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# Corporate Social Responsibility

Suprajit ensures fulfilment of Environmental, Social and Governance obligations to compliment UN Sustainable Development goals.



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Managing Director and Group CEO  
Date: 02.01.2023

## Preface

Organization Sustainability Declaration sets out the standards and behaviors we require from our self & our suppliers and their suppliers to improve conditions for workers and promote a cleaner environment for local communities.

We expect Suprajit Employees & its suppliers providing products, components, parts, sub-assemblies, materials, packaging, services, or solutions to comply with this Organization Sustainability Development program.



Scope: This is the Apex Policy issued by Suprajit Top Management to be adhered to by all stake holders, Employees and Supply chain partners. Complying to Country Specific rules and regulations. The same is to be managed and monitored by Respective Plants Head.

## ***VISION***

To be a globally competitive manufacturer of engineered products and sub-systems in terms of Quality, Cost, Delivery & Development.

To supply customers globally, by leveraging current competence, opportunities, expansions, and acquisitions

## ***MISSION***

Suprajit is a global supplier of engineered products and sub-systems serving the Customers.

We utilize our Engineering & Material expertise, proprietary technology, manufacturing skill, distribution flexibility & marketing power to deliver products & services of value to our customers.

We are focused on the globalization of our teams, products & processes to bring greater opportunities for our customers, employees, and value to our constituents.

## ***CORE VALUES***

Suprajit's constant commitment to Organizational values

### People:

We at Suprajit respect each other, provide leadership & direction to realize potential & involve employees in the success of the Organization. Build reliability, belongingness, mutual trust & positive relationships. We will train them for skill development.

### Lean Approach

Suprajit ensure elimination wastes by practicing Lean Manufacturing principles.

### Innovation

Suprajit challenges conventional practices, explore new technologies and implement new ideas.

### Partnership

Suprajit partners with Customers, Employees and Suppliers for mutual growth.

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## **A. Labor**

Organization is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

### **1. Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment.

### **2. Young Workers**

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15 ( Or as per County Specific Rules), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers as per Country specific rules) shall not perform work that is likely to jeopardize the health or safety of young workers, including night shifts and overtime. Organization shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Organization shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

### **3. Women Workers**

Nondiscrimination and Sexual harassment Policy systems addressed in Plants HR Manual based on Relevant country specific Legal requirements related to women employees have been established at all plants of suprajit. Woman employees are entitled to Maternity Leave in accordance with Provision of Maternity benefit act of respective countries,

The Company has in place a Sexual Harassment Policy in line with the requirements of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act Grievance committee

#### **4. Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, reduced turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, workers shall be allowed at least one day off every seven days and a workweek should not be more than 60 hours per week or as per the local Rules whichever is less, including overtime, except in emergency or unusual situations.

#### **5. Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Suprajit is committed to the "Pay equals time worked principle." Every individual who has been employed for the work which is allotted to him should be given sufficient pay as that of the others. There should not be any discrimination in the payment of wages for the same work between males and females, contract employee and company employee. The payment cycle will begin on the first day of his/her joining and we are committed to giving him/her salary during his training period too.

#### **6. Humane Treatment**

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

#### **7. Non-Discrimination**

Organization should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.



## **8. Freedom of Association ( Social Dialogue)**

In conformance with local law, Suprajit respect the rights of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. Management does not interfere in the process by directly or indirectly conducting elections related to the formation, recognition, or governance of a trade union and shall not finance a trade union.

Management is committed to workers and/or their representatives being able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation, or harassment.

## **B. Health and Safety**

Organization recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Organization also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as ISO45001 OHSAS were used as references in preparing the Code and may be a useful source of additional information.

### **1. Occupational Safety**

Worker exposure to potential safety hazards (e.g., electrical, and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures, and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall be encouraged to raise safety concerns. Processes are Periodically evaluated to eliminate Unsafe conditions and Employees are trained for safe operation.

### **2. Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property. Periodic mock drills are conducted at plants to validate the preparedness for emergencies.

