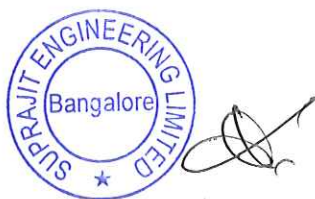


BUSINESS RESPONSIBILITY POLICY

SUPRAJIT ENGINEERING LIMITED



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A. BACKGROUND, SCOPE , PURPOSE AND EFFECTIVE DATE

Securities Exchange Board of India (SEBI) on 2nd September, 2015 has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) effective from 1st December, 2015.

On 22nd December, 2015, SEBI notified SEBI (Listing Obligations and Disclosure Requirements) (Amendments) Regulations, 2015 to be effective from 1st April, 2016. Vide this notification, SEBI amended Regulation 34 of the Listing Regulations, thereby requiring top five hundred listed companies (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report.

Suprajit Engineering Limited (the “Company”) being one of the top five hundred listed companies as per the criteria mentioned above, the Company has approved and adopted this Business Responsibility Policy (the “Policy”) at its meeting held on May 29, 2018, being the effective date of the Policy .

This Policy is based on principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of a Business published by the Ministry of Corporate Affairs, towards conducting business by a company.

The key objective of this Policy is to ensure a unified and common approach to the dimensions of Business Responsibility and act as a strategic driver that will help Suprajit respond to the complexities and challenges that keep emerging and be abreast with changes in regulations.

The Policy is applicable to all Directors and Employees of the Company.

B. DEFINITIONS

- a. “Board” shall mean Board of Directors of the Company.
- b. “Companies Act” shall mean the Companies Act, 2013 and Rules there under, notified by the Ministry of Corporate Affairs, Government of India, as amended.
- c. “Listed Entity / Company” shall mean Suprajit Engineering Limited.
- d. “Policy” means Business Responsibility Policy.
- e. “Regulations” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as notified by the SEBI, as amended from time to time.
- f. “Stock Exchange” shall mean a recognized Stock Exchange as defined under clause (f) of Section 2 of the Securities Contracts (regulation) Act, 1956.



C. RESPONSIBILITY

The Managing Director of the Company shall be responsible for the implementation of the Policy. The Managing Director may take support of such functional heads and internal and external experts, which he may deem fit, for the effective implementation of the Policy. Foreign subsidiaries of the Company shall participate in the Policy to the possible required under the laws of the country of their operation.

D. POLICY

The Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. Company's Business practices would therefore be governed by the following guiding principles.

Principle 1:

Ethics, Transparency & Accountability

The Company has always believed that a strong ethical corporate citizenship and establishment of good corporate culture in business is key to the success of the Company. The Company trusts adhering to the best governance practices to ensure protection of interests of all stakeholders who are directly or indirectly associated with the Company is equally important with healthy growth of the Company.

The Company shall:

1. Develop governance structures, procedures and practices that ensure ethical conduct at all levels across its value chain.
2. To the extent possible communicate transparently and assure access to information about their decisions that impact relevant stakeholders.
3. Not engage in practices that are abusive, corrupt, or anti-competition.
4. Truthfully discharge its responsibility on making financial and other mandatory disclosures timely.
5. Encourage its business partners and third parties with whom it conducts business to abide by this policy to the extent possible.

Principle 2: Product Lifecycle Sustainability

The Company's actions to embed the principles of sustainability, to the extent possible, into the various stages of product life cycle including procurement of raw material, manufacturing and disposal by consumers to improve the quality of life of the products.



The Company shall:

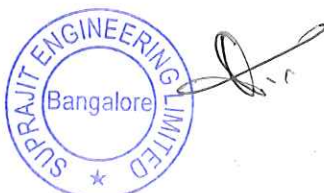
1. Assure safety and optimal resource use over the life-cycle of the product – from design to disposal – and ensure that everyone connected with it- designers, producers, value chain members, customers and recyclers are aware of their responsibilities.
2. Raise the consumer's awareness of their rights through education, product labeling, appropriate and helpful marketing communication, full details of contents and composition and promotion of safe usage and disposal of their products and services.
3. In designing the product, ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
4. Regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
5. Recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.
6. Recognize that over-consumption results in unsustainable exploitation of resources, and should therefore be promoted sustainable consumption, including recycling of resources, wherever possible.

Principle 3: Employee Well Being

The Company focuses on ensuring the well-being of all of its employees. The safety and health of employees is extremely important to the Company. Ensuring diversity, preventing discrimination, safety and health are part of Company's Code of Conduct. The Company has under taken various measures for safety of employees/ workers in the work place.

