



## **CENTURY PHARMACEUTICALS LIMITED**

### **ENVIRONMENT, HEALTH & SAFETY POLICY**

We at Century Pharmaceuticals Limited, reaffirm our belief towards a clean and sustainable environment and decent workplace as a core principle of our business philosophy. We are committed to comply with all applicable legislation on environment, health & safety performance on continual basis.

To achieve above objectives, we commit ourselves to:

- Prevent pollution by optimal utilization of resources through regular revision in consumption norms.
- Minimize effluents, emission and solid waste by recycle and reuse.
- Strengthen awareness, skill and competence of our employees to enable them to contribute effectively and pro-actively in sound EHS management.
- Design procedures and develop competent workplace through regular and effective training and define clearly the roles and responsibilities at all levels of organization.
- Maintain high level of housekeeping and observe all safety standards/ codes during construction/ installation and maintenance of plant and machinery.
- Improve occupational health standards by regular monitoring of workplace environment and employee health.
- Implement safe work practices for handling, processing, storage and transportation of incoming, in-process and finished product and create a culture of learning involving all its workmen and contractors.

**July 2010**

**Janak Sheth  
Managing Director**



# CENTURY PHARMACEUTICALS LIMITED

## POLICY ON GIFTS AND CORPORATE ENTERTAINMENT

### 1. General

Business gifts and corporate entertainment can play a positive role in the strengthening of relationships between Century Pharmaceuticals Ltd and its business partners. However, the independence and objectivity of the recipient must never be compromised.

**Business decisions must be based on independence and objectivity and may not be inappropriately influenced by business gifts and corporate entertainment.** If this is indeed the case, it is **bribery**. Century Pharmaceuticals Ltd expects you to avoid creating any possible impression of bribery with regard to gifts or corporate entertainment.

This policy can help you to determine how to behave in situations that may arise with regard to gifts and corporate entertainment. Always discuss with your manager in advance if you may accept a gift or invitation for corporate entertainment. If prior permission is not possible, please inform your manager as soon as possible.

### 2. Basic principles

Our starting point is that gifts and corporate entertainment are purely intended to strengthen the business relationship. A gift or corporate entertainment may not be intended to persuade the recipient to grant an unfair advantage, or to reward him for doing so (bribery). Furthermore, gifts and corporate entertainment should always be modest and appropriate to the particular circumstances. Therefore, you must stick to the following basic principles.

#### **You (Century Employee) are the recipient from external organizations**

You do not accept gifts or invitations for corporate entertainment if there is a chance that this could be seen as bribery (Anti-Bribery Principles of Century Pharmaceuticals Ltd believes that business decisions must be based on independence and objectivity. We therefore condemn any kind of bribery or

attempt at bribery, in both the public and private sectors. This means that you must never be involved in any form of or attempt at bribery).

You do not accept gifts from external contacts in the form of money. The same applies to gift tokens or vouchers, for example, and to other items that could be considered equivalent to money.

You ensure that expenditure in relation to gifts and corporate entertainment is correctly recorded and accounted for.

You do not ask for or accept gifts or corporate entertainment in order to obtain a personal advantage.

### **Business contact (Partner or Representatives) is the recipient**

You do not offer gifts or corporate entertainment if there is a chance that this could be seen as bribery (also see Policy on Anti-Bribery).

You do not offer gifts in the form of money. The same applies to gift tokens or vouchers, for example, and to other items that could be considered equivalent to money.

You do not offer gifts or corporate entertainment if these do not comply with the internal rules of the organization of the recipient (e.g. a business partner's or Representatives Code of Conduct) or with the relevant laws.

There are strict rules people; they may in principle not accept anything of value. Participation in corporate entertainment is also linked to strict rules. Always inquire after the existing rules within the relevant organization in advance and comply with these to avoid embarrassment.

### **3. Gifts**

A gift can consist of something tangible. It can be a small article or a ticket for a event. But it can also be in the form of a personal favour. This type of favour also has value and within this policy is therefore regarded as a gift. In principle it is a matter of your own judgment, and that of your manager the reason for the favour or it may be possible, give or receive a gift with the logo on it. Nevertheless, even in the case of gifts with a value, it is acceptable, hence the

company or organization that aware about the gifts as a token of remembrance has no intension of expecting a favour from the individual who receives and the same may be informed to manager or higher officials or reporting authorities about giving or receiving the same.

- ✓ The recipient should not be expected to offer any quid pro quo in return.
- ✓ The gift may not be given or received in secret and can be discussed openly.
- ✓ The negotiations with the relevant business contact are not in a critical phase

#### **4. Corporate entertainment and hospitality**

Corporate entertainment may consist of a meal out, or attending a event along with the business contact.

Corporate entertainment also includes: participation in work-related events, trips, trade fairs, partner meetings, and occasions where the main intention is to share knowledge and/or to network.

Entertainment that is too expensive or too frequent can embarrass the recipient, or convey the impression that the recipient is no longer unbiased and objective in his or her decisions. Be aware of this when issuing invitations to business contacts and accepting invitations.

