

Caring... Sharing... Growing...



CORPORATE SUSTAINABILITY REPORT 2011-12



Statement GRI Application Level Check

GRI hereby states that Jubilant Life Sciences Limited has presented its report "Caring...Sharing...Growing...(2011)" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level A+.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines.

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 19 June 2012





The "+" has been added to this Application Level because Jubilant Life Sciences Limited has submitted (part of) this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance, www.globalveporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 22 June 2012. GRI explicitly excludes the statement being applied to any later changes to such material.



CONTENTS

1.0 Chairmen's Message	3	
2.0 Key Impacts, Risks and Opportunities	8	
3.0 Company Profile	13	
4.0 Report Profile	22	
5.0 Governance, Commitments & Engagement	24	
6.0 Environmental Performance	38	
7.0 Economic Performance	58	
8.0 Social Performance		
9.0 · Way Forward	99	
UNGC Index	101	
List of Abbreviations	102	
Application Level Check	103	
Assurance	106	
GRI Index	108	





SUSTAINABILITY MISSION

Jubilant Life Sciences Limited is committed to **Sustainability** and considers environmental protection, accountability, transparency and inclusiveness as the facets to Sustainable Development.

As a responsible corporate citizen the company is constantly engaged in delivering value to its stakeholders through its promise of **Caring**, **Sharing & Growing**.

Show S Phartie

Shyam S Bhartia Chairman & Managing Director Hari S Bhartia Co-Chairman & Managing Director

October 4, 2010

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CLIMATE CHANGE MITIGATION POLICY

Jubilant Life Sciences Limited recognizes the risk of **Climate Change** and is committed to mitigate its impact. Our initiatives to reduce carbon emissions are to:

Join hands with the employees, families & community to create awareness

Undertake energy conservation measures

Benchmark all activities for optimum use of resources

Involve suppliers to reduce emissions through Greening of Supply Chain

Limit Greenhouse Gas emission by process optimization and pollution prevention

Adopt advanced information technology to reduce travel related emission

Nourish the plantation in the units and the vicinity for carbon sequestration

Transform above initiatives into actions

We shall abide by this policy to mitigate the risk of Climate Change at JUBILANT.

Shyam S Bhartia Chairman & Managing Director Hari S Bhartia Co-Chairman & Managing Director

October 10, 2010



1.0 CHAIRMEN'S MESSAGE



Dear Stakeholders,

THE CONTINUED SUPPORT AND PATRONAGE PROVIDED BY YOU HAS ENABLED US TO SUCCESSFULLY COMPLETE A DECADE OF SUSTAINABILITY REPORTING JOURNEY.

The Company started its reporting as 'March Towards Sustainability' in 2003 and has successfully brought out the report on yearly basis. The Company has been on forefront for many achievements during this Sustainability journey. These include the following:

- Amongst the first Indian companies to report on Sustainability performance as per GRI Guidelines in 2003.
- The first company in the global pharmaceutical sector to report on GRI Generation 3 (GRI G3) version in 2007 with A+ application Level check.
- The first Indian company to publish the Sustainability Report on GRI G3.1 Guidelines in 2011 with A+ Application Level check.



THE COMPANY
CONTINUES TO
COMMUNICATE
REGULARLY
WITH KEY
STAKEHOLDERS
ON THE COMPANY'S
SUSTAINABILITY
AGENDA
AND INVOLVE
STAKEHOLDERS

The onus of Sustainability has been changing over the past decade. Initially the focus was primarily on environmental concerns. To address these, Jubilant had put in place Environmental Management Systems and adopted the technologies available for environmental conservation.

At The Earth Summit, 2002 held in Johannesburg, the global community accepted social dimension as an important aspect of sustainable development along with environment. Over a period of time after this consensus, gradually companies started adopting social initiatives as a part of their business agenda. We have been working with the local community since a long time and for more focused approach, Jubilant Bhartia Foundation was formed. Presently, the social activities of the Company are carried out by Jubilant Bhartia Foundation.

The global economic meltdown of 2008 highlighted that good performance on triple bottomline of Economic, Environment & Social does not ensure Sustainability of the company. We believe that governance has to be added as the fourth dimension along with the three dimensions of Sustainability. Supporting our belief, we have already constituted Sustainability Committee at the Board Level. This committee will guide the Company to excel in the path of Sustainability while improving the governance. This is also in line with the National Voluntary Guidelines on Social, Environmental & Economic Responsibilities of Business brought out by Ministry of Corporate Affairs, Government of India in 2011. With this in view, we had committed for better governance in the Company.

We would like to share our performance in the areas indicated under the path forward in last year's report.

- 1. The Company had released the new Climate Change Mitigation Policy in the previous year. The aim was to have a focus on mitigation of climate change impacts due to the Company's operations. The company implemented initiatives to reduce its carbon footprint. One of the initiatives was to transport raw material by railway and also follow reverse logistics for sending finished goods through railway. This also resulted in greener logistics.
- 2. The usage of renewable energy in one of the major operating units was significantly increased during the





- year. At another unit, a new source of biomass (almond shell) was identified for meeting the energy demands of the Unit.
- 3. The Company took several initiatives for capacity building of its workforce. One of them was a specialised online training on disaster management for 6 weeks organised for the Environment, Health & Safety (EHS) personnel in the Company. This training was conducted jointly by The World Bank and National Disaster Management Authority.
- 4. To enhance governance in the Company, a new software based system was implemented during the year for monitoring the regulatory compliances within the Company. The Company proactively initiated the practice of emailing to shareholders Notice of Annual General Meeting, Annual Report and Corporate Sustainability Report, wherever email IDs are available, as an effort in the direction of better governance.
- 5. The Company continues to communicate regularly with key stakeholders on the Company's Sustainability agenda and involve stakeholders on wider national scene for the awareness on climate change and other environmental issues. This was achieved through regular mailers to the employees, awareness messages in technical journals and participation in various seminars & workshops. A series of training programs were conducted at manufacturing units for awareness on climate change, environmental regulations & other issues related to Sustainability.
- 6. The Company, as committed last year, continued to follow the initiatives such as ethical business principles as defined by the United Nations Global Compact by submitting the required Communication of Progress (CoP). The socio-economic development work in the vicinity of units was continued, addressing the Millennium Development Goals of United Nations. The Company also continues reporting its carbon footprint through Carbon Disclosure Project, UK. The Company followed the practice of conserving water, paper & energy across its operations. A new initiative was launched at Kirkland, Montreal, Canada unit for paper and bottle recycling.







In order to keep abreast with the latest global trends in financial accounting, we carried out extensive training for the employees of finance department. This was conducted for capacity building to meet future requirements. The training covered important areas with respect to accounting procedures & standards, changes in finance world, updation of budgets etc. Training & awareness programs were organised for employees on avoidance of any frauds.

We continued our efforts for environmental conservation through product & process innovation through R&D. Several initiatives were taken in the direction of energy conservation, waste minimisation and productivity improvement. Another major initiative taken this year was to reduce environmental footprint through green logistics by implementing end to end transportation of raw material and finished goods through railways. This not only helped reduce emissions due to road transportation but also improved safety in movement of material.

Safety continues to be a major area of concern in the Company. Regular training & audits are carried out across all locations to improve the safety performance. No fatal accident in the Company was a key achievement





this year that demonstrates improvement in safety performance. This was also recognised through various awards the Company received this year as given in the report.

The Company strengthened its efforts in the area of social development for the neighbouring community. With a view to improving the well-being of women in the rural areas and to ensure inclusive growth for this segment of the society, the Company implemented a major project for institutional delivery. This not only improved the well-being of the mother but also helped to improve the health of the infant.

In continuation to the Muskaan project on supporting primary rural education, the Company aimed at improving the quality of education by employing audio visual methodology for teaching. This also provided an opportunity for the local youth to work as social entrepreneur, thereby improving their livelihood.



Initiatives such as fund raising for cancer patients and collection of food for a food bank in the community 'West Island Mission' were carried out by the employees at the Kirkland, Montreal, Canadaunit of the Company.

We value the support of our stakeholders in partnering with us for a successful decade of Sustainability performance for Jubilant. We look forward to your continued support in our journey to achieve a more sustainable world. We welcome your feedback on our sustainability performance over the last decade.

Best Wishes and Regards,

Shyam S Bhartia

Chairman & Managing Director

Hari S Bhartia

Co-chairman & Managing Director



2.0 KEY IMPACTS, RISKS AND OPPORTUNITIES

Internal Control Systems & Risk Management

Risk-taking is an inherent trait of any enterprise. There can be no growth or creation of value in a company without risk-taking. However, if risks are not properly managed and controlled, they can affect the company's ability to attain its objectives. Risk management and internal control systems play a key role in directing and guiding the company's various activities within the desired parameters.

Vision on Risk Management

The vision of the Company is to establish and maintain enterprise wide risk management capabilities for active monitoring & mitigation of organisational risks on a continuous and sustainable basis.

Risk Management Strategy

Jubilant has a strong risk management framework in place that enables active monitoring of business activities for identification, assessment and mitigation of potential internal or external risks, given the established processes and guidelines we have in place, along with a strong oversight and monitoring system at the Board and senior management levels.

The Company's senior management team sets the overall tone and risk culture through defined and communicated corporate values, clearly assigned risk responsibilities and appropriately delegated authority. The Company has laid down procedures to inform the Board members about the risk assessment and risk minimisation procedures. As an organisation, the Company promotes strong ethical values and high levels of integrity in all our activities, which by itself significantly mitigates risk.

Risk Management Structure

The Company's risk management structure comprises of the Board of Directors and Audit Committee at the Apex level, supported by Executive Directors, Heads of Businesses, Functional Heads, Unit Heads, Divisional Heads of Accounts & Finance and Head of Assurance Function. As risk owners, the Heads are entrusted with the responsibility of identification



RISK **MANAGEMENT** AND INTERNAL **CONTROL** SYSTEMS PLAY A KEY ROLE IN DIRECTING **AND GUIDING** THE COMPANY'S **VARIOUS ACTIVITIES WITHIN** THE DESIRED PARAMETERS.





and monitoring of risks. These are then discussed and deliberated at various review forums chaired by the Executive Directors and actions are drawn upon. The Audit Committee, Executive Directors and Head of Assurance act as a governing body to monitor the effectiveness of the internal controls framework. There is a perpetual internal audit activity carried out by M/s Ernst & Young Private Ltd. and the in-house internal audit team, who make an independent assessment of the Company's risk mitigating measures and provide suggestions for improvement.

The Audit Committee, on a quarterly basis, reviews the adequacy and effectiveness of the internal controls being exercised by various businesses and support functions and advises the Board on matters of core concern for appropriate redressal.

Risk Mitigation Methodology

Jubilant has a comprehensive internal audit plan and a robust Enterprise Risk Management (ERM) exercise which helps to identify risks at an early stage and take appropriate steps to mitigate the same. The Company has completed six years of the certification process wherein, all concerned control owners certify the correctness of about 1600 controls related to key operating, financial and compliance related issues, every quarter. This has made internal controls and processes stronger and also serves as the basis for compliance with revised Clause 49 requirements mandated by the Securities and Exchange Board of India (SEBI).

The Company has also identified entity level controls for the organisation, covering integrity and ethical values, adequacy of audit and control mechanisms and effectiveness of internal and external communication, there by strengthening the internal controls systems and processes with clear documentation on key control points.

Management's Assessment of Risk

The Company identifies and evaluates several risk factors and makes appropriate mitigation plans associated with the same in detail. Some of the key risks affecting its business are laid out below.

Cost Competitiveness

The Company believes that it is a low-cost manufacturer for most of its products and is a major contender for outsourcing opportunities with global corporations offering products that also conform to quality standards set in developed markets. The Company continued to take initiatives in reducing our costs by employing Business Excellence





initiatives. Significant variations in the cost as well as availability of raw materials and energy may impact its operating results. Where ever feasible, the Company enters into long term contracts with volume commitments and prices which are linked to key input material prices to mitigate risks.

Compliance and Regulatory Framework

The Company needs to comply with a broad range of regulatory controls on testing, manufacture and marketing of its products in the pharmaceuticals and life sciences space. In some countries, including the US, regulatory controls have become increasingly demanding leading to increased costs and reduced operating margins for its line of products and services. Failure to achieve regulatory approval of new products can mean that the Company does not recoup its R&D investment through the sale of final products. Any change in regulations or reassessment of safety and efficacy of products based on new scientific knowledge or other factors could result in the amendment or withdrawal of existing approvals to market our products, which in turn could result in revenue loss. This may occur even if regulators take action falling short of actual withdrawal. The Company has adopted measures to address these stricter regulations by increasing the efficiency of its R&D process, reducing the impact of extended testing and making its products available on time.

Environment, Health & Safety Risks

In the current business climate of reputational threats and rising political backlash, corporate need to tread carefully to maintain public trust. Social acceptance and Corporate Social Responsibility (CSR) have become increasingly important over the last decade. Compliance with stringent emission standards for the manufacturing facilities and other environmental regulations may adversely affect the business. R&D, life science services and manufacturing of products involve dangerous chemicals, processes and by-products and are subjected to stringent regulations. The Company anticipates that environmental laws and regulations in the jurisdictions, where it operates, may become more restrictive and be enforced more strictly in the future. The Company also anticipates that customer requirements as to the quality and safety of products will continue to increase. In anticipation of such requirements, the Company has invested substantially and allocated other resources to proactively adopt and implement manufacturing processes to increase its adherence to environmental standards and enhance its industrial safety levels.



THE COMPANY
CONTINUES
TO HIRE NEW,
HIGHLY-SKILLED
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PERSONNEL
STAFF, IT HAS
ALSO INTRODUCED
REWARDS &
RECOGNITION
POLICIES FOR
EFFECTIVE
EMPLOYEE
ENGAGEMENT.



At Jubilant, the challenges due to the Company's operations related to Environment, Health and Safety (EHS) aspects of the business, employees and society are mapped and mitigated through a series of systematic and disciplined sets of policies and procedures.

Foreign Currency and Interest Rate Exposures

Foreign currency exposures on account of global operations could impact the financial results of the Company. Foreign currency exposures arise out of international revenues, imports and foreign currency debt, including convertible bonds. Constantly increasing interest cost on the borrowings may impact the profitability of the organisation adversely. To mitigate foreign currency related risks, a risk management team formulates the approach and reviews it dynamically to align it with external environment and business exigency. Further, currency swaps and interest rate swaps may be taken on Company's loans and interest rate exposures. A quarterly update on foreign exchange exposures, outstanding forward contracts and derivatives is placed before the Board, for information.

Acquire and Retain Professional Talent

The Company's dependence on R&D activity makes it very important that it recruits and retains high quality R&D





specialists. In case the Company fails to hire and retain sufficient numbers of qualified personnel, the operating results and financial condition could be harmed. The Company has committed substantial resources to this effort given the competition for qualified and experienced scientists from biotechnology, pharmaceutical and chemical companies, as well as universities and research institutes, in India and abroad. To execute its growth and diversification plans, while on one hand the Company continues to hire new, highly-skilled scientific and technical personnel staff, it has also introduced Rewards & Recognition policies for effective employee engagement.

Protecting Intellectual Property Rights (IPRs)

Jubilant's success will depend, in part, on the ability in the future to obtain and protect IPRs and operate without infringing others' IPRs. The Company's competitors may have filed patent applications, or may hold issued patents, relating to products or processes that compete with those that the Company is developing, or their patents may impair its ability to do business in a particular geography. The Company in addition to patents has relied on trade secrets, know-how and other proprietary information and hence its employees, vendors and suppliers sign confidentiality agreements.

Business Interruption Due To Force Majeure

The Company's largest manufacturing facility for organic intermediates is at Gajraula, India. Any disruption or stoppage of work at this facility, for any reasons, may adversely affect its business and results of operations not just for this but other business segments which depend on supplies from Gajraula plant. Industrial all risk insurance protection has been taken by Jubilant to ensure continuity in its earning capacity. Besides, the presence of a majority of the workforce in the residential colony adjoining our plant premises ensures sustenance of plant operations under challenging circumstances.

Third Party Liability Risks

The Company's business inherently exposes it to potential liability from its customers or end users for defects in products and services, especially in highly regulated markets noted for their litigious nature and high awards of damages. The Company carries global product liability insurance program with respect to its major manufactured products which provides a compensating safeguard against such risks, if they were to materialise.



3.0 COMPANY PROFILE

Jubilant Life Sciences Limited, an integrated pharmaceutical and life sciences company, is the largest Custom Research and Manufacturing Services (CRAMS) player and a leading Drug Discovery and Development Solution (DDDS) provider out of India. Recently it has been ranked No. 6 amongst the Top 10 global contract manufacturing & services outsourcing players of the pharmaceutical industry (Source: UNCTAD).

The Company provides Products and Services across the pharmaceutical value chain, serving its customers globally with its ground presence in India, North America, Europe and China. The Company is well recognized as a 'Partner of Choice' by leading life sciences companies worldwide. Jubilant Life Sciences is a public limited company and is listed on Indian Stock Exchanges (both NSE and BSE)

Our Global Leadership Positions:

- Globally No.1 in 10 APIs products
- Globally No.1 in Pyridines, Beta Picolines & 14 other Pyridine derivatives – Fine Chemicals
- Globally amongst top 10 players in Ethyl Acetate & Acetic Anhydride
- Globally amongst top 10 players in Choline Chloride (Vitamin B4)
- Globally No. 2 in Niacin & Niacinamide/Vitamin B3-Nutrition Ingredients



THE COMPANY IS WELL RECOGNISED AS A 'PARTNER OF CHOICE' BY LEADING LIFE SCIENCES **COMPANIES** WORLDWIDE. JUBILANT LIFE SCIENCES IS A **PUBLIC LIMITED COMPANY AND** IS LISTED ON **INDIAN STOCK EXCHANGES** (BOTH NSE & BSE)





- Leading market share positions in Four therapeutic and imaging, Nuclear Medicine products in North America
- Leading No. 2 Allergy Therapy Company in the USA
- Amongst top 3 in the contract manufacturing of semi-solid OCL dosage formulations in North America
- Global leadership in the contract development and manufacture of sterile injectable dosage forms
- Leadership, amongst the world's top 5 in Integrated Drug Discovery and Development solutions
- Unique affordable healthcare model operational in West Bengal, India

The Company's success so far is an outcome of its strategic focus on the pharmaceuticals and life sciences industry, moving up the value chain for products and services across geographies, constantly investing in various growth platforms and promoting a culture of innovation.