### **3. Occupational Injury and Illness (Incident and accident management)**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

### **4. Handling of Chemicals & Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control over exposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs. Material Storage and handling systems are derived based on the MSDS provided by Manufacturers and Employees are provided with appropriate PPEs consistent with the Hazard and Risk.

### **5. Physically Demanding Work (Workplace ergonomics)**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

### **6. Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

### **7. Sanitation & Food.**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Organization, or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress.

### **8. Health and Safety Communication**

Organization shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility. Safety committees formed at Plants to regularly evaluate the Controls provided.

## **9. PPE**

Personal protective equipment (PPE) requirement list to be made, supplied and used at work wherever there are risks to health and safety that cannot be adequately controlled in other ways. PPE must be considered in addition to all other control measures and should not be relied on as the only means of protection. PPE is 'all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects individuals against one or more risks to their health or safety.

## **10. Fire Protection**

Siren is provided in the plants shop floor and offices to raise alarm in case of fire occurrence.

Fire extinguishers are provided at prominent places logically determined locations, which is accessible. (Shown in the layout drawing) at respective plants. Fire Licenses have been provided across the plants complying to local legislation

Personnel trained in Emergency preparedness; periodic mock drills conducted at regular intervals to validate the competency of fire emergency handling.

Responsibility : All the people & fire safety / fighting team

# **C. Environmental**

Organization recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 are used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are:

### **1. Environmental Permits and Reporting**

All required environmental permits (e.g., discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

### **2. Pollution Prevention and Resource Reduction**

The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

### **3. Hazardous Substances**

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### **4. Wastewater and Solid Waste**

Organization shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Organization shall conduct routine monitoring of the performance of its wastewater treatment systems.

### **5. Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Organization shall conduct routine monitoring of the performance of its air emission control systems.

### **6. Materials Restrictions**

Organization is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

### **7. Storm Water Management**

Organization shall implement a systematic approach to prevent contamination of storm water runoff. Organization shall prevent illegal discharges and spills from entering storm drains.

### **8. Energy Consumption**

Energy consumption are to be tracked and documented, at the facility and/or corporate level. Organization is to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption.

Conservation of energy is one of the highest priority measures directly supervised by the senior management of the Company

The following energy conservation measures were implemented during the year under review.

- Monitoring and regular review of power consumption, maintaining the power factor value nearby 0.99 to reduce the reactive power losses.
- Up-gradation of the machine by using VFDs (Variable Frequency Drives) and TPRs (Thyristor Power Regulators) to increase the m/c efficiency and reduction of power consumption.
- The Company has installed plants has generated 2065834.2 units of solar power in 2022

Plants have started various initiative toward conservation of energy

- LED lamp to reduce power consumption.
- Automatic Water Level Controllers
- Electrical systems with individual controls, user can select fan, light etc.,
- Shop floors having roofing sheets with thermal vents on top of the roofing sheets
- Rainwater harvesting has been modified to facilitate bore well its re-generation

GREEN INITIATIVES: The Company has initiated a sustainability initiative with the aim of going green and minimizing our impact on the environment. Like the previous years, this year too, the Company is publishing only the statutory disclosures in the print version of the Annual Report.

***Suprajit's current Solar power plant installed capacity amount to reduction of 1,78,29,87,175 Kg CO2 equivalent per year at end of year 2022-23***

## **9. Compliance Obligation**

Suprajit Manufacturing plants maintain and monitor the compliance requirements and reports relevant authorities as per the stipulated frequency. Respective Plants Head ensure the timely reporting to relevant authorities fulfilling the Obligations.

## **D. Business Ethics**

To meet social responsibilities and to achieve success in the marketplace, Organization and their agents are to uphold the highest standards of ethics including:

### **1. Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Organization shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Organization's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

**Avoid Exploitation of Consumers:**

Suprajit Do not directly deal with consumers however if any such direct business Suprajit does not exploit consumer with measures such as artificial price rise and adulteration.

