

Submission of the Assessment Report on Bill S211

(Financial year 1st April 2023 - 31st March 2024)

Piramal Healthcare (Canada) Limited



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Introduction

Piramal Healthcare (Canada) Limited (PHCL) is a leading pharmaceutical company dedicated to pioneering innovative healthcare solutions. PHCL, a subsidiary of Piramal Pharma Limited (PPL) India¹, operates at the forefront of pharmaceutical research, development, and manufacturing.

PPL, alongside all its subsidiaries (including PHCL), is committed to conducting business in a sustainable and responsible manner. This commitment encompasses adhering to the highest standards in workplace environments and ensuring freedom from the risks of forced labour and child labour, both within our organization and throughout our supply chains. PPL is dedicated to upholding robust value systems that foster an enabling ecosystem within organizations, cultivating a culture of continuous improvement and the pursuit of perfection. The values and Code of Conduct of PPL serve as guiding principles for the performance of work and the conduct of business, anchored by unwavering integrity and the highest ethical standards.

PHCL has ensured that its plant site complies fully with applicable regulations, safety, and environmental standards. The company has undergone regular inspections by regulatory authorities, including the US FDA, Health Canada, and PMDA Japan. These inspections reflect PHCL's commitment to maintaining high standards of quality, safety, and compliance within its operations.

In the year 2023 Piramal, also became a member of the Pharmaceutical Supply Chain Initiative (PSCI)², which has a comprehensive agenda focusing on human rights, human health and safety, governance, management systems, environment, and ethics.

PHCL has remained steadfast in its commitment to striving for perfection and ensuring that its global supply chain is free from forced and child labour, aligning with the emerging requirements outlined in Bill S211 in Canada. This dedication underscores PHCL's proactive approach to upholding ethical labour practices and promoting social responsibility across its operations. A detailed self-assessment of PHCL in this regard is presented next.

PHCL location and registration details

PHCL's facility is located at 110 Industrial Parkway North, Aurora, Ontario L4G 3H4, Canada. The company conducts its business operations within Canada and holds total assets exceeding \$20 million in Canada. Furthermore, PHCL has generated revenue more than \$40 million during the previous two financial years (1st April 2022 to 31st March 2023, and 1st April 2023 to 31st March 2024). PHCL is committed to advancing pharmaceutical science through cutting-edge research and development initiatives, with state-of-the-art R&D facilities equipped with advanced technologies and staffed by highly skilled scientists and researchers ([Link](#)).

¹ Details related to subsidiaries of PPL are presented in annexure 1

² Details of PSCI members are presented in annexure 2

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PHCL operations and Supply chain

PHCL engages in various activities related to the production, sale, and importation of goods. This encompasses the production of goods, including manufacturing and processing, within Canada. Additionally, PHCL sells goods both within Canada and outside of Canada, catering to domestic and international markets.

PHCL boasts an extensive supplier network, comprising over 300 suppliers strategically positioned within its supply chain. Major suppliers of the PHCL are located in Europe and USA. The company primarily sources raw materials, goods, and services from following countries USA, Germany, Denmark, Belgium, China, India, and Canada.

PHCL is committed to ensuring the supply chain remains free from forced and child labour, maintaining vigilance in this regard. PHCL has implemented code of the conduct and sustainable procurement policies as laid down by PPL. PHCL ensures full compliance with all sourcing requirements for various raw materials and services obtained from global suppliers.

Policies and Code of conduct

PHCL has recently updated its Sustainable Procurement Policy ([Link](#)), effective December 2023, and its Supplier Code of Conduct, effective April 2024, to align with Bill S211 requirements. Following these updates, PHCL initiated a comprehensive training program for all its employees in March 2024. The training covered various aspects of Bill S211 compliance and sustainability, including modules on Child & Forced Labour, Sustainable Procurement, and Traceability.

In addition, Piramal has laid down a Global Human Rights statement ([Link](#)), which defines the highest level of the company's commitment to prohibiting all forms of child labour, forced labour, and other unfair practices. Piramal periodically conducts third party due diligence to ensure the effective implementation of the policies and code of conduct.