Over the years, the Company has extended the footprint beyond India in the USA, Canada, Europe, and other countries across the globe. the Company has expanded our business by building capabilities internally, through strategic build outs and acquisitions, resulting in a network of 7 world class manufacturing facilities in India and 3 in North America and a team of around 6300 people across the globe with ~ 1500 in North America, with international sales in more than 75 countries.





The multi-location presence helps the Company to get closer to the customers and serve them better with the best in class products developed most efficiently, economically and on time.

At Jubilant we are engaged in continuous improvement of our products and processes to enhance the quality of our production and cost competitiveness in order to build value for our customers. The Company serves the customers across the globe in over 75 countries and has strong relationships with the Top 20 pharmaceuticalcompanies and 7 out of the top 10 agrochemical companies across the globe.



Products & Services

The Company offers:

PHARMACEUTICALS

Active Pharmaceutical Ingredients (APIs)

- Provider of bulk drugs to generic pharmaceutical companies
- Socus on therapeutic segments CVS, CNS, Gastro-intestinal and Anti-infectives





Generics

Provider of high quality finished dosage forms (tablets and capsules)

Specialty Pharmaceuticals

- Radiopharmaceuticals Development, manufacture and marketing of radiopharmaceutical products for diagnostic and therapeutic use
- Allergy Therapy Products Major therapeutic and diagnostic extracts for allergy derived from pollens, animals and stinging insects venoms

Contract Manufacturing Outsourcing (CMO) –Sterile & Non-sterile Products

- OMO services for Lyophilized products, liquid fills, biologics, suspensions and WFI / diluent and clinical trial quantities
- CMO services for ointment, cream and liquid

Drug Discovery & Development Solutions (DDDS)

- Providing integrated Drug Discovery and Development Solutions to globalpharmaceutical and biotech companies
- Discovery Research: Target to IND, functional services, medicinal chemistry and scale up synthesis
- Clinical Research: Integrated from Phase I to Phase IV in US, Europe and India
- JV with Lilly for managing drug development from Pre-clinical to Phase II proof of concept

Healthcare

 Providing affordable high-quality healthcare services in West Bengal, India

LIFE SCIENCE INGREDIENTS

Proprietary Products & Exclusive Synthesis

Custom manufacturer of advanced intermediates, innovator active ingredients & preparatory products for global pharmaceutical and agrochemical companies





- Portfolio comprises Pyridines, Picolines, Amino Pyridines, Cyanopyridines, Chloro/ Bromo/ Fluoro Pyridines and many other derivatives
- Custom manufacturing of Intermediates and NCE's on Exclusive Synthesis basis
- Service offerings include route design, process development & analytical method development
- Agro Actives and Key Advanced Intermediates for the Agrochemical industry

Nutrition Ingredients

- Leading provider of nutritional ingredients for pharmaceuticals, human and animal applications
- Niacin and Niacinamide (Vitamin B3)
- Choline Chloride (Vitamin B4) for Animal Nutrition; Specialty Premixes for poultry

Life Science Chemicals

Manufactures a range of Life Sciences chemicals of Acetyl group







Research & Development: Jubilant's progress in diverse businesses has been made possible through the contribution of R&D; for quality, non-infringing process for product development and cost reduction through process innovation. Innovation at Jubilant is backed by strong chemistry and bio science expertise and the knowledge bank created by the Company over the years. The Company has harnessed its strengths – a strong R&D team, modern R&D facilities, command over cheap technologies and economies of scale into a synergistic organic entity, continuously creating and nurturing high quality products and technologies.

Sustainability: In line with the continued focus on sustainability of the business we aim at improving stakeholder value through improved eco efficient use of capital and natural resources. The approach to sustainable development focuses on the triple bottom line of Economics, Environment and Social performance. The company is committed and working on various areas for energy conservation and climate change mitigation. The Sustainability efforts have been reported through a Sustainability report since 2003 and the report has been rated A+ since 2007 by Global Reporting Initiative (GRI). This reflects our commitment towards sustainable development and continued efforts directed towards protecting the environment wherever we operate.

Corporate Social Responsibility is an integral part of how the Company conducts the business and the efforts are directed towards community development through focus on primary education, basic Healthcare Service, and Livelihood generation programs focused on improving the employability of women and local youth.

The Company has been recognised with several awards which bear testimony to the commitment towards operational excellence, innovation, corporate governance and social responsibility.



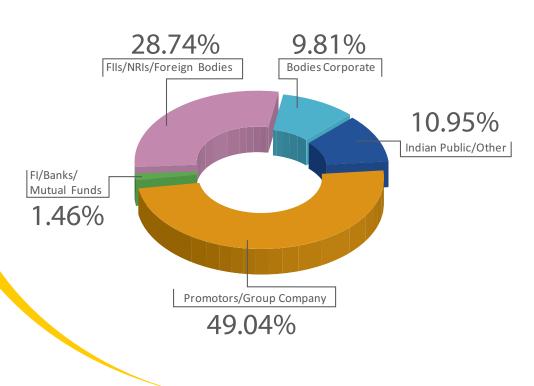




The Company also has many subsidiary companies. Some of these are:

- Jubilant Clinsys Limited
- Jubilant Biosys Limited
- Jubilant Chemsys Limited
- Jubilant First Trust Healthcare Limited
- Jubilant Infrastructure Limited
- Jubilant DraxImage Limited
- Jubilant Cadista Pharmaceuticals Inc.
- Jubilant DraxImage Inc
- Jubilant HollisterStier LLC

There has been no significant change regarding size, structure or ownership during the reporting period. The total number of employees in the Company is over 6200 with 10 manufacturing units. The revenue for the year was ₹43,031.3 million. The paid up capital was ₹159.28 million and consolidated debt was ₹36,069.84 million. The quantity of life sciences products was 409132 MT and 210.83 million capsules and tablets during the year. The Company has strong assets and financials comprising Fixed Assets and Current Assets which were ₹55,021.11million and ₹23,438.08 million respectively. The international sales of the Company comprises of revenue from America & Europe at 56.7%, China at 6.7%, Asia & others at 7.2% and India markets at 29.4% respectively. The shareholding pattern of the Company and the major shareholder groups are mentioned below.







The Company has been conferred with several awards which bear testimony to our commitment towards operational excellence, innovation, corporate governance and social responsibility.

Some of the recent awards are:

- 1 Ernst & Young Entrepreneur of the Year 2010 for life sciences &consumer products to Mr. Shyam S Bhartia, Chairman & Managing Director and Mr. Hari S Bhartia, Co-Chairman and Managing Director.
- 2 Best CFO in the pharmaceutical and healthcare space in 2011 for Jubilant's Group CFO Mr. R. Sankaraiah.
- 3 DHL CNBC TV 18 International Trade Awards 2010-11, powered by ICRA
- 4 Among the companies with a Level 4 rating by The Karmayog Corporate Social Responsibility (CSR) Study on CSR Ratings of India's Largest 500 companies: 2009-10
- 5 International Quality & Productivity Centre Award (2011) for the Best Innovative Continuous Improvement Project Process Reengineering implemented in North American Subsidiaries.
- Two Environmental Best Practices Award 2011, by CII-Sohrabji Godrej Green Business Centre, under Most Innovative Environmental Project and Most Useful Environmental Project for the Co-processing of Hazardous waste in cement kiln at our plant at Nanjangud, Mysore, India







- 7 CII EHS Award 2010 First Place for Excellence in EH&S systems at the Nanjangud Plant, among medium scale industries
- 8 Award by Maharashtra Energy Development Agency (MEDA) for Efficient Utilisation, Management and Conservation of Energy to Nira Unit.
 - a. Year 08-09 (first Prize) savings and utilisation of renewable energy
 - b. Year 09-10 (third Prize) Savings and utilisation of renewable energy
- 9 Golden Peacock National Quality Award-2011 in pharmaceutical sector under large enterprises category for Gajraula unit.
- 10 National Energy Conservation Awards -2011 in the chemicals sector, second prize for Gajraula unit.
- 11 The Economic Times Frost & Sullivan India manufacturing excellence gold award- 2011 for Gajraula unit.
- 12 Frost & Sullivan's excellence in regulatory compliance of the year award
- 13 Frost & Sullivan Indian contract research organization of the year 2011 for Jubilant Biosys.
- 14 ICC Award for social responsibility for 2010, Jubilant Life Sciences Limited.
- 15 FICCI quality system excellence award for manufacturing for Nanjangud unit.
- 16 National Award for excellence in water management 2011" from CII for Nanjangud unit.
- 17 Rajiv Gandhi Award for individual achievements and nation building by All India Achiever's Conference





4.() REPORT PROFILE

The Corporate Sustainability Report is for the Financial Year 2011-12 i.e. April 2011 - March 2012. All the information provided is for this period. The last report published by the Company was in the month of August, 2011 which covered information for the previous Financial Year. Since 2003, when the Company reported for the first time on its Sustainability performance, the reports have been published annually.

The compilation of data for Corporate Sustainability Report is the prime responsibility of Corporate EHS and Sustainability group. The data is provided by concerned departments to the Sustainability team for all the manufacturing units in India and abroad. The data is verified through regular audits. However, for any clarifications or queries the contact person of the Company is Mr. Deepak Jain, General Manager-Sustainability. His address for communication/feedback is:

Jubilant Life Sciences Limited

1-A, Sector 16-A, Noida - 201 301 Gautam Budh Nagar Uttar Pradesh, India

Phone: +91 120 2516601-11 Email: sustainability@jubl.com

Report Scope and Boundary

The Company has applied the Report Content Principles as per GRI G3.1 for determining the material issues for the Company. Reporting on Sustainability for years have made the Company put in place systems to report on all core &additional indicators as per GRI G3.1. However, there are no sector supplements applicable for Jubilant Life Sciences Ltd. Both internal &external factors have been considered for prioritising the issues. An internal Sustainability survey was conducted to determine the importance of Sustainability Reporting for the Company.

While determining the materiality issues for the Company. both internal & external stakeholders have been considered. These include stakeholders who can affect the operations/ performance of the Company and others who are affected/ impacted by the Company.



REPORTING ON SUSTAINABILITY **FOR YEARS** HAVE MADE THE **COMPANY PUT IN PLACE SYSTEMS** TO REPORT ON ALL CORE &ADDITIONAL INDICATORS AS PER GRI G3.1.





All the manufacturing units of the Company in India & abroad which have been in operation for the full Financial Year have been covered in the Report. The Report includes subsidiaries on which there is direct control of the Company including the Corporate Office and R&D centre at Noida.

The Report does not cover those sites which have not completed one full year of operations. These will be included in the next year's report. However, the data in economic section includes SEZ, Bharuch operations also. For some indicators reporting is only for the Indian operations. This has been mentioned wherever applicable in the report. There is no change that can significantly affect the comparability from period to period for the Company.

Data measurement techniques are same as previous year. Quantified values as well as estimated values have been used for representing the data. Standard protocols/ guidelines have been used for calculation of specific data. There has been no change in the reporting period scope, boundary or measurement methods applied in the Report. There are no re-statements of information provided in previous report. Previous years' figures have been regrouped/ rearranged wherever found necessary to conform to this year's (FY 2012) classification.





5.0 GOVERNANCE,

COMMITMENTS & ENGAGEMENT

Corporate Governance

Corporate governance is the set of processes, customs, policies, laws and institutions affecting the way a company is directed, administered or controlled. Corporate governance also includes relationship among all the stakeholders involved. Stakeholders are the shareholders, employees, customers, creditors, suppliers, regulators and the community at large.

Jubilant promotes transparency and accountability with a strong corporate governance regime. At Jubilant, corporate governance is both a tradition and a way of life. Jubilant believes in delivering on its Promise of Caring, Sharing, Growing which spells:

OUR PROMISE

Caring, Sharing, Growing

We will, with utmost care for the environment and society, continue to enhance value for our customers by providing innovative products and economically efficient solutions; and for our stakeholders through growth, cost effectiveness and wise investment of resources

The highest governing body responsible for framing and implementation of corporate governance policies is the Board of Directors of the Company. The Board's objectives are to create sustainable value for stakeholders, provide vision to the Company and oversee the implementation of the Board's decisions.

Unitary Board of Jubilant comprises of nine directors of which six are Non-Executive Independent Directors, two Managing Directors and one Executive Director. All the Members of the Board are above 50 years of age. The Board comprises 100 percent male members by gender. The

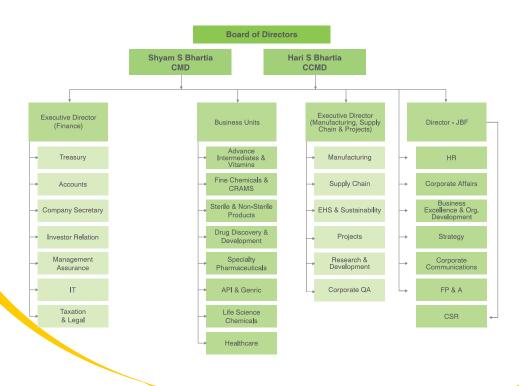




Independent Directors constitute majority of the Board, thus ensuring independence and transparency of the Board's decision-making process. Further, the Board has delegated operational powers to the Chairman & Managing Director (CMD) and Co-Chairman & Managing Director (CCMD) for smooth operations of the business. The Non-executive Independent Directors are not associated with the Company in any executive capacity. They do not have any material pecuniary relationship with the Company other than their remuneration.

The Board along with its Committees provides leadership and strategic guidance to the Company's management while discharging its fiduciary responsibilities thereby ensuring that the management adheres to high standards of ethics, transparency and disclosures.

The CMD and CCMD are highest executive officers of the Company. Both of them belong to the promoter group and have led the Company to its present growth and success. The Company has extended its operations globally under their guidance and leadership and stands prominently on the industry's world map in many of the businesses. The Chief Executive Officers (CEOs) of various businesses are responsible for smooth functioning of their respective businesses and they are placed at one level below the Board. This also includes the development of business strategies as well as due consideration of the interests of stakeholders. The business strategies and plans are reviewed during the Annual Strategy Meet by CMD, CCMD, Executive Director and CEOs. The Global Management Team of Jubilant is presented.





JUBILANT
VALUES ITS
INVESTORS AND
SHAREHOLDERS
IMMENSELY AND
IS CONTINUALLY
WORKING TO
IMPROVE THE
QUALITY OF
SERVICE FOR ITS
SHAREHOLDERS
AND
INVESTORS.

Jubilant values its investors and shareholders immensely and is continually working to improve the quality of service for its shareholders and investors. An annual feedback from shareholders regarding the quality of services rendered to them is obtained. The Shareholders can also give their feedback by filling the on-line Investor Feedback Form available on the Company's website.

The feedback is regularly evaluated by the concerned Company officials and action is taken as per the need. As per the statutory requirements annual shareholders meetings are also convened. The shareholders also have an opportunity to share their valuable suggestions/ideas with directors during Annual General Meeting.

Due consideration and suitable actions are taken to the suggestions/ideas of the shareholders and employees. However, this is subject to being found practicable, appropriate and in the interests of the Company. In addition, where the shareholders have expressed their opinion through mails to the Company Secretary, the same are forwarded to the concerned authorities for necessary action. The minutes of the meetings of members are prepared as per requirements of law and as such, inputs received in the general meetings are not mentioned.

With a view to communicating on a real time basis, guarterly results, press releases and other similar communications are e-mailed to all the shareholders whose e-mail IDs are available with the Company soon after these are sent to the stockexchanges. For the purpose of effective communication with shareholders, for financial year 2009-10, as a voluntary initiative, the Company e-mailed significant documents such as Notice of Annual General Meeting (AGM), Annual Report and Corporate Sustainability Report to those shareholders whose e-mail IDs were available. This was in addition to statutory physical mailing. The initiative was well appreciated by the shareholders. Subsequently, the Ministry of Corporate Affairs, Governmentof India advised companies to e-mail documents to those shareholders whose e-mail IDs are available with the Company. Therefore, for 2010-11, Notice of Annual General Meeting, Annual Report and Corporate Sustainability Report were e-mailed





to shareholders who had registered their e-mail IDs with the Company and physical documents mailed to those whose e-mail IDs were not available.

Directors' Remuneration Policy of Jubilant aims at encouraging and rewarding good performance/contribution to the Company's objectives. The remuneration of Executive Directors is paid as recommended by the Remuneration Committee and approved by the Board and Shareholders. Time and efforts put in by Non-Executive Directors at Board/Committee meetings are considered while remunerating Non-Executive Directors. They are remunerated by way of Sitting Fee for attending the meetings of Board/ Committees and also through Commission, as approved by the Board and shareholders. In addition, stock options are also given to Non-Executive Directors.

The compensation policies of the Company's executives are also structured in line with the current industry standards and business practices with the aim of retaining and attracting the best talent. The appraisal system followed in the Company is comprehensive in nature and consists of four parts including three non-financial parameters. In fact, the compensation paid to the Company's executives clearly reflects their achievements on non-financial parameters as well as on financial goals.

There is no formal written policy for conflict resolution in the Company. Conflicts are resolved through informal discussions in case of senior management. However, if any conflict is unresolved, the following approach is adopted in the Company:

- Analyse or review the situation of conflict
- Organise meeting jointly with the concerned parties to know their perspective
- Reconcile through the involvement of other senior executives

In case, it is not possible to solve the conflicts, the matter is dealt by senior persons/outside reputed persons. However, no such cases occurred during the year.