**Fulfil Customers' Expectations:**

Suprajit Adjust its business activities as per the demands, needs and expectations of the customers

**Optimum Utilization of Resources:**

Ensure optimum utilization of resources to remove poverty and to increase the Livelihood of people.

## **2.No Improper Advantage- Anti Bribery policy**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Ethics and code of Conduct Agreement signed with all employees appropriate monitoring system implemented at plants.

## **3.Disclosure of Information**

Information regarding Organization labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## **4.Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer information is to be safeguarded.

- a. In Suprajit our data-center is fully protected with firewall with high availability, so that it Can serve the business seamlessly.
- b. The data cannot be moved out of Suprajit network for any users until user has been authorized.
- c. Access to the storage devices has been restricted to approved users only.
- d. The data-center has been secured with proper access control for only unauthorized entry.
- e. Physical access to the server has been restricted to only for IT team members.
- f. Proper humidity alarm in place so that, whenever the server room temperature goes beyond set limit it raises an alarm to all the authorized persons.
- g. Data-center has two uninterrupted power sources at any given point of time with proper backup.
- h. Non Suprajit assets are not allowed to connect to Suprajit network.
- i. All plants of Suprajit are protected with proper firewalls.

## **5.Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information available at respective plants of Suprajit.

## **6. Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistle blowers are to be maintained, unless prohibited by law. Organization should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## **7. Responsible Sourcing of Minerals**

Organization shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Organization shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

## **8. Privacy & Confidentiality**

Organization is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Organization is to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **9. Counterfeit Parts**

To ensure and preclude the introduction of counterfeit product into our supply chain through strict avoidance, mitigation, and disposition processes.

- a). Purchase of Product - Suprajit purchases material, measuring equipment etc. from authorized manufacturers and suppliers and customer directed suppliers as per customer demand .
- b). Traceability of Product:- Suprajit maintains traceability of purchases from Suppliers, retaining the original purchase orders and other receiving documentation, including manufacturers' Certificate of Conformance where applicable for the required document retention periods.
- c). In case of Return of Product The disposition of any products returned by our customers will be identified, segregate. Any product that is deemed to be defective and not recoverable will be disposed of in accordance with the company procedure.
- d). Suprajit ensure use of authorized scrap merchants to ensure no defective product is returned to the supply chain and approved scrap vendor will be monitored case to case basis.
- e). Training All our employees involved in the purchasing of goods have been informed about the potential for Counterfeit, Fraudulent and Suspect Items, and advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels.

## **10. Trade controls & Economics sanctions**

Suprajit is committed to follow the applicable international trade control laws and regulation which include economic sanctions, customer requirements and export controls.

## **E. Management System**

Organization shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Organization's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

### **1. Company Commitment**

A corporate OHSAS and environmental responsibility policy statements affirming Organization's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

### **2. Management Accountability and Responsibility**

The Organization clearly identifies senior executive and company representative responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

### **3. Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

### **4. Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Organization's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### **5. Improvement Objectives**

Written performance objectives, targets and implementation plans to improve the Organization's social and environmental performance, including a periodic assessment of Organization's performance in achieving those objectives.



#### **6. Training and Development (Chairman's Club)**

Programs for training managers and workers to implement Organization's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements. Suprajit has established performance management system to develop Leaders through Systemic performance evaluation system. High Performers are encouraged by absorbing to Chairman's Club for Transform to perform initiative for Career progression in the group.

#### **7. Communication**

A process for communicating clear and accurate information about Organization's policies, practices, expectations and performance to workers, suppliers and customers.

#### **8. Worker Feedback and Participation**

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

#### **9. Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

#### **10. Corrective Action Process**

process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

#### **11. Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

## F. Supplier Responsibility & Conflict of interest

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

Suppliers needs to enter a formal documentation before engaging with Suprajit and need to ensure the compliance with the system defined.

Suppliers needs to adhere with Risk and supplier assessments conducted before awarding the business and close all the logical action items evidenced and projected during the Audit .

