Novartis India Limited

September 02, 2026

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

Scrip Code: 500672

Sub.: <u>Business Responsibility and Sustainability Report for the Financial Year 2025-26</u>

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 March 31, 2026, 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 2025-26 can be accessed on the website of Company at the given link: - https://nilpharma.co.in/annual-general-meeting/

This is for your information and records.

You are requested to take the above information on record.

Thanking you

Yours sincerely,
For Novartis India Limited

CHANDNI BHUPENDRA MARU
Digitally signed by CHANDNI BHUPENDRA MARU
Date: 2026.09.02 15:45:37 +05'30'

Chandni Maru
Company Secretary and Compliance Officer
M.No - ACS 60291

Encl.: as above

Business Responsibility and Sustainability Reporting

About this Report

This Business Responsibility and Sustainability Report (BRSR) aims to disclose our performance against the nine principles of the 'National Guidelines on Responsible Business Conduct' (NGBRC). The BRSR is designed to help the investors and other stakeholders understand how the business practices are adopted by Novartis India Limited in relation to 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 fourth year, we have disclosed all Essential Indicators and opted for certain Leadership Indicators. As Novartis India Limited is a trading entity, certain indicators do not apply to the company, due to the nature of its operations. Therefore, we have identified and disclosed as "not applicable."

The members are informed that certain disclosures are aligned with applicable policies of its promoter, Novartis AG. Accordingly, the BRSR for the period ended March 31, 2026 has been prepared with reference to these policies and therefore contains certain cross-references to the promoter.

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	Inspire BKC, 7th Floor, Bandra Kurla Complex, Bandra (East), Mumbai, Maharashtra, India, 400051.
5.	Corporate Address	Inspire BKC, 7th Floor Bandra Kurla Complex, Bandra (East) Mumbai - 400051
6.	Email	investor.relations@nilpharma.co.in
7.	Telephone	+91 22 50243000
8.	Website	https://nilpharma.co.in/
9.	Financial year for which reporting is being done	1st April 2025 – 31st March 2026
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited
11.	Paid-up Capital	₹ 123,453,985
12.	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: investor.relations@nilpharma.co.in Contact No: +91 22 50243000
13.	Reporting Boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone
14.	Name of assurance provider	Not Applicable
15.	Type of assurance obtained	Not Applicable

II. Products/services

16. 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%

17. 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

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

Location	Number of plants	Number of offices	Total
National	—	7	7
International	—	—	—

Note: The Company is engaged in trading and distribution of pharmaceutical products and does not have any manufacturing facilities. The operational footprint comprises one corporate office and six warehousing locations across India.

Note: The Company has operations across 22 states in India, with warehouses located in Mumbai, Haryana, Kolkata, Chennai and Ghaziabad. Its corporate office is situated in Mumbai.

19. 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?

Contribution of exports is 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

20. 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 (D)	57	48	84%	9	16%
2.	Other than Permanent (E)	2	0	0%	2	100%
3.	**Total employees (D+E)**	59	48	81%	11	19%

S. No.	Particulars	Total A	Male		Female	
			No. B	B/A %	No. C	C/A %
Workers						
4.	Permanent (F)	—	—	—	—	—
5.	Other than Permanent (G)	—	—	—	—	—
6.	**Total workers (F+G)**	—	—	—	—	—

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 (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	**Total differently abled employees (D+E)**	0	0	0	0	0
Differently Abled Workers						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	**Total differently abled workers (F+G)**	0	0	0	0	0

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	6	3	50.00%
Key Management Personnel	3	2	66.66%

22. Turnover rate for permanent employees and workers: (Disclose trends for the past 3 years)

	FY Apr 2025 - Mar 2026 (Turnover rate in Current Financial Year)			FY Apr 2024- Mar 2025 (Turnover rate in previous Financial Year)			FY Apr 2023 - Mar 2024 (Turnover rate in year prior to previous Financial Year)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	0%	0%	0%	7%	0%	7%	11%	10%	11%
Permanent Workers	—	—	—	—	—	—	—	—	—

Note: There have been no separation cases for the year 2025-26.