There is no formal procedure for appointing members of the Board. However, assessment is carried out to ensure that proper balance is in place at the strategic level while determining the composition of the Board. For appointing a new director, suitable candidates are short-listed, based on the criteria set by the Board, including the desired expertise



SUSTAINABILITY
IS BOTH A
TRADITION AND

A WAY OF LIFE IN

THE COMPANY.

or specialisation. There is no consideration of gender or any other indicators of diversity. The Company is an equal opportunity employer and members of the highest governing body are selected on merit as mentioned above.

Sustainability is both a tradition and a way of life in the Company. The Company has built a strong sustainable business model through consistent organic growth and in-organic expansion by acquiring niche businesses in developed markets like the US, Canada and Europe.

The Promise, Vision and Values statements of the Company are also adopted by businesses and other functions. There are several internally developed policies and codes adopted by the Company for good corporate governance. A few of these include:

- Whistle Blower Policy
- Sustainability Mission
- Climate Change Mitigation Policy
- Environment, Health and Safety Policy
- Green Supply Chain Policy
- Quality Policy
- Code of Conduct for Directors and Senior Management
- Code of Conduct for Employees
- Child Labour Policy
- Policy on Forced and Compulsory Labour
- Bribery and Corruption Policy
- Conflict of Interest Policy
- Freedom of Association Policy
- Policy on Prevention of Sexual Harassment
- Non Discrimination Policy

Sustainability Mission & Climate Change Mitigation Policy are global policies of the Company applicable to all units domestic & foreign whereas other policies are applicable to Indian units of the Company. Applicable international standards are followed across location. The details of Corporate Sustainability of the Company covering policies, Corporate Governance, initiatives for social responsibility, awards and Corporate Sustainability





Reports since 2003 are posted on Company's website www.jubl.com. This is one more effort for engagement with stakeholders. The stakeholders can contact through e-mail or other contact details given on the website.

To focus effectively on the issues and ensure expedient resolution of diverse matters, the Board has constituted several Committees of Directors with specific terms of reference/ scope. Committee members are appointed by the Board with the consent of individual Directors. The Committees meet as often as required. The minutes of the meetings of all Committees of the Board are placed before the subsequent quarterly Board meeting for noting. Major Committees are:

- Audit Committee
- Remuneration Committee
- Investors Grievance Committee
- Corporate Governance Committee
- Sustainability Committee
- Finance Committee
- Compensation Committee

Audit Committee primarily constitutes a formal and transparent arrangement for accurate financial reporting and strong internal controls. The Committee through regular interaction with external and internal auditors and review of various financial statements ensures that the interests of the stakeholders are properly protected.

Remuneration Committee is responsible for framing policy on executive remuneration and for determining the remuneration packages of Executive/ Managing Directors. It also ensures that the levels of remunerations are sufficient to attract, retain and motivate directors to run the Company successfully.

To expedite the process of share transfers, the Board has delegated the power of share transfer to the Investors Grievance Committee as well as to senior executives. Share transfers are normally done once in a fortnight.

Corporate Governance Committee is responsible for evaluation and implementation of Voluntary Corporate Governance and Corporate Social Responsibility Guidelines issued by the Central Govt.

SustainabilityCommittee oversees the performance of the Company on triple bottom line indicators viz. Environmental, Economic & Social factors.





Finance Committee has been delegated the powers to borrow moneys, to avail financial assistance from Banks, financial institutions etc.

Compensation Committee has been constituted for administration and superintendence of the Jubilant Employees Stock Option Plan, 2005 and Jubilant Life Sciences Employees Stock Option Plan, 2011. The Committee frames suitable policies and systems for grant of stock options so that there is full compliance with the relevant provisions of law. It also monitors the quantum of options to be granted under both the plans.

Also, to ensure appropriate business and functional reviews on a continuous basis, the Board has constituted various Executive Committees comprising of Managing Directors /Whole Time Director, ED-Finance and other Senior Executives of the Company. These include Supply Chain Committee to review various operational areas, Purchase Committee to ensure that key purchases pass through a leadership rigour, Business Performance Review Committee to review business performance on a regular basis, Capex Committee to have a control on capital expenditure, Credit Control Committee to ensure tight control on quality of working capital and Functional Review Committee for various important operational and functional areas including EHS performance review. The meetings of these Committees are held periodically, depending upon the business exigencies.

The Company has not adopted a formal method for evaluating the performance of the Non-Executive Directors. The performance evaluation of the Executive Directors is based on the results achieved in their respective areas.

Commitments to External Initiatives

India is party to key international protocols / forums on precautionary approach (Ozone depleting substance phase out, climate change etc.) and Indian laws & regulations are also based on these aspects. The Company follows all applicable regulations encouraging precautionary approach and also had conducted green chemistry study to identify further scope to reduce the Sustainability impact of products through R&D.

Jubilant continuously works for innovation and improvement. The Company's effort in achieving product improvement at Gajraula unit resulted in increase in carbon efficiency of a major commercial product. This product has been modified to reduced decolourising carbon consumption to zero from approx. 20 MT/annum. The product achieved



THE PRODUCT
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ALSO REDUCED
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a higher level of resource reduction as one of the key resource material used in the product development has reduced significantly and solvent handling reduced in this modified product.

The product improvement also reduced environmental load by reducing aqueous effluent generation. It brought a win-win situation for organisation as it reduced operation time with an increased productivity.

Case: Solvent Recovery

The drive towards greater economic and environmental efficiency in chemicals manufacturing has led to a growing need for processes that produces minimal waste and avoid, as much as possible the use of toxic and/or hazardous reagents and solvents. Organic solvents are constantly used in the pharmaceutical production processes. Pharmaceutical production includes production of bulk pharmaceuticals, drug intermediates and Active Pharmaceutical Ingredients (API) by means of synthesis, fermentation and extraction. Solvents are usually used at any step of the synthesis pathway of an active substance and sometimes during the drug product formulation process.

Some of the initiatives on solvent recovery are implemented to reduce the solvent by recycling after recovery of the same in a dedicated solvent recovery plant. The Nanjangud unit has a solvent recovery plant. The Company has direct benefit by recovering waste solvent which is reused in the various processes.

One of the products manufactured at Nanjangud unit has five stages manufacturing process where various solvents are used across each stage. Due to fresh solvent consumption, it has a major influence on product cost and has environmental impact as well. The project was executed through DMAIC (Define -> Measure -> Analyze -> Improve -> Control) methodology. Data was collated for the spent solvent recovery & recyclability in a process established by simulation studies and subsequently modifying the distillation facility.

Another initiative implemented at Nanjangud unit was for another product, which is a runner product manufactured





at this unit. There were two major solvents (Toluene & Acetone) used during manufacturing of this product. However, there was already some solvent recovery in the process but recovery was low. The project was executed through DMAIC (Define -> Measure -> Analyze -> Improve -> Control) methodology. Data was collated for the spent solvent recovery & recyclability in a process established by simulation studies and subsequently modifying the distillation facility. Acetone & Toulene recovery increased in the process.

The Company follows several charters, principles and other initiatives related to Sustainability. Various charters/ principles have been adopted by the manufacturing locations at different points of time and subsequently renewed as per their specific requirements. Some of them are:

Charters / Principles	Description	Voluntary / Compliance
ISO 9001	Quality Management System	Voluntary
ISO 14001	Environmental Management System	Voluntary
OHSAS 18001	Occupational Health and Safety Assessment Series	Voluntary
CDP	Carbon Disclosure Project for Climate Change	Voluntary
MDG	UN Millennium Development Goals	Voluntary
REACH	Chemical Manufacturing	Compliance
UNGC	UN Sustainability Principles	Voluntary
CWC	Chemical Weapon Convention	Compliance
Earth Hour	Climate Change	Voluntary

Amongst the current issues, the Company has taken an initiative for promotion of RIO+20. The United Nations Conference on Sustainable Development better known as RIO+20 suggests corporates to promote RIO+20 either by contribution to trust fund or sponsor for participation or promote RIO+20 through company's website. As a responsible corporate citizen, Jubilant took initiative and gave support through Company's website www.jubl.com.

The Conference will be held in Rio de Janeiro in 2012 to mark 20 years of its launch and focus mainly on a green economy in the context of sustainable development, poverty eradication and the institutional framework for sustainable development.





The Company is a member of several industry associations and international organisations.

Name of the Organisation

All India Distillers' Association

All India Industrial Gases Manufacturers' Association

American Chemical Society

Associated Chambers of Commerce and Industry of India (ASSOCHAM)

Catalysis Society of India

Confederation of Indian Industry (CII)

Employers' Federation of India

FEFANA (EU Association of Specialty Feed Ingredients and their Mixtures)- VITAC Committee

Federation of Indian Chambers of Commerce & Industries (FICCI)

Indian Chemical Council (ICC)

Indian Chemical Society

Indo-Canadian Business Chamber

Indian Pharmaceutical Association

International Society of Heterocyclic Chemistry

International Society of Pharmaceutical Engineering (ISPE) India Affiliate

Pharmaceuticals Export Promotion Council (Pharmexil)

PHD Chambers of Commerce

Quality Federation Of India

The Institution of Engineers (India)

US-India Business Council (USIBC)

World Economic Forum





NOT FOLLOW

THE ETHICAL

PRACTICES.

Stakeholder Engagement

List of stakeholder groups engaged by the Company are mentioned below:

- Shareholders
- Financial Institutions and Investors
- Employees
- Customers
- Vendors & Suppliers
- Consultants
- Regulatory Agencies
- Local Communities
- Academic & Research institutions
- NGOs
- Media
- Industry Association

Global set of stakeholders were identified out of which stakeholders were selected for engagement based on their influence on the Company's operations and impact of the Company's operations on them. The stakeholder groups are defined by the Company on the nature of their interaction with the Company. The defined groups are then engaged by the concerned departments of the Company like Business-Customers, Suppliers-Vendors, HR-Employees, Investors Relation-Financial Institutions/Investors etc. The Company does not engage with those stakeholders that do not follow the ethical practices.

There is no fixed frequency of engagement with the stakeholders though there are annual events like vendor meet for suppliers, exhibition for customers etc. However, the departments engage with their specific stakeholder groups on need basis. Performance Management System is another tool for engagement with employees of the Company.

The engagement methodology adopted with some of the stakeholders is as follows:





Customers

The Exclusive Synthesis Business participated the CPhI Worldwide at Frankfurt having large number of exhibitors in October 2011 and also attended Informex at New Orleans, USA in February 2012 to engage and network with customers for Business prospects. Informex is the premier trade show event exclusively for the lifesciences industry.

The prospective customers who attended the exhibition included the pharmaceutical and agrochemical innovators and top Custom Manufacturing Organization's (CRO) worldwide. In Exclusive Synthesis Business, the Company is doing lot of development In-phase programs with the customers and working towards getting preferred partner status with Innovators.

Media

Engagement with media (Print & Electronic) is one of the focus areas for the Company. The Company engages with the media fraternity on an on-going basis through integrated media outreach program that encompasses print publications, electronic media, digital media and wire services. Besides nationwide key business publications the regional level media journalists are also constantly engaged by the plant representatives in order to keep them well informed about Company's developments.

The Company continued its media outreach through sharing press releases of the major developments like quarterly release, collaborations, product approvals etc. to print, wire services and electronic media journalists. The Company also follows the Standard Operating Procedure (SOP) of sharing all material information with the stock exchanges before sharing it with the media.

Investors

The Company works towards excellent stakeholder communication. It believes in sharing all information that directly or indirectly affects the financial and operational performance of the Company that can have material impact on the share price.

An extensive investor outreach program includes hosting a quarterly conference call to share the financial results of the Company along with discussion on the performance of the businesses by the leadership team. This is followed by question and answer session such that whosoever has





a question for the management can raise it in the forum. In the 4 quarterly calls that were conducted during FY2012, over 100 participants from brokerage houses, foreign and domestic institutional investors, banks, insurance and portfolio management companies, rating agencies besides media and others logged into the conference each time to listen to the management discussion and analysis. A detailed docket on the financials and business highlights is released after the Board approves the results for the period. Transcript of the investor call is also available on the Company website. There is also continuous process of dissemination of material information on specific business updates through business or press releases, as is appropriate.

As an on-going investor relations activity, one on one calls and meetings with analysts from intermediary broking outfits and institutional shareholders (current and potential) are organised. The Company also participates in Investor conferences organised by various brokers and goes on non-deal road shows, in India and internationally which helps reach out to a larger fund management fraternity. This not only helps improve the overall visibility of the Company for potential investors, but also improves the understanding about the various business lines that the Company is engaged in. Detailed business and industry related discussions with brokers helps increase analyst coverage on the Company. As on date, most analysts covering the stock have a buy rating on Jubilant Life Sciences Ltd.

Employees

The Salisbury unit, Maryland, USA sponsored a Softball team "The Cadista Capsule". The team finished 3rd place in division two of Wicomico parks and recreation softball league. This is the second season for "The Cadista Capsules". The event has been covered in the Wicomico Rec Round-Up Blog.

At the Salisbury unit the Company also sponsored a bowling league; this league meets every Sunday and is strong team comprising of 24 members. This league consists of six teams that compete against each other, this is a great social event and fitness program for employees.

An annual picnic was organized for the employees on July 13, 2011. The picnic took place at Purdue Stadium. A minor league base ballgame was played by the employees followed by fireworks. In addition, employees were allowed to bring one guest and the temporary employees were also invited to join in the fun.



STAKEHOLDERS ALWAYS PLAY A KEY ROLE TO **ENHANCE THE COMPANY'S VALUE. IT IS** ALSO IMPORTANT TO UNDERSTAND THE NEEDS OF **STAKEHOLDER** AND PROVIDE REALISTIC **SOLUTIONS AGAINST THE ISSUES OF** CONCERNS.



Stakeholders always play a key role to enhance the Company's value. It is also important to understand the needs of stakeholder and provide realistic solutions against the issues of concerns.

This year, we add a new practice to achieve an effective engagement. A small survey was conducted to have views of the internal stakeholders on the Business/Company's Sustainability to improve the Sustainability Reporting. The outcome information was helpful in order to achieve the objectives.

Solar lamp Distribution Program- To address the extremity of power shortage in Gajraula, a solar lamp distribution program was organised where the employees at Jubilant from all the manufacturing locations partly bore the cost of the light. The rest of the cost was borne by the family head. Solar lamps were distributed to 35 kids in Gajraula who were very happy to receive the new lamps which would remove darkness from their lives, their future and motivate them to study more to shape their future.

Vastra Daan Abhiyan (Old clothes donation campaign) at Roorkee-Under the employees' involvement activity "PRAYAS" at Roorkee plant clothes distribution program was organised for the labourers working in expansion project of unit and their families. Old and new clothes for men, women and children were collected by the Company's employees and distributed to the needy labourers.



6.0 ENVIRONMENTAL PERFORMANCE

DISCLOSURE ON MANAGEMENT APPROACH

Goals & Performance

The overall objective of the Company is to continuously improve on environmental performance as per the Company's policies. Efforts are made to adopt cleaner & latest technologies for environmental impact abatement.

Policy

The Company has integrated Environmental, Health & Safety Policy applicable to all manufacturing units in India. The Global Sustainability Mission from the Top Management provides roadmap to the Company to follow the path of Sustainability. Jubilant as a part of global consensus encourage adaptation & mitigation of climate change. The global climate change mitigation policy support endeavours for tackling the climate change. To spread awareness in the Supply Chain department, the Company has Green Supply Chain Policy applicable to all Indian units.

Organisational Responsibility

The operational responsibility for the environmental aspects is with the Executive Director of the Company. At each Indian manufacturing unit the subject is reviewed by the respective unit heads with the dedicated personnel looking after the environmental aspects of the respective unit. At North American units, there is a dedicated personnel looking after the environment.

Training & Awareness

All new employees undergo Induction training that includes environment as one of the component. At shop floor level personnel are trained on environmental aspects of their respective work. Employees are also nominated for external trainings on environmental awareness & current topics of concern.

Monitoring & Follow-up

All the major Indian manufacturing units are ISO 14001, Environmental Management System (EMS) certified and monitoring follow-up is a part of the EMS. As required by the EMS, audits are conducted for monitoring



THE COMPANY
HAS INTEGRATED
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APPLICABLE
TO ALL
MANUFACTURING
UNITS IN INDIA.





the performance. Environmental performance is also reviewed at the Corporate at regular intervals by the Senior Management.

Additional Contextual Information

FE-EVI Green Business Survey

FE-EVI Green Business Survey is an annual survey held jointly by The Financial Express, a business daily from The Express Group, and Emergent Ventures, a carbon consultancy. The survey aims at assessing the actual performance of companies across various parameters of Sustainability and climate change mitigation measures. The outcomes were utilised to assess corporate India's readiness to effectively tackle emerging Sustainability risks. The survey report 2010-11 also recognises entrepreneurs and organisations that are spearheading business innovation in climate change mitigation, adaptation and sustainable development.

The Company received a certificate from Emergent Ventures regarding the participation in the FE-EVI Green Business Survey 2010-11.

Advertisements for raising awareness

Information dissemination & awareness play an important role, not only in the life of human being but also on growth of the society. Following this principle, the Company remains committed to increase awareness of the employee, stakeholder and community on the issues pertaining to Sustainability. On the occasions like World Environment Day, Earth Hour & Earth Day an email was circulated by the Chief of EHS & Sustainability to all employees and also published an advertisement in daily newspaper as well as in fortnightly magazine. During the year, the Company released advertisements on Environment i.e. Earth Day – April 22, World Environment Day – June 5 and International Day for Climate Action - October 24. Apart from this, the Company also published an advertisement in National Daily News Paper 'Loksatta'.



International Day for Climate Action

October 24, 2011

Observed worldwide to initiate action to bring down the CO₂ concentration to below 350 PPM

WHY – 350 PPM: It is believed that a maximum 350 PPM of CO₂ is required in order to sustain and preserve the Earth's Climate, with higher concentration there is a possibility of irreversible catastrophic effects.

