? If yes, then provide details.

   Since Novartis India has accounted for electricity consumption, all related initiatives focus on energy savings, which contributes to a reduction in Scope 2 emissions. A few of the initiatives are provided below:

   - **Energy Efficient Lighting System:** LED Lighting has been installed across office floors. This system has the potential to reduce the energy consumption of up to 90 per cent as compared to the traditional lightning.
   - **Occupancy and motion-based sensor:** Sensor-controlled LED lights are installed in all workstation areas and meeting rooms to minimise energy consumption when not in use.
   - **Optimised use of Natural Light:** The office space is designed to maximise natural light through the façade, thereby reducing the need for artificial lighting during day light hours.
   - **Logistics and Transportation:**

     To further reduce indirect emissions, the company has transitioned a significant portion of its import logistics from air to surface freight. This shift has had a substantial impact, resulting transportation-related emissions being over 70 per cent lower in 2024 compared to 2022. The improved efficiency also led to a notable decrease in emission intensity, aligning with the company's broader sustainability objectives.

9. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste ***(A)***	Nil	Nil
E–waste ***(B)***	Nil	Nil
Bio–medical waste ***(C)***	Nil	Nil
Construction and demolition waste ***(D)***	Nil	Nil
Battery waste ***(E)***	Nil	Nil
Radioactive waste ***(F)***	Nil	Nil
Other Hazardous waste. Please specify, if any. ***(G)***	36.09	48.92*
Other Non–hazardous waste generated **(H)**. Please specify, if any. General Waste	1.814	2.28
Carton box	1.695	1.82
Total (A + B + C + D + E + F + G + H)	39.599	53.02

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Waste intensity per rupee of turnover (Total waste generated/ Revenue from operations)	0.0000000111	0.00
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/ Revenue from operations adjusted for PPP)	0.0000002296	0.00
Waste intensity in terms of physical output	NA	NA
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	—	—
(ii) Re–used	—	—
(iii) Other recovery operations	—	—
Total		
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	36.09	48.92*
(ii) Landfilling	—	—
(iii) Other disposal operations Recycled e–waste through third party	—	—
Total	36.09	48.92*

**As a part of data strengthening and accuracy exercise, the data for the previous year has been added.*

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/ No) If yes, name of the external agency. **No**

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such waste.

    Hazardous waste source, if from central storage warehouse wherein date expired medicines or market rejects are sent to MWML (Mumbai Waste Management Limited) for incineration as per 'The Hazardous Waste Rules, 2016' and its amendments from time to time.

11. If the entity has operations/ offices in/ around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals/ clearances are required, please specify details in the following format:

S. No.	Location of operations/ offices	Type of Operations	Whether the conditions of environmental approval/ clearance are being complied with? (Yes/ No) If no, the reasons thereof and corrective action taken, if any.
Our office is not located in ecologically sensitive areas.			

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/ No)	Relevant Web link
—	—	—	—	—	—

The Company does not cause adverse impacts on the regional environment and biodiversity, as it is only into trading.

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment Protection Act and rules thereunder (Yes/ No). If not, provide details of all such non-compliances, in the following format:

S. No.	Specify the law/ regulation/ guidelines which was not complied with	Provide details of the non–compliance	Any fines/ penalties/ action taken by regulatory agencies such as pollution control board or by courts	Corrective action taken, if any
	—	—	—	—

The Company is compliant with environmental laws. Therefore, this question is not relevant.

Leadership Indicators

1. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link

   Yes. Business Continuity Plan (BCP) is available and is under the scope of site REFS (Real Estate Facility Services).

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations. Four (4)

   b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/ National)
1	Organization of Pharmaceutical Producers of India	National
2	Federation of Indian Chambers of Commerce & Industry	National
3	Healthcare Federation of India (NATHEALTH)	National
4	Swiss-Indian Chamber of Commerce India	National

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities. **NA**

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

Essential Indicator

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year. **NA**

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
—	—	—	—	—	—

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format: **NA**

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
—	—	—	—	—	—	—

3. Describe the mechanisms to receive and redress grievances of the community.

   While the whistle blower/ vigil mechanism is available to the community for raising grievances related to business conduct, ethics, human rights and more, Novartis India also engages with NGOs to take feedback and understand their concerns.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Directly Sourced through MSME/ small producers	2.87%	3.45%
Directly from within India	56.35%	55.81%

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/ on contract basis) in the following locations, as % of total wage cost

Location	FY 2024-2025 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Rural	—	—
Semi-urban	—	—
Urban	—	—
Metropolitan	100%	100%

(Place to be categorized as RBI Classification System - rural/ semi-urban/ urban/ metropolitan)

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):
   Not Applicable

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies.

S. No.	State	Aspirational District	Amount Spent (In INR)
NA	NA	NA	NA

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/ vulnerable groups? (~~Yes~~/ No)

   (b) From which marginalized/ vulnerable groups do you procure? NA

   (c) What percentage of total procurement (by value) does it constitute? NA

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge: NA

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved: NA

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of people benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1.	Sustainable Livelihood for people of high risk of unemployment	159	100%
2.	Community Skilling and Livelihood project	150	100%

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

   Being in the Pharmaceutical industry, we are committed to adhering to best-in-class practices and have developed a robust mechanism for receiving and responding to consumer complaints and feedback. The consumers can report a complaint about product related issue on the website of the Company at https://www.novartis.com/report. All the complaints have defined Turnaround Time ("**TAT**") and are resolved within this timeframe.

2. Turnover of products and/ services as a percentage of turnover from all products/ services that carry information about:

	As percentage to turnover
Environmental and Social parameters relevant to products	Not Applicable
Safe and responsible usage	100%
Recycling and/ or safe disposal	Not Applicable

3. Number of consumer complaints in respect of the following:

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Received during the year	Pending Resolution at the end of year	Remarks	Received during the year	Pending Resolution at the end of year	Remarks
Data Privacy	—	—	NA	—	—	NA
Advertising	—	—	NA	—	—	NA
Cyber Security	—	—	NA	—	—	NA
Delivery of essential services	—	—	NA	—	—	NA
Restrictive trade practices	—	—	NA	—	—	NA
Unfair trade practices	—	—	NA	—	—	NA
Other Product related	20	3	All pending complaints will be closed in due course.	25	8	All the cases have been closed as on date

4. Details of instances of product recalls on account of safety issues:

	Number	Reason for recall
Voluntary recall	—	NA
Forced recall	—	NA

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/ No) If available, provide a web-link of the policy.

   Yes, Novartis India has established a framework for cyber security and risks related to data privacy. The Company is committed to complying with all applicable data privacy laws and upholding the Novartis India Data Privacy Principles, which also extend to genetic data. Our data privacy program includes a global organization and infrastructure, as along with procedures and training to support local activities and reinforce our compliance efforts. The framework can be accessed by clicking https://www.novartis.com/privacy

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty/ action taken by regulatory authorities on safety of products/ services.

   There were no instances.

7. Provide the following information relating to data breaches:

   a. Number of instances of data breaches: **Nil**

   b. Percentage of data breaches involving personally identifiable information of customers: **Nil**

   c. Impact, if any, of the data breaches: **NA**

Essential Indicators

1. Steps taken to inform and educate consumers about safe and responsible usage of products and/ or services

   In the Pharmaceutical industry, we are committed to adhering to best-in-class practices and have developed a robust mechanism for receiving and responding to consumer complaints and feedback. Consumers can report product-related issues on the Company's website at https://www.novartis.com/report. All complaints have a defined Turnaround Time ("TAT") and are resolved within this timeframe.