

ONESOURCE TAX POLICY

About OneSource

OneSource Specialty Pharma Limited (“OneSource”) is a pure-play specialty pharma Contract Development and Manufacturing Organisation (CDMO) with integrated, end-to-end capabilities across advanced technology platforms and therapeutic modalities. Incorporated in 2007, OneSource specialises in offering end-to-end solutions across biologics, drug-device combinations, sterile injectables, and oral technologies (soft gelatin capsules).

In FY25, pursuant to a Scheme of Arrangement, the identified CDMO business, Soft Gelatin business of Strides Pharma Science Limited and identified CDMO business of Steriscience Specialties Private Limited merged with OneSource and equity shares of OneSource were listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) (together “the Stock Exchanges”) on January 24, 2025.

With five state-of-the-art manufacturing facilities approved by global regulatory authorities and a global workforce of 1,700+ professionals, OneSource recognises its responsibility to pay the appropriate amount of taxes in each jurisdiction where it operates, in full compliance with the relevant local tax laws.

Purpose and Scope

This document aims to offer a comprehensive understanding of the tax principles followed by OneSource and entities that are controlled directly or indirectly by OneSource (collectively referred to as the "**OneSource Group**"). It outlines OneSource Group’s overall strategy for handling tax affairs and defines the tax framework that provides guidance to manage tax-related issues.

Tax Compliance

OneSource is committed to being fully compliant with tax laws, regulations, and rules in all jurisdictions where OneSource Group operates, ensuring timely filing of relevant tax returns and payment of applicable taxes. OneSource applies adequate professional care and judgment in managing tax compliance responsibilities, ensuring that these tasks are entrusted to qualified personnel and supported by robust processes and comprehensive documentation. OneSource leverages technology and automation wherever feasible to efficiently meet the growing complexity of global tax compliance requirements.

OneSource is also committed to adhering to international standards concerning transfer pricing, in line with the Base Erosion and Profit Shifting (BEPS) initiative. In this regard, OneSource ensures that all transactions within OneSource Group and between Related Parties (as defined by the Securities and

Exchanges Board of India (SEBI)) are conducted at arm's length and in compliance with the guidelines set forth by the Organisation for Economic Co-operation and Development (OECD) on international taxation. These transactions are reviewed at the appropriate levels of management to ensure strict adherence to tax policies.

Tax Risk Management

Given OneSource's global presence, tax risks may arise from the interpretation of tax laws and the volume of tax compliance obligations. These risks are further intensified by the dynamic nature of tax regulations and the frequent changes in the regulatory framework that impact both current and future business strategies. Tax risk is mitigated through the implementation of robust internal controls, continuous training, regular updates on tax knowledge, cross-functional collaboration, and alignment with business units to ensure ongoing compliance.

To mitigate and manage tax-related risks, OneSource focuses on optimising legal structures, enforcing robust tax governance, and implementing continuous monitoring of internal processes and controls mechanisms. In recognition of the dynamic nature of the tax environment, characterised by frequent amendments to applicable statutes, rules, and regulations, and the prevailing global emphasis on regulatory compliance and transparent financial reporting, OneSource proactively ensures that its policies and procedures remain duly aligned with evolving legal and regulatory requirements.

Tax Governance and Control

The tax governance framework is structured in alignment with OneSource corporate values, ensuring that tax practices support the organisation's commitment to integrity, competency and efficiency.

- **Integrity:** OneSource affirms its adherence to the highest standards of integrity in the conduct of its tax practices, ensuring that tax positions adopted and disclosures made are accurate, honest, and fair at the time of adoption or disclosure. The organisation is committed to maintaining transparency in tax reporting by appropriately presenting all significant tax matters within its financial statements in accordance with all applicable laws, regulations, and accounting standards, thereby reinforcing and safeguarding the trust and confidence of its stakeholder.
- **Competency:** By embedding competency as a core element of tax governance framework, OneSource aims to ensure that its tax compliance related responsibilities and decisions as well as tax risks are managed with highest level of expertise and diligence, ultimately contributing to transparency, integrity and accountability.
- **Efficiency:** OneSource affirms that efficiency, coupled with adherence to ethical standards, constitutes a fundamental principle of effective tax management. OneSource's tax policies are

designed to promote transparency, ensure compliance with applicable laws and regulations, mitigate tax related risks, and optimise tax outcomes through lawful and prudent practices.

OneSource's tax processes are governed by internal controls set by the Internal Audit Function, in alignment with established accounting and reporting standards. Additionally, external auditors assess the adequacy and effectiveness of these controls and procedures in accordance with relevant auditing requirements. OneSource Group's tax team consists of qualified professionals possessing requisite training, expertise, and experience to perform their responsibilities effectively. As part of the tax team's workflow, the team collaborates closely with various functional departments to gain a thorough understanding of operating models, key value drivers, and associated risks.

This Tax Policy has been duly approved by the Audit Committee and the Board of Directors on 23 July 2026 and 24 July 2026 respectively and shall remain in effect until amended, modified superseded by subsequent resolution. The primary objective of this Policy is to ensure that all tax matters of OneSource Group are conducted with integrity and transparency, in adherence with applicable laws and regulations, thereby providing assurance and reinforcing confidence to all stakeholders.

Tax Planning and Incentives

OneSource aims to achieve an optimal tax position for OneSource Group. This does not mean the lowest tax result possible in the short term, rather the optimal tax result taking into account sustainability and continuity of the positions taken over the longer term. In furtherance of this objective, OneSource Group shall lawfully avail itself of tax reliefs and incentives provided under applicable laws and double taxation treaties. Where such measures are consistent with OneSource Group's business operations, OneSource shall seek to utilise government-sponsored tax benefits strictly in accordance with the intended policy objectives of the respective authorities.

The tax planning at OneSource is closely integrated with its overall business and investment strategies, aiming to enhance stakeholder value. OneSource Group is committed to using only commercially substantive business structures and ensuring full compliance with applicable tax regulations. OneSource Group upholds its responsibility to pay taxes in the jurisdictions where it creates value.

In line with its commitment to ethical corporate conduct and as a responsible multinational enterprise, OneSource Group expressly prohibits any involvement in tax evasion or fraudulent tax practices. As a responsible corporate citizen, OneSource does not engage in tax evasion or tax fraudulent practices. In case of OneSource Group being present in low-tax jurisdictions, OneSource endeavors to not use these jurisdictions as an avenue to avoid tax or transfer value on activities conducted elsewhere.

Tax Authorities

OneSource Group affirms its commitment to fostering transparent and cooperative relationships with tax authorities in all jurisdictions in which it conducts business. Such interactions shall be grounded in principles of mutual trust, good faith, and a recognition of tax authorities as key stakeholders within the broader business environment.

OneSource Group affirms its commitment to engage with tax administrations in a forward-looking and solution-oriented manner, with the objective of maintaining transparent communication and fostering long-term, constructive relationships. In circumstances where differing interpretations of applicable tax laws may arise, OneSource Group shall endeavor to resolve such matters through early and meaningful dialogue, with a view to achieving balanced and timely outcomes. To ensure the effective management of tax risks, OneSource Group has instituted periodic review mechanisms and established robust internal processes designed to facilitate continuous monitoring and assessment of tax positions in compliance with applicable legal and regulatory requirements.