

SUZLON ENERGY LIMITED

RESPONSIBLE BUSINESS CONDUCT (AS PER NGRBC) POLICY STATEMENT

1. Policy History:

Date of Board approval	Particulars	Effective Date
22 nd July 2024	Responsible Business Conduct Policy Statement governing NGRBC Principles are as follows: <ul style="list-style-type: none"> • Code of Ethics for Directors and Senior Management • Corporate Governance Policy • Corporate Social Responsibility (CSR) Policy • Diversity, Inclusion, Equity and Belonging (DEIB) Policy • Health, Safety and Environment (HSE) Policy • Human Right Policy • Prevention of Sexual Harassment (POSH) Policy • Stakeholder Engagement Policy • Supplier Code of Conduct • Sustainability Policy • Sustainable Sourcing Policy • Whistleblower Policy 	22 nd July 2024

2. Purpose:

2.1 Suzlon Energy Limited (the “Company” or “SEL”) recognizes the importance of National Guiding Principles of Responsible Business Conduct (NGRBC) in achieving sustainable business growth and accordingly has framed following policies (collectively referred to as the “NGRBC Policies” or “Policies”) as a commitment towards ensuring *Responsible Business Conduct*.

- Code of Ethics for Directors and Senior Management
- Corporate Governance Policy
- Corporate Social Responsibility (CSR) Policy
- Diversity, Inclusion, Equity and Belonging (DEIB) Policy
- Health, Safety and Environment (HSE) Policy
- Human Right Policy
- Prevention of Sexual Harassment (POSH) Policy
- Stakeholder Engagement Policy
- Supplier Code of Conduct
- Sustainability Policy
- Sustainable Sourcing Policy
- Whistleblower Policy

2.2 The purpose of the *Responsible Business Conduct* Policies is to ensure a unified and common approach to the dimensions of business responsibility in the Company and to act as a strategic driver that will help the Company respond to the complexities and challenges that keep emerging and to align itself with the best of global business conduct principles, including ethical, social, and environmental responsibilities.

3. Applicability of the Policies:

- 3.1 The Responsible Business Conduct Policies apply to Suzlon Energy Limited (the “Company”) and its material subsidiaries unless specified in the respective Policy.
- 3.2 The Responsible Business Conduct Policies may be adopted by the Company’s subsidiaries other than material subsidiaries subject to suitable modifications, if and to the extent required by law.
- 3.3 The Responsible Business Conduct Policies are designed to ensure a unified and common approach in the Company and shall be applicable to the respective stakeholders mentioned in the NGRBC Policies.

4. Definitions:

Unless repugnant to the context:

- 4.1 “Act” shall mean the Companies Act, 2013 including the Rules made thereunder, as amended from time to time.
- 4.2 “Applicable Laws” shall mean the Guidelines as amended from time to time and such other Act, Rules or Regulations which are / may be applicable.
- 4.3 “Company” or “SEL” shall mean Suzlon Energy Limited.
- 4.4 “Board” or “Board of Directors” shall mean the Board of Directors of the Company.
- 4.5 “Guidelines” shall mean the National Guidelines on Responsible Business Conduct issued by the Ministry of Corporate Affairs on 10th December 2018.
- 4.6 “MCA” means the Ministry of Corporate Affairs, Government of India.
- 4.7 “Responsible Business Conduct Policies” or “these Policies” shall mean the Policies adopted in terms of the Guidelines and referred to in this Policy Statement.
- 4.8 Interpretation – In this Code, unless the contrary intention appears, words and expressions used and not defined but defined in the Applicable Laws shall have the meanings respectively assigned to them in those Applicable Laws.

5. Disclosure requirements:

- 5.1 The Responsible Business Conduct Policies and this Statement has been implemented w.e.f. 22nd July 2024.
- 5.2 The Responsible Business Conduct Policies and this Statement shall be disclosed on the website of the Company.
- 5.3 The Board will review the Responsible Business Conduct Policies and this Statement on a periodic basis on the recommendation of the ESG Committee to ensure its effectiveness and also compliance with the Applicable Laws.