Hence,

Manage the Un-Manageable



Jubilant Life Sciences Limited 1A, Sector 16A, Noida 201 301, U.P. www.jubl.com



Jubilant is committed to Sustainability. Let us conserve our Forests and Forest Ecosystems to mitigate Climate Change.





Jubilant Life Sciences Limited

1A, Sector 16A, Institutional Area, Noida 201 301, Uttar Pradesh

www.aubl.com





THE COMPANY'S **OPERATIONS** LED TO **CREATION OF CONDUCIVE** HABITAT FOR **VARIOUS MIGRATORY BIRDS IDENTIFIED UNDER THE AVIFAUNA STUDY CONDUCTED** FOR OUR MAJOR **OPERATIONS DURING THE** YEAR.

Biodiversity

Biodiversity has direct (through provisioning, regulating, and cultural ecosystem services) and indirect (through supporting ecosystem services) benefits to human well-being. At the same time, the rapid industrialisation has caused losses to the biodiversity and increased poverty in some social groups dependant on biodiversity services. Poor people, particularly those in rural areas in developing countries, are more directly dependent on biodiversity and ecosystem services and more vulnerable to their degradation. Richer groups of people are often less affected by the loss of ecosystem services because of their ability to purchase substitutes or to offset local losses of ecosystem services by shifting production and harvest to other regions.

Culture conditions, individuals' perceptions and consumer preferences suggest courses of action that are appropriate and inappropriate for biodiversity conservation. The commitment of industries towards sustainable development, diffusion of scientific knowledge and research & development for new technologies has also increased efficiency in resource use.

The land use change, physical modification of rivers, significant water withdrawal from rivers, loss of coral reefs, climate change, overexploitation of species, pollution etc have been the major drivers for biodiversity losses. Responsible businesses have limited operation around biodiversity sensitive areas and are responsible for restoration of the same.

All the locations that are owned, leased or managed by the Company are not adjacent to protected areas or areas of high biodiversity value. The nature of the Company's operations does not have any significant impact on areas of high biodiversity. Therefore no specific habitat was required to be protected or restored. However, the Company's operations led to creation of conducive habitat for various migratory birds identified under the Avifauna study conducted for our major operations during the year.

There was presence of large flocks of the migratory Starlings at the bio-compost site. During the survey the Black Ibis was primarily seen foraging at the site. This species was not





recorded in the previous study conducted at Gajraula & Nira sites in 2009.

At the bio-compost site at Nira Unit, resident species like Cattle egrets, and Mynas (4 species) were sighted. Amongst migratory bird species Wagtails (3 species) provide a spectacular site as significant numbers converge at the site during the day time to feed on a variety of insects and worms from the bio-compost site.

As per the regulatory compliance EIA study is conducted for the expansion or establishment of new operations. The process includes formal risk management, public hearing for stakeholder engagement and significant biodiversity loss due to operations. Concerns are then highlighted from this study and necessary actions are planned accordingly. There has been no IUCN Red List species and national conservation list species with habitats in or near the operations of the Company.



Raw Material

Climate change, energy, and the economy are frequently in the headlines, but the stories that follow often miss the point that all these issues are, in part, symptoms of how we use materials. The use of raw materials





is enormous and increasing with population and economic growth. The unsustainable use of materials now challenges the capacity of the Earth – air, water and land – to withstand the many resulting environmental problems. This situation fundamentally affects many other aspects of the future, such as the economy, energy and climate.

Raw materials like wood, minerals, fuels, chemicals, agricultural plants & animals, soil, rock and other materials form the foundation for the Businesses. Responsible use of these materials is an important aspect from the economical and environmental point of view. If we want the business to be competitive in the global environment, the sustainable use of materials must be one of the key goals.

The major raw materials consumed by the Company at the Indian operations are given in the table. Molasses & Press Mud are recycled raw material and constitute 55 percent of the total major raw material. Apart from these, certain Process chemicals like solvents are recovered & recycled wherever possible. The major raw materials reported are for all Indian manufacturing units.

Major Raw Materials	2009-10	2010-11	2011-12
Molasses (MT)	43449	95230	271655
Press Mud (MT)	53233	36291	104697
Alcohol (KL)	110868	115299	89389
Process Chemicals (MT)	198973	188699	202012
Chemicals for API (MT)	6668	9361	9188
Chemicals for Feed Additive (MT)	3772	4192	4651

Molasses and Press mud consumption has increased due to enhanced distillery operations. The quantity of Alcohol purchased reduced due to increased captive production.

Energy

Energy is the backbone of the economy. The development and distribution of energy is perhaps one of the key Sustainability challenges. The current energy sources are dominantly derived from depleting fossil fuel reserves. To meet the rising worldwide demands for energy, renewable energy sources must be deployed at large scale. Use of fossil fuels



THE COMPANY, **THROUGH ITS BUSINESS EXCELLENCE UNDERTOOK SEVERAL INITIATIVES FOR REDUCTION OF** INDIRECT ENERGY. THIS RESULTED IN **SAVING OF ₹1.81 MILLION IN POWER** (~360,000 KWH).

induces anthropogenic climate change. Sustainable energy will require new approaches towards both national and international economic policy, along with business endeavours to mitigate climate change. The Company uses several sources of direct energy which constitute both fossil fuels (non-renewable) and renewable sources of energy.

Fossil Fuel	2009-10 (MT)	2010-11 (MT)	2011-12 (MT)
Coal	358358	347989	388265
Energy (peta joules)	5.93	6.01	7.27
LDO	6363	1463	34
Energy (peta joules)	0.287	0.064	0.002
RFO	11238	10798	3862
Energy (peta joules)	0.46	0.43	0.15
HSD	1184	4198	4728
Energy (peta joules)	0.054	0.178	0.204
FO	5225	4684	6104
Energy (peta joules)	0.214	0.187	0.241
Natural Gas Energy* (peta joules)	0.137	0.143	0.140

Renewable Fuel	2009-10	2010-11	2011-12
Bio-gas (1000Nm3)	5542	10696	30286
Energy (peta joules)	0.105	0.208	0.559
Biomass(MT)	4565	4991	5591
Energy (peta joules)	0.089	0.060	0.076

*Calculated as per GRI G3.1 Guidelines

Indirect Sources of Energy							
Year	Electricity Purchased (KWH)	Steam Purchased (MT)	Energy Equivalent (peta joule)				
2009-10	90433887	-	0.326				
2010-11	103578410	66673	0.560				
2011-12	116683382	61050	0.591				





Peta Joules



The net electrical energy sold was 0.049 PJ & net steam sold was equivalent to 0.037 PJ out of the total energy reported.

The Company had undertaken several energy conservation initiatives during the year though the total absolute energy consumption of the Company increased due to increased operations. The Company saved ~1800 MT of fuel equivalent to ₹12.28 million. Other projects implemented for reduction in steam consumption saved ~49,000 MT of steam thereby saving approximately ₹52.95 million.

Case Study: Reduction in Steam Consumption through process change

The Company has been manufacturing pure Pyridine & Beta Picoline by batch distillation process. During the reporting year, modification was carried out to convert batch distillation to continuous distillation in order to reduce the steam consumption norm for both the products. Significant reduction was achieved in the average steam consumption norm for both the products by this modification. The change in process from Batch to Continuous Distillation has not altered the quality of the products.

The Company is in manufacturing of intermediate chemicals & bulk drugs as per the specifications of the customer. The Company is manufacturing limited consumer goods however there have been cases for improvement in energy efficiency of the manufacturing process. Providing energy efficient or renewable energy based products and services are not applicable to the business of the Company.

The Company installed a new & efficient Screw Type Chiller for HVAC system to reduce the indirect energy consumption at the Corporate Office. This had resulted in reduction in power consumption of the system.





The Salisbury unit participated in the "Beat the Peak" program. This program notifies a member of the maintenance department when the electrical usage is close to reaching a maximum level creating a power outage. When the maintenance team receives a notification, they turn down the chillers, and undertaking other measures to conserve energy. This program helped create awareness in the Unit, throughout the day the employees are now turning off unnecessary lighting and at the end of the day all computers and office equipment are switched off.

The Company, through its Business Excellence undertook several initiatives for reduction of indirect energy. This resulted in saving of ₹1.81 million in power (~360,000 kWh).

Water

Inefficiency to meet the water challenges may lead to economic catastrophe, massive unemployment, industrial flight, and agricultural ruin. The water demand for future will be function of population size, economic wealth, and per capita water use per unit of wealth.

The "water conservation" refers to reducing water use by improving the efficiency of various uses of water, without decreasing services. Water conservation makes business sense leading to reduced bills; a



water supplier reduces delivery costs and treatment costs; a wastewater treatment utility reduces operations costs; and costs of new supply and equipment is deferred or eliminated.

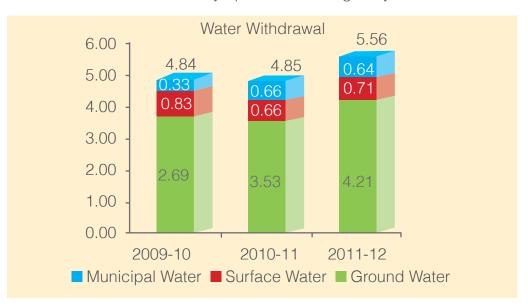
The total water withdrawal of the Company for the year was 5,564,868cu. m. The Company supplied water to Jubilant Industries Limited at Gajraula & Samlaya Unit and the quantity supplied during the year was 292,351 cu. m.

Source type	Unit	2009-10	2010-11	2011-12
Ground Water	m3/yr	3690486	3530222	4210671
Surface Water	m3/yr	825217	655735	710735
Municipal Water/ Other Sources	m3/yr	326703	660026	643462
Total	m3/yr	4842406	4845983	5564868





There was significant increase in ground water withdrawn at Gajraula unit due to increased distillery operations during the year.



Though water at Nira plant is drawn from the river, there were no water sources that are significantly affected by the withdrawal of water for the Company.

The Company has installed (Reverse Osmosis) RO plants for treatment of waste water at the major locations. Permeate from the RO plants is recycled/ reused within the manufacturing unit for make-up water in cooling towers and horticulture. Treated water from the sewage treatment plants at major locations is used for horticulture saving valuable natural resource. The recycled/reused water is not metered therefore the quantity has not been reported.







Emissions Reduction

Air is a vital natural resource on which all life depends. Polluting the air affects human health as well as other environmental resources such as water, soil, and forests. Large cities, industries, intensive transport networks and high population density are a major source of air pollution.

Degradation of air quality not only hinders economic growth by imposing significant additional operating costs on business – it also means that the quality of life in these affected areas is spiralling downwards. A reputation for bad air pollution certainly deters investments from the outside. Air pollution puts a strain on sustainable urban development, which includes economic growth, social inclusion, human well-being, and the environment.

Industries under the purview of several environmental regulations and organisational ethics have adopted technologies like Electrostatic Precipitators (ESPs), Scrubbers, ThermalOxidisers etc for abatement of air pollution. One of the key impacts of air emissions is through Greenhouse Gases (GHG) emissions leading to global warming & climate change.



The Company calculated direct & indirect GHG emissions using GHG Protocol. The measured quantity of fuels is used for these calculations and the emission factors have been calculated based on site specific





data wherever applicable. In some cases the default data/ data provided by the supplier have also been used.

The Scope 1 CO2 emissions of the Company are 780432 tCO₂e and Scope 2 emissions are calculated as 78354 tCO₂e based on weighted grid emission factors. The Scope 2 does not include emissions due to purchase of steam, since the steam is obtained from waste heat recovery process. The Company has been using Bio-gas & Biomass as renewable source of energy. CO2 emissions for Biomass were 7,445 tCO₂e and Biogas was 33501 tCO₂e.

END-END Logistics for Liquid Movement to achieve emission reduction

Jubilant has achieved another milestone this year by integrating END-END logistics for liquid movement. The first full liquid rake carrying Acetic Acid and Methanol in ISO – Tankers, from the port was executed successfully to the Company's railway siding at Gajarula unit. Through this multi modal logistics initiative, the Company achieved emission reduction and provided safer handling of the logistics. It is also profitable from economic aspect as well. The Company had also evaluated the feasibility of reverse logistics for the outbound shipments which was implemented during the year.

The Salisbury unit, while making a decision to purchase a generator, preferred a gas based generator over diesel-powered motor with a view to reduce GHG emissions.

The GHG emission reduction was ~3400 tCO₂e through various initiatives implemented under the Business Excellence program of the Company.



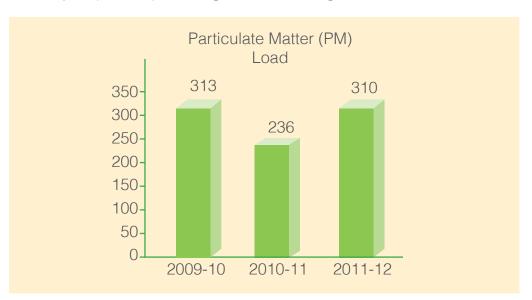






The Company is not manufacturing any product containing ODS. However, Ozone Depleting Substances contained or emitted from products like air conditioner or refrigerator during their usage are not covered.

The significant air emissions reported are for Indian manufacturing units. For the North American units, the air quality is monitored by local authority as per the prevailing laws for the region.



The Particulate Matter emissions increased during the year primarily at the Gajraula unit due to increased operations of slop fired boiler for the treatment of distillery effluent.









The changes in NOx and SO2 emissions are due to change in fuel specification.

Effluent Management

It is acknowledged that water is a limited resource for which demand is growing. Managing wastewater is intrinsically linked to management of the entire water chain. How we use and reuse water is the key to successfully meeting the vast water requirements.

Pollution/ contamination due to wastewater depreciates land values, increases municipal costs and causes numerous adverse biological and human health effects, the cost of which are difficult to calculate. Various industries have implemented the most cost-effective solutions focusing on preventing contaminants from ever entering the wastewater stream or developing a closed system of water use. Industry also benefit from access to cleaner water resources with fewer impurities, as impurities can add costs to the production processes.





The major manufacturing units of the Company are zero discharge units. The effluent from Samlaya (2086 cu. meter) & Ambernath unit (660 cu.m) in India was sent to common treatment facility. This is as per the respective state regulatory requirement. At all the North American units, the waste water is dischargedas per the applicable laws. The total quantity of waste water discharged was 439628 cu. meter from North American units during the year. There has been no significant spillage/s during the year.

As already reported, the Company's major operating Units are either zero discharge units or effluent is disposed of as per the local regulations. The Units are located outside any biodiversity sensitive or notified protected area therefore there is no affect on water bodies due to Company's operations.



Waste Management

Rapid increase in volume and types of solid and hazardous waste as a result of continuous economic growth and development, is becoming a burgeoning problem for industries to ensure effective and sustainable management of waste.

Solid waste management chain requires intensive use of environmentally sound technology for its activities which could be as simple as containers for primary collection to as complicated as incinerators for disposal of hazardous waste. Some of the key aspects while planning waste management are:

Transportation: Various types of vehicles are required to transport different types of solid waste from its generation point to the site for the treatment and disposal of waste.

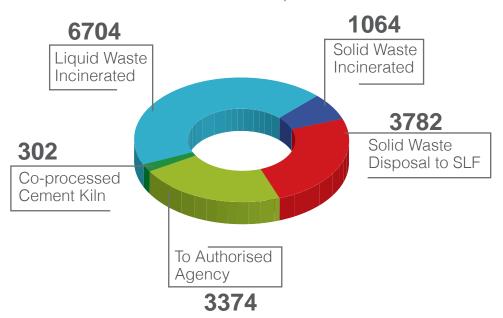




Disposal: The technologies may vary in accordance with the type of disposable waste, for example, landfills may be used for disposal of inert wastes. The secured landfills are designed for disposal of hazardous waste.

Recycling and Recovery: This includes various types of activities like recycling of reusable materials (e.g., plastic and glass containers), recycling of materials for industrial production (e.g., paper and iron), converting waste into energy (e.g., burning tyres in cement kiln to produce heat), and converting waste into a resource (e.g., composting and landfill gas).

Hazardous Waste Disposal 2011-12



Biomedical waste disposed by the Company during the reporting year was 21.54 MT. The major source of generation of waste was Jubilant First Trust Healthcare Limited.







The Company sold 90363 MT of Fly Ash during the year 2011-12 from Gajraula, Nira and Ambernath Units. The other non-hazardous waste sold by the Company included, plastic, paper, metal, wood etc of the value more than ₹123 million by the Indian Units; although the waste quantities are accounted for, since there is a wide variety of such wastes measured in different units (KL, MT, numbers), the respective quantities have not been reported for convenience and in consideration of the nominal significance from the readers' perspective.



Case: E-Waste Recycled in an Eco-Friendly Manner

Industries today need to adopt a good waste management approach to achieve productivity improvement and environmental protection. Recently, the Ministry of Environment & Forests (MoEF) has notified draft rules for e-waste (management &handling) rules, 2011 for the organisations to deal with the e-waste in a sustainable way. Few advantages for e-waste management are:

- Electronic products like computers and mobile phones contain toxins that can leach out into the soil and damage the environment. Better management will eliminate impact on the environment.
- The heavy metals in e-waste such as lead, mercury, etc. pose environmental and health problems. For instance, Beryllium, a toxic metal, can cause damage to the lungs. Through proper management of waste the risk of damage to environment is eliminated.
- When recycled properly, valuable metals can be extracted out of the waste products, which can be reused for some other purposes.





IN ONE OF THE PLANTS **MANUFACTURING** APIs. THE USAGE **OF SULFURIC** ACID HAS BEEN REDUCED **SIGNIFICANTLY** BY DEVELOPING A MODIFIED **PROCESS** IN R&D.

As per the Company's commitment towards safe disposal of e-waste, an inventory of IT Stores in corporate office was audited and removed 147 assets which were more than 3.5 years old and was beyond repairs or used. Apart from this there were 428 used printer cartridges that were disposed. The total weight of the e-waste disposed during the year was 980 Kg. An authorised agency Greenscape Eco Management Pvt Ltd collected the e-waste. The Company received a certificate from Greenscape Eco Management Pvt Ltd regarding disposal of the waste.

