

# **Submission of the Assessment Report on Bill S211**

**(Financial year 1<sup>st</sup> April 2024 - 31<sup>st</sup> March 2025)**

**Piramal Healthcare (Canada) Limited**



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## Introduction

**Piramal Healthcare (Canada) Limited (PHCL)** is a leading pharmaceutical company dedicated to pioneering innovative healthcare solutions. PHCL, a subsidiary of Piramal Pharma Limited (PPL) India<sup>1</sup>, operates at the forefront of pharmaceutical research, development, and manufacturing.

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

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

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

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

## PHCL location and registration details

PHCL's facility is located at 110 Industrial Parkway North, Aurora, Ontario L4G 4C3, Canada. The company conducts its business operations within Canada and holds total assets exceeding \$20 million in Canada. Furthermore, PHCL has generated revenue more than \$40 million during the previous two financial years (1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024, and 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025). PHCL is registered in Canada with corporation<sup>3</sup> number – 855150-2, holding a GST Registration number of

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<sup>1</sup> Details related to subsidiaries of PPL are presented in annexure 1

<sup>2</sup> Details of PSCI members are presented in annexure 2

<sup>3</sup> Details of the registration is attached as annexure 3



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R105320212 and a D&B identification number of 24-413-3364. PHCL is committed to advancing pharmaceutical science through cutting-edge research and development initiatives, with state-of-the-art R&D facilities equipped with advanced technologies and staffed by highly skilled scientists and researchers ([Link](#)).

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## PHCL operations and Supply chain

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

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

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

## Policies and Code of conduct

PHCL has taken significant steps to align with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211), having updated its Sustainable Procurement Policy ([Link](#)), effective December 2023, and its Supplier Code of Conduct ([Link](#)), effective April 2024. These updates reflect our commitment to preventing forced and child labour within our operations and supply chains. In line with these changes, PHCL launched a comprehensive training program in March 2024 for all employees. This training provided in-depth education on Bill S-211 compliance and key sustainability issues, including specific modules focused on Child & Forced Labour, Sustainable Procurement, and Traceability.

Furthermore, Piramal has reaffirmed its commitment to human rights through the Global Human Rights Statement ([Link](#)), which establishes a zero-tolerance policy toward forced labour, child labour, and other unethical practices. As part of our ongoing due diligence, Piramal conducts regular third-party audits to ensure effective implementation of our Supplier Code of Conduct and human rights policies across all operations.



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PHCL has proactively undertaken numerous measures to identify and mitigate the risk of forced and child labour. These efforts include the detailed mapping of our supply chains to better understand and address potential risks, conducting thorough internal assessments to pinpoint areas of concern, and developing comprehensive action plans aimed at eliminating forced and child labour.

We have also implemented robust due diligence procedures to ensure that all workers are recruited voluntarily and that no forced or child labour is present in our supply chain. As part of these measures, PHCL requires suppliers to adhere to the same high standards outlined in our Supplier Code of Conduct. Additionally, we have introduced child protection policies and anti-forced labour and anti-child labour clauses in our contracts with suppliers to ensure that ethical labour practices are consistently upheld across the supply chain.

Piramal remains fully committed to continually improving our labour practices and stewardship, ensuring that all employees work in safe, fair, and respectful conditions. As part of this ongoing commitment, Piramal Pharma has rolled out a series of policies ([Link](#)) focused on environmental health and safety, as well as Environmental, Social, and Governance (ESG) standards, which ensure that we not only comply with anti-forced and child labour regulations but also foster the best possible working conditions for all employees.

### Training and Assessment

Piramal Pharma Limited (PPL) has implemented comprehensive training sessions focused on its Sustainable Procurement Policies and the Supplier Code of Conduct. These sessions cover key areas such as Labour & Human Rights, Climate & Environment, Business Integrity & Ethics, and Sustainable Procurement, with a particular focus on critical issues like forced labour, child labour, working conditions, and non-discrimination. These training modules are directly aligned with the International Labour Organization (ILO) guidelines, ensuring that our workforce and supply chain adhere to the highest standards of ethical labour practices. Our commitment to a zero-tolerance policy toward forced and child labour remains a cornerstone of our operations, ensuring optimal working conditions and safeguarding human rights across the supply chain.

In line with Bill S-211's compliance requirements, PHCL rolled out its employee training program in March 2024. This underscores the company's dedication to adhering to the reporting and due diligence standards set forth by Bill S-211. The training covered key aspects of Bill S-211 compliance and sustainability, including specific modules on Child & Forced Labour, Sustainable Procurement, and Traceability. A summary of the training assessments and outcomes is provided in Annexure 4.