- 5.4 The Responsible Business Conduct Policies and this Statement is subordinate to the Act or other applicable statutory provisions (including the Listing Regulations), and in the event of inconsistency between them and the Applicable Laws (including due to subsequent amendments to the Applicable Laws), the provisions of the Applicable Laws will prevail.
- 5.5 To the extent any change or amendment is required due to change in the Applicable Laws, the Managing Director or the Chief Executive Officer of the Company shall be authorised to review and amend the Responsible Business Conduct Policies and this Statement to give effect to any such changes or amendments. Such amended Policies shall be placed before the ESG Committee / Board for noting and necessary ratification.
- 5.6 The ESG Committee / Board reserve the right to alter, modify, add, delete or amend any of the provisions of the Responsible Business Conduct Policies subject to Applicable Laws.

6. Background:

- 6.1 The MCA had released a set of guidelines in 2011 called the National Voluntary Guidelines on the Social, Environmental and Economic Responsibilities of Business (NVGs) with the aim of providing guidance to businesses on what constitutes responsible business conduct. To align the NVGs with the Sustainable Development Goals (SDGs) and the 'Respect' pillar of the United Nations Guiding Principles (UNGP), the NVGs was revised and the MCA issued the Guidelines.
- 6.2 The primary rationale for the issuance of the Guidelines was to capture key national and international developments in the sustainable development agenda and business responsibility field that have occurred since the release of the NVGs in 2011. Some of the key drivers of the Guidelines are the UN Guiding Principles for Business and Human Rights, the UN Sustainable Development Goals, the Paris Agreement on Climate Change, Core Conventions 138 and 182 on Child Labour by the International Labour Organization (ILO) and the Annual Business Responsibility and Sustainability Reporting (BRSR).

7. Policy Statement:

The Company's business practices shall be governed by the guiding principles of NGRBC for ensuring *Responsible Business Conduct*. The National Guidelines on Responsible Business Conduct comprises nine thematic pillars of business responsibility known as Principles. These principles are interdependent, interrelated and non-divisible and all business units are urged to address them holistically.

Each principle is outlined below including the Company's adherence to them, along with relevant policies and a reaffirmation of its commitment.

Principle 1 - Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable

- The Company is committed to upholding the highest ethical standards in all its business operations and interactions with all our internal as well as external stakeholders.

- The Corporate Governance Policy covering Code of Ethics and the Whistleblower Policy ensures good governance, and ethical practices being followed by all employees, suppliers and business partners.
- The Group will conduct trainings on Code of Ethics, Governance and Integrity on periodic basis for employees and other stakeholders.
- The Company will disclose financial performance including that of subsidiaries and compliance under Disclosures pertaining to Regulation 46 of SEBI (LODR) Regulations, 2015. The disclosures on policies and procedures, proceedings of investor meet, returns and compliances will also will be carried out.
- None of the Group Companies will engage in activities that pose a concern on malpractices, impropriety, abuse or wrong-doing.
- The company shall have a dedicated helpdesk for handling grievances and for registering complaints / grievances, investors / shareholders can reach out to the Company's Registrar and Transfer Agent (RTA) or Investor Relation Department. In case the investor / shareholder is not satisfied with the resolution provided by the RTA / Company, he / she may opt for review of the complaint through SEBI Complaints Redress System ("SCORES") which can be accessed at <https://www.scores.gov.in>. If the investor / shareholder is still dissatisfied after the review process, he / she can opt for the Securities Markets Online Dispute Resolution (ODR) mechanism by visiting <https://smartodr.in/login>.