There has been no trans-boundary movement of waste deemed hazardous under the terms of the Basel Convention from the Company.

Initiatives To Mitigate Environmental Impacts

In one of the plants manufacturing APIs, the usage of Sulfuric Acid has been reduced significantly by developing a modified process in R&D. This revised process has further reduced the consumption of Sodium hydroxide needed for basification thereby leading to reduction in overall effluent load.

Continuous Flow Reactors

Jubilant R&D is successfully engaged in converting batch processes into continuous processes since last one year very aggressively. The use of continuous flow reactors viz. micro-reactors, plug -flow- reactors are gaining momentum in commercial chemical manufacturing ultimately leading to higher product selectivity and hence less waste, saving lot of solvents, avoiding hazardous chemicals use and sealing of toxic chemical reactions.

Also, short residence times enable micro-reactors/ plug flow reactor to perform reactions that involve highly unstable intermediates at ambient temperatures thereby avoiding cryogenic conditions and minimising the energy required for cooling. Precise residence time control avoids the use of auxiliary substances such as protecting groups, enabling straightforward syntheses with good atom economy and fewer reaction steps. All these steps lead to enhanced carbon efficiencies.



POLLUTION
PREVENTION
AND RECYCLE
PROGRAMS
WHICH CAN
REDUCE OR
ELIMINATE WASTE
GENERATION
RESULTING IN
A SIGNIFICANT
SAVINGS.

The products manufactured by the Company are intermediates mostly transported in bulk packaging. Some of the material is sent in drums &carboys also. Where feasible these containers are reclaimed.

Transportation

Some of the environmental concerns associated with transportations are: climate change, air pollution, dumping waste (including packaging waste), soil degradation, noise, vibration and accidents. One of the initiatives taken by the Company to reduce the environmental impact due to transportation was the implementation of movement of material through railways instead of road transportation.

Compliance

Moving onto the path of sustainable development requires change in human behaviour to address major environmental issues. Compliance is essential in the field of environment and sustainable development. Compliance with the law is related to the respect and the enforcement of legal system. The growing focus on compliance seems to be important to enhance the success of efforts to strengthen rule of law, which in turn will improve the achievement of efforts to promote good governance, and thereby allow the society to reach sustainable development.

In general, environmental compliance is considered as an additional cost which will negatively impact the bottom line. However, the effect can be minimised. There are pollution prevention and recycle programs which can reduce or eliminate waste generation resulting in a significant savings. There is also an increasing awareness of the public relations benefit for companies perceived as environmentally conscientious. Many companies are promoting this image through advertising campaigns, symbols (e.g. recycle emblem) and consequently realising increased sales which often offset the environmental compliance costs. There has been no significant fine or non-monetary sanction for non-compliance with environmental laws.

The Company had an expenditure of about ₹477 million for operational as well as capital expenditure for various environmental protection equipment.



7.0 ECONOMIC PERFORMANCE

DISCLOSURE ON MANAGEMENT APPROACH

Policy, Goals & Performance

OUR VISION

- To acquire and maintain global leadership position in chosen areas of businesses
- To continuously create new opportunities for growth in our strategic businesses
 - To be among the top 10 most admired companies to work for
 - To continuously achieve a return on invested capital of at least 10 points higher than the cost of capital



THE SELL SIDE
IN THE 2011 ALL
ASIA EXECUTIVE
TEAM RANKINGS
BY INSTITUTIONAL
INVESTOR, A
GLOBAL LEADER
IN INVESTOR
RELATIONS

RESEARCH.

The Company works towards excellent stakeholder communication. It believes in sharing all information that directly or indirectly affects the financial and operational performance of the Company that can have material impact on the share price. The CFO of the Company, Mr. R Sankaraiah was awarded as the best CFO in the healthcare and pharmaceutical segment by the sell side in the 2011 All Asia Executive Team rankings by Institutional Investor, a global leader in investor relations research.

Economic Performance

True economic sustainability encourages the responsible use of resources. This involves not only making sure that the business is making a profit, but that the operation is not creating environmental concerns that could cause harm to the balance of the local ecology. By being mindful of the impact of the operation on the local community, the business is able to choose raw materials that are more environmentally





friendly, and design a waste disposal strategy that does not damage the local environment. In the long run, attention to these types of details has the potential to increase the community's investment in the continued operation of the business, and improve the chances for remaining a viable operation for a longer period of time.

Component		Data	
	2009-10	2010-11	2011-12
Direct economic value	e generated (₹mil	llion)	
Revenues	37911.32	34456.23	43031.3
Economic value distri	buted (₹million)		
Major operating costs	20957.32	19991.88	25504.03
Employee wages and benefits	7452.60	7185.42	8363.64
Payments to providers of capital	370.30	370.24	555.36
Community investment	57.09	30.13	39.53
Retained earnings	21854.56	21563.36	23138.43

The Company paid taxes related to its products and services to Government of India. These include corporate income tax, excise duty, service tax, sales tax, customs etc. The net taxes paid during the year were ₹1328.70 million for Indian manufacturing locations. The Company received export incentives of ₹302.37 million as financial assistance from government.

The Company has manufacturing units in areas with low impact of climate change. The change in regulations may result in financial implications with respect to energy use applicable to all the industries. The Company has renewable sources to meet the energy requirement thereby reducing the risks related to climate change.

The Company continued to provide defined benefit plan obligations to the employees as in previous years. These include provident fund and gratuity to permanent employees working in India. 12% of the basic salary is contributed by the employee to the provident fund and the Company also makes equal contribution for the employee. Provident fund may be reimbursed after an employee leaves the organisation or



IN ADDITION TO **DISTRIBUTION OF ECONOMIC VALUE** GENERATED. THE COMPANY'S **DIRECT ECONOMIC CONTRIBUTIONS** TO HOST **COMMUNITIES** AND **GOVERNMENTS** ARE SIZABLE.

may be transferred, as per the law. Gratuity is awarded to an employee at the time of separation and is 4.81% of the basic salary of an employee for Indian operations.

Market Presence

In addition to distribution of economic value generated, the Company's direct economic contributions to host communities and governments are sizable. These include employee wages and benefits, taxes and royalties paid to governments, purchases of goods and services from local and regional suppliers, charitable donations, scholarships and support for community initiatives and non-mining infrastructure development. The value of raw materials, stores & spares parts purchased by the Company from indigenous sources was ₹8426.39 and ₹5122.75 was imported for Indian operations. The spending on locally based suppliers refers to material procured from suppliers within the country and 62.2% material was procured locally and 37.8% material was procured from suppliers outside the country. The general practice followed is to procure material locally if it meets the required specifications. The entry level wages by gender are equal for same work. The salary at entry level in Indian units is approximately ₹80,000.00 to ₹100,000.00 per annum, varying from region to region. This is higher than the minimum wages as defined by Minimum Wages Act for the respective region. The prevailing law in North American units is very stringent and gender discrimination is prohibited. At Salisbury unit, the entry level wages offered is for the packaging line i.e. \$9.00 per hour and Federal minimum wages as per The Fair Labour Standards Act is \$7.25 per hour.

Management staffs its workforce in foreign countries with as many local people as possible. The theory is simple: local people know best the host country's culture, language, and work ethic. Thus, they are the ideal candidates for management. Companies have several primary approaches to recruiting and assigning upper-level managers. For example, they can rely strictly on local residents or use expatriates (individuals who are not citizens of the countries in which they are assigned to work). If they assign expatriates to foreign operations, they must make sure those individuals relate well to the local population. The Company hires most of the





senior management based on the technical skills required for performing the duty from the local community. Most of the senior management at significant operations is hired locally.

Indirect Economic Impact

Based on the needs identified through community development initiatives, various projects are undertaken by the Company. One of the initiatives undertaken during the year was supply of good quality drinking water to the villagers around the Nanjangud unit. This was achieved by installing necessary water treatment facility with an approximate cost of ₹ 450,000.



The Company continued to create an affordable, healthcare delivery system for the middle and lower income-group people, living across West Bengal, including the districts and villages. The focus is on establishing a modern healthcare network beyond the metro limits to the districts where the majority of the population lives – thereby increasing access to quality healthcare for a larger section of the population. The 'common man' faces challenges in all three aspects of healthcare access, affordability & uniformity of quality. "Better quality at affordable





Cost" remains the objective; thus further improving access to healthcare to a wider cross-section of the society. The Company has embarked on a long-term mission in West Bengal to address all of these issues by setting up 2 hospitals at Barasat Berhampore. The Company has future plans to set up a network of hospitals in West Bengal, in a hub-and-spoke manner.

The net economic impact is usually viewed as the expansion or contraction of an area's economy, resulting from changes like opening, closing, expansion or contraction of a facility, project or program. Assessing the indirect economic impact is viewed in terms of the livelihood generation for the local community, impact on the families of the workers in local community etc. Such measures actually represent the gross effect i.e. the facility's or project's role in contribution to the area economy. That is not necessarily the same as the net impact.

Economic impacts are different from the valuation of individual user benefits of a particular facility or service, and they are also different from broader social impacts. The user benefits and social impacts may include the valuation of changes in amenity or quality of life factors (such as health, safety, recreation, air or noise quality). The details of the indirect economic impacts are covered under the social section of the report.





8.0 social PERFORMANCE

8.1 DISCLOSURE ON MANAGEMENT APPROACH -LABOUR PRACTICES

Goals & Performance

The Company aims to maintain good labour management relations though good labour practices. The Company's Values include selecting, training & developing labour to be creative and empower them to take decisions, so that they respond to all stakeholders with agility, confidence and teamwork.

Policy

There are several policies in place to achieve the above objective. Some of the policies are given below:



- Compensation & Benefits Policy
- Employee Assistance Policy etc

Organisational Responsibility

The Operational responsibility of the Labour Practices Aspects is over looked by Sr. Vice President (HR) of the Company. At each manufacturing location the subject is reviewed by the respective Unit HR Heads.

Monitoring & Follow-up

The employee remuneration is purely through Performance Management System (PMS) for all employees without any preference for gender or any other indicator of diversity. Everyone is evaluated on merit basis only.

Employment

Employees are the real assets of any organisation. Relationship between an employee and its employer will decide upon the balance between the economic efficiency & social equity. Employees on one hand tries to meet the needs of the employer; performing its role to establish and maintain economic efficiency. On the other hand, the employer shall engage with its employee and creating social equity that benefits the worker so that he/she can fund and enjoy healthy living.



THE COMPANY'S **VALUES INCLUDE** SELECTING, **TRAINING & DEVELOPING LABOUR TO BE CREATIVE** AND EMPOWER THEM TO TAKE DECISIONS. SO THAT THEY **RESPOND TO ALL STAKEHOLDERS** WITH AGILITY, **CONFIDENCE AND** TEAMWORK.







LOCATION/COMPANY -JLL	Executives	Workmen	Total	Temp & Labour Supply*	Job Contracts/Projects*	Total
Corporate Office/ Branches	405	0	405	105	0	510
Gajraula	639	270	909	514	667	2090
R&D Noida	303	0	303	89	0	392
Samlaya	41	29	70	90	27	187
Nira	137	122	259	54	271	584
Nanjangud	657	237	894	147	343	1384
Roorkee	184	71	255	52	288	595
Ambernath	166	39	205	192	55	452
Bharuch	184	21	205	73	540	818
(A)	2716	789	3505	1316	2191	7012
Indian subsidiaries						
Jubilant Biosys	342	0	342	21	0	363
Jubilant Chemsys	410	0	410	14	0	424
Jubilant Clinsys	164	0	164	3	0	167
JFTH	48	200	248	4	0	252
Jubilant Infrastructure	74	49	123	313	0	436
Total (B)	1038	249	1287	355	0	1642
International subsidiaries						
JLL China	11	0	11	0	0	11
JLL USA	4	0	4	0	0	4
Jubilant Cadista	73	128	201	68	0	269
Jubilant Clinsys Inc	73	0	73	1	0	74
PSI Supply NV	15	0	15	1	0	16
Jubilant HollisterStier	263	316	579	35	0	614
Jubilant DraxImage	289	258	547	0	0	547
Total (C)	728	702	1430	105	0	1535
Grand Total (A+B+C)	4482	1740	6222	1776	2191	10189

^{*}The calculations are based on average man-days worked.





Some specific indicators may be used to assess the employee and employer relationship. For instance, the turnover rate & hiring rate can provide trends for the employee retention and hiring policy of the organisation. There are certain additional benefits exclusively provided to the direct employees of the company. Such incentives will further strengthen the employment strategies of an organisation.

Age in	Executive			Worker	Grand		
yrs	Male	Female	Total	Male	Female	Total	Total
< 30	1059	130	1189	236	43	279	1468
30-50	1459	122	1581	868	289	1157	2738
> 50	193	37	230	253	137	390	620
Grand	2711	289	3000	1357	469	1826	4826
Total							

Gender	Headcount				
	Executive	Worker	Grand Total		
Female	289	469	758		
Male	2711	1357	4068		
Grand Total	3000	1826	4826		

Age in	Attrition			New Joinees		
yrs	Executive	Worker	Grand	Executive	Worker	Grand
			Total			Total
< 30	325	25	350	742	51	793
30-50	213	35	248	250	52	302
> 50	5	14	19	4	23	27
Grand	543	74	617	996	126	1122
Total						

Gender	Attrition			New Joine	Grand	
	Executive	Worker	Grand	Executive	Worker	Total
			Total			
Female	34	24	58	54	31	85
Male	509	50	559	942	95	1037
Grand	543	74	617	996	126	1122
Total						





	Average Manpower		A	Attrition Nos			Attrition %			
	F	Y 2011-1	2	F	FY 2011-12			FY 2011-12		
Location	Execu- tive	Work- men	Total	Execu- tive	Work- men	Total	Execu- tive	Work- men	Total	
Ambernath	160	44	204	63	7	70	39.42%	15.79%	34.29%	
Branches	42	0	42	7	0	7	16.50%	0.00%	16.50%	
Corporate Office	354	0	354	61	0	61	17.26%	0.00%	17.26%	
Gajraula	627	268	895	64	4	68	10.21%	1.49%	7.60%	
Nanjangud	609	244	853	209	4	213	34.32%	1.64%	24.97%	
Nira	119	124	243	8	0	8	6.71%	0.00%	3.29%	
R & D Noida	297	0	297	65	0	65	21.88%	0.00%	21.88%	
Roorkee	164	65	228	27	5	32	16.50%	7.73%	14.01%	
Samlaya	43	29	72	7	1	8	16.28%	3.41%	11.06%	

The Company continued to provide the following benefits exclusively to full time employees as reported last year, these include:

- Maternity leave;
- Disability and invalidity coverage as per the Industrial Dispute and Workers Compensation Act etc.
- Group Mediclaim Insurance: Provides hospitalisation coverage for employees (and their dependents) and many more.

The Company provides certain benefits exclusive to full-time employees at manufacturing units. Few of them are education and hostel fee reimbursement for employee children; accommodation in the township; Loan on nominal interest for purchase of computer, vehicle and housing etc. The full-time employees of the Company at North Americanunits have benefits different to that of Indian operations. Some select benefits are given below.

- Short Term / Long Term Disability Insurance (Company paid) Benefits
- Health club reimbursement
- Jury Duty Leave / Court Appearances
- Military LOA (Leave)

The Company believes that jury duty and court subpoenaed appearances are a responsibility of good citizenship. The Company therefore provides





employee pay for up to 21 calendar days per summons. The objective is to provide continued and consistent pay to employees called to jury duty and court-subpoenaed appearances. Under Military Leave, the Company supplements military pay up to 20 days of training, 120 days of emergency military leave. Re-employment rights for unpaid full-time military leave.

All female employees in Indian units and all employees in North Americanunits are entitled for parental leave. All the employees availing the leave returned to work.

Labour / Management Relations

This refers to the system in which employers, workers and their representatives interact to set the ground rules for the governance of work relationships. It also describes a field of study dedicated to examining such relationships. The field is an outgrowth of the industrial revolution, whose excesses led to the emergence of trade unions to represent workers and to the development of collective labour relations. A labour or industrial relations system reflects the interaction between the main actors in it: the state, the employer (or employers or an employers' association), trade unions and employees (who may participate or not in unions and other bodies affording workers' representation). They can also encompass individual employment relationships between an employer and a worker under a written or implied contract of employment, although these are usually referred to as "employment relations". There is considerable variation in the use of the terms, partly reflecting the evolving nature of the field over time and place. There is general agreement, however, that the field embraces collective bargaining, various forms of workers' participation (such as works councils and joint health and safety committees) and mechanisms for resolving collective and individual disputes.

Employees represented by trade unions		/ Collective bargaining Agreements
No. of employees covered by Trade Union/ Collective bargaining Agreements	Number.	924

The Company follows the statutory norms and 70% of workers are covered by collective bargaining agreements for Indian & Kirkland units. The minimum notice period is provided as per the prevailing regional / country labour laws.





Occupational Health & Safety

100 percent of the workforce is represented by the formal joint management-worker health and safety committees. These committees operated at the Unit level.

First aid cases are not included. Lost days are referred by calendar days & the count begins from the next day of occurrence of incidence. (There was no injury cases with female employees and all were with only male employees in Indian units. However, separate record for gender wise injury is not reported for North American units as per the prevailing laws. The data includes the independent contractors. There was no occupational disease for the reporting year including for the independent contractors. There has been no fatal accident for employees as well as for the independent contractor working on-site for the Company for the reporting year.



An organisation with operation in remote areas have corporate responsibility to assist the workforce members, their families or community members to educate, train, counsel regarding risks related to diseases like HIV etc. Training & Counselling helps in establishing preparedness amongst employees themselves and helps in promoting good practices to reduce the risks associated with such diseases.