#### **5. Declining gifts or corporate entertainment**

If you are offered a gift or corporate entertainment that is not in line with the above rules, politely decline and explain Century Pharmaceuticals Ltd's rules on integrity.

#### **6. Any questions or doubts?**

Do you have any questions or doubts as to how to behave in a particular situation? If so, always contact your manager or the Management

**July 2010**

**Janak Sheth  
Managing Director**



## CENTURY PHARMACEUTICALS LIMITED

### Personal Information Protection Policy

At Century Pharmaceuticals Ltd, we are committed to providing our clients, customers, members with exceptional supply API and regulatory support. This policy involves the information about our clients, customers and our employee received or collected, and not to disclose of personal information about our clients, customers, employee members, protecting their personal information is one of our highest priorities.

While we have always respected our clients, customers, and employee member's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information, provided under **The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011** that came into effect from April 13, 2011 sets out the ground rules for how businesses may collect, use and disclose personal information.

We will inform our clients, customers, members of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

#### **Scope of this Policy**

This Personal Information Protection Policy applies to Century Pharmaceuticals Ltd. This policy also applies to any support service providers to us, using our personal information on behalf of Century Pharmaceuticals Ltd.

## **Definitions**

***Personal Information*** - means information about an identifiable *individual*, including name, age, home address and phone number, marital status, religion, income, medical information, education, employment information. Personal information does not include contact information (described below).

***Contact information*** - means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

## **Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the client, customer, member voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect client, customer, member information that is necessary to fulfill the following purposes:

*[Fill in the purposes for which your organization collects personal information. Examples of purpose statements, which may or may not be applicable to your organization, include:*

- To verify identity;
- To verify creditworthiness;
- To identify [client, customer, member] preferences;
- To understand the [financial, banking, insurance] needs of our [clients, customers, members];
- To open and manage an account;
- To deliver requested products and services

- To guarantee a travel or hotel reservation;
- To process a magazine subscription;
- To provide [medical, dental, counseling] services;
- To enroll the client in a program;
- To send out association membership information;
- To contact our [clients, customers, members] for fundraising;
- To ensure a high standard of service to our [clients, customers, members];
- To meet regulatory requirements;
- To assess suitability for tenancy;
- To collect and process rent payments;

## **Policy 2 – Consent**

- 2.1 We will obtain client, customer, member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided [*include the methods that apply to your organization: e.g., orally, in writing, electronically, through an authorized representative*] or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client, customer, member voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client, customer, member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client, customer, member does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients, customers, members can withhold or withdraw their consent for Name of organization to use their personal information in certain ways. A client's, customer's, member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client, customer, member in making the decision.

2.5 We may collect, use or disclose personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law.

### **Policy 3 – Using and Disclosing Personal Information**

3.1 We will only use or disclose client, customer, member personal information where necessary to fulfill the purposes identified at the time of collection [*or for a purpose reasonably related to those purposes such as:*

*Fill in any related purposes for which your organization uses or discloses personal information. Examples that may be applicable to your organization include:*

- To conduct client, customer, member surveys in order to enhance the provision of our services;
- To contact our [clients, customers, members] directly about products and services that may be of interest;]

3.2 We will not use or disclose client, customer, member personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell client, customer, member lists or personal information to other parties



## **Policy 4 – Retaining Personal Information**

- 4.1 If we use client, customer, member personal information to make a decision that directly affects the client, customer, member, we will retain that personal information for at least one year so that the client, customer, member has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client, customer, member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

## **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that client, customer, member personal information is accurate and complete where it may be used to make a decision about the client, customer, member or disclosed to another organization.
- 5.2 Clients, Customers, Members of Century Pharmaceuticals Ltd may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients', customers', members' correction request in the file.

## **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of client, customer, member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that client, customer, member personal information is appropriately protected in *the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate*
- 6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as [*Fill in destruction methods*

*your organization employs. Examples may include: shredding documents, deleting electronically stored information].*

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

### **Policy 7 – Providing Clients, Customers, Members Access to Personal Information**

- 7.1 Clients, Customers, Members have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. [**IF APPLICABLE:** A request to access personal information should be forwarded to the HR [or designated individual]
- 7.3 Upon request, we will also tell clients, customers, members how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client, customer, member of the cost and request further direction from the client, customer, and member on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the client, customer, member in writing, providing the reasons for refusal and the recourse available to the client, customer, member.

### **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The HR Officer **or designated individual** is responsible for ensuring Century Pharmaceuticals ltd compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Clients, Customers, Members should direct any complaints, concerns or questions regarding Name of organization's compliance in writing to the HR Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to Business Manager

Contact information for Century Pharmaceuticals Ltd's Privacy Officer or designated individual:

Any Information Contact

**Plant HR Manager,  
103-106 GIDC Halol  
Panchmahal dist  
Gujarat-389350  
Mobile: 7574851057  
Phone +91 2676 223220/ Extn. 214  
E mail:Plant [century@gmail.com](mailto:century@gmail.com)**

**July 2010**

**Janak Sheth  
Managing Director**



# CENTURY PHARMACEUTICALS LIMITED

## ANTI-DISCRIMINATION AND HARASSMENT

### **Background**

This template will help you create your own workplace discrimination and harassment policy. It covers topics relevant to the following

- *Racial Discrimination*
- *Sex Discrimination*
- *Disability Discrimination*
- *Age Discrimination*
- *Cast Discrimination*
- *Religious discrimination*

### **Policy and Complaint Procedure**

Century Pharmaceuticals Ltd is committed to provide a happy and satisfying work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, this organization expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.

