



SUNFLAG IRON AND STEEL COMPANY LIMITED

BUSINESS RESPONSIBILITY AND SUSTAINABILITY POLICY

1. Introduction

Sunflag Iron and Steel Company Limited (“The Company”) is a public limited listed Company, limited by shares having CIN: L27100MH1984PLC034003. The equity shares of the Company are listed on Bombay Stock Exchange (“BSE”) and National Stock Exchange (“NSE”). The Company produces high quality Special Steels and is one of the largest suppliers in Flat Bars, Round Bars, Bright Bars and Wire Rods of Alloy Steel, Spring Steel, Clean Steel and Stainless Steel globally. The manufacturing units of the Company are situated at Warthi, Bhandara Road in the state of Maharashtra.

This Policy has been formulated by the Board of Directors of the Company on 13th August, 2020 and subsequently modified at its meeting held on 7th February, 2023 and shall be disclosed on the website of the Company.

2. Purpose of the Policy

The Company recognizes that its accountability is not limited only to its investors and various business stakeholders from financial perspective but also to the society at large covering environmental, social and governance aspects. Accordingly, this Policy on Business Responsibility and Sustainability lays down the broad principles to guide the Company in delivering its various responsibilities to its stakeholders and the society. The Policy is intended to ensure that the Company adopts responsible business practices in the interest of the society and environment to contribute beyond financial and operational performance. The Company is committed to high ethical standards, doing open and fair business, follow best practices of corporate governance and support the business reputation at the appropriate level. As one of India’s leading Company within the steel and related area, many of Company’s activities have the potential to impact on environment, both locally and globally. Whilst we have always sought to protect and where possible enhance environment, and have always worked within any relevant regulatory frameworks relating to environment, we recognise that we have a moral and social responsibility to do much more.



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3. Scope of the Policy

This Policy is formulated in accordance with Regulation 34 and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”). This Policy also reiterates the Company’s commitment to follow the nine principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs while conducting its business to the extent these are relevant. The policy is well aligned with Sustainable Development Goals covering environmental, social and governance aspects.

4. Implementation of the Policy

The Deputy Managing Director of the Company shall be responsible for the implementation of the Policy under overall supervision of Board of Directors. He may take support of such functional heads and internal and external experts, which he may deem fit, for the effective implementation of the Policy and may , if deem fit designate any officer of the Company as Chief Sustainability Officer (CSO) of the Company.

5. Principle wise Policies/Practices

The Company shall conduct its business practices/activities in alignment with the following Nine (9) Key Principles which are broadly based on the principles envisaged in the National Voluntary Guidelines in the interest of social set up, environment and governance:

Principle 1: The Company should conduct and govern itself with integrity and in a manner that is ethical, transparent and accountable.

- i. The Company should develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of this principle across its value chain.



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- ii. The Company should communicate transparently and assure access to information about its decisions that impact relevant stakeholders.
- iii. The Company should not engage in practices that are abusive, corrupt, or anticompetition.
- iv. The Company should truthfully discharge its responsibility on financial and other mandatory disclosures.
- v. The Company should report on the status of its adoption of these Guidelines as suggested in the reporting framework in this document.
- vi. The Company should avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.

Principle 2: The Company should provide products and services that contribute to sustainability throughout their life cycle and safe

- i. The Company should assure safety and optimal resource use over the lifecycle 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.
- ii. The Company should support environment sustainability with significant focus on excellence by continuously improving quality in all aspects of business to meet key customer expectations and drive environmental sustainability.
- iii. The Company shall ensure that its product strictly comply with all Statutory Regulations.



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- iv. In designing the products, the Company shall ensure that the manufacturing process and technologies required to produce it are resource efficient and sustainable.
- v. The Company is manufacturing high quality steel products including a wide range of Special Alloy and Stainless Steels. The Company has developed steel with high cleanliness, low gas and low inclusion content that are used in critical applications.
- vi. The Company shall make sure that the waste products generated during the process of manufacturing are re-cycled or the by-products generated are put to best possible use to safeguard the environment from over utilisation of resources and minimise the hazards.
- vii. The Company shall work towards safe and optimal resource use over the lifecycle of its products, including recycling of resources wherever possible.
- viii. 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.
- ix. The Company shall work with Supply Chain vendors that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health and safety and environment.
- x. The Company shall work towards building capacity such that all the value chain partners namely the third-party manufacturers, service providers including transporters and suppliers of significant raw materials are sensitised and empowered to fulfil their roles and responsibilities towards sustainability.



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- xi. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy.

Principle 3: The Company should respect and promote the well-being of all employees, including those in value chains.