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

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	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*

V. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **(Yes/~~No~~)**
    (ii) Turnover (in ₹) - ₹ 3,543.4 Mn
    (iii) Net worth (in ₹) - ₹ 8,178.3 Mn

VII. Transparency and Disclosures Compliances

25. 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 Apr 2025 - Mar 2026 Current Financial Year			FY Apr 2024- Mar 2025 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	Yes; (Refer Note 1)	—	—	—	—	—	—
Investors (other than shareholder)	Yes; (Refer Note 1)	—	—	—	—	—	—
Shareholders	Yes; (Refer Note 1)	19	1	The one open complaint has been closed as on the date of this report.	24	—	—
Employees and workers	Yes; (Refer Note 1)	—	—	—	3	—	—
Customers	Yes; (Refer Note 1)	15	7	NA	26	—	All the Complaints have been addressed and closed
Value Chain Partners	Yes; (Refer Note 1)	—	—	—	—	—	—
Other (please specify)	Inquiries	96	3	The open cases pending for closure are related to availability.	4 (Refer Note 2)	1	The open case is under investigation and shall be closed in due course

Note

1. *Novartis India Limited has Vigil Mechanism & Whistle Blower Policy which allows any of the stakeholders to raise concerns. The same is available at https://nilpharma.co.in/pdfs/investors/cp/NIL_Vigil%20Mechanism_Whistleblower%20Policy.pdf*
2. *These are Global Security/ Legal Finance Cases*

26. 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 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 an 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 Limited adheres 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	We are committed to protect data and technology, and to ensure that information is safeguarded against theft, loss, misuse or disclosure. We 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	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.	Regulatory Compliance	Regulatory Environment	Risk	Non-compliance could result in monetary penalties, reputational damage to Novartis India Limited.	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

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)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	https://nilpharma.co.in/corporate-polices/								
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 following Indian laws and regulations.								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Novartis India Limited is covered by the goals and targets defined and pursued by Novartis AG.								
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 Limited 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. From ESG perspective, some of our initiatives at our offices include installation of Energy Efficient Lighting System consisting of LED Lighting reducing the energy consumption up to 90%, occupancy and motion-based sensor LEDs at all workstations and meeting rooms, for reduction of energy consumption when not in use and designing the office space such that it maximizes the use of natural light. Similarly, a comprehensive Standard Operating Procedure (SOP) has been developed outlining procedures for the retrieval and safe disposal of expired/defected products. As per government protocol and at government approved waste disposal management facilities products are disposed/ incinerated.									
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 Chief Financial Officer								
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 and 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://nilpharma.co.in/corporate-polices/
Fair Disclosure Code	P1	https://nilpharma.co.in/pdfs/investors/cp/NIL_Code%20of%20Practices%20%20Procedures%20for%20Fair%20Disclosure%20of%20UPSI.pdf
Health, Safety & Environment Policy	P2, P3, P6	https://nilpharma.co.in/corporate-polices/
CSR Policy	P8	https://nilpharma.co.in/pdfs/investors/cp/NIL_Corporate%20Social%20Responsibility%20Policy.pdf

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 are overseen 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 consistent with the Code of Ethics, which is a document for conducting business of the Company.*

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

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			
Non-Executive & Independent Directors	1	Code of Ethics	100%
Executive Directors	7		100%
Key Managerial Personnel	7	Code of Ethics, POSH, Adverse Events, Compliance, TPRM for value chain partner, Sustainability, Safety Trainings	100%
Employees other than Board of Directors and KMPs	7		100%
Workers	Not Applicable		

Note: The training programs were focused on compliance requirements under various policies and codes of the Company. Apart from above, the Board of Directors are also provided with an update on economic outlook, industry, business trends etc. These training courses help the Board and employees stay up-to-update 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 (Listing Obligations and Disclosure Obligations) 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 **Settlement** **Compounding Fee**	–	Assessment Unit, Income Tax Department	₹ 33.83 million (approx.) excluding interest and penalty.	Company has received a draft order from the Assessment Unit being passed under section 144C(1) of the Income Tax Act, 1961 for assessment year 2022-23, wherein adjustment on the transfer pricing issues have been proposed.	Yes

