



BUSINESS RESPONSIBILITY POLICY

Contents

1. SCOPE & PURPOSE

This Business Responsibility Policy (Policy) is based on principles enunciated in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of a Business released 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 across the Company and act as a strategic driver that will help the Company 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.

2. DEFINITIONS

- a “**Board**” shall mean Board of Directors of the Company.
- b “**Companies Act**” shall mean the Companies Act, 2013 and Rules thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended.
- c “**Listed Entity / Company**” shall mean Capacit'e Infraprojects Limited.
- d “**Policy**” means Business Responsibility Policy.
- e “**Regulations**” shall mean the 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.

3. POLICY

The Company is committed to conduct all its operations, activities and initiatives in a responsible manner that entails efficient utilization of all resources and adoption of forward - looking strategies leading to financial and economic growth, minimizing the environmental footprint and maximizing social and community development, ultimately leading to stakeholder value creation.

This Policy reaffirms the Company's commitment to follow principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs towards conducting its business.

In view of the above, the Board of Directors of the Company (Board) approved this Policy at its meeting held on March 30, 2020.

Principal 1: To conduct and govern business with Ethics, Transparency and Accountability:

- i. The Company shall create necessary governance structures, procedures and practices to ensure ethical conduct at all levels and promote the adoption of this principle across its value chain.
- ii. The Company shall ensure access to information about its decisions to relevant stakeholders.
- iii. The Company shall not engage in practices that are abusive, corrupt, or anti-competition.
- iv. The Company shall truthfully discharge their responsibility on financial and other mandatory disclosures.

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- v. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct are reported in a responsible and confidential manner through its Vigil Mechanism.

Principal 2: To provide goods and services that assures safety and contributes to sustainability throughout their life cycle:

- i. The Company shall ensure that its products and services are manufactured / delivered through optimal use of resources.
- ii. The Company shall ensure that its products and services comply with all applicable laws.
- iii. The Company shall work towards safe and optimal utilization of resources over the life cycle of its products and services.
- iv. The Company shall raise the consumer's awareness with regard to their rights through education, product labelling, appropriate and helpful marketing communication, full details of contents and composition as per applicable laws and promotion of safe usage and disposal of their products and services.
- v. In designing the product, the Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
- vi. The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- vii. The Company shall recognize and respect the rights of people who may be owners of traditional knowledge and other forms of intellectual property.
- viii. The Company shall recognize that over-consumption results in unsustainable exploitation of our planet's resources, and therefore promote sustainable consumption, including recycling of resources.

Principal 3: Promote the well-being of all employees:

- i. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- ii. 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.
- iii. The Company shall not use child labour, forced labour or any form of Involuntary labour, paid or unpaid.
- iv. The Company shall take cognizance of the work-life balance of its employees.
- v. The Company shall provide facilities for the wellbeing of its employees including those with special needs.
- vi. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- vii. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.



- viii. 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.
- ix. The Company shall promote employee morale and career development through enlightened human resource interventions.
- x. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Principal 4: To respect the interest of, and be responsive towards all stakeholders specially those who are disadvantaged, vulnerable and marginalized:

- i. The Company shall understand the concerns of its stakeholders, define purpose and scope of engagement, and commit to engaging with them.
- ii. The Company shall acknowledge, assume responsibility and be transparent about the impact of the policies, decisions, product & services and associated operations on the stakeholders.
- iii. The Company shall give special attention to stakeholders in areas that are underdeveloped.
- iv. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

Principal 5: To respect and promote Human Rights:

- i. The Company shall integrate respect for the human rights in management systems, in particular through assessing and managing human rights impacts of operations and all those impacted by the business have access to grievance redressal mechanisms.
- ii. The Company shall recognize and respect the human rights of all relevant stakeholders including that of communities, consumers and vulnerable and marginalized groups.
- iii. The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.

Principal 6: To respect, protect and make efforts to restore the Environment:

- i. 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.
- ii. 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.
- iii. 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.
- iv. 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.
- v. 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 its operations or that of a member of its value chain.





- vi. The Company shall strive to report their environmental performance, including the assessment of potential environmental risks associated with the operations, to the stakeholders in a fair and transparent manner.

Principal 7: When engaged in influencing public and regulatory policy, the Company should do so in a responsible manner:

- i. The Company, while pursuing policy advocacy, shall ensure that advocacy positions are consistent with these Policies and Sub-policies.
- ii. To the extent possible, Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

Principal 8: To support inclusive growth and equitable development:

- i. The Company shall understand the impact of inclusive growth and equitable development on social and economic development, and respond through appropriate action to minimize the negative impacts.
- ii. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- iii. The Company shall undertake Corporate Social Responsibility (CSR) activities in accordance with the Schedule VII of the Companies Act, 2013 as per the recommendation of CSR Committee and in accordance with CSR Policy of the Company.
- iv. The Company shall be sensitive to the local concerns while operating in Region that are underdeveloped.

Principal 9: To engage with and provide value to their customers/ consumers in a responsible manner:

- i. The Company, while serving the needs of the customers, shall take into account the overall well-being of the customers and that of society.
- ii. The Company shall ensure that there is no restriction on the freedom of choice and free competition in any manner while designing, promoting and selling the products.
- iii. The Company shall disclose all information truthfully and factually, through labelling and other means, including the risks to the individual, to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, the Company shall also educate the customers on the safe and responsible usage of the products and services of the Company.
- iv. The Company shall promote and advertise the products in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- v. 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.
- vi. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.





4. DISCLOSURE & IMPLEMENTATION:

This Policy shall be appropriately communicated across all levels and shall be appropriately disclosed in the Annual Report and on the website of the Company i.e. at www.capacite.in

The Company shall ensure that all Principles are followed in compliance with all applicable laws.

The Company shall proactively persuade its business partners and third parties with whom it conducts business to abide by the principles contained in this Policy.

5. POLICY REVIEW AND AMENDMENTS:

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.

This policy is also supported by a series of existing policies, and the principles set out in this document are reflected in the existing policies and would be reflected in such other new policies that would be put in place from time to time, as relevant.

**For and on behalf of
CAPACIT'E INFRAPROJECTS LIMITED**

Rohit Ramnath Katyal
Executive Director & CFO
DIN: 00252944



Date: March 30, 2020
Place Mumbai