Comply with all laws, rules and government regulations that are applicable to the Company.

Maintain accurate business records, following best practice in all respects.

Maintain financial statements and accounts in a manner that are accurate and auditable.

Adhere all Legal and Statutory requirements on regular basis and need to adhere .

Supplier will be Audited regularly as per defined interval and all the action items will be closed logically .

Supplier will not engage child labor and need to adhere to all the Industrial labor acts enforced by legal authority's time to time

Supplier shall not disclose to any other person either during the continuance of this agreement and thereafter the specifications, drawings, designs

or process of manufacture of the Tooling and Commodity manufactured under this Agreement. SUPPLIER undertakes not to sell to any other person including a corporate entity, the Supplied components manufactured out of the Tooling under this Agreement.

Local law suppliers undertake to abide by all laws, regulations, rules, byelaws, notification etc. which may be applicable for the conduct of its business including the performance of its respective rights and obligations under this agreement.

WAIVER Any time, indulgence or concession granted by the COMPANY shall not alter

or invalidate this agreement or constitute waiver of any of its provisions. The failure or delay by the COMPANY in exercising any right or remedy

under this agreement shall not operate as waiver there of Supplier shall indemnify and keep indemnified the COMPANY against

all losses, actions, claims, damages, costs, suits which the COMPANY may suffer on account of the failure of SUPPLIER to comply with any provisions of this agreement.

Supplier code of conduct document issued by respective Plants Head and agreement is obtained from Suppliers as a token of their commitment to comply with sustainable development.

## **G. WHISTLE BLOWER POLICY**

### **Preface:**

The Company believes in the conduct of its affairs and its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior in consonance with the Code of Conduct and Ethics (attached). Any actual or potential violation of these Principles and the Group's Code of Conduct & ethics would be a matter of serious concern.

### **1. Objective:**

a. The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct in any form to come forward and express these concerns without fear of punishment or unfair treatment. The policy aims to provide an avenue for employees to raise concerns of any violations of legal or regulatory requirements, incorrect or misrepresentation of facts.

### **2. Policy:**

a. The Whistle Blower Policy intends to cover various concerns that could have significant impact on the operations and performance of the business of the Company.

b. The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation or be a route for raising malicious or unfounded allegations against colleagues.

### **3. Definitions**

a. Policy or Policies, refers to the "Whistle Blower Policy"

b. "Disciplinary Action" means any action that can be taken on the completion of / during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension, discharge from official duties or any such action as is deemed to be fit considering the gravity of the matter.

c. "Employee" means every employee of the Company.

d. "Protected Disclosure" means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

e. "Subject" means a person against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

f. "Whistle Blower" is someone who makes a Protected Disclosure under this Policy.

g. "Committee" means a committee of persons who is nominated/ appointed by the Compliance Officer to conduct detailed investigation.

h. "Company" means Suprajit

i. "Good Faith" An employee shall be deemed to be communicating in 'good faith' if there is a reasonable basis for communication of the alleged wrongful conduct. Good faith shall be deemed lacking when the employee does not have personal knowledge of or a factual basis for the communication or where the employee knew or reasonably should have known that the communication about the alleged wrongful conduct is malicious, false or frivolous.

j. The Company's Board of Directors will nominate a "Compliance Officer" (refer Annexure A), who will receive all complaints under this Policy and ensure appropriate action.

#### **4. Scope:**

a. Various stakeholders of the Company are eligible to make protected Disclosures under the policy.

These stakeholders may fall into any of the following broad categories:

i. Employees of the Company

ii. Employees of other agencies deployed for the Company's activities, whether working from any of the Company's offices or any other location

iii. Contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company

iv. Customers of the Company

v. Any other person having an association with the Company

vi. A person belonging to any of the above-mentioned categories can avail of the channel provided by this Policy for raising an issue covered under this Policy.

b. The unlawful or unethical or improper practice or act or activity (hereinafter referred to as an "alleged wrongful conduct") may include, but is not limited to, any of the following:

i. Abuse of authority;

ii. Breach of contract;

iii. Negligence causing substantial and specific danger to public health and safety;

iv. Manipulation of company data/records;

v. Financial irregularities, including fraud, or suspected fraud;

vi. Criminal offence;

vii. Pilferage of confidential/propriety information;

viii. Deliberate violation of law/regulation;

ix. Wastage/misappropriation of company funds/assets;

x. Any other unethical, biased, favored, imprudent event.