<https://www.suzlon.com/in-en/investor-relations/investor-helpdesk>

Principle 2 - Businesses should provide goods and services in a manner that is sustainable and safe

- The company has a Sustainability Policy adopted at Group Level which integrated 3 pillars of ESG focussing on Environmental Stewardship, Social Responsibility and ensuring economic progress. The Policy covers employees, investors, customers, partners, suppliers, community and other stakeholders.
- The Sustainability Policy at Group level shall ensure Responsible Consumption and Production, resource efficiency and integration of value chain.
- The Company has a Sustainable Sourcing Policy that emphasizes the development and promotion of sustainable procurement practices across operations and value chain.
- The sustainability objectives are articulated along with compliance with state and national environmental regulations and focus on promoting safe and optimal resource use. throughout the product lifecycle; ensuring resource-efficient and sustainable processes and technologies in product development; providing environmental consciousness training.
- The Company is dedicated to providing safe, sustainable, and environmentally friendly wind energy solutions to its customers by working from designing, manufacturing, supplying, operations and monitoring stage for the operational life of the turbines supplied.
- The adherence of Code of Ethics, Business Ethics, Responsible Business Practices shall be ensured by all employees, partners and suppliers.
- The Group will maintain a clean, healthy and safe environment. The HSE Policy shall help in analysing and implementing practical measures to mitigate the health, safety, and environmental risks which may affect the Company, its employees, and customers.

- The alignment with Universal Declaration of Human Rights, International Labour Organization's fundamental conventions on core labour standards and operate as an equal opportunities employer.

Principle 3 - Businesses should ensure the well-being of all employees, including those in their value chains

- Suzlon prioritizes the safety, well-being, and professional growth of our employees and those in our value chains through its HSE Policy.
- The Employee Compensation and Benefits Policy, Periodic Health check-ups for Employees, Mediclaim and GPA benefits for employees and other benefits helps in ensuring well-being of employees.
- The Company aims to make the workplace a safer environment for its Employees by preventing, prohibiting & redressing acts of sexual harassment against them and has gone a step ahead by adopting a Gender Neutral POSH Policy.
- Suzlon as a Company finds it essential to promote a sense of belongingness in its Employees and promotes fair treatment, and integration of individuals from diverse backgrounds. In order to prohibit discrimination on any level and promote inclusiveness has adopted a DEIB Policy.
- The Group focusses on learning and development and enhancing skills as per competency mapping to enhance knowledge and foster development..

Principle 4 - Businesses should respect the interests of, and be responsive to all its stakeholders

- The Stakeholder Engagement Policy emphasizes commitment towards all stakeholders responsibly, ensuring their satisfaction, and addressing their concerns effectively and also providing quality services and products while actively seeking feedback from customers and relevant stakeholders.
- The Stakeholder Engagement Policy ensures integrating feedback of all internal and external stakeholders and establishing value creation model.
- The CSR framework of company believes that sustainable development can be ensured only by continually and responsibly enhancing meagre resources – financial, natural, social, human and physical – for the benefit of business; and by offsetting the impact of business on these resources.
- The CSR Team focuses on community development initiatives aligned with local needs of community and marginalized section of the society.
- The engagement with stakeholders and community ensures fostering a better outreach to community and undertaking community development initiatives.

Principle 5 - Businesses should respect and promote human rights

- Suzlon is committed to promoting human rights in all aspects of operations and supply chain. It recognizes that business activities can have a direct or indirect impact on human rights, and strive to ensure respect and uphold these rights at all times. The following stipulations are adhered:
 - i. Non-Discrimination on basis of their race, gender, nationality, religion, sexual orientation, or any other status.
 - ii. Respect for Human Dignity and not engaging in any activities that undermine this principle.