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
		Commissioner Appeals-II CGST & Central Excise, Mumbai	Service Tax - ₹ 15,01,762/- Interest – Not Quantified Penalty – ₹ 15,03,762/- Total – ₹ 30,05,524/-	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
		Assistant Commissioner of Income-tax, TDS, TDS Circle 2(3)	Demand of ₹ 10,28,40,780/-, comprising of ₹ 5,75,85,157/- and interest under section 201(1A) of ₹ 4,52,55,623	Notice of demand under Section 156 of the Income-tax Act, 1961 (pertaining to Order issued u/s 201(1)/ 201(1A) of the Act for Assessment Year 2020-21 (i.e. financial year ended 31 March 2020).	Yes
		Delhi High Court	In case of favorable order, Commissioner of Trade and Taxes needs to follow the guidelines and complete the proceeding within the prescribed timelines which may result into a refund of ₹ 54.45 Lacs. In case of unfavourable order, there is no impact as the amount of pre-deposit is fully provided for in the books.	Petition filed to direct the respondents (Commissioner of Trade and Taxes, New Delhi) to complete the proceedings initiated for FY 2013-14 within the prescribed time.	No
			Non-Monetary		
Imprisonment	–	–	–	–	–
Punishment	–	–	–	–	–

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
Assessment Unit, Income Tax Department	ITAT (Income Tax Appellate Tribunal)
Commissioner Appeals-II CGST & Central Excise, Mumbai	CESTAT (Customs, Excise and Service Tax Appellate Tribunal).
Assistant Commissioner of Income-tax, TDS, TDS Circle 2(3)	CIT(A) (Commissioner of Income Tax (Appeals))

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

   Yes, Company has an Anti-Bribery Policy. The Policy addresses a variety of contexts in which bribery issues may arise. Other aspects of business ethics and corruption, including conflicts of interest and passive bribery (e.g. receipt of a bribe) as well as insider trading are regulated separately. Aligned to best practices, within Novartis Group globally, it prohibits its associates from bribing or corruption and using intermediaries, such as agents, consultants, advisers, distributors or any other business partners to commit acts of bribery or corruption.

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

	FY Apr 2025 - Mar 2026 (Current Financial Year)	**FY Apr 2024 - Mar 2025 (Previous Financial Year)**
Directors	NIL	NIL
KMPs		
Employees		
Workers		

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

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.

	Apr 2025 - Mar 2026 (Current Financial Year)		**Apr 2024 - Mar 2025 (Previous Financial Year)**	
	Number	**Remarks**	**Number**	**Remarks**
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NA	NIL	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMP	NIL	NA	NIL	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. – Not Applicable

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

Particulars	**FY Apr 2025 - Mar 2026 (Current Financial Year)**	**FY Apr 2024 - Mar 2025 (Previous Financial Year)**
Number of days of accounts payables	83.4	76.3

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 Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (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.	—	—
Concentration of Sales	a. Sales to dealers/ distributors as % of total sales	98.8%	97.6%
	b. Number of dealers/ distributors to whom sales are made	1762	1978
	c. Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors	60.8%	63.7%
Share of RPTs in	a. Purchases (Purchases with related parties/ total Purchases)	48.4%	41.3%
	b. Sales (Sales to 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. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programmes held	Topics/ principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Nil	Nil	Nil

2. 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 Limited 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.

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 Apr 2025 - Mar 2026	Previous Financial Year Apr 2024 - Mar 2025	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 Limited implements ESG practices for third–parties. To promote sustainable and environmentally compliant partnerships, Novartis has developed an Environmental Sustainability Criteria, which are included in contracts with all suppliers. 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 Limited has established procedures for the retrieval and safe disposal of its expired/defective products through incineration. Any products that have expired or are deemed defective undergo comprehensive analysis. A comprehensive Standard Operating Procedure (SOP) has been developed that outlines the specific responsibilities of each person involved in the supply chain, as well as the process for safely disposing of these products. This SOP is periodically reviewed and includes training programs for those who handle expired or defective products, ensuring that they are equipped with the necessary skills to carry out this task safely and effectively. Novartis India Limited's commitment to safe and responsible product disposal underscores the Novartis India Limited'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 Limited is a trading entity, it has not carried out Life Cycle Assessment of the products sold by it.

