



Corporate Social Responsibility Policy

ALLERGAN INDIA PRIVATE LIMITED

Version No	1.5
Authorized by	CSR Committee

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1. Preamble:

Any business is part of a dynamically symbiotic ecosystem, which sustains it and needs sustenance in turn. The true and full measure of growth, success and progress therefore lies beyond financials or conventional economic indices. It is best reflected in the difference that business and industry make to the lives of people. At Allergan, we believe in taking our Corporate Social Responsibilities (“CSR”) seriously and are committed to give back to society recognizing fully well how much we owe it and to make our planet a better place for future generations. We actively look for opportunities to help and support the needy and the underserved in various areas such as malnutrition, promoting education, promoting healthcare, promoting gender equality, ensuring environmental sustainability, culture, sports and such similar areas. These initiatives are independent of the normal conduct of our business. Programs, projects and activities (collectively "CSR Programs") carried out in this regard are the subject matter of this Policy.

2. Objective:

The objective of this Policy is to operate Company’s business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders and other objects of the Company alongside taking up CSR Programs, directly or indirectly, that benefit the communities and society at large, in enhancing the quality of life & economic well-being of the local populace.

3. Focus Areas:

CSR Programs at Allergan India shall direct towards achieving one or more of the following:

- (a) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat

- Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
 - (c) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
 - (d) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
 - (e) Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts.
 - (f) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
 - (g) Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports.
 - (h) Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
 - (i) (A) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

- (j) (B) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- (k) Rural development projects.
- (l) Slum area development.
- (m) Disaster management, including relief, rehabilitation and reconstruction activities.
- (n) To promote such other activities towards betterment of the society as the CSR Committee may think fit.
- (o) To contribute to/promote such other activities as may be notified in Schedule VII to the Companies Act by Central Government, from time to time.

4. Exclusions

The CSR Programs of the Company will not include:

- (a) Contribution directly or indirectly to any political party or any religious groups.
- (b) Programs or Activities that benefit only the employees of the Company.
- (c) Programs or Activities undertaken outside geographical boundaries of India.

5. CSR Committee

Composition:

The CSR Committee shall consist of following members:

- Mr. Suresh Pattathil, Managing Director
- Mr. Mohan Nair Raghvan, Director
- Mr. Ramachandran Suresh, Director

The above composition of the CSR Committee can be changed at any time by passing resolution in the Board Meeting.

Responsibilities of the CSR Committee:

The CSR Committee will be responsible for the following:

- (a) Formulating and recommending to the Board for its approval the CSR Policy and indicating the activities to be undertaken by the Company within the framework of Schedule VII of the Companies Act, 2013.
- (b) Recommending the amount of expenditure to be incurred on the CSR Programs.
- (c) Monitoring the CSR Programs and reporting to the Board from time to time.

6. Implementation:

The CSR Committee may directly implement CSR Programs through Company personnel or through external implementing agencies.

The CSR Committee may also implement CSR Programs through Registered Trusts, Registered Society or Section 8 Companies established by the Company (Partners). In such cases, the CSR Committee will specify the CSR Programs which may be undertaken by those Trusts/Foundations/Section 8 companies in accordance with their objects and administrative and accounting processes laid down in the respective Trust Deeds/Charter documents.

7. Governance:

- (a) CSR Committee will receive requests for funding various CSR Programs and will evaluate the same. The CSR Committee will deliberate the proposals along with the evaluation report and approve the same for implementation at its discretion.

- (b) The CSR Committee may further assign the task of implementation of the CSR Program within specified budgets and timeframes to such persons, departments or bodies as it may deem fit.
- (c) The persons/departments/bodies to which the implementation is assigned will carry out such CSR Programs as determined by the CSR Committee within the specified budgets and timeframes and report back to the CSR Committee on the progress thereon at such frequency as the CSR Committee may direct.
- (d) The CSR Committee shall review the implementation of the CSR Programs at regular intervals and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programs in accordance with this Policy.
- (e) Periodically, CSR Committee will provide a status update to Board on the progress of implementation of the approved CSR Programs carried out during any given period. The Board shall review such reports and implementation of the programs.
- (f) At the end of every financial year, the CSR Committee will submit its report to the Board.

8. Allocation to CSR Funds:

The allocation of fund for the purpose of carrying on the aforesaid activities would be computed as 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.

9. FCPA, UKBA and anti-bribery laws

Partners shall comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act of 1977, as amended, (collectively hereinafter the "FCPA"), UK Bribery Act 2010 (hereinafter the "UKBA") and anti-bribery laws in the countries where the Partners has its principal place of business and where it conducts activities.

Partners warrants and represents to Company that, in carrying out its responsibilities, neither the Partners nor any of its officers, directors, employees, agents or other

representatives will pay, offer or promise to pay, or authorize the payment of, any money, or give or promise to give, or authorize the giving of, any services or anything else of value, either directly or through a third party, to any official or employee of any governmental authority or instrumentality, or of a public international organization, or of any agency or subdivision thereof, or to any political party or official thereof or to any candidate for political office corruptly for the purpose of :

- i) influencing any act or decision of that person in his official capacity, including a decision to fail to perform his official functions with such governmental agency or instrumentality or such public international organization or such political party,
- ii) inducing such person to use his influence with such governmental agency or instrumentality or such public international organization or such political party to affect or influence any act or decision thereof or
- iii) securing any improper advantage.

10. Documentation and Reporting

All CSR grants must be properly documented and Due Diligence to be performed, evaluated and recommended. All CSR grants should have Request Letter which captures details like date of the event, event details, agenda, donation amount, seal/stamp of the third party/partners. Sanction Letter / Contract executed with partners to have clause pertaining to acceptance of FCPA, UKBA and anti-bribery laws guidelines.

Documents for all completed activities such as activity completion report to be maintained for review and audit purposes.

CSR Lead to prepare QTD/YTD CSR Spend Report giving the details of the Projects and balance funds available for CSR Activities and to be shared with the CSR Committee.

11. Effective Date:

This Policy is effective from Aug 18, 2020.

12. Contact:

For queries related to CSR Policy, please write to us at IN-CS@allergan.com.