- iii. Freedom of Association for employees to form associations and trade unions.
 - iv. Respect and adherence for Labour Rights of all workers, including the right to fair wages, safe working conditions, and freedom from exploitation.
 - v. Ensuring fair compensation that employees are paid fairly for their work, including.
 - vi. providing equal pay for equal work.
 - vii. Zero tolerance for Child labour and Forced labour in operations and supply chain and undertaking due diligence to identify risks and take adequate measures for mitigation.
 - viii. Monitoring and audit of suppliers to ensure compliance with standards, provide training and resources, and collaborate with stakeholders to promote respect for human rights.
 - ix.
 - x. Commitment towards Environmental Responsibility to adopt sustainable practices that minimize harm to the environment and respect the rights of future generations.
 - xi. Respect the rights of indigenous people and their communities, including their right to land, resources, and self-determination.
 - xii. Community Engagement to understand needs and concerns of the community and working with them to develop solutions that promote mutual respect and benefit.
 - xiii. Providing a safe and healthy work environment for employees, taking steps to prevent workplace incidents, accidents and ensuring that employees have access to necessary protective equipment.
 - xiv. Suzlon is committed to the responsible use of potentially hazardous chemicals and compliance with applicable laws and regulations, implement safety procedures, monitor use of hazardous chemicals, engage with suppliers, and continuously improve management practices to minimize risks to health, the environment, and communities.
 - xv. Ensuring that the rights of employees are respected and protected through fair retrenchment procedures and providing notice period to affected employees, severance packages, other benefits in compliance with country law and any support that to be offered to affected employees in finding alternative employment.
- The Suzniti policy document sets out commitment to human rights at Suzlon and the actions being taken to ensure to meet this commitment.
 - Suzlon believes that every individual is entitled to fundamental human rights, regardless of their race, gender, nationality, religion, sexual orientation, or any other status. The Company is committed to upholding the following human rights principles in operations.

Principle 6 - Businesses should respect and make efforts to protect and restore the environment

- The Company has in place Sustainability Policy, HSE Policy and Sustainable Sourcing Policy focused on reducing its carbon footprint, optimizing resource consumption, minimizing environmental impact, and promoting sustainable practices which demonstrates the Company's commitment to sustainable and safety practices, measurable goals and targets, strategies to achieve those goals, and plans for monitoring and reporting progress.

- The Company is dedicated to environmental stewardship and continuously work towards minimizing environmental footprint.
- The Sustainability Policy of Suzlon has a strong focus of topics of significance as per materiality issues for environmental restoration and achieving Sustainability excellence.

Principle 7 - Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

- The Corporate Governance Policy and Suzlon's Code of Ethics ensures maintaining business responsibility and transparency.
- The Code of Ethics is used for taking actions in influencing public and regulatory policy.

Principle 8 - Businesses should support inclusive growth and equitable development.

- The company takes up CSR initiatives through Suzlon Foundation based on "Gender Just Approach".
- The CSR initiatives are aligned with needs of local community and for development of locals and community..
- The company is committed for fostering inclusive growth in the regions where we operate, promoting economic development and social well-being of local communities.
- The CSR program categories being undertaken are as follows:
 - i. Transformative programmes posing minimal impact of business on surroundings
 - ii. Responsive programmes to offset (even potential) negative impacts and optimize positive impacts of business on its surroundings
 - iii. Proactive programmes on development issues
 - iv. Focus on thematic areas as specified in Schedule VII of CSR Act
 - a) Environment
 - b) Livelihoods
 - c) Education
 - d) Health
 - e) Civic Amenities

Principle 9 - Businesses should engage with and provide value to their consumers in a responsible manner

- The Sustainability Policy and Sustainable Sourcing Policy helps in ensuring Responsible Consumption and Production practices.
- The Stakeholder Engagement Plan will support in ensuring interests of all customers, suppliers, investors and other stakeholders.
- The Stakeholder Engagement Policy of the company focuses on engaging and addressing customer concerns in a responsible manner and likewise, the Whistleblower Policy encourages a stakeholder to raise concerns against any misconduct or illegality or unethical conduct.

8. Reporting Requirement

As per the requirements of the Listing Regulations, the Company shall prepare a Business Responsibility and Sustainability Report (BRSR) in the format specified by SEBI from time to time and place before the Board for its approval on an annual basis. The BRSR as approved by the Board will be included in the Annual Report along with Assurance by a third party.