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/ No) If yes, provide the web-link
—	—	—	—	—	—

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.**

Name of Product/ Service	Description of the risk/ concern	Action Taken
—	—	—

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**

Indicate input material	Recycled or re-used input material to total material	
	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
—	—	—

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

	FY Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (Previous Financial Year)		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	—	—	—	—	—	—
E-waste	—	—	—	—	—	—
Hazardous waste	—	—	25.3	—	—	53.1
Other waste	—	—	—	—	—	—

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Vials	Not applicable
Liquid	Not applicable
Capsules	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	
		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%	0	0	48	100%	48	100%
Female	9	9	100%	9	100%	9	100%	0	0	9	100%
Total	57	57	100%	57	100%	09	100%	48	100%	57	100%
Other than Permanent employees											
Male	0	—	—	—	—	—	—	—	—	—	—
Female	2	—	—	—	—	—	—	—	—	—	—
Total	2	—	—	—	—	—	—	—	—	—	—

Note:

1. *Company provides its employees (both male and female) an allowance up to 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											
Male	—	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

Note:

** 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 Apr 2025 - Mar 2026 Current financial year	FY Apr 2024 - Mar 2025 Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the company	0.3%	0.4%

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

Benefits	FY Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (Previous 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%	—	Y
Gratuity	100%	—	NA	100%	—	NA
Employee State Insurance	NA	NA	NA	NA	NA	NA
Others, please specify	—	—	—	—	—	—

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 Limited 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.

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 only two female employees who took parental leave and returned to work in FY 2025-26. However, they were not associated with Novartis India for more than 12 months.*

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.

Permanent Workers	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. Associates may also access the Chairperson of the Audit Committee of the Company, in appropriate and exceptional cases, by writing to ethics@nilpharma.co.in
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (Previous Financial Year)		
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/ A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/ C)
Total Permanent Employees	—	—	—	—	—	—
- Male	—	—	—	—	—	—
- Female	—	—	—	—	—	—
Total Permanent Workers	—	—	—	—	—	—
- Male	—	—	—	—	—	—
- Female	—	—	—	—	—	—
Total	—	—	—	—	—	—

8. Details of training given to employees and workers:

Category	FY Apr 2025 - Mar 2026 (Current Financial Year)					FY Apr 2024 - Mar 2025 (Previous Financial Year)				
	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)
Employees										
- Male	48	48	100%	48	100%	48	48	100%	48	100%
- Female	9	9	100%	9	100%	8	8	100%	8	100%
Total	57	57	100%	57	100%	56	56	100%	56	100%
Workers										
- Male	—	—	—	—	—	—	—	—	—	—
- Female	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

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

Category	FY Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	48	48	100%	48	48	100%
Female	9	9	100%	8	8	100%
Total	57	57	100%	56	56	100%
Workers						
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, is the coverage such system?

Yes, we have 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 Limited works on providing a safe and a healthy environment. The Management evaluates the potential work-related hazards through incidents that are reported through health and safety management systems or basis the analysis of day-to-day operations and industry.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)

Yes, Novartis India Limited is committed towards health and safety of employees. Periodic training is provided to employees to report the work-related hazards and remove themselves from such risks. They are encouraged to report work related hazards through different channels of communication including reporting to HR, reporting managers or reporting online.

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/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 Apr 2025 - Mar 2026	FY Apr 2024 - Mar 2025
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	—	—
	Workers	—	—
Total recordable work-related injuries	Employees	2	—
	Workers	—	—
No. of fatalities	Employees	—	—
	Workers	—	—
High consequence work-related injury or ill-health (excluding fatalities)	Employees	—	—
	Workers	—	—

Note: A high consequence work-related injury/ill-health refers to incidents that result in:

- *Fatality (death)*
- *Permanent disability/ permanent incapacity*
- *Serious long-term health impairment*
- *Any injury/illness that leads to loss of ability to work for a significant period or permanently*

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

Novartis India Limited provides 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 which help prevent recurring injuries by sharing past learnings with employees and workers. Additionally, Novartis India Limited consistently conducts trainings based on Standard Operating Procedures (SOPs) to ensure that its workplace remains safe and healthy.

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

	FY Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (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 Limited utilizes a Corrective and Preventive Action Plan for all safety incidents, including thorough investigations and reports to determine the root cause of each incident. The findings are then incorporated into training modules to prevent similar incidents from occurring 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 are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total No. of affected employees/ workers		No. of employees/ workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
Employees	—	—	—	—
Workers	—	—	—	—

2. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (~~Yes~~/ No)
3. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from assessments of health and safety practices and working conditions of value chain partners. Not Applicable.

