

**SAVITA OIL TECHNOLOGIES LIMITED**  
**Environmental, Social, Governance (ESG) Policy**

**I. Effective Date**

This policy is being effective from **1<sup>st</sup> April 2024**.

**II. Introduction**

Savita Oil Technologies Limited (*hereafter referred as Savita, SOTL, the Company, we, our*) is a leading manufacturer of specialty petroleum products with a wide range of offerings that includes Transformer Oil, White and Mineral Oil, Automotive and Industrial Oil and Formulated Specialty Products. At Savita, we accord the highest priority to ethical and sustainable business operations that drives positive value for all stakeholders. In order to guide us through our sustainability journey, we have developed our ESG Policy (*hereinafter referred to as 'The Policy' or 'Policy'*), which acts as a sole reference point highlighting our policy commitments and how we propose to achieve them with responsible business practices. We are driven by our ESG Vision - *'To integrate the principles of sustainability as a core element in our quest for operational and business excellence.'*

**III. Scope of the Policy**

This Policy is applicable to all our business operations and extends to our value chain partners, unless otherwise stated. All directors, Key Managerial Personnel (KMP), full-time and part-time employees & workers, consultants, trainees, interns, or equivalents shall abide by this policy.

**IV. Reference Frameworks**

The Policy is broadly outlined in reference to the nine (9) principles of National Guidelines on Responsible Business Conduct (NGRBC) in accordance with Business Responsibility and Sustainability Reporting (BRSR) Framework. The Policy commitments are also referred to with Universal Declaration of Human Rights (UDHR), United Nations Global Compact (UNGC), and Sustainable Development Goals (SDGs).

**V. Policy Commitments**

**A. Principle 1: Ethical, Transparent and Accountable Business Operations**

*Savita is committed to conduct its business in accordance with the applicable laws, rules, and regulations and with highest standards of business ethics, transparent practices, and accountability while dealing with the stakeholders.*

- We have in place Code of Conduct for our Directors and Senior Management Personnel which they shall abide by to ensure adequate safeguards to ensure ethical, transparent, and accountable business operations. We have also adopted an Employee Code of Conduct, which outlines standards of personal and professional conduct that all employees must strive to uphold and behave in an ethical and professional manner.
- We recognize our fundamental duties towards our stakeholders and are committed to keeping them informed about material information across our value chain in a transparent manner, thereby ensuring access to information related to decisions that impact the stakeholders.
- We are committed to competing fairly in business transactions and expect our employees not to engage in or promote practices which are corrupt and abusive in nature. We ensure adherence to anti-competitive behaviour in all our corporate dealings.

- We shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through our ‘Whistle-Blower Policy’.
- We have adopted significant measures to identify and mitigate any potential conflict of interest in business transactions. Our Code of Conduct<sup>1</sup> highlights our requisite due diligence mechanisms in this aspect for all our Directors and Senior Managers.
- We strive to uphold the highest levels of integrity at each level of management and have a zero-tolerance approach towards corruption of any form or manner.

#### **B. Principle 2: Sustainable Goods and Services**

*Savita has intertwined principles of safety and sustainability into its processes and products throughout its lifecycle covering procurement of raw material, product design, manufacturing, and delivery to the customers. SOTL’s procurement practices are driven in accordance with its ‘Sustainable (Green) Procurement Policy’.*

- We are committed to maintain the highest level of ethical standards and transparency in dealings with all our suppliers through our ‘Supplier Code of Conduct’.
- We are committed to leveraging innovation, maintaining focus on environmental sustainability, and delivering sustainable products to our customers, thereby, minimizing our environmental and social impact in accordance with our ‘Sustainable (Green) Procurement’ Policy.
- We conduct periodic assessments of lifecycle environmental footprint of our select key products and adopt appropriate measure to enhance eco-efficiency of our products.
- We continuously strive to explore alternative raw materials, in order to reduce our dependency on materials which have a higher environmental footprint, and prioritizing energy-efficient and greener products and services.
- We strive to map our supply chain in order to identify the chain of custody for critical materials and develop a systemic plan for engaging with suppliers on ESG attributes.
- We have adopted necessary measures to raise the consumer's awareness of their rights through education, responsible product labelling, appropriate and helpful marketing communication, description of contents and composition and promotion of safe usage and disposal of our products.
- We shall strive to integrate the aspects of local procurement in our business operations, after ensuring sustainable value propositions and quality.
- We shall adhere to safe usage and responsible disposal practices for all our products and establish robust processes for addressing any product recalls or query to reclaim or dispose any product.
- We shall maximize usage of recycled packaging materials in our business operations.

#### **C. Principle 3: Employee Well-Being**

*Savita is committed to professional development and growth of employees through selecting the right candidates for right jobs, monitoring performance for optimum utilization of their potential, providing growth opportunities, and inculcating the culture of mutual faith and accountability.*

- We are committed to providing and maintaining 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.

- We are committed to fostering a collaborative, diverse and inclusive work environment, which inspires professionalism, respect for all, and transparency.
- We are committed to fostering a workplace that has an environment free from all forms of physical, verbal abuse and any form of harassment. We have adopted requisite measures in order to address any forms of employee grievances in accordance with our ‘Grievance Handling Procedure’.
- We are committed to having requisite infrastructure and facilities dedicated to specially abled employees, which allows them to perform their duties diligently.
- We shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid in our business operations. None of our employees are 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.
- We are committed to holistic growth of employees by motivating them to perform at their highest potential by imparting necessary guidance and training at all levels and providing them with opportunities for enhancing their knowledge and honing their skills.
- We are committed to adoption of fair remuneration practices, adherence to local regulations on minimum wages, and shall ensure timely payment of fair living wages to meet basic needs, economic security, and enhance the standard of living of our employees.
- We ensure adherence to appropriate safety practices in reference to ISO 45001 to prevent injury and ill health by ensuring an injury free workplace with a zero tolerance towards it.

#### **D. Principle 4: Stakeholder Engagement**

*Savita ensures a healthy engagement with all its stakeholders by continuously engaging with them through various mechanisms such as supplier/vendor meets, customer/employee satisfaction surveys, investor forums, consultations with local communities etc.*

- At Savita, we adhere to a comprehensive stakeholder engagement process for identification of our key stakeholders, namely, employees, suppliers, dealers, customers, shareholders / investors, communities surrounding the operations and government / regulatory authorities.
- Through Stakeholder Engagement Framework, we connect periodically with the key stakeholders and discuss matters of critical concern through pre-identified channels of communication. We also strive to recognize stakeholders that may be vulnerable, disadvantaged and marginalized and aim to devote special attention towards their upliftment.
- We are committed to address needs and expectations of our key stakeholders in order to achieve long-term value for them and inclusive growth for all.
- We are committed to timely reporting of important information, transparent disclosures, and a robust mechanism to collate stakeholder feedback which aids in deepening the trust placed by them in our brand.

#### **E. Principle 5: Human Rights**

*Savita believes that human rights are fundamental, inherent, universal, indivisible, and interdependent in nature and hence, continuously strives to ensure that employees’ basic human rights are protected.*

- We aim to uphold the human rights of our employees, permanent and part-time, suppliers, contractors, and people of all the communities that we operate in and seek to avoid involvement or abuse of any form, in order to safeguard their basic rights.

- We are committed to promoting human rights protection and ensuring adherence to the Universal Declaration of Human Rights (UDHR), United Nations Global Compact (UNGC) Principles, and other