



**SPACENET ENTERPRISES INDIA LIMITED**

**BUSINESS RESPONSIBILITY POLICY**

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### **1. PREAMBLE**

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been framed and adopted by the Board of Directors of the Company, in line with the requirements of Regulation 34 and other applicable provisions of the SEBI (Listing Obligations and Disclosure Requirement) Regulations 2015.

The business responsibility reporting requirement is in line with "National Voluntary Guidelines (NVGs) on Social, Environmental and Economic Responsibilities of Business" notified by Ministry of Corporate Affairs, Government of India, in July 2011. The key principles identified in the NVGs which are required to be reported by the entities include the areas such as environment, social, governance, stakeholder's relationships, etc.

This Policy lays down the Company's commitment to follow nine principles laid down in the NVGs published by the Ministry of Corporate Affairs towards conducting its business.

### **2. APPLICABILITY**

This Policy applies to all the employees of the Company.

### **3. KEY PRINCIPLES**

#### **Principle 1: To conduct and govern our Business with Ethics, Transparency and Accountability**

- (a) The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of its principle across its value chain.
- (b) The Company shall communicate transparently and assure access to information about its decisions that impact relevant stakeholders.
- (c) The Company shall not engage in practices that are abusive, corrupt, or anti-competition.
- (d) The Company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely.
- (e) The Company shall avoid complicity with the actions of any third party that violates any of the principles contained in this Policy.

#### **Principle 2: To provide goods and services that assure safety and contribute to sustainability throughout their life cycle**

- (a) The Company ensures safety and optimal use of resources while providing services, and also ensures that everyone connected with it, value chain members, customers and recyclers are aware of their responsibilities.
- (b) The Company shall strive to consistently enhance its value proposition to the customers and adhere to its promised standards of service delivery.

- (c) The Company shall raise consumer awareness with regard to their rights, through education, appropriate and helpful marketing communication, full details of the contents and composition and promotion of services.
- (d) The Company shall ensure that the services consider resource efficiency and principles of sustainability.
- (e) Conducting regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- (f) The Company shall recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
- (g) The Company shall recognize that over-consumption results in unsustainable exploitation of our planet's resources, and therefore to promote sustainable consumption, including recycling of resources.

**Principle 3: To promote the wellbeing of all employees**

- (a) The Company shall respecting the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
- (b) The Company shall 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.
- (c) The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- (d) The Company shall take cognizance of the work-life balance of its employees.
- (e) The Company shall provide facilities for the wellbeing of the employees including those with special needs ensuring timely payment of fair living wages to meet basic needs and economic security of the employees.
- (f) The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees. Business should communicate this provision to their employees and strive to train them on a regular basis.
- (g) The Company shall ensure continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and non- discriminatory basis.
- (h) The Company shall promote employee morale and career development through enlightened human resource interventions.
- (i) The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

**Principle 4: To respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized,**

- (a) The Company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.

- (b) The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the Stakeholders.
- (c) The Company shall give special attention to stakeholders in areas that are underdeveloped.
- (d) The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

**Principle 5: To respect and promote human rights**

- (a) The Company shall understand the human rights content of the Constitution of India, national laws and policies. It shall appreciate that human rights are inherent, universal, indivisible and interdependent in nature.
- (b) 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.
- (c) The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, customers and vulnerable and marginalized groups.
- (d) The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.
- (e) The Company should not be complicit with human rights abuses by a third party

**Principle 6: To respect, protect, and make efforts to restore the environment**

- (a) 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.
- (b) The Company shall take measures to check and prevent pollution and assessing the environmental damage and bearing the cost of pollution abatement with due regard to public interest, wherever possible.
- (c) The Company shall ensure that, benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- (d) The Company shall continuously seek to improve environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- (e) The Company shall develop Environment Management Systems (EMS) and contingency plans and processes that help in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to our operations or that of a member of our value chain.
- (f) The Company shall report environmental performance, including the assessment of potential environmental risks associated with the operations, to the stakeholders in a fair and transparent manner.
- (g) The Company shall proactively persuading and supporting the value chain to adopt this policy.

**Principle 7: To behave responsibly when involved in influencing public and regulatory policy**

- The Company shall ensure that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.
- Utilizing to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.

**Principle 8: To support inclusive growth and equitable development**

- The Company should understand their impact on social and economic development, and respond through appropriate action to minimise the negative impacts.
- The Company should innovate and invest in products, technologies and processes that promote the wellbeing of society.
- The Company should make efforts to complement and support the development priorities at local and national levels, and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
- The Company operating in regions that are underdeveloped should be especially sensitive to local concerns.

**Principle 9: To engage with and provide value to our customers and consumers in a responsible manner**

- Company, while serving the needs of their customers, should take into account the overall well-being of the customers and that of society.
- The Company should ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
- The Company should 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, Company should also educate their customers on the safe and responsible usage of their products and services.
- The Company should promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in the Guidelines.
- The Company should exercise due care and caution while providing services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- The Company should provide adequate grievance handling mechanisms to address customer concerns and feedback.

#### **4. IMPLEMENTATION**

- The Chief Executive Officer/Managing director/Whole-Time Director/Executive Director, of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- Any grievances/ complaints with respect to violation of the policy shall be reported to the Compliance Officer of the Company.

#### **5. REVIEW**

- The Board or such other person / committee authorized by the Board/Managing Director/CEO may review the Policy from time to time as may be required, subject, however, to the condition that such alterations shall not be inconsistent with any provision of any law for the time being in changes, if any, shall be effective only upon approval by the Board.