PHCL has been proactively working towards and remains committed to undertaking several measures to prevent and reduce the risk of forced labour or child labour in its operations and supply chains. These initiatives include mapping activities and supply chains to better understand potential risks, conducting internal assessments to identify areas of concern, and developing comprehensive action plans to address forced labour and child labour.

PHCL focused on ensuring that all workers are recruited voluntarily, implementing due diligence policies and processes to identify and address any instances of forced labour or child labour, and requiring suppliers to adhere to similar standards. Additionally, the company developed and implemented child protection policies, anti-forced labour and anti-child labour contractual clauses, and standards to uphold ethical labour practices.

Piramal is committed to ensuring the highest level of stewardship and adopting continual improvement practices across all levels. Piramal Pharma has rolled out various policies ([Link](#)) on environmental health and safety, as well as environmental social governance, to ensure that the organization is not only free from forced and child labour but also provides the best working conditions for all employees.



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Training and Assessment

Piramal Pharma Limited has implemented training sessions covering sustainable procurement policies and a revised supplier code of conduct. These sessions encompass various aspects such as Labour & Human Rights, Climate & Environment, Business Integrity & Ethics, and Sustainable Procurement. A specific focus is placed on addressing forced labour, child labour, working conditions, and non-discrimination. This is in alignment with ILO guidelines. The aim is to ensure optimal working conditions and a zero-tolerance policy towards forced and child labour within the organization and its supply chain.

PHCL rolled out training for its employees in March 2024 and ensured 100% completion of the training by 1st May 2024, underscoring the significance of the training in aligning with Bill S211 compliance requirement of Canada. The training encompassed various aspects of Bill S211 and sustainability, including modules on Child & Forced Labour, Sustainable Procurement, and Traceability. Further, PPL is launching similar training session for its suppliers in the months of June to July 2024.

Self-Assessment on Child and Forced labour

PHCL has conducted a thorough self-assessment of operations at its facility in Canada and confirms that there is no evidence of forced or child labour within its operations. Additionally, there has been no indication of such risks within the supplier network.

Furthermore, PHCL has revised the supplier assessment questionnaire (SAQ) to ensure compliance with regulations regarding forced and child labour. This questionnaire was circulated to PHCL's suppliers contributing over 80% of the total supply volume. PHCL ensured that the questionnaires were sent to suppliers who are deemed high-risk based on PHCL's risk assessment.

Post circulating the SAQ's; PHCL supply chain team has engaged in in-depth discussions with all suppliers, during which all suppliers have confirmed that they do not foresee any risk of child labour or forced labour within their facilities. The PHCL team reiterated to all suppliers their zero-tolerance policy against any deviation from the revised clauses outlined in the code of conduct and sustainable procurement policy.

In addition, Piramal has a grievance mechanism in place to address and manage grievances effectively. There is no record of any complaints reported under the grievance mechanism, indicating its successful operation. Similarly, no complaints were reported under the whistleblower policy (*Link Vigil*) mechanism, affirming the robustness of Piramal's internal reporting procedures.

Continual processes for ensuring the compliance

PHCL has also adopted various strategies to continually mitigate risks and reduce child and forced labour across the supply chain. Some key steps taken and planned by the organization include:

- Evaluating suppliers based on their policies and compliance with the Bill S211 act, as well as other regulatory requirements as notified during the time.
- Initiating activities aimed at conducting third-party assessments through the PSCI initiative to verify compliance and ensure the supply chain is free from child and forced labour.

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- Implementing strategies to evaluate potential risks and develop diversification strategies for suppliers, aiming to reduce or eliminate the use of child labour and forced labour in the entire supply chain.
- PPL is implementing supplier training programs to educate suppliers about various risks, including the potential business implications associated with child or forced labour within their organizations and supply chains. Piramal is committed to this journey of continual improvement and will adhere to emerging rules and regulations in the various jurisdictions in which it and its subsidiaries operate.
- Piramal is determined for achieving excellence and has implemented third-party audit procedures for all its subsidiaries, including PHCL.
- PPL / PHCL may engage third-party auditors to conduct due diligence for carrying out the assessment team will also carry out due diligence on Bill S211 compliance.