	Education/ Training		Counselling		Prevention/ Risk Control		Treatment	
Program Recipients	Yes	No	Yes	No	Yes	No	Yes	No
Workers	V		V		V		√	
Workers'	$\sqrt{}$						√	
Families*								
Community Members	V		V		V		V	

*The Company continued to provide the training, counselling etc. to assist workforce members, their families (Gajraula & Nira units) and local community regarding serious diseases.



Jubilant considers ATM (AIDS, Tuberculosis and Malaria) as serious diseases which can affect industrial workforce which could further impact the productivity of the workforce. Considering prevention as the best method to control these diseases, Jubilant organises various awareness programs for all the important stakeholders like employees, their families and the community around its manufacturing locations.

The Company organised HIV/AIDS awareness programs for creating awareness amongst employee and their families at Gajraula unit. The Company has an Integrated Counselling and Testing Centre (ICTC) for HIV/AIDS in association with Uttar Pradesh State AIDS Control Society (UPSACS) at Gajraula.





To create awareness among Jubilant family on health, occupational health centre day was celebrated in Gajraula plant. On this occasion, a scientific workshop was conducted for knowledge sharing on issues like "Arthritis of the Knee" and "Ergonomics" by eminent dignitaries in the respective field. Occupational health centre was formed in the form of an OHC camp and first aid training program was also conducted in which more than 50 participants were trained in first aid.



At the Kirkland unit, fund raising activity was organised in June 2011 through sale of pink ribbons. Large number of ribbons was sold and the company contributed an amount equal to the fund raised through sale of ribbons.



Health & safety topics are included in the local formal agreements of the manufacturing units of the Company with trade unions.

The Occupational Health & Safety (OHS)refers to health & safety impacts on the workforce and community due to company's operations. The OHS

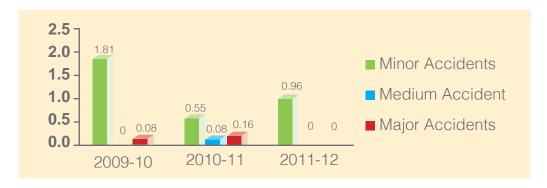




program aims to minimise the impact on co-workers, family members, employers, customers, suppliers, nearby communities, and other members of the public who are affected by the workplace environment.

To further understand the requirements of the workers and providing mutually accepted solutions, a joint Health & Safety Committee is formed comprising of labour and management representatives. The advantage of a joint committee is that the in-depth practical knowledge of specific tasks (labour) is brought together with the larger overview of company policies, and procedures (management). Another significant benefit is the enhancement of co-operation among all parts of the work force toward solving health and safety problems.

Safety of an employee is responsibility of the employer. If there is any risk associated with the work place or profile of an employee then adequate systems & procedures should be established to minimise the risk. An effective training program can reduce the number of injuries, property damage, legal liability, illnesses, workers' compensation claims, and missed time from work. Safety training classes help establish a safety culture in which employees themselves help promote proper safety procedures while on the job. It is important that new employees be properly trained and embraces the importance of workplace safety as it is easy for seasoned workers to negatively influence the new hires. Recordable accidents for North American operation were 43 and non-recordable were 139.



Major accidents: more than 2 months of absence from work
Medium accidents: 48 hours – 2 months of absence from work
Minor accidents: Lost time injuries, less than 48 hours

Safety Week Celebrations - Samlaya Unit

National Safety Day is celebrated every year on March 4 in the country. This year, the nation observed 41st National Safety Day. Samlaya unit





celebrated safety week 2012, which started on February 27 and got completed on March 4, 2012. The objective of safety week celebrations was to make the plant people involved in week's activities and to motivate them for continual improvements in the areas of safety &health in their day to day activities. During the week dedicated activities were organised including first aid competition, fire fighting competition etc.

Nira Unit

To commemorate the occasion, safety posters, safety slogans, safety elocution, safety quiz, wet fire drill, SCBA set wearing and using ammonia gas leak arrest kit in shortest time, etc. competitions were organised in the Unit. A full time training program on first aid &fire fighting was organised for company employees working in the Unit.

Similar activities were also carried out at other manufacturing units in India to celebrate the safety week.

Training and Education

Training is required to develop essential work-related skills, techniques and knowledge on the related subject. However, the most effective way to develop people is quite different from conventional skills training modules, where employees will participate of course, but they won't enjoy it much because it's about work, not about themselves as people. Therefore, the most effective way to develop people is to enable learning and personal development. This extends the range of development way outside traditional work skills and knowledge, and creates far more exciting, liberating, motivational opportunities - for people and for employers.

Category	Avg. No. of Employees	Man-Hours	Avg Training (Manhr/ Emp/Year)
Female	507	9280	18.3
Male	3654	81490	22.3
Total	4161	90770	21.8

The average training work hours per female employees were 18.3 and for male employees were 22.3 for all the locations except Kirkland. The average training work hours per employee at Kirkland was 7.7.





Category	Avg No. of Employees	Man-Hours	Avg Training (Manhr/Emp/Year)
Sr. Manager and above	216	6926	32.1
Manager and below	2557	68804	26.9
Operators	1392	15112	10.9
Total	4164	90842	21.8

The average training work hours per employee (Sr. Manager and above) were 32.1, for middle management (Manager & below) were 26.9 and for operators were 10.9 for all the locations except Kirkland.

Organisations may plan skill management & lifelong learning programs to support the continued employability and assist them in managing retirements. To make the retirement creative, satisfying and fun, seeds need to be planted as early as possible so that this goal is realised. Rather than focusing on financial planning, such programs concentrate on ways to successful transition into this period as we identify new interests, take on new challenges and enjoy new pleasures. There are no formal programs for skills management and lifelong learning in the Company.

Career review & development is also an important factor behind successful employers and employees. Earlier, employment with a reputed firm actually meant lifelong employment. People ascended the hierarchy with age. The terms like career review & development in-fact meant timely promotions. Career progression, largely was a function of experience in a job. The idea of employees changing companies to carve out a career was almost unheard of. Employees reciprocated the lifelong employment offer of companies with total commitment for the company. An opening with a good company was considered a life time achievement; thereafter it was simply a matter of time, performance and politically positioning oneself to be at the right place at right time to go up the ladder.

A career is a sequence of jobs or positions occupied by an individual during a course of time. Career is the specialisation in a profession which continues to progress in spite of changes in jobs. Thereby development in the area of career review will add value to employee lifelong learning and will increase the trust for the employer.





100 percent executives both male & female received formal performance appraisal through the Performance Management System of the Company.

Diversity and Equal Opportunity

It's about treating people fairly, identifying and removing barriers that get in the way of this and redressing existing imbalances, so that groups which continue to be disadvantaged gain access to opportunities for full participation in the workplace and in wider society.

Diversity is about creating working environments that value a range of differences, believing that understanding and managing these can lead to organisational and societal benefit.

Equal opportunity and diversity are interdependent. Diversity builds on equal opportunity and embraces its principles of equity but has a broader focus. The Company provides an environment in which the employees with varied origins and backgrounds can work positively together and feel valued, included, treated fairly and with dignity.

More and more companies are realising that considering equality and diversity in marketing campaigns, product design and service delivery is actually good for business. Equal opportunity and diversity help companies meet their targets, reach wider audiences, get good publicity from being an employer of choice, and attract and keep a motivated workforce.







Equal Remuneration for Women and Men

All human beings have the human right to livelihood and work, and human rights norms and standards guarantee women full equality in all aspects of economic life. Women have the human right on equal terms with men to dignified, creative and productive labour, free from discrimination and exploitation, enabling them to live in peace, security, justice and dignity.

Given that women are usually in a disadvantaged position in the workplace compared to men, promotion of gender equality implies explicit attention to women's needs and perspectives. Both women and men should be free to develop their abilities and make choices – without limitations set by rigid gender roles and prejudices – based on personal interests and capacities.

The Company follows equal pay for equal work principle. There is no difference in the salary for men and women for the same work.





8.2 DISCLOSURE ON MANAGEMENT APPROACH - HUMAN RIGHTS

Goals & Performance

The Company aims to encourage the protection of human rights through organisational wide policies.

Policy

The Company has policies covering key aspects of human rights like Child Labour, Forced & Compulsory Labour etc.

Organisational Responsibility

The operational responsibility of the human rights is of the respective unit HR head at each manufacturing location and they report to the corporate HR head.

Training & Awareness

The policies related to human rights are available on the Company's intranet with access to all users. These are also included in Employee Handbook to create awareness.

Monitoring & Follow-up

Human rights issues are covered during the internal audit conducted for Sustainability Reporting and for compliance to regional regulatory requirement.

Additional Contextual Information

Global Chairmen's Annual Awards

This year the first ever global Chairmen's Annual Awards was presented to the employees. These awards are in recognition of employees who have exhibited positive behaviours while delivering par excellence performance, demonstrating jubilant values, working collaboratively, surmounting the toughest of obstacles and driving innovation within the Company. The winners of the awards of three categories, Emerging Talent of the Year, Achiever of the Year & Innovator of the Year were rewarded by CMD/CCMD.









EUREKA Awards

At the Kirkland unit, a ceremony of handing-over EUREKA Awards was held to congratulate and recognise the contribution of the employees. Employees submit ideas for improvement and after completion and evaluation, awards are given to employees. Senior management also testified the engagement of the employees with the EUREKA Awards and also motivated the others to take part in this award actively.







IN ADDITION TO **DISTRIBUTION OF ECONOMIC VALUE** GENERATED. THE COMPANY'S **DIRECT ECONOMIC CONTRIBUTIONS** TO HOST **COMMUNITIES** AND **GOVERNMENTS** ARE SIZABLE.

Special Cleft Care Unit

The hospital at Barasat, West Bengal under JFTHL, is the first Cleft Care Unit in India. It is a joint initiative with Operation Smile, an Non-government Organisation (NGO) dedicated to the care of poor children with Cleft Lip and Palate. The Hospital aims at offering services to the poor children from villages free of cost. There were total 51 surgeries under this project during the year.

Investment and Procurement Practices

There had been no significant investment agreement for the Company during the reporting year. Formal due diligence is done before any acquisition of new business/ operations. The Company adheres to all the rules and regulations pertaining to contracting and procurement policies with respect to human rights. The Company does not procure material from vendors who violate human rights and standards as stipulated. This is scanned as per the contract agreement document of the Company with all the significant suppliers. It has been required by the supply chain management division that human rights and related commitments are obtained from the contractors and suppliers that they shall confirm to the requirements of contract agreement document. The agreement also ensures no exploitation of contract labour by contractors/agencies working for the manufacturing units of the Company, at various locations. This is also covered in Green Supply Chain Policy.

One of the most important challenges of the 21st century is to ensure that the investment and corporate procurement activity do not contradict with the commitment to the human rights. It is therefore ethical duty of the business to consider human rights as one of the key factors for investment decision to be made.

A human rights impact assessment emphasises the obligations of businesses with respect to national/international human rights law. It recalls the responsibilities of business to respect human rights and does not benefit from any violations of same. In essence, a human rights impact assessment measures the gap between the actual practices and ethical/regulatory requirement.



Several trainings were carried out in the Company which also addresses human rights issues. Exclusively no training programs were conducted on the subject during the year.

Non-Discrimination

Due to various cultures of several countries, the multination operations of the business affect individual political, social and economic rights. International human rights law provides a unique framework within which multination corporationsmay develop universally acceptable standards of business conduct. By virtue of its widespread acceptance by the United Nations, it is legal, moral, and public responsibility of business to respect the human rights.

Human rights are the birthright of every person and everyone is entitled to enjoy their human rights regardless of discrimination of any kind. The non-discrimination is a fundamental rule accepted by international community. This means that human rights are for all human beings, regardless of "race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status". Non-discrimination protects individuals and groups against the denial and violation of their human rights.

There has been no incident of discrimination in the Company during the reporting year.

Freedom of Association & Collective Bargaining

Under the **Declaration on Fundamental Principles and Rights at Work** by International Labour Organisation, the freedom of association & the right to collective bargaining are recognised as an essential right of workers.

The right to bargain collectively with an employer enhances the human dignity, liberty and autonomy of workers by giving them the opportunity to participate in the establishment of workplace rules. Collective bargaining permits workers to achieve a form of workplace democracy and to ensure the rule of law in the workplace.

Collective agreements include wage scales, working hours, training, grievance mechanism, environment, health & safety etc. Such agreements are made between the representatives of the workers and management.





IN ADDITION TO **DISTRIBUTION OF ECONOMIC VALUE** GENERATED. THE COMPANY'S **DIRECT ECONOMIC CONTRIBUTIONS** TO HOST **COMMUNITIES** AND **GOVERNMENTS** ARE SIZABLE.

There are no operations or significant suppliers violating freedom of association and collective bargaining or at significant risks.

Child Labour

Employing children below certain age in a factory or engaging in any hazardous employment is against the law. Some of the common causes of exploitation of children for work include poverty, parental illiteracy, social apathy, ignorance, lack of education & awareness, exploitation of cheap and unorganised labour.

Poverty & over population have been identified as the two main causes of child labour. Parents are forced to send children to work for some extra income. Over population creates paucity of resources therefore children are driven to commercial activities and not provided their development needs.

There has been no case of child labour in any of the operations of the Company during the reporting year. It is as per the Company's procedure to verify the age of any contractual/ permanent employee through any authentic document like birth certificate/voter card etc. to ensure there is no child labour. Medical examinations are carried out in case of any doubt about the age of the employee.

Forced and Compulsory Labour

Forced labour is a practice where workers are forced by individuals who have the will and power to threaten them with severe deprivations, such as withholding food or land or wages, physical violence or sexual abuse, restricting peoples' movements or locking them up. Bonding workers through debts is, in fact, a widespread form of forced labour in a number of developing countries.

International convention on Abolition of Forced Labour held in 1957 appeals each ratified country to undertake initiatives to suppress and not to make use of any form of forced Labour.

There are no operations that have significant risks of forced or compulsory labour in the Company. However, an agreement is signed mutually between the Company & the Employee on the terms & conditions for separation.





Security Practices

The industry contributes towards human rights by ensuring adherence to the highest ethical standards and respect human rights in their operations. Industry self-regulation cannot substitute for the government's primary regulatory responsibility; but it can serve as a useful compliment. By communicating their policies regarding ethical conduct and by providing adequate & effective training on respecting human rights to the security providers, companies ensure that security is provided in a manner consistent with company's policy to respect human rights.

The Company requires the security providers to have 100% of their staff to be trained issue related to human rights.

Indigenous Rights

Indigenous people across the world have been living since historical colonisation, but face threat of invasion of their territories, and discrimination because of their distinct cultures, identities and ways of living. **United Nations Declaration on the Rights of Indigenous People** was adopted by the General Assembly in September 2007. The adoption of this declaration is the clearest indication, that the international community is committing itself to the protection of the individual and collective rights of indigenous people. This includes not only the most basic human rights of physical survival and integrity, but also the preservation of their land, language, religion and other elements of cultural heritage that are a part of their existence as people.

The Company has operations in various locations across India & North America. The Company supports the local culture & heritage for the respective regions. There has been no incident of violation involving rights of indigenous people during the reporting year.

Assessment

Business operations may have potential positive or negative impact on human rights of the people involved or living in the vicinity. A formal assessment helps identifying such risks and company can strategise on how to mitigate such risks. The UN mandated Special Representative to develop materials and methodologies for undertaking human rights impact assessments of the activities of transnational corporations and other business enterprises. This culminated in a set of guiding principles for companies, to identify, prevent and mitigate adverse human rights impacts, and to account for their performance, business enterprises





should carry out human rights due diligence. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, and tracking as well as communicating their performance.

The Company has 7 manufacturing locations in India and 3 in North America. During the internal audit human rights assessment was carried out at all 7 (100%) locations in India and 1 (33.34%) in North America.

Remediation

The stakeholder assessment process involves employees, local community etc. as key stakeholders. Any concern related to potential impact on human rights of the stakeholders involved is identified through formal engagement process and accordingly actions are planned to reduce or mitigate any such effect. Several programs are conducted in the vicinity of the operating facility for education, health & livelihood of the people living in the nearby areas.

There has been no grievance related to human rights during the reporting year.





8.3 DISCLOSURE ON MANAGEMENT APPROACH - SOCIETY

Goals & Performance

The Company believes in inclusive growth and maintaining healthy relations with the local community. Several programs & projects are implemented in consultation with local community; the details of projects are included in the report.

Policy

The Company has Global Sustainability Mission which also addresses social issues. The Mission states the importance of inclusive growth as one of the key areas for sustainable development.

Organisational Responsibility

The social activities are carried out through Jubilant Bhartia Foundation (JBF), a not-for-profit company. The Coordinator of JBF is responsible for regular operations through program coordinators at the manufacturing units in India. The social activities at North American units are carried out under the supervision on respective unit heads.

Monitoring & Follow-up

Regular monitoring of the projects is carried out by JBF and the progress is reported to the senior management of the Company.

Additional Contextual Information

The Salisbury unit carried out a collection drive for school supplies. During the year two boxes of various supplies were collected and donated to a local homeless shelter for the resident children

Local Communities

The social initiatives of the Company are carried out under the aegis of Jubilant Bhartia Foundation (JBF).







80 percent manufacturing locations of the Company have implemented local community engagement programs. These programs are of several types depending upon the requirement of the region.

The Company's approach towards addressing the concerns of the local community fall in line with the UN Millennium Development Goals adopted in Johannesburg, 2002.

Goal 1: Eradicate Extreme Poverty and Hunger

Jubilant aims at sustainable livelihood opportunity for all by empowering youth, unskilled and semi-skilled, through proper training and helping them to escalate their lives from subsistence level to sustainable living. The livelihood programs involve:

- Capacity building to SHG members
- Vocational Training Centres (VTCs)
- Technical literacy at government primary schools for student of class
 VIII

The Company has established Vocational Training Centres at Gajraula and Nanjangud in rental space. While at all other locations, the Company organises training in the rental space or at the space provided by the community when training program is organised. Based on need assessment studies, some of the skills identified are repairing electrical/electronic appliances & mobile phones, beautician & hair dressing,









tailoring, repairing of tractors, diesel engines, threshers, two-wheelers etc. All the interventions aim at increasing employability of the community. The Foundation works towards forward linkages for their placement and self-employment.