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Furthermore, in recognition of the need for global cooperation, PPL extended this training program to its suppliers during the months of November to December 2024. These training sessions aimed to raise awareness, ensure understanding, and empower suppliers to meet PPL's ethical standards in relation to forced and child labour prevention.

As part of our ongoing commitment to responsible business practices, PPL successfully organized three high-impact ESG (Environmental, Social, and Governance) awareness sessions, engaging 128 participants from 86 suppliers across global locations. Additionally, a dedicated ESG training session was conducted for our Supply Chain Management (SCM) team through Piramal Learning University (PLU), reinforcing the importance of aligning with both local and global human rights standards and advancing our efforts to prevent forced and child labour in our operations.

### **Self-Assessment on Child and Forced labour**

PHCL has conducted a comprehensive self-assessment of its operations at its Canadian facility and confirms that there is no evidence of forced labour or child labour within its operations. Additionally, our internal review has identified no such risks within our supplier network, reflecting our ongoing commitment to upholding the highest ethical labour standards.

In further alignment with the requirements, PHCL has updated the Supplier Assessment Questionnaire (SAQ) to ensure full compliance with regulations concerning forced and child labour. This updated questionnaire was distributed to the critical suppliers. In addition, PHCL prioritized sending the SAQs to suppliers identified as high-risk based on the company's risk assessment procedures, ensuring targeted and effective due diligence.

Following the distribution of the SAQs, the PHCL Supply Chain Team engaged in in-depth consultations with each supplier to review the responses and address any potential concerns. During these discussions, all suppliers confirmed that they do not foresee any risk of forced or child labour within their operations. PHCL also reinforced its zero-tolerance policy against forced and child labour and emphasized the critical importance of adhering to the updated clauses within the Supplier Code of Conduct and Sustainable Procurement Policy.

To further strengthen our commitment to responsible business practices, Piramal has established a robust grievance mechanism to allow workers, suppliers, and other stakeholders to report any concerns or violations related to labour practices. To date, there have been no complaints reported through this mechanism, affirming its effective operation and our commitment to addressing grievances promptly and transparently. Similarly, no complaints have been lodged under our whistleblower policy ([Link](#)), further demonstrating the strength and integrity of Piramal's internal reporting procedure.

### **Continual processes for ensuring the compliance**

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



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- Evaluating suppliers based on their policies and compliance with the Bill S211 act, as well as other regulatory requirements as notified during the time.
- Initiating activities aimed at conducting third-party assessments through the PSCI initiative to verify compliance and ensure the supply chain is free from child and forced labour.
- Implementing strategies to evaluate potential risks and develop diversification strategies for suppliers, aiming to reduce or eliminate the use of child labour and forced labour in the entire supply chain.
- PPL is implementing supplier training programs to educate suppliers about various risks, including the potential business implications associated with child or forced labour within their organizations and supply chains. Piramal is committed to this journey of continual improvement and will adhere to emerging rules and regulations in the various jurisdictions in which it and its subsidiaries operate.
- Piramal is determined for achieving excellence and has implemented third-party audit procedures for all its subsidiaries, including PHCL.
- PPL / PHCL may engage third-party auditors to conduct due diligence for carrying out the assessment team will also carry out due diligence on Bill S211 compliance.



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## Attestation of the Report

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

Full name : Don Liscombe  
Title : Vice President & Site Head (PHCL)  
Date : Day, Month, 2025

Signature, *Don Liscombe* Don Liscombe  
13 May 2025 18:39:55 (Z)

REASON: I am approving this document.

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

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



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## Reference and Links-

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



## Annexure – 1

PHCL Subsidiary of PPL (Page number 50 of the Annual Report) ([Link](#))