Attestation of the Report

This report has been prepared in accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

Full name : Don Liscombe

Title : Vice President & Site Head (PHCL)

Date : Thursday, May 30, 2024

Signature *Don Liscombe* Don Liscombe
30 May 2024 14:21:57 (Z)

REASON: I am approving this document.

f55ac855-5a1f-465d-8c56-3b9b51f30aeb

“I have the authority to bind ‘Piramal Healthcare (Canada) Limited.



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Reference and Links-

1. Piramal Pharma Limited's [Sustainable Procurement Policy](#)
2. [Pharmaceutical Supply Chain Initiative](#) (Piramal Pharma Limited is member of the PSCI)
3. Piramal code of conduct [\(Link\)](#)
4. Piramal Pharma Limited's [Annual report](#)
5. Piramal Healthcare (Canada) Limited – [Operations](#)
6. Piramal Pharma Limited's [Grievance Mechanism](#)
7. Piramal Pharma Limited's [Vigil Mechanism](#) (Whistle blower policy)
8. Piramal Pharma Limited's [Global Human rights statement](#)



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Annexure – 1

PHCL Subsidiary of PPL (Page number 80 of the Annual Report) [\(Link\)](#)

P. Plant Locations of the Company ('PPL') and its Subsidiaries

India:

Piramal Pharma Limited

- Ennore Express Highway, Ernavur Village, Ennore, Chennai 600 057, Tamil Nadu.
- Plot Nos.18 and 19 - PHARMEZ, Village Matoda, Sarkhej Bawla, NH 8A, Taluka Sanand, Ahmedabad - 382 213, Gujarat.
- Plot No C-43 & C-46, TTC Industrial Area, MIDC, Off Thane Belapur Road Turbhe, Navi Mumbai - 400 703
- 159 - A, Wagle Estate, 25th Road, MIDC, Thane - 400 604.
- D. No. 7-70, Sy. No. 71 & 77 to 82, Digwal - Village, Kohir -Mandal, Sangareddy -District, Telangana -State – 502321
- Plot no. R-856, TTC Industrial Area, Rabale MIDC, Off Thane Belapur Road, PO Ghansoli, Navi Mumbai 400 701 India
- Plot No. 67-70, Sector II, Pithampur, District Dhar, 454775, Madhya Pradesh
- Plot No. K-1, Additional M.I.D.C, Mahad, District Raigad, 402 302, Maharashtra.
- Plot No. D-2/11/A1 GIDC, Phase II, Dahej, Tal Vagra, District Bharuch, Gujarat – 392130

Overseas:

Piramal Healthcare UK Limited

- Whalton Road, Morpeth, Northumberland, NE61 3YA, UK
- Earls Road, Grangemouth, Stirlingshire, FK 38XG, Scotland, UK

Piramal Healthcare (Canada) Limited

110, Industrial Parkway North, Aurora, Ontario, L4G 3H4, Canada.

Piramal Critical Care Inc.

3950 Schelden Circle, Brodhead Road, Bethlehem, PA 18017, USA.

Piramal Pharma Solutions Inc.

1575 McGrathiana Parkway, Lexington, Kentucky, 40511, USA.

Ash Stevens LLC

18655 Krause Street, Riverview, MI 48193, USA.

PEL Healthcare LLC

650 Cathill Rd, Sellersville, PA 18960, USA.



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Annexure – 2

List of PSCI members [\(Link\)](#)

The screenshot shows the PSCI website interface. At the top left is the PSCI logo with the tagline 'Building responsible supply chains'. A navigation menu includes 'ABOUT US', 'WHAT WE DO', 'NEWS', 'RESOURCES', 'EVENTS', and 'CONTACT'. A 'LOGIN' button is located in the top right. Below the navigation, there are several bullet points and a section titled 'MEMBERSHIP FEES'. The main content area is titled 'FULL MEMBERS' and displays a grid of 27 pharmaceutical company logos. The logos are arranged in a 9x3 grid. The logo for Piramal Pharma Limited is highlighted with a red rectangular border.

FULL MEMBERS		



