

BUSINESS RESPONSIBILITY POLICY

1. Introduction:

Suvidhaa Infoserve Limited (the “Company”) is a public limited company incorporated on 22nd June, 2007 under the Companies Act, 1956 having CIN: U72900GJ2007PLC109642.

The equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Ltd and as such the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') are applicable and binding on it.

2. Scope and Purpose:

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been in line with the requirements of Regulation 34(2)(f) and other applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 based on the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs and is intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

3. Applicability:

As per the list of Top 1000 Listed Companies based on the Market Capitalization as on 31st March, 2021, the Company is covered under the same and hence, the Company is required to formulate policy on Business Responsibility Reporting, which shall be implemented during the F.Y. 2021-22 and the compliance of the same shall be reported in the Annual Report of F.Y. 2021-22.

This policy shall be applicable to the Company with effect from F.Y. 2021-22.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on _____.

4. Implementation:

The Managing Director, Chief Financial Officer and Company Secretary of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels. Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy. Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

Principle 1: Ethics, Transparency & Accountability

The Company is committed for conducting its business in accordance with the applicable laws, rules and regulations and with highest standards of business ethics. The Company has in place the Code of Conduct (“Code”) for its Directors and Senior Management Personnel.

This Policy is intended to provide guidance and help in recognizing and dealing with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability. The objective is to ensure the highest standards of ethical conduct, transparency and accountability while dealing with the stakeholders.

Policy:

1. The company shall develop necessary governance structures, procedures and practices to ensure ethical conduct at all levels; and to promote the adoption of this principle across the value chain.
2. The Company shall assure access to information about its decisions that impact relevant stakeholders.
3. The company shall not engage in practices that are abusive, corrupt, or anti-competition.
4. The company shall truthfully discharge its responsibility on financial and other mandatory disclosures timely.
5. The company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
6. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
7. The Company shall report on the status of adoption of these Guidelines, as necessary.

Principle 2: Business Lifecycle Sustainability

Policy:

1. The company shall assure safety and optimal use of resources over the business lifecycle and ensure that everyone connected with it are aware of their responsibilities.
2. The company shall work with such members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment.
3. The company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services.
4. The company shall continue to recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
5. In designing the products/services, the company shall ensure that the processes and technologies required to produce it are resource efficient and sustainable.
6. The company shall raise the consumer's awareness of their rights through education, product labelling, appropriate and helpful marketing communication, full details of contents and composition as per the applicable laws and promotion of safe usage and disposal of their products and services.
7. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
8. The Company shall regularly review and improve upon the technological advancement & commercialization of, incorporating Social, Ethical & Environmental consideration.

Principle 3: Employees Wellbeing

The Company is committed to professional development and growth of employees through selecting the right candidate for right job, monitoring performance for optimum utilization of their potential, providing growth opportunities and creating the culture of mutual faith and accountability.

The policies, procedures and practices in the Company are aligned to meet employee's well-being, diversity, non-discrimination, safety and health so as to have a healthy, cordial and harmonious relationships and value enhancement at all levels.

Policy:

1. The Company shall provide & maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
2. The Company shall Respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
3. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
4. The Company shall take cognizance of the work-life balance of its employees, especially that of women.
5. The Company shall provide facilities for the wellbeing of the employees including those with special needs and Ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
6. The company would provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. The Company shall create awareness of these provisions to the employees and training them on a regular basis.
7. The Company would ensure continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and nondiscriminatory basis and promote employee morale and career development through enlightened human resource interventions.
8. The company shall implement necessary systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Principle 4: Stakeholder Engagement

The Company gives utmost importance to the healthy engagement with its various stakeholders like employees, suppliers, stockists, dealers, customers, shareholders / investors, communities surrounding the operations and government / regulatory authorities.

Policy:

1. The Company would systematically identify stakeholders, understand their concerns, define the purpose and scope of engagement, and commitment to engage with them.
2. The company would acknowledge responsibility and be transparent about the impact of the policies, decisions, product & services and associated operations on the stakeholders.
3. The Company would give special attention to stakeholders in areas that are underdeveloped.
4. The Company would resolve differences with stakeholders in a just, fair and equitable manner.

Principle 5: Human Rights

The Company believes that human rights are fundamental, inherent, universal, indivisible and interdependent in nature and hence, continuously strive to ensure that employees' basic human rights are protected.

Policy:

1. The Company will observe that basic human rights of the employees are respected, valued and protected keeping in mind the Constitution of India, Laws, Policies of Human Rights and accordingly, formulate all policies, practices, procedures and rules of the Company.
2. The Company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
3. The Company recognizes and respects the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
4. The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
5. The Company will ensure that each employee is made aware of their basic rights and redressal mechanisms.
6. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 6: Environmental Protection

Policy:

1. The company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
2. The Company shall take measures to check and prevent pollution and assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
3. The company shall continuously seek to improve environmental performance by adopting such methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
4. The company shall develop Environment Management Systems and contingency plans and processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.

Principle 7: Responsible Advocacy

The Company believes that to protect overall interest of its business and the diverse stakeholders, the Company has to express its fair views, opinions, representations, concerns etc on the policies framed by the competent authorities. The Company may either itself or through various association/forums/chambers make such representations etc before the competent authorities. The Company's engagement with the relevant association/forums/chambers etc is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

Policy:

1. The Company will make reasonable efforts to ensure that its advocacy positions are consistent with the principles and core elements enhancing business responsibility and transparency.
2. The Company may, in the best interest of all stakeholders, provide inputs in policy making decisions to various governmental authorities and agencies which concern the business and as well as the society in general, either directly or through the trade and industry chambers and such other collective platforms.

Principle 8: Inclusive growth and equitable development

The Company has in place a Corporate Social Responsibility Policy which encompasses guidelines and mechanism for undertaking socially relevant programs for welfare and sustainable development of the community at large. The same was framed as per the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility) Rules, 2014 and is carrying out various CSR Activities in accordance with the Schedule VII to the Companies Act, 2013.

Policy:

1. Identification of the impact of the Company's operations on social and economic development and to minimize the negative impacts, if any on the same.
2. Innovation and investment in products, technologies and processes on continuous basis for the overall wellbeing of the society.
3. The Company endeavors to undertake various community development activities at local and national level and to ensure that appropriate mechanism for resettlement and rehabilitation of communities who have been displaced due to business operations are in place.
4. The Company will endeavor to give priority to the regions that are underdeveloped near the business operations of the Company.

Principle 9: Customer Value

Customers are one of the most important stakeholders. The foundation of the Company is based on the trust, satisfaction and loyalty of our consumers across the world.

Policy:

1. The Company, while serving the needs of their customers, will take into account the overall well-being of the customers and that of society.
2. The Company will ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products/services.
3. The Company will disclose all information truthfully and factually, through labelling and other means, including the risks to the individual, to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, the Company shall also educate their customers on the safe and responsible usage of their products and services.
4. The Company will promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
5. The Company will exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
6. The Company will provide adequate grievance handling mechanisms to address customer concerns and feedback.

5. Policy Amendments:

Any subsequent amendment / modification in the Listing Regulations, NVGs and/or other laws in this regard shall automatically apply to this Policy. The same shall be added / amended / modified from time to time as authorized by the Board of Directors.

6. Website:

This Policy shall be disclosed on the website of the Company.