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

#### India:

##### Piramal Pharma Limited

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

#### Overseas:

##### Piramal Healthcare UK Limited

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

##### Piramal Healthcare (Canada) Limited

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

##### Piramal Critical Care Inc.

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

##### Piramal Pharma Solutions Inc.

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

##### Ash Stevens LLC

18655 Krause Street, Riverview, MI 48193, USA.

##### PEL Healthcare LLC

650 Cathill Rd, Sellersville, PA 18960, USA.



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## Annexure – 2

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

The screenshot displays the PSCI (Pharmaceutical Supply Chain Initiative) website. At the top left is the PSCI logo with the tagline "Building responsible supply chains". A navigation menu includes "ABOUT US", "WHAT WE DO", "NEWS", "RESOURCES", "EVENTS", and "CONTACT", along with a "LOGIN" button. Below the navigation, there are three bullet points: "Approved PSCI member companies are listed on the PSCI member company website.", "Members receive supply chain-related news on the Company's and government documents administered by PSCI.", and "Approved members of our Shared Audit Program, Audit Capabilities and Program." A red square icon is followed by the text "Upload a minimum of five supplier audits via our Shared Audit Program." Below this, it states "Members are invited and encouraged to run for a seat on our Board." The "MEMBERSHIP FEES" section explains that fees are tiered by company size and revenue, with a link to the "PSCI fee structure". A red bar labeled "FULL MEMBERS" is positioned above a grid of logos. The logos are arranged in a 10x3 grid. The logo for Piramal Pharma Limited is highlighted with a red border. The logos include: Abbott, Abbvie, acino, AstraZeneca, AUROBINDO, BASF, Baxter, Bayer, Boehringer Ingelheim, Bristol Myers Squibb, Catalent, CENTRIENT, Coloplast, Dr.Reddy's, Elanco, GRÜNENTHAL, GSK, HALCON, Johnson & Johnson, Kenvue, Lilly, Mallinckrodt Pharmaceuticals, MERCK, NOVARTIS, novo nordisk, ORION, Pfizer, Piramal Pharma Limited, Roche, and SANDOZ.

| FULL MEMBERS |  |  |
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## Annexure – 3

Registered corporation in Canada.

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|---|--|
| <b>Certificate of Amalgamation</b><br><i>Canada Business Corporations Act</i>   | <b>Certificat de fusion</b><br><i>Loi canadienne sur les sociétés par actions</i>  |
| <b>PIRAMAL HEALTHCARE (CANADA) LIMITED</b><br>Corporate name / Dénomination sociale   |  |
| <b>855150-2</b><br>Corporation number / Numéro de société   |  |
| I HEREBY CERTIFY that the above-named corporation resulted from an amalgamation, under section 185 of the <i>Canada Business Corporations Act</i> , of the corporations set out in the attached articles of amalgamation. | JE CERTIFIE que la société susmentionnée est issue d'une fusion, en vertu de l'article 185 de la <i>Loi canadienne sur les sociétés par actions</i> , des sociétés dont les dénominations apparaissent dans les statuts de fusion ci-joints. |
| <br><b>Marcie Girouard</b><br>Director / Directeur   |  |
| <b>2013-09-01</b><br>Date of Amalgamation (YYYY-MM-DD)<br>Date de fusion (AAAA-MM-JJ)   |  |



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## Annexure – 4

Training record from Piramal Learning University (Piramal's training and learning platform)

### Training Completion Record – PHCL

| Row Labels              | Dept Count | Dept Done  | Completion % |
|-------------------------|------------|------------|--------------|
| ADMINISTRATION          | 3          | 3          | 100%         |
| ANALYTICAL DEVELOPMENT  | 17         | 17         | 100%         |
| ANALYTICAL SERVICES     | 22         | 22         | 100%         |
| BUSINESS DEVELOPMENT    | 1          | 1          | 100%         |
| CTS                     | 4          | 4          | 100%         |
| EHS                     | 1          | 1          | 100%         |
| FINANCE                 | 4          | 4          | 100%         |
| HUMAN RESOURCES         | 2          | 2          | 100%         |
| MAINTENANCE/ENGINEERING | 10         | 10         | 100%         |
| OPERATIONS/PRODUCTION   | 36         | 36         | 100%         |
| Other                   | 1          | 1          | 100%         |
| PM DIRECTOR             | 1          | 1          | 100%         |
| PROJECT MANAGEMENT      | 6          | 6          | 100%         |
| PROPOSAL MANAGEMENT     | 1          | 1          | 100%         |
| QUALITY ASSURANCE       | 14         | 14         | 100%         |
| QUALITY CONTROL         | 25         | 25         | 100%         |
| RESEARCH & DEVELOPMENT  | 27         | 27         | 100%         |
| SUPPLY CHAIN            | 2          | 2          | 100%         |
| TECHNOLOGY TRANSFER     | 9          | 9          | 100%         |
| WAREHOUSE               | 12         | 12         | 100%         |
| <b>Grand Total</b>      | <b>198</b> | <b>198</b> | <b>100%</b>  |



