

INDEX

S No.	Particulars	Page No.
1.	Policy No. 1- Ethics, Transparency & Accountability	1
2.	Policy No. 2- Product Lifecycle Sustainability	1-2
3.	Policy No. 3- Employee Well Being	3-4
4.	Policy No. 4- Stakeholder Engagement	4
5.	Policy No. 5- Human Rights	5
6.	Policy No. 6- Preservation of Environment	5-6
7.	Policy No. 7- Responsible Advocacy	6-7
8.	Policy No. 8- Inclusive Growth & Equitable Development	7
9.	Policy No. 9- Customer Value	7-8



Business Responsibility Policies

Policy 1: Ethics, Transparency & Accountability

Philosophy:

Shilpi lays a strong emphasis corporate citizenship and is an establishment of good corporate culture. It has always believed in adhering to the best governance practices to ensure protection of interests of all stakeholders of the Company in tandem with healthy growth of the Company.

Policy:

1. The company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels across its value chain.
2. The company shall assure access to information about its decisions that impact or affect the relevant stakeholders.
3. The company shall not engage in practices that are abusive, corrupt, or anticompetition.
4. The company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely and efficiently.
5. Every employee of the company shall abide by the values and the commitment to ethical business practices reflected in the company's Code of Conduct.
6. The company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
7. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, 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.

Policy 2: Product Lifecycle Sustainability

Philosophy:

Shilpi endeavours to embed the principles of sustainability, as far as practicable, into the various stages of product or service lifecycle including procurement of raw material / service, manufacturing of product or delivery of service, transportation of raw materials and finished goods, and disposal by consumers to improve the quality of life and people.

Policy:

1. The company shall ensure that its products and services comply with all applicable statutes and regulations;

2. The company shall work towards ensuring that all goods and services are procured, manufactured and delivered embedding the principles of labour practices, human rights, ethics, occupational health, safety and environment as defined in the company's policies namely;

- a. Code of Conduct
- b. Policy on Ethics, Transparency and Accountability
- c. Policy on Employee Well Being
- d. Policy on Human Rights
- e. Policy on Customer Value

3. The company shall work towards sourcing significant raw materials, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts ;

4. The company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services;

5. The company shall continue to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.

6. In designing the products, the company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.

7. The company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling of resources wherever possible ;

8. The company shall work with supply chain members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment ;

9. The Company shall encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming more sustainable.

10. The company shall work towards building capacity such that all the value chain partners, service providers including transporters and suppliers of significant raw materials, are sensitised and empowered to fulfil their roles and responsibilities towards sustainability ;

11. 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.

12. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, 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.



Policy 3: Employee Well Being

Philosophy:

Shilpi focuses on ensuring the well-being of all its employees. The safety and health of employees is extremely important to the Company. The company believes in giving the best services and assistance to ensure well being of its employees which is imperative to achieve a profitable growth. Ensuring diversity, preventing discrimination, safety and health are part of Shilpi's Code of Conduct.

Policy:

Diversity, Equal Opportunity, Freedom of Association

1. 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.
2. The company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.

Prevention of Child Labour/ Forced Labour and Harassment

3. The company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
4. The company shall ensure that no person below the age of eighteen years is employed in the workplace.
5. The company shall ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work.
6. The company shall provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment ;
7. The company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities

Employee Well Being:

8. The company shall strive to instil a sense of duty in every employee including those of service providers at the Company's premises, towards their personal safety, as well as that of their co-workers.
9. The company shall take cognizance of the work-life balance of its employees, especially that of women.
10. The company shall provide facilities for the wellbeing of its employees including those with special needs.
11. The company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
12. The company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.

13. The company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and nondiscriminatory basis. The company shall promote employee morale and career development through enlightened human resource interventions.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, through the Human Resource Department along with the Functional Heads of 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 Head- Human Resource Department on a regular basis.
4. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.

Policy 4: Stakeholder Engagement

Philosophy:

Shilpi recognises employees, business associates (network of suppliers, stockists and dealers), customers, shareholders/investors and communities surrounding our operations and regulatory authorities as key stakeholders. The company continues its engagement with them through various mechanisms such as consultations with local communities, supplier/vendor meets, customer/employee satisfaction surveys, investor forums, etc.

Policy:

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

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, 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.



Policy 5: Human Rights

Philosophy:

Shilpi 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.

Policy:

1. 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.
2. The company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
3. The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
4. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, through the Human Resource Department along with 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 Head Human Resources Department/ Head the Company Secretary.

Policy 6: Preservation of Environment

Philosophy:

The Company places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. Shilpi sets high standards in the area of environmental responsibility — striving for performance that does not merely comply with regulations but reduces environmental impacts. Shilpi believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for future generations.

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. The company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
3. 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.

4. The company shall 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. 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.
6. The company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
7. The company shall proactively persuade and support its value chain to adopt these principles.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, through the Human Resource Department along with 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 Head Human Resources Department/ Head the Company Secretary.

Policy 7: Responsible Advocacy

Philosophy:

Shilpi believes that a lot can be achieved the company it works together with the Government, legislators, trade bodies and regulators to create positive social and environmental outcomes. Shilpi 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. Shilpi engages with industry bodies and associations to influence public and regulatory policy in a responsible manner.

Policy:

1. The company shall work with industry organisations that are engaged in policy advocacy in a responsible manner;
2. The company shall ensure that policy advocacy is conducted ethically.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, through the Human Resource Department along with 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 Head Human Resources Department/ Head the Company Secretary.

Policy 8: Inclusive Growth & Equitable Development

Philosophy:

Shilpi has always believed to ensure protection of interests of all stakeholders of the Company in tandem with healthy growth of the Company. In compliance with section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, the company has adopted a CSR policy through which it undertakes the projects in accordance with Schedule VII of the Companies Act, 2013

Policy:

1. The company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
2. The company shall 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.
3. The company shall be sensitive to local concerns while operating in regions that are underdeveloped.
4. The company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR committee and as per the CSR policy of the company.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, through the Human Resource Department along with 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 Head Human Resources Department/ Head the Company Secretary.

Policy 9: Customer Value

Philosophy:

Foundation of the company is based on the trust, satisfaction and loyalty of our consumers located across the globe. Shilpi is dedicated to delivering products that draws attention of the customers and meets their expectations. Shilpi's products are the result of understanding consumers' expectations, through path breaking technology by combining generations of practical experience with a



continuous flow of new knowledge. Shilpi's innovative product pipeline to ensure sustainable growth over the years to come.

Policy:

1. The company shall take into account the overall satisfaction of its customers.
2. The company shall ensure that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its products.
3. The company shall disclose all information truthfully and factually as per applicable laws, through labelling and other means, including the risks to the individual and to the society from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner.
4. The company shall educate its customers on the safe and responsible usage of its products and services.
5. The company shall promote and advertise its products in ways that such promotions do not mislead or confuse the consumers.
6. The company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
7. The company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels.
2. The Managing Director, through the Human Resource Department along with 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 Head Human Resources Department/ Head the Company Secretary.