The Company shall:

1. Provide access to appropriate grievance redressal mechanisms to the employees.
2. Provide and 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.
3. Not use child labour, forced labour or any form of involuntary labour, paid or unpaid and shall take cognizance of the work-life balance of its employees, especially that of women.
4. Provide facilities for the wellbeing of its employees including those with special needs and should ensure timely payment of fair living wages to meet basic needs and economic security of the employees.



5. Provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees and communicate this provision to their employees and train them on a regular basis. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.
6. Ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis and shall promote employee morale and career development through progressive human resource interventions.

Principle 4: Stakeholder Engagement

The Company recognizes employees, vendors, customers, shareholders/investors and communities surrounding the operations and regulatory authorities as key stakeholders. The company continues its engagement with them through various mechanisms with a view to safeguard their interest in all possible ways.

The Company shall:

1. Identify its stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them
2. Acknowledge assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders and shall willing to give attention to stakeholders in areas that are underdeveloped.
3. Resolve differences with stakeholders, if any in a just, fair and equitable manner.

Principle 5: Human Rights

The Company respects and promotes human rights for all individuals. The company's commitment to human rights and fair treatment is set in its Code of Conduct. The Code provides to conduct the operations with honesty, integrity and openness with respect for human rights and interests of employees.

The Company shall:

1. Businesses should understand the human rights content of the Constitution of India, national laws and policies and the content of International Bill of Human Rights. Businesses should appreciate that human rights are inherent, universal, indivisible and interdependent in nature.
2. Businesses should 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. Businesses should recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers
4. Businesses should, within their sphere of influence, promote the awareness and realization of human rights across their value chain and there shall not be any complicit with human rights abuses by a third party.

Principle 6: Protection of Environment

The Company places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. The Company sets high standards in the area of environmental responsibility. The Company believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for future generations.

The Company shall:

1. 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. Take measures to check and prevent pollution. They should assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
3. Ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
4. Continuously seek to improve their environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
5. Develop environment management systems and contingency plans and processes that helps in preventing, mitigating and controlling environmental damages which may be caused due to its operations.
6. Proactively persuade and support its value chain to adopt this principle.

Principle 7: Responsible Advocacy

The Company believes that to maintain a healthy relation with Government, semi government, trade bodies and regulators is important to create positive environment. The Company has always strived to create a positive impact in the business eco-system and communities by practicing pro-active advocacy not for securing certain benefits for industry, but for advocating certain best practices for the benefit of society at large. The Company engages with industry bodies and associations to influence public and regulatory policy in a responsible manner.



The Company shall:

1. While pursuing policy advocacy, must ensure that their advocacy positions are consistent with the Principles and Core Elements contained in these Guidelines.
2. To the extent possible, utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy

Principle 8: Inclusive Growth & Equitable Development

The Company in compliance with Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, has adopted a CSR policy. The Company through its CSR wing i.e. Suprajit Foundation is being actively participating in CSR activities and contributing in the field of education, healthcare, rural development, etc.

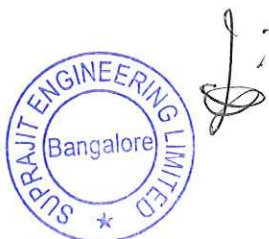
The Company shall:

1. The Company shall understand its impact on social and economic development, and respond through appropriate action to minimize the negative impacts.
2. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
3. The locations of operations of the Company in the regions that are underdeveloped shall be sensitive to local concerns.

Principle 9: Customer Value

The Company is a customer centric company and the foundation of the company is based on the trust, satisfaction and loyalty of the customers across the world. The Company has cultivated a customer oriented values in all the units and every employee understand such value.

1. The Company, while serving the needs of their customers, should take into account the overall well-being of the customers and that of society.
2. The Company shall ensure that it do not restrict the freedom of choice and free competition in any manner while designing and promoting its products.
3. The Company shall disclose all information truthfully and factually wherever required.
4. The Company shall promote and advertise its products in ways that do not mislead or confuse the consumers or violate any of the principles in these guidelines.
5. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.



E. IMPLEMENTATION

1. The policy shall be displayed on the Company's website.
2. The Company Secretary, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
3. Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis.
4. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.

F. DISCLOSURES

The Business Responsibility Policy shall be disclosed in the Annual Report and on the website of the Company i.e. at www.suprajit.com.

G. REVIEW / AMENDMENT:

This Policy would be subject to modification in accordance with the guidelines / clarifications as may be issued from time to time by relevant statutory and regulatory authorities. The Board may modify, add, delete or amend any of the provisions of this Policy. Any exceptions to the Business Responsibility Policy must be consistent with the Regulations and must be approved in the manner as may be decided by the Board of Directors.



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