#### **5. The Guiding Principles**

a. To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

b. Ensure that the Whistle Blower and/or the person processing the Protected Disclosure, is not victimized for doing so;

c. Treat victimization as a serious matter including initiating disciplinary action on such person/(s);

d. Ensure complete confidentiality;

e. Not attempt to conceal evidence of the Protected Disclosure;

f. Take disciplinary action, if anyone destroys or conceals evidence of the Protected Disclosure made/to be made; and/or

g. Provide an opportunity of being heard to the persons involved especially to the Subject.

## **6. Anonymous Allegation**

- a. Whistle Blower must put his/her name to allegations. Concerns expressed anonymously WILL NOT BE investigated.

## **7. Roles, Rights and Responsibilities of Whistle Blowers**

- a. Whistle Blowers provide initial information based on a reasonable belief that alleged wrongful conduct has occurred. The motivation of a whistle blower is irrelevant to the consideration of the validity of the allegations. However, the intentional filing of a false report, whether orally or in writing is itself considered an alleged wrongful conduct, which the Committee has the right to act upon.
- b. Whistle Blowers shall refrain from obtaining evidence for which they do not have a right of access. Such improper access may itself be considered an alleged wrongful conduct.
- c. Whistle-Blowers have a responsibility to be candid with the members of the Designated Committee or others to whom they make a report of alleged improper activities and shall set forth all known information regarding any reported allegations.
- d. Whistle Blowers are “reporting parties,” not investigators. They are not to act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the investigating authority.
- e. The identity of the Whistle Blower will not be disclosed except where required under the law or for the purpose of the investigation. Should, however, the Whistle Blower self-disclose his or her identity, there will no longer be an obligation to maintain the confidentiality of the Whistle Blower’s identity.
- f. A Whistle Blower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation or any other misconduct or wrongdoing.
- g. This policy may not be used as a defense by an employee against whom an adverse personnel action has been taken for legitimate reasons or cause under Company rules and policies. It shall not be a violation of this policy to take adverse personnel action against an employee, whose conduct or performance warrants that action, separate and apart from that employee making a disclosure.

## **8. Management Action on False Disclosure**

- a. While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
- b. Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.
- c. Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable to be disciplined under the Policy and/or the Code of Conduct & Ethics.

## **9. Procedure for making a Disclosure**

- a. A Stakeholder (as defined in Clause 5) can make Protected Disclosure to the Compliance Officer, as soon as possible but not later than 90 consecutive days after becoming aware of the same.
- b. If initial inquiries by the Compliance Officer indicate that the concern has no basis, or it is not a matter to be investigation pursued under this Policy, it may be dismissed at this stage and the decision is documented.
- c. Where initial inquiries indicate that further investigation is necessary, this will be referred to the Committee, nominated for this purpose. The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt. A written report of the findings would be made.
- d. Name of the Whistle Blower shall not be disclosed to the Committee.

## **10. Accountabilities of the Committee**

- a. The Committee - which will:
  - i. Conduct the enquiry in a fair, unbiased manner;
  - ii. Ensure complete fact-finding;
  - iii. Maintain strict confidentiality;
  - iv. Decide on the findings of the investigation, whether an improper action has been committed and if so by whom;
  - v. Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures; and
  - vi. The Committee shall Minute the deliberations and document the final report of the investigation with the recommendations on the action to be taken to the Compliance Officer within 45 days of receipt of the protected disclosure.
- b. Compliance Officer will finalize the committee's findings and add his / her recommendation for the Board.