This organization takes claims of discrimination and harassment, as well as the procedures outlined below very seriously. We expect all employees to similarly appreciate the seriousness of these issues, and ask that all employees report any violations of this policy as soon as they occur by utilizing the procedure set forth herein. Employees must not only commit themselves to following this policy and acting appropriately if they become aware of or feel they are a victim of discrimination or harassment, but this organization prohibits the misuse of this policy by employees. Interfering with the proper functioning of this policy or improper use

of the procedures set forth herein will be considered misconduct and dealt with in accordance with our regular disciplinary procedures.

## **Equal Employment Opportunity Policy**

It has and will continue to be the policy of Century Pharmaceuticals Ltd to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, citizenship, marital status or any other characteristic protected by the law. It is a fundamental principal of this organization that all employees are evaluated on their skills and abilities without regard to any protected characteristic. This policy permeates all decisions, including but not limited to those involving employee compensation, benefits, hiring, promotion, training and development, and other terms and conditions of employment. Moreover, we believe that no employee should ever be subjected to a work environment that is hostile because of a protected characteristic. All employees should be able to enjoy a work environment free from all forms of discrimination; including harassment. Thus, this organization strictly prohibits and will not tolerate any such discrimination or harassment by any of its employees, faculty committees, contractors, customers, etc. Any employee who feels they are a victim of such discrimination must follow the policies set forth herein.

## **Definition of Discrimination**

Discrimination is any action taken against an employee, which affects the terms and conditions of his or her employment, because of that person's, or because that person associates with another of a certain, race, color, national origin, religion, sex, age, disability, citizenship, marital status or any other characteristic protected by law. Forms of discrimination can include improper discipline, discriminatory hiring or promotion decisions, derogatory comments, harassment, as well as any other action

or inaction by another which adversely affects the terms or conditions of your employment.

### ***Definitions of Harassment***

1. Harassment, on the basis of a protected characteristic, is a form of discrimination and is strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, sex, national origin, age, disability, citizenship, marital status or any other characteristic protected by law or that of his/her relatives, friends or associates, and that:

- a. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- b. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- c. Otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display, or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail).

1. Sexual harassment constitutes discrimination and is crime by laws. The Equal Employment Opportunity Commission Guidelines define sexual harassment as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature.:

- a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- b) Submission to or rejection of such conduct by an individual is used as

- the basis for employment decisions affecting such individual; or
- c) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

In general terms, sexual harassment is unwanted sexual attention or conduct of a persistent or offensive nature made by a person who knows, or reasonably should know, that such attention or conduct is unwelcome or sexually offensive. Sexual harassment does not refer to occasional compliments of a socially acceptable nature or even indications of affection, which are immediately ceased once an employee indicates that they are unwelcome.

### ***Individuals and Conduct Covered***

These policies apply to all applicants and employees, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees or by someone not directly connected to this organization (e.g. an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

This organization never condones or approves of any conduct in violation of this policy. The faculty committee is responsible for assuring that no employee is subjected to conduct that constitutes discrimination or harassment under this policy.

### **Complaint Procedure – Reporting the Incident**

This organization strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to this organization's policies or who have concerns about such matters should file their

complaints with Management. The complaints can be written on the paper than can be dropped in the suggestion Box.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, this organization strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.

### ***The Investigation***

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly by the committee which will be organized by the management.. The investigation may include individual interviews with the parties involved, and where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. All decisions regarding the scope and duration of the investigation, who is interviewed, etc. are in the sole discretion of Management.

It is the employee's responsibility to disclose any and all information regarding the incidents of discrimination or harassment to the employee.. All documents or other physical evidence of the harassment or discrimination must be turned over to the investigators, as soon as possible after an employee reports the incident. Additionally, the employee must identify all known witnesses. Failure to do so will adversely affect the investigative process. Confidentiality will be maintained throughout the investigation process to the extent consistent with adequate investigation and appropriate corrective action.



## **Responsive Action**

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately at Management's discretion. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as this organization believes appropriate under the circumstances. To protect everyone's privacy or everyone involved, this organization does not have a policy of disclosing the nature of any disciplinary actions it chooses to take as a result of the investigation.

Individuals who have questions or concerns about these policies should talk with any of the individuals previously identified in this complaint procedure.

Finally, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of this organization prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.

## **Retaliation Is Strictly Prohibited**

This organization will not in any way retaliate against an employee, potential employee, or former employee who, in good faith, makes a complaint or report of harassment or participates in the investigation of such a complaint or report. This organization similarly prohibits retaliation by any of its faculty committee members or employees against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for

reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action.

**July 2010**

**Janak Sheth  
Managing Director**