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.

   While selecting the stakeholder group we have selected a group of individuals, firms, entities who are most crucial to our business operations and revolve around our business ecosystem. These comprise of both internal and external stakeholders. These stakeholder groups are identified after thorough analysis and deliberation by leaders across Novartis India Limited.

2. List of 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 take feedback on the products and understand patient needs.

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
Employees	No	Employee Engagement Survey, Townhalls, Awards and Recognitions, Performance Evaluation.	Periodic, 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 Limited and to understand their concerns.
Government & Regulatory Bodies	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	Quarterly Results through stock exchanges, general meetings, emails, newspaper advertisements, notices, Annual Report, Website.	Annual, Quarterly and Event based	Intimation of the business performance of the Company and understanding their 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 Limited 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 insights that play 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 stakeholder's concerns are given due consideration. Novartis India Limited 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 engages with stakeholders to identify key environmental and social topics at periodic intervals. 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 Limited updates its policies, strategies, business practices, and operations as needed, taking into account stakeholder feedback and suggestions. These efforts are reflected in the Company's disclosures under the 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 Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (Previous Financial Year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	57	57	100%	56	56	100%
Other than permanent	2	2	100%	5	5	100%
Total Employees	59	59	100%	61	61	100%
Workers						
Permanent	—	—	—	—	—	—
Other than permanent	—	—	—	—	—	—
Total Workers	—	—	—	—	—	—

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

Category	FY Apr 2025 - Mar 2026 (Current Financial Year)					FY Apr 2024 - Mar 2025 (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										
Male	48	—	—	48	100%	48	—	—	48	100%
Female	9	—	—	9	100%	8	—	—	8	100%
Other than Permanent										
Male	—	—	—	—	—	—	—	—	—	—
Female	2	—	—	2	100%	5	—	—	5	100%
Workers										
Permanent										
Male	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—
Other than Permanent										
Male	—	—	—	—	—	—	—	—	—	—
Female	—	—	—	—	—	—	—	—	—	—

3. Details of remuneration/ salary/ wages, in the following format:

   a. Median remuneration/ wages (amounts in INR)

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Independent Directors	1	10,00,000	2	10,00,000
Key Managerial Personnel	1	89,65,212	2	63,09,227
Employees other than BoD and KMP	47	15,69,881	7	15,66,545
Permanent Workers	NA	NA	NA	NA

Notes: The payment made to Independent Directors does not include the sitting fees paid to the Independent Directors.

The Chairperson of the Company, Mr. Christopher Snook is a Non-executive & non-independent director and does not receive any remuneration, commission or sitting fees. Hence, not included in the above disclosure.

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

	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
Gross wages paid to females as % of total wages	19.9%	17.6%

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). We provide adequate access to a grievance mechanism for all affected rightsholders, consistent with the "Effectiveness Criteria" in the United Nations Guiding Principles (UNGPs), and to remediate harms consistent with the UNGPs. Our SpeakUp channel, is an independent channel to address all issues related to Human Rights amongst the others. Associates and external parties may also access the Chairperson of the Audit Committee of the Company, in appropriate and exceptional cases, by writing to ethics@nilpharma.co.in

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

   As stated above, our SpeakUp channel is an independent channel to address all issues related to Human Rights amongst the others is available to employees. The SpeakUp Office helps Novartis India Limited 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 Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (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	—	—	—	—	—	—
Other 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 Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
Total Complaints reported under Sexual Harassment 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 Limited has established the SpeakUp Office as a grievance mechanism to allow employees and external parties to report potential misconduct without fear of retaliation. Additionally, the Company provides specialized training to employees in high-risk functions or locations and raises awareness across the organization about the significance of upholding human rights. Novartis India Limited also engages with stakeholders to listen to their concerns, takes collective action when necessary, and provides regular reporting on its progress.

9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

   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	NA
Forced Labour	NA
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%
Others	NA

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 2025-26.