- i. The Company respects the right to freedom of association, participation, collective bargaining and provides access to appropriate grievance Redressal mechanism.
- ii. The Company shall provide and ensure equal opportunities at the time of recruitment, during the course of employment irrespective of caste, creed, gender, race, religion, disability.
- 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 well-being of its employees including those with special needs.
- vi. The Company shall ensure fair, timely and transparent payment of fair living wages to sustain economic security of the employees without discrimination.
- vii. The Company shall strive to instil a sense of duty in every employee including those of the service providers at the Company's premises, towards their personal safety, as well as that of their co-workers and 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 upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. The Company shall promote employee morale and



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career development through enlightened human resource interventions.

- ix. 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: The Company should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

- i. The Company should systematically identify its stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them.
- ii. The Company should acknowledge, assume responsibility and be transparent about the impact of its policies, decisions, products and associated operations on the stakeholders.
- iii. The Company should give special attention to stakeholders in areas that are underdeveloped.
- iv. The Company should enable all stakeholders to benefit fairly from the value generated by the businesses, and resolve differences and grievances with stakeholders in a just, fair and equitable manner.
- v. The Company's Corporate Social Responsibility (CSR) policy that drives the initiatives undertaken by the Company towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders shall ensure the above principles.

Principle 5: The Company should respect and promote human rights

- i. The Company should implement the human rights content of the Constitution of India, national laws and policies.



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- ii. The Company should appreciate that human rights are inherent, universal, indivisible and interdependent in nature.
- iii. 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.
- iv. The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- v. The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- vi. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 6: The Company should respect, protect, and make efforts to restore the environment

- i. The Company should take measures to check and prevent pollution. The Company should assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- ii. The Company should minimize the overall environmental footprint through reduction in consumption of natural resources, pollution prevention, waste minimization, using renewable energy and reduction of carbon footprint etc. wherever possible.
- iii. The Company should strive to procure products or services from local- based suppliers and sub-contractors who comply



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with the local and national regulations pertaining to their business.

- iv. The Company should encourage and support its member of value chain to adopt its environmental policy/ management systems.
- v. The Company should engage with its Customers to consider the environmental impact and support them in addressing their own environmental impacts.
- vi. The Company should measure waste generation and water usage wherever possible across the operations and conduct the business in a manner that aims to prevent pollution and minimize the consumption of natural resources.
- vii. The Company should 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.
- viii. The Company should develop Environment Management Systems (EMS) and contingency plans and processes that help them in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.
- ix. The Company shall proactively persuade and support its value chain to adopt these principles.

Principle 7: The Company, when engaged in influencing public and regulatory policy, should do so in a responsible and transparent manner

- i. The Company shall work with industry organisations that are engaged in policy advocacy in a responsible manner;



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- ii. The Company shall ensure that policy advocacy is conducted ethically.
- iii. The Company, while pursuing policy advocacy, must preserve and expand public good and shall not advocate any policy change to benefit the Company or select few alone.
- iv. To the extent possible, the Company should utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.
- v. The Company shall strive to perform the function of policy advocacy in a transparent and responsible manner while engaging with all the authorities and will take into account the Company's as well as the larger national interest.

Principle 8: The Company should promote inclusive growth and equitable development

- i. The Company should understand its impact on social and economic development, and respond through appropriate action to minimise the negative impacts.
- ii. The Company should innovate and invest in products, technologies and processes that promote the wellbeing of society.
- iii. 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 its business operations, if any.
- iv. The Company should be sensitive to the local concerns while operating in regions that are underdeveloped.
- v. The Company shall enhance its philosophy to reach out to the community by supporting service-oriented philanthropic



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institutions in the field of education, healthcare and technology development as the core focus areas.

- vi. The Company shall be guided by its Corporate Social Responsibility Policy for inclusive growth and equitable development.
- vii. The Company shall respect all forms of intellectual property and traditional knowledge.

Principle 9: The Company should engage with and provide value to its customers and consumers in a responsible manner

- i. The Company, while serving the needs of its customers, should take into account the overall well-being of the customers and that of society.
- ii. 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.
- iii. The Company should adopt clean technology, wherever applicable.
- iv. The Company shall disclose all information truthfully and factually as per applicable Laws.
- v. Company shall manage consumer data in a way that does not infringe upon their right to privacy.
- vi. The Company shall educate/ train its customers on the safe and responsible usage and disposal of its products.
- vii. The Company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
- viii. The Company shall exercise due care and caution while providing goods and services that result in environment pollution and exploitation of natural resources.



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- ix. The Company shall provide an adequate consumer feedback mechanism/ grievance redressal mechanism to address customer concerns and feedback.

6. Policy Review and Amendments

This Policy will 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 and Sustainability 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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