Goal 2: Achieve Universal Primary Education

Lack of education is the root cause of numerous social and economic problems therefore the Company believes that education should be the primary area of intervention for empowering the communities. Taking in to cognizance the need to sensitise the community on the virtue of education, Jubilant Bhartia Foundation started engagement programs with the community. Lack of proper infrastructure in the school was one of the challenges to be met. This gave birth to the project Muskaan, where the Company partnered with local government in their educational initiatives in addressing the gamut of challenges. Through Muskaan, the Company intends to bring all stakeholders namely the villagers, teachers, students, Panchayati Raj Institution members, local authorities and others on board to get all round acceptance and unconditional support of the entire community for the project. Since its inception in 2007 in a pilot school at Sultanther village near Gajraula, it has now grown to 100 schools. Out of these 100 schools, the cost of expenses of 80 schools is being supported by Jubilant Life Sciences.

To measure the development taking place through Muskaan Project in the community, indicators were developed and standard scores





were assigned to each component of the core activities (Community involvement, Infrastructure, Attendance and Knowledge). Based on these indicators an assessment activity was performed in the Muskaan Project Schools at all the locations.







Goal 3: Promote Gender Equality and Empower Women

Conducive milieu instills confidence in women and empowers them. The approach of the Company is to provide an environment where women may explore their skills to maximum. There are several interventions which provide opportunity to the fairer sex for starting and continuing education, having access to basic healthcare facilities and attaining economic empowerment.





Case Study:

The Company under the arena of vocational training program imparted tailoring skills to the women SHG members at Kallahali Village, Nanjangud location. With some infrastructure support from the Jubilant Bhartia Foundation, the women started the uniform stitching centre and bagged several assignments from various organisations including Jubilant. These women are now significantly contributing towards their net family income.



Goal 4: Reduce Child Mortality&Goal 5: Improve Maternal Health

The Company is concerned about the poor Maternal and Child Health (MCH) in the society and working towards creating a healthy community. The company has started a pilot project for approximate population of 100,000 at Gajraula unit. The details are given in the following case study.

Project 'Swasthaya Prahari'-Under health initiatives besides supplementing basic healthcare services at all locations a pilot project on community health was initiated with a goal to address IMR & MMR. It is a unique community based pilot healthcare project named 'Swasthya Prahari' in **People-Public-Private-Partnership (4P)** model. Instead of reinventing any new system, this project is aimed at strengthening government's efforts with more effective community participation for improved services.





The project is proposed to be completed in following stages –

- Building capacity in the community to pursue various aspects of MCH
- Helping revitalise existing infrastructure to improve delivery mechanism
- Introducing performance based incentive system for effective implementation

The project primarily involves advocacy with various stakeholders like community, Panchayati Raj Institution (PRI) members, government officials on the concept of 'Swasthya Prahari', win their support, train a group of Block Resource Teamwho would in turn train Change Agents (1 for every village) to take the awareness up to the ground level.

The project has resulted in increased awareness about health issues. Increase in birth registration, Immunisation practices and institutional delivery has been observed. Institutional delivery ensures reduction in infant and mother mortality rate.

The key objectives of project:

- 1. Monitoring and reducing Birth rate
- 2. Monitoring and reducing IMR (Infant Mortality Ratio)
- 3. Monitoring and increasing Institutional delivery to reduce MMR (Maternal Mortality Ratio)





THE COMPANY
ORGANISED
VARIOUS
ACTIVITIES LIKE
CELEBRATING
WORLD
ENVIRONMENT
DAY, EARTH DAY,
AND WORLD
HEALTH DAY.



Goal 6: Combat HIV/AIDS, Malaria and Other Diseases

The Company recognises AIDS, Tuberculosis and Malaria as important issues. The Company is working towards awareness generation about these diseases and supports the stakeholders for prevention through various programs:

- Organising regular awareness sessions on various health issues
- Observing World AIDS Day which is celebrated at all the units through various workshops and programs for employees, contractual workers, truckers and communities in the vicinity.
- DOTS centre for Tuberculosis (TB) treatment and Integrated Counseling and Testing Centre (ICTC) for HIV at Gajraula unit for diagnostic and counseling services.
- Various other regular health camps are organised at all location at frequent intervals for the community around which included eye camps, dental camps, healthy heart camps and veterinary camps etc.

Goal 7: Ensure Environmental Sustainability

Ensuring awareness on health and environment issues amongst the community residing in proximity of the manufacturing location, the Company organised various activities like celebrating World Environment Day, Earth Day, and World Health Day.





The projects like Eco-clubs, Swasthya Prahari & Occupational Health Centre generate awareness on long term benefit of hygiene and environmental issues for community.

Case Study:

'Har Aangan Main Ped' Initiative: A revolutionary activity generated environmental awareness amongst the Muskaan school students and their families. In this initiative, 2 saplings (one flowering plant and one perennial plant) were distributed to the students and the teacher explained them the importance of the trees and how one should take care of the saplings.

Mass plantation: By this initiative through the Muskaan Schools, several trees were planted across various locations.

Community participation: During the distribution of the saplings, the PRI and VEC were involved. By this way, the awareness on this initiative is communicated to the key members of the villages, who can further communicate it to the masses and take this initiative at a higher level.





Workplace Volunteering

Jubilant encourages and supports workplace volunteering programs and offers opportunities for employees to make an impact in the society. Some examples are:

- The employees at Jubilant supported the lives of Tihar inmates by buying Rakhi, Bags, Herbal Holi Colours made by them.
- The employees of the Company sponsored & distributed solar lantern in the community at one of the manufacturing locations.



COMPANY
BELIEVES IN
WORKING IN
PARTNERSHIP
WITH VARIOUS
LOCAL AND
GLOBAL
ORGANISATIONS

Blood donation camps were organised across the locations in close cooperation with Indian Red Cross (IRC) Society and local hospitals. These series of events saw an outstanding contribution by the employees of the Company. Necessary health tests were done by IRC doctors prior to accepting the blood from the employees. All the blood donors were given blood donation card by IRC which can be utilised for future need of blood within one year.



Goal 8: Develop a Global Partnership for Development

The Company believes in working in partnership with various local and global organisations. This year Jubilant's partners under its various programs were:

- World Economic Forum (WEF)
- Schwab Foundation for Social Entrepreneurship
- NIIT
- SEWA
- Labour NET
- National Bank for Agriculture and Rural Development (NABARD)
- Pratham

There are no significant actual negative impacts on local community around the manufacturing location. However,





there are potentials for negative impacts on the local communities which can arise out of any industrial mishap due to abnormal conditions. To address the above mentioned potential negative impacts, the Company has adequate systems and equipment in place beyond regulatory compliance. The Company also has off site emergency plan to mitigate the impact of any unlikely event as required by the local regulations.

Corruption

Most of the companies understand the risks related to corruption is and its business implications. But how to encounter or mitigate such risks in the practical operation is a challenging task. Corruption can introduce inefficiencies that reduce competitiveness. It may limit the number of bidders on a contract, favour insiders, limit the information available to participants and introduce added bargaining costs. Several companies have written policies and code of conduct signed by the employees, showcasing the commitment of the employees and company as a whole towards mitigating the corruption from the business.

The Company carries out Enterprise Risk Management through external agency and also conducts internal audits at each manufacturing location which covers corruption as one of the aspects to be analysed. In the systematic way, all (100%) of the business units are analysed for risks related to corruption.

The induction training covers the organisational policies and procedures related to anti-corruption. All new employees are required to undergo induction training. Declaration in writing is taken from the senior management to confirm that they havenot indulged in any corruption related activities. There has been no incident of corruption in the Company during the reporting year and therefore no action was taken.

Public Policy

Businesses are involved in the public policy development and lobbying through various NGOs and industry chambers. Sometimes the organisation holds a firm position on a public issue even though it may not undertake specific activities from year to year. Single interest lobbies raising small points of policy can undermine the achievement of widely held environmental and social objectives. Companies practicing & supporting Sustainability should not be advocating single interest issues thereby lowering the environmental and social relevance of the activity. There has been no financial and in-kind contribution to political parties, politicians and related institutions.





COMPANY HAD **PARTICIPATED** IN SEVERAL **SURVEYS ORGANISED** BY EXTERNAL AGENCIES. **ONE OF THEM CONDUCTED BY** FICCI WAS ON **ENVIRONMENT APPRAISALS** AND FOREST **CLEARANCE PROCESS** IN INDIA

The Company has taken part in public policy development when invited by industry association or any other independent body.Such engagements are conducted for industrial groups and not limiting to any single group of companies. The Company CEO-Advanced Intermediates & Nutritional Products, Mr. Pramod Yadav is the member of Drafting Committee for CPL (Classification Packaging and Labeling) regulation.

FICCI Survey on Environment Appraisals and **Forest Clearance**

Company had participated in several surveys organised by external agencies. One of them conducted by FICCI was on environment appraisals and forest clearance process in India. As a part of survey a structured form with a questionnaire was provided. The objective of survey was to analyse the present system of project appraisal for environment and forest clearance to carry an analysis of all responses.

Anti-Competitive Behaviour

Anti-competitive practices like dumping, exclusive dealing, limit pricing etc. often enrich those who practice them but has a negative effect on the economy as a whole. Such practices lead to formation of monopoly in the freely functioning market economy, affecting other participants each of which has some market share. Other effects include consequently reducing the prices and selling the product in loss to consumers thereby forcing other competitors out of the market.

Competition Law India also known as Anti-Trust Law in some jurisdictions is designed to protect the interest of the consumer by protecting 'competition' in the market.

There has been no legal action on anti-competitive behaviour, anti-trust and monopoly practices.

Compliance

There has been no significant fines or non-monetary sanctions related to accounting frauds, workplace discrimination, corruption etc.





8.4 DISCLOSURE ON MANAGEMENT APPROACH - PRODUCT RESPONSIBILITY

Goals & Performance

Excellent Quality is one of the Values of the Company. This is addressed as 'With utmost care for the environment and safety, we will always strive to excel in the quality of our processes, our products and our services'.



QUALITY POLICY

- Our endeavour shall be to achieve delighted customers across the globe by providing them products and services meeting highest quality standards, with utmost care for the environment.
- We shall continuously upgrade our manufacturing technologies and quality standards to achieve and maintain quality leadership with thrust on ecofriendly processes.
- We shall always strive to create a cohesive and motivated team of international competence by providing them continuous training to enhancetheirknowledge and skills.
- We shall ensure compliance to the national and international regulatory requirements as applicable.

Shyam S Bhartia Chairman & Managing Director

Hari S Bhartia Co-Chairman & Managing Director

January 01, 2010



THE COMPANY HAS
STRONG R&D BASE
AND THE PRODUCTS
& PROCESSES
DEVELOPED
THEREIN TAKE
CARE OF
HEALTH &
SAFETY
IMPACTS.

Organisational Responsibility

Each Business & Functional Head is responsible for their respective departments. They are supported by divisional heads in their department.

Training & Awareness

Training & Awareness is organised as per the need identified through annual Performance Management System.

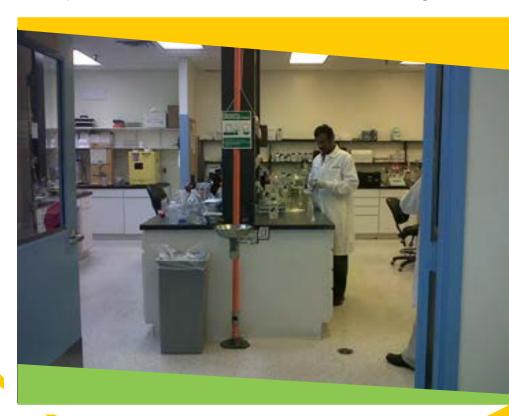
Monitoring & Follow-up

Regular follow-ups are conducted with customers to ensure the necessary standards are maintained.

Additional Contextual Information

Customer Health & Safety

Health & Safety impact of the products are assessed for improvement in various life cycle stages. The Company has strong R&D base and the products & processes developed therein take care of health & safety impacts. These practices developed in R&D are then followed in manufacturing of







product. The last stage of the product life cycle (as applicable to the Company) is delivery to customer, here the health & safety impacts of the products are addressed through proper labelling and Material Safety Data Sheet (MSDS). The MSDS is developed for all significant products manufactured by the Company.

Responsible businesses disclose detailed information about products—particularly in areas of Customer Health & Safety. This is also linked to the concept of "consumer rights" i.e. various rights consumers have, facilitating them to make better choices in the marketplace. The assessment begins right from the Research & Development stage and further to other life cycle stages of product development.

There has been no incident of non-compliance with regulations and voluntary codes concerning health & safety impact of products and services during their life cycle.

Product & Service Labelling

Information related to the Sustainability impact of any product or service can be communicated through labelling of the product or service. Certain information like storage conditions, hazardous components used, recycling method etc. are common in consumer products. Such information is useful for the customer so that the product is stored, used





APART FROM **IMPROVING ON** PRODUCTS. **CONDUCTING SURVEYS ENHANCES CUSTOMER VALUE TO THE ORGANISATION LEADING TO STRENGTHENING** STAKEHOLDERS' **CONFIDENCE IN** THE COMPANY.

in prescribed way. Sustainable businesses have developed procedures/ SOPs for product labelling.

The chemicals supplied by the Company require information labelling to be done as per the procedures mandated by the regional/global regulations. 100% of the significant products are required to adhere to labelling requirements as already mentioned. Compliance to these regulations concerning product information labelling is required to remain competitive in business. There has been no incident of non-compliance with regulations and voluntary codes during the reporting year.

Another important aspect of product responsibility is conducting customer satisfaction surveys. with customers helps business to customise the product according the customer needs. Apart from improving on products, conducting surveys enhances customer value to the organisation leading to strengthening stakeholders' confidence in the company.

Customer feedback is taken through non formal processes like direct meeting, telephonic conversation or written emails and during various exhibitions where company participates. Necessary actions are implemented based on the feedback wherever applicable.

At the Kirkland unit, a Standard Operating Procedure (SOP) was put in place for complaints and adverse events. The Company conducted a consumer satisfaction survey throughout the entire database of customers. The consumer service representatives ensure follow up on any issues brought forward by the customers.

Marketing Communication

Indian law related to advertisement of products includes prohibition of public marketing of Tobacco & related products, prize competition without license from the respective authorities, defamatory ads (use of provocative language) etc. Businesses have also developed own standards according to the regulatory requirement regarding marketing & communication of products & services.





The nature of Company's business primarily being B2B does not require marketing to general public. The Company is not marketing products on commercial carriers like hoardings or through commercial television channels. The advertisements are inserted in technical journals for the information of potential industrial customers. The Company is not selling products that are banned in market or are the subject of stakeholder questions or public debate.

There has been no incident of non-compliance with regulations and voluntary codes concerning marketing communications etc.

Customer Privacy

Businesses take measures to ensure that confidential customer data is not mishandled or abused. Since businesses have a strong competitive incentive to retain an exclusive access to these data, and customers trust is a high priority, most companies use IT tools, exclusive security software for securing customer database. Businesses have Customer Privacy Policies to provide confidence to the customers regarding data security.

Custom Research & Manufacturing Services (CRAMS) is one of the key businesses of the Company. This requires high level of customer privacy and confidentiality of data. There has been no complaint regarding breaches of customer privacy and losses of customer data.

Compliance

There has been no monetary fine for non-compliance with laws and regulations concerning the provision and use of products & services.





9.0 WAY FORWARD

- THE COMPANY **WILL CONTINUE** TO TAKE **INITIATIVES UNDER THE BUSINESS EXCELLENCE FOR IMPROVEMENT** IN PROCESSES **LEADING TO CONSERVATION** OF ENERGY. **REDUCTION IN EMISSIONS AND** RAW MATERIAL CONSUMPTION NORMS.
- Hazardous waste: The Company will explore the possibility for co-processing of hazardous waste in cement industries. Co-processing of waste is one of the sustainable ways suggested by regulatory authorities for management of the hazardous waste. This will not only reduce the incinerator operations at the Company's manufacturing unit and the waste will be utilised by the cement industry as fuel.
- Increase transportation of raw materials & finished goods through railways resulting in reduction of movement of number of trucks thereby reducing emissions. This would also lead to safer operations for transportation of goods & raw materials due to reduced number of trips.
- The Company will continue to take initiatives under the Business Excellence for improvement in processes leading to conservation of energy, reduction in emissions and raw material consumption norms.
- The Company would continue working towards empowering community in vicinity of its manufacturing locations through Jubilant Bhartia Foundation in the realm of primary schooling in rural areas, provision of basic







health care, vocational training. The Company is also committed to continue its efforts to promote social enterprises in India. The efforts would be towards making the initiatives sustainable and participatory and in line with the Millennium Development Goals of United Nations.

- The Company will continue to participate in voluntary initiatives like United Nations Global Compact Ten Principles for Sustainability. The Company would respond to information disclosure under National Voluntary Guidelines by Ministry of Corporate Affairs.
- The Company would commence the production of Symtet through greener route. Jubilant's in-house R&D team has developed an innovative technology to manufacture Symtet involving green chemistry that helps reduce GHG emissions and thus brings down the carbon footprint of our customers using this product.
- Sustainability Dashboard: The Company formalised a Sustainability Committee at the Board level in the year 2010-11. To develop a Sustainability Dashboard to identify Indicators in addition to the one covered by GRI framework. This will help to evaluate the Company's performance through the dashboard by the Committee.