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 Limited 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 Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	230 GJ	—
Total fuel consumption (B)	—	—
Energy consumption through other sources (C)	—	—
Total energy consumed from renewable sources (A+B+C)	230 GJ	—
From non-renewable sources		
Total electricity consumption (D)	60.02 GJ	1310.0 GJ
Total fuel consumption (E)	—	—
Energy consumption through other sources (F)	—	—
Total energy consumed from non-renewable sources (D+E+F)	60.02 GJ	1310.0 GJ
Total energy consumed (A+B+C+D+E+F)	290.02 GJ	1310.0 GJ
Energy intensity per rupee of turnover* (Total energy consumed/ Revenue from operations)	0.00000008185	0.00000036770
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)* (Total energy consumed/ Revenue from operations adjusted for PPP)	0.000001665	0.0000075966
Energy intensity in terms of physical output	—	—
Energy intensity (optional) – the relevant metric may be selected by the entity	—	—

Note: Renewable Electricity Consumption (REC) has been recognised only to the extent supported by the REC Redemption Statement available for the period January 2025 to December 2025. As the BRSR reporting period is FY 2025–26 (April 2025 to March 2026) and the REC Redemption Statement covering January 2026 to December 2026 is not yet available, electricity consumption for January 2026 to March 2026 has been reported as non-renewable for the current reporting period. This classification will be updated based on the subsequent REC Redemption Statement.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) 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? (Y/N) 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 Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	—	—
(ii) Groundwater	—	—
(iii) Third party water	708.8	—
(iv) Seawater/ desalinated water	—	—
(v) Others	—	321.0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	708.8	321.0
Total volume of water consumption (in kilolitres)	708.8	321.0
Water intensity per rupee of turnover *(Total water consumption/ Revenue from operations)*	0.0000002000	0.00000009009
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) *(Total water consumption/ Revenue from operations adjusted for PPP)*	0.000004068	—
Water intensity in terms of physical output	—	—
Water intensity *(optional)* – the relevant metric may be selected by the entity	—	—

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

4. Provide the following details related to water discharged:

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

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

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

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: Not Applicable as Company is the trading company.

Parameter	Unit	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (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? (¥/N) 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 Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (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*	12.3	277.4
Total Scope 1 and Scope 2 emissions per rupee of Turnover		0.00000000347	0.0000000779
Total Scope 1 and Scope 2 emission intensity (*optional*) – the relevant metric may be selected by the entity		—	—
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)		0.00000007066	0.0000016084
Total Scope 1 and Scope 2 emission intensity in terms of physical output		—	—
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		—	—

Note: Scope 2 (market-based) emissions have been calculated based on the available REC Redemption Statement. Although the Company has entered into a renewable power procurement arrangement, the corresponding renewable energy generation and REC redemption pertain to a subsequent period.

Accordingly, electricity consumption for January–March 2026 has been considered under grid electricity for the current reporting period.

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Y/N) 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 Limited 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:

   - LED Lighting has been installed across office floors. This system has the potential to reduce energy consumption by up to 90 per cent as compared to the traditional lighting.
   - Sensor-controlled LED lights are installed in all workstation areas and meeting rooms to minimize energy consumption when not in use.
   - The office space is designed to maximize natural light through the façade, thereby reducing the need for artificial lighting during daylight hours.
   - To further reduce indirect emissions, the company has transitioned a significant portion of its Local logistics from air to surface freight. This shift has had a substantial impact, resulting transportation-related emissions being over 70 per cent lower in 2025 compared to 2024. The improved efficiency also led to a notable decrease in emission intensity, aligning with the Company's broader sustainability objectives.
   - The India ESO Team's Environmental Sustainability Project marked a transformative step in the Company's journey toward becoming net-zero by 2040 and to contribute to nature-positive. By transitioning carton packaging from virgin board to recycled board for key product SKUs, the initiative has significantly reduced the Company's environmental footprints. This impactful move demonstrates the Company's commitment to sustainable innovation, responsible resource utilization, and measurable climate action. The project not only supports global sustainability goals but also sets a strong benchmark for environmentally conscious operations across the organization.