## **11. Rights of a Subject:**

- a. Subjects have right to be heard and the Committee must give adequate time and opportunity for the subject to communicate his/her say on the matter.
- b. Subjects have the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry/ investigation process, subject to any legal limitations and obligations of confidentiality.

## **12. Protection:**

- a). No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower. Complete protection will, therefore, be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behavior or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure, etc.
- b). The identity of the Whistle Blower shall be kept confidential.
- c). Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower.

## **13. Secrecy/Confidentiality**

The Whistle Blower, the Subject, the Committee, and everyone involved in the process shall:

- a. maintains complete confidentiality/ secrecy of the matter.
- b. does not discuss the matter in any informal/social gatherings/ meetings.
- c. discusses only to the extent or with the persons required for the purpose of completing the process and investigations.
- d. does not keep the papers unattended anywhere at any time.
- e. if anyone is found not complying with the above, he/ she shall be held liable for such disciplinary action as is considered fit.

## **14. Reporting**

- a. A report with number of complaints received under the Policy and their outcome shall be placed before the Board by the Compliance Officer.

## **15. Amendment**

- a. The Board of Directors of the Company has the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever.

## **H. CORPORATE SOCIAL RESPONSIBILITY(CSR):**

CSR Policy is available on the website of the Company at [www.suprajit.com](http://www.suprajit.com)  
(<http://suprajit.com/investors/compliance/policies-codes/>).

## COMMUNITY INVOLVEMENT AND DEVELOPMENT

### I. SUPRAJIT FOUNDATION

The Suprajit Foundation was established in 2011 as a not-for profit Trust to conduct social welfare activities. Over the years, the Foundation has initiated, guided, and conducted several programs in education, healthcare, and rural development.

honorary Trustees of the Foundation, who continue to devote their valuable time and energy in planning, directing, and monitoring its activities. Annual Report provides the summary of various services provided during the year.

Renovation of 40 anganwadies in and around Bommasandra Indl area, Narasapura Industrial area. Distribution of Dry Ration kits during covid 19 , distribution of bench and desks to various government schools, mid-day meal programme at Sukrupa a school for economically backward students, scholarship programme for economically backward students carried out during the year 2020-21

### 2. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

The Role of the CSR Committee shall include inter-alia the following:

- a. Formulate and recommend to the Board, a Corporate Social Responsibility Policy indicating the activities to be undertaken by the Company from time to time;
- b. Recommend the amount of expenditure to be incurred on the activities undertaken as specified in Schedule VII of the Companies Act, 2013 in India;
- c. Monitor the Corporate Social Responsibility Policy of the Company from time to time;
- d. Perform such functions as may be statutorily required by the CSR Committee;
- e. Other matters as may be assigned by the Board from time to time.

### References:

1. Grievance redressal Procedure
2. Procedure for Reporting Environmental Performance
3. Procedure for reporting Health and Safety System performance
4. Management Review of EMS Performance
5. Management Review of OHSMS Performance
6. Minutes of Meeting with Employees
7. Internal Audit Report on CSR
8. Annual Report on CSR
9. Procedure for compliance to obligations as applicable

Note: The above procedures are addressed in the respective Country Specific HR Manual/ Management systems maintained by the respective plants Head.



### Document version history

Month	Authors	Rev No & Date	Remarks
NOV 2015	RAG & SMH	00 / 05.11.2015	New launch
MAY 2018	Arun	01 / 18.05.2018	UPDATED OHSAS 18001 TO ISO45001
Mar 2021	Arun & Raviraj	02 / 16.03.2021	Updated in Privacy and Added Counterfeit parts, Intellectual property, Export controls and economic sanctions, Whistle blowing and protection against retaliation, Supplier responsibility & Conflicts of interest
June 2022	Arun Kumar B.K	03/ 01.06.2022	RBA Audit Corrective actions updated.
Jan 2023	Arunkumar B.K & K.K.Mallya	04/ 02.01.2023	Expanded on the global Perspective Referred to ISO 26000