UNGC - THE TEN PRINCIPLE



United Nations Global Compact

UNGC "THE TEN PRINCIPLE"				
Principle	Statement			
Principle1	Businesses should support and respect the protection of internationally proclaimed human rights.	76-82		
Principle2	Businesses should make sure they are not complicit in human rights abuses.	76-82		
Principle3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	79		
Principle4	Businesses should uphold the elimination of all forms of forced and compulsory labour.	80		
Principle5	Businesses should uphold the effective abolition of child labour.	80		
Principle6	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	79		
Principle7	Businesses should support a precautionary approach to environmental challenges.	30		
Principle8	Businesses should undertake initiatives to promote greater environmental responsibility.	55		
Principle9	Businesses should encourage the development and diffusion of environmentally friendly technologies.	56,46		
Principle10	Businesses should work against corruption in all its forms, including extortion and bribery.	92		



List of Abbreviations

AIDS	Acquired Immunodeficiency Syndrome			
API	Active Pharmaceutical Ingredients			
BSE	Bombay Stock Exchange			
CCMD	Co-Chairman & Managing Director			
CEOs	Chief Executive Officers			
CMD	Chairman & Managing Director			
CMO	Contract Manufacturing Operations			
CNS	Central Nervous System			
CoP	Communication of Progress			
CRAMS	Custom Research and Manufacturing Services			
CSR	Corporate Social Responsibility			
CVS	Cardio Vascular Segment			
DDDS	Drug Discovery and Development Solution			
EDC	Electronic Data Capture			
EHS	Environment, Health and Safety			
EIA	Environmental Impact Assessment			
EMS	Environmental Management System			
ERM	Enterprise Risk Management			
ERP	Enterprise Resource Planning			
GHG	Green House Gas			
GRI				
HIV	Global Reporting Initiative Human Immunodeficiency Virus			
ICTC	Integrated Counseling and Testing Centre			
IMR	Infant Mortality Rate			
IPRs	Intellectual Property Rights			
IUCN	International Union for Conservation of Nature			
JLL	Jubilant Life Sciences Ltd.			
MDGs	Millennium Development Goals			
MMR				
MoEF	Maternal Mortality Ratio Ministry of Environment & Forests			
NA	North America			
NCE	New Chemical Entities			
NGO				
	Non Governmental Organization			
NSE	National Stock Exchange			
ODS	Ozone-Depleting Substances			
OHS	Occupational Health & Safety			
PhDs	Doctor of Philosophy			
PRI	Panchayati Raj Institute			
R&D	Research & Development			
RO	Reverse Osmosis			
SCBA	Self-Contained Breathing Apparatus			
SEBI	Securities and Exchange Board of India			
SEWA	Self-Employed Women's Association of India			
SHG	Self Help Group			
SO2	Sulphur Dioxide			
UPSACS	UP State AIDS Control Society			
VEC	Village Education Committee			
WFI	Water For Injection			
TU	Trade Union			



APPLICATION LEVEL CHECK

	Report Application Level	С	C+	В	B+ _	Α	A+
S	G3 Profit Disclosures	Report on: 1.1 2.1- 2.10 3.1- 3.8, 3.10-3.12 4.1- 4.4,4.14-4.15	 	Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5-4.13, 4.16-4.17	 	Same as requirement for Level B	
Disclosures		Not Required	ssured	Management Approach	ssured	Management Approach	ssured
Standard Disc	G3 Management Approach Disclosures	Not Required	ort Externally Assured	Disclosures for each Indicator Category	Report Externally Assured	Disclosures for each Indicator Category	Report Externally Assured
Star	G3 Performance Indicators & Sector Supplement Performance Indicators	Report on a minimum of 10 Performance Indicators, including at least one from each of: Economic, Social and Environmental.	: 1	Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human Rights, Labour, Society, Product Responsi- bility.		Report on each core G3 and Sector Supplement* Indicator with due regard to the Materiality Principle by either: a) reporting on the Indicator or b) explaining the reason for its omission.	

^{*} Sector supplement in final version





ENVIRONMENT, HEALTH AND SAFETY POLICY

Jubilant Life Sciences Limited is an integrated pharma & life sciences Company serving its customers globally with recognised strengths in innovation, manufacturing and support services. Jubilant endeavors to go beyond compliance with regulatory standards, to achieve excellence in Environmental, Health and Safety (EHS) management practices.

We shall achieve this by:

- Complying with regulatory standards on Environment, Health and Safety
- Optimizing resource utilization for pollution prevention, energy & water conservation and reduction of wastes & emissions
- Identifying hazards at the design stage of the processes & services and build appropriate measures to mitigate risks
- Ensuring safe & healthy work environment with necessary infrastructure and systems
- Reviewing EHS performance for continual improvement
- Promoting EHS awareness among key stakeholders
- Imparting training to operating personnel

The policy will be available in public domain and it is applicable to all Indian operations.

October 14, 2010

Shyam Bang Executive Director





GREEN SUPPLY CHAIN POLICY

At Jubilant Life Sciences Limited, we are committed to protect the Environment by striving for the Greening of Supply Chain in collaboration with Partners in Progress for long term Sustainability.

Jubilant is committed to maintain & expand its Green Supply Chain and will work with PARTNERS to:

Protect the environment by creating awareness

Adhere to environment, health & safety compliance

Reduce, reuse and recycle resources

Train and educate to say no to child labour

Nourish plantation and greenery in vicinity

Encourage saving of water and electricity

Reduce Greenhouse Gas emissions

Strive for sustainable partnership

November 9, 2010

Shyam Bang Executive Director





Ernst & Young Pvt. Ltd. 22, Carriac Street 3rd Floor, Block 'C' Kolkuta-700 016, India

Tel: +91 33 6615 3400 Fax: +91 33 2281 7750 www.sy.com/india

The Management and Board of Directors Jubilant Life Sciences Limited 1-A, Sector 16-A NOIDA 201301 Utter Predesh, India

Independent Assurance Statement

Ernst & Young Pvt. Ltd. (EY) has been engaged by Jubilant Life Sciences Limited (the 'Company') to provide independent assurance of its Sustainability Report 2011-12 (the 'Report') covering the Company's sustainability performance during the period 1st April 2011 to 31st March 2012.

The development of the Report, its content, and presentation is the sole responsibility of the management of the Company. EY's responsibility, as egreed with the management of the Company, is to provide independent assurance on the report content as described in the scope of assurance. Our responsibility in performing our assurance activities is to the management of the Company only and in accordance with the terms of reference agreed with the Company. We do not therefore accept or assume any responsibility for any other purpose or to any other person or organization. Any dependence that any such third party may place on the Report is entirely at its own risk. The assurance report should not be taken as a basis for interpreting the Company's overall performance, except for the aspects mentioned in the scope below.

Reporting criteria and assurance standard

The Company has stated that it has developed the Report based on the Global Reporting Initiative (GRI-G3.1) Guidelines.

Our assurance is in accordance with International Federation of Accountants' International Standard for Assurance Engagements Other than Aucits or Reviews of Historical Financial Information (ISAE 3000), and our conclusions are for 'limited' assurance as set out in ISAE 3000.

Scope of assurance and methodology

The scope of our work for this assurance engagement was limited to review of information pertaining to environment, health & safety (EHS) and social performance for the period 1st April 2011 to 31st March 2012. We conducted review and verification of data collection/ measurement methodology and general review of the logic of inclusion/ omission of necessary relevant information / data and this was limited to:

- Review of major anomaly within the report as well as between the report and source data/information;
- Review of the transcription of the data internally verified by the company;
- Execution of audit trail of selected data streams and information to determine the level of accuracy in collection, transcription and aggregation processes followed;
- Review of Company's plans, policies and practices, so as to be able to make comments on the
 completeness of the reporting and degree to which EY believes the report provides a fair and honest
 representation of the Company's activities.

The assurance engagement was performed by our multidisciplinary team of professionals in the field of environment, health, safety and social aspects, who visited the corporate office at Noida and two manufacturing locations at Gajraula (Uttar Pradesh) and Semlaya (Gujarat) for reviewing and verifying the information and data trail pertaining to the other manufacturing locations were made available to us at Company's Corporate Office at Noida.

A chember from of Errort & Young Globel Landed Regd. Office: 22, Samo: Street, Block %7, 316 Floor, Rullativ 790-008.





Limitations of our engagement

The assurance scope excludes:

- Data and information outside the defined reporting period (1st April 2011 to 31st March 2012);
- Review of the 'economic performance indicators' included in the Report which, we have been informed by the Company, are derived from the Company's audited financial records;
- The Company's statements that describe expression of opinion, belief, inference, aspiration, expectation, aim or future intention.

Conclusion

Based on our scope of review and approach, nothing has come to our attention that causes us not to believe that the Company is concerned about environment, health & safety (EHS) and social issues pertaining to its business activities, and the Report covers a broad range of EHS and social issues that are relevant to the sustainability performance of the Company;

Ernst & Young Private Limited

Sudipta Das Partner

Dated: 11 June 2012 Place: Kolkata



	G3.1 C	ontent	Index			
	Application Level	A+	Self Declar		Assured by	Ernst & Young India Pvt. Ltd.
	STANDARD DISCLOSU	JRES PART	I: Profile Di	isclosures		
	1. Stra	tegy and Ar	nalysis			
Profile Disclosure	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
1.1	Statement from the most senior decision-maker of the organisation.	Fully	3			
1.2	Description of key impacts, risks, and opportunities.	Fully	8			
	2. Orga	anizational l	Profile			
Profile Disclosure	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
2.1	Name of the organisation.	Fully	13			
2.2	Primary brands, products, and/or services.	Fully	15			
2.3	Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.	Fully	19			
2.4	Location of organisation's headquarters.	Fully	23			
2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully	14			
2.6	Nature of ownership and legal form.	Fully	13			
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Fully	14			
2.8	Scale of the reporting organisation.	Fully	19			
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	Fully	19			
2.10	Awards received in the reporting period.	Fully	20			



	3. Re	port Param	eters			
Profile Disclosure	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Fully	22			
3.2	Date of most recent previous report (if any).	Fully	22			
3.3	Reporting cycle (annual, biennial, etc.)	Fully	22			
3.4	Contact point for questions regarding the report or its contents.	Fully	22			
3.5	Process for defining report content.	Fully	22			
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	Fully	22			
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	Fully	23			
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	Fully	23			
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Fully	23			
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g.,mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Fully	23			
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Fully	23			
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully	108			
3.13	Policy and current practice with regard to seeking external assurance for the report.	Fully	106			



	4. Governance, Co	mmitments	, and Engag	ement		
Profile Disclosure	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.		24			
4.2	Indicate whether the chair of the highest governance body is also an executive officer.	Fully	25			
4.3	For organisations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	Fully	24			
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully	26			
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	Fully	27			
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	27			
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	Fully	27			
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Fully	28			
4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Fully	29			



4.10	Processes for evaluating the highest	Fully	30			_	
	governance body's own performance, particularly with respect to economic, environmental, and social performance.						
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	Fully	30				
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	Fully	32				
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.		33				
4.14	List of stakeholder groups engaged by the organisation.	Fully	34				
4.15	Basis for identification and selection of stakeholders with whom to engage.	Fully	34				
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Fully	34				
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	Fully	37				
	STANDARD DISCLOSURES PART II:	Disclosure	s on Manage	ement Appro	ach (DMAs)		
G3 DMA	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	To be reported in
DMA EC	Disclosure on Management Approach EC	Fully	58				
Aspects	Economic performance	Fully	58				
	Market presence	Fully	60				
	Indirect economic impacts	Fully	61				
DMA EN	Disclosure on Management Approach EN	Fully	38				



Aspects	Materials	Fully	43		
	Energy	Fully	44		
	Water	Fully	47		
	Biodiversity	Fully	42		
	Emissions, effluents and waste	Fully	49		
	Products and services	Fully	56		
	Compliance	Fully	57		
	Transport	Fully	57		
	Overall	Fully	57		
DMA LA	Disclosure on Management Approach LA	Fully	63		
Aspects	Employment	Fully	63		
	Labour/management relations	Fully	67		
	Occupational health and safety	Fully	68		
	Training and education	Fully	72		
	Diversity and equal opportunity	Fully	74		
	Equal remuneration for women and men	Fully	75		
DMA HR	Disclosure on Management Approach HR	Fully	76		
Aspects	Investment and procurement practices	Fully	78		
	Non-discrimination	Fully	79		
	Freedom of association and collective bargaining	Fully	79		
	Child labour	Fully	80		
	Prevention of forced and compulsory labour	Fully	80		
	Security practices	Fully	81		
	Indigenous rights	Fully	81		
	Assessment	Fully	81		
	Remediation	Fully	82		
DMA SO	Disclosure on Management Approach SO	Fully	83		
Aspects	Local communities	Fully	83		
	Corruption	Fully	92		
	Public policy	Fully	92		
	Anti-competitive behaviour	Fully	93		
	Compliance	Fully	93		
DMA PR	Disclosure on Management Approach PR	Fully	94		



		Í				I	
Aspects	Customer health and safety	Fully	95				
	Product and service labelling	Fully	96				
	Marketing communications	Fully	97				
	Customer privacy	Fully	98				
	Compliance	Fully	98				
	STANDARD DISCLOSURE	ES PART III	: Performan	ce Indicators	;		
		Economic					
Performance Indicator	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
	Econo	mic perforr	mance				
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Fully	59				
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	Fully	59				
EC3	Coverage of the organisation's defined benefit plan obligations.	Fully	59				
EC4	Significant financial assistance received from government.	Fully	59				
	Ma	rket presen	се				
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	Fully	60				
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	Fully	60				
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	Fully	60				
	Indirect	economic i	mpacts				
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, inkind, or pro bono engagement.	Fully	61				
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	Fully	61				



	Er	nvironment	al				
Performance Indicator	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
		Materials					
EN1	Materials used by weight or volume.	Fully	43				
EN2	Percentage of materials used that are recycled input materials.	Fully	44				
		Energy					
EN3	Direct energy consumption by primary energy source.	Fully	44				
EN4	Indirect energy consumption by primary source.	Fully	45				
EN5	Energy saved due to conservation and efficiency improvements.	Fully	46				
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	Fully	46				
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Fully	46				
		Water					
EN8	Total water withdrawal by source.	Fully	47				
EN9	Water sources significantly affected by withdrawal of water.	Fully	48				
EN10	Percentage and total volume of water recycled and reused.	Fully	48				
	E	Biodiversity					
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Fully	42				
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Fully	42				
EN13	Habitats protected or restored.	Fully	42				
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Fully	42				
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.		43				



	Emissions	, effluents a	d waste		
EN16	Total direct and indirect greenhouse gas emissions by weight.	Fully	19		
EN17	Other relevant indirect greenhouse gas emissions by weight.	Fully	19		
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully	50		
EN19	Emissions of ozone-depleting substances by weight.	Fully	51		
EN20	NOx, SOx, and other significant air emissions by type and weight.	Fully	51		
EN21	Total water discharge by quality and destination.	Fully	52		
EN22	Total weight of waste by type and disposal method.	Fully	53		
EN23	Total number and volume of significant spills.	Fully	53		
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	Fully	56		
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff.	Fully	53		
	Produ	icts and ser	ces		
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	-	56		
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Fully	57		
	(Compliance			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully	57		
		Transport			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	Fully	57, 50		



		Overall					
EN30	Total environmental protection expenditures and investments by type.	Fully	57				
	Social: Labor P	ractices an	d Decent Wo	ork			
Performance Indicator	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
	E	Employmen [*]	t				
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	Fully	64				
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	Fully	65				
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	Fully	66				
LA15	Return to work and retention rates after parental leave, by gender.	Fully	67				
	Labour/m	anagement	relations				
LA4	Percentage of employees covered by collective bargaining agreements.	Fully	68				
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	Fully	67				
	Occupatio	nal health a	ind safety				
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Fully	68				
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	Fully	71				
LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	Fully	68				
LA9	Health and safety topics covered in formal agreements with trade unions.	Fully	71				



	Trainir	ng and educ	cation				
LA10	Average hours of training per year per employee by gender, and by employee category.	Fully	72				
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Fully	73				
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	Fully	74				
	Diversity a	nd equal o	oportunity				
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Fully	24, 74				
	Equal remuner	ation for wo	men and m	en			
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	Fully	75				
	Socia	l: Human R	ights				
Performance Indicator	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
	Investment an	d procuren	nent practice	es			
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	Fully	78				
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	Fully	78				
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Fully	79				
	Non	-discrimina	tion				
HR4	Total number of incidents of discrimination and corrective actions taken.	Fully	79				



	Freedom of associa	ation and co	llective barç	gaining			
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	Fully	79				
		Child labor					
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour.	Fully	80				
	Forced ar	nd compuls	ory labor				
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of all forms of forced or compulsory labour.	Fully	80				
	Sec	urity practi	ces				
HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations.	Fully	81				
	Ind	igenous rig	hts				
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	Fully	81				
	1	Assessment					
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.		81				
	F	Remediation	1				
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	Fully	82				
	So	ocial: Socie	ty				
Performance Indicator	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
	Loca	al communi	ties				
S01	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	Fully	83				
S09	Operations with significant potential or actual negative impacts on local communities.	Fully	91				



S010	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	Fully	92				
		Corruption					
S02	Percentage and total number of business units analysed for risks related to corruption.	Fully	92				
S03	Percentage of employees trained in organisation's anti-corruption policies and procedures.	Fully	92				
S04	Actions taken in response to incidents of corruption.	Fully	92				
	F	ublic policy	/				
S05	Public policy positions and participation in public policy development and lobbying.	Fully	92				
S06	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Fully	92				
	Anti-co	mpetitive be	ehavior				
S07	Total number of legal actions for anti- competitive behaviour, anti-trust, and monopoly practices and their outcomes.	Fully	93				
	(Compliance				'	
S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	93				
	Social: Pr	oduct Resp	onsibility				
Performance Indicator	Description	Reported	Cross- reference/ Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	To be reported in
	Custome	er health an	d safety				
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Fully	95				
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Fully	96				



Product and service labelling							
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.		96				
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	Fully	97				
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Fully	97				
Marketing communications							
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	Fully	97				
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	Fully	98				
Customer privacy							
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Fully	98				
Compliance							
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Fully	98				





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