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

Parameter	Apr 2025 - Mar 2026 (Current Financial Year)	Apr 2024 - Mar 2025 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste ***(A)***	26.5	Nil
E–waste ***(B)***	Nil	Nil
Bio–medical waste ***(C)***	Nil	Nil
Construction and demolition waste ***(D)***	Nil	Nil
Battery waste ***(E)***	1.9	Nil
Radioactive waste ***(F)***	Nil	Nil
Other Hazardous waste. Please specify, if any. ***(G)***	17.5	36.1
Other non–hazardous waste generated **(H)**. Please specify, if any. General Waste	2.2	1.8
Carton box	0.8	1.7
Total (A + B + C + D + E + F + G + H)	48.9	39.6
Waste intensity per rupee of turnover* (Total waste generated/ Revenue from operations)	0.0000000138	0.0000000111

Parameter	Apr 2025 - Mar 2026 (Current Financial Year)	Apr 2024 - Mar 2025 (Previous Financial Year)
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/ Revenue from operations adjusted for PPP)	0.0000002804	0.0000002296
Waste intensity in terms of physical output	—	—
Waste intensity (optional) – the relevant metric may be selected by the entity	—	—

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
(i) Recycled	2.9	—
(ii) Re-used	—	—
(iii) Other recovery operations	—	—
Total	2.9	—

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

Category of waste	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
(i) Incineration	17.5	36.1
(ii) Landfilling	—	—
(iii) Other disposal operations Recycled e-waste through third party	1.9	—
Total	19.4	36.1

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

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? (Y/ N) 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
—	—	—	—	—	—

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 (Y/N). 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 boards 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	Swiss-Indian Chamber of Commerce India	National
4	NatHealth	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**

Name of the entity	Brief of the case	Corrective Action Taken
—	—	—

Leadership Indicators

S. No	Public policy advocated	Method resorted for such advocacy	Whether information is available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
—	—	—	—	—	—

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. **Not Applicable**

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: **Not Applicable**

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 with community for raising their grievances regarding, conduct of business, ethics, human rights etc., Novartis India Limited also engages with NGOs to get feedback and understand their concerns.

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

	FY Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (Previous Financial Year)
Directly Sourced through MSME/ small producers	4.6%	2.9%
Directly from within India	46.9%	56.4%

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 Apr 2025 - Mar 2026 (Current Financial Year)	FY Apr 2024 - Mar 2025 (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**

Details of negative social impact identified	Corrective action taken
—	—

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)
1	Andhra Pradesh	Vizianagaram	23,40,000

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? – Not Applicable

   (c) What percentage of total procurement (by value) does it constitute? – Not Applicable

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: Not Applicable

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes/ No)	Basis of calculating benefit share
—	—	—	—	—

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: Not Applicable

Name of authority	Brief of the Case	Corrective action taken
—	—	—

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	378	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 pharmaceutical industry we are committed to adhering to high ethical standards and have developed a robust mechanism to receive and respond to consumer complaints and feedback. The consumers can complaint about product related issue on the website of the Company. All the complaints have defined Turnaround Time ("TAT") and are closed within the TAT.

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

	As percentage to turnover
Environmental and Social parameters relevant to products	Nil
Safe and responsible usage	100%
Recycling and/ or safe disposal	Nil

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

	FY Apr 2025 - Mar 2026 (Current Financial Year)			FY Apr 2024 - Mar 2025 (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	0	NA	NA	—	—	NA
Advertising	0	NA	NA	—	—	NA
Cyber Security	0	NA	NA	—	—	NA
Delivery of essential services	0	NA	NA	—	—	NA
Restrictive trade practices	0	NA	NA	—	—	NA
Unfair trade practices	0	NA	NA	—	—	NA
Other Product related	38	4	One is closed in April 2026. Other pending complaints are under investigation and will be closed within due date.	20	3	All pending complaints will be closed in due course.

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

	Number	Reason for recall
Voluntary recall	—	—
Forced recall	1	As per tests done by the Karnataka Health Authorities, the product did not meet the required standards. Accordingly, recalls were carried out immediately up to the pharmacy level.

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 Limited has in place framework on cyber security and risks related to data privacy. Novartis India Limited seeks to adhere to all privacy laws and enforce clear Novartis India Limited Data Privacy Principles, which also apply to genetic data. Our data privacy program includes a global organization and infrastructure as well as procedures and training to support local activities and help our efforts to ensure compliance.

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**

Leadership 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 mechanism for receiving and responding to consumer complaints and feedback. Consumers can report product-related issues on the Company's website. All complaints have a defined Turnaround Time ("TAT") and are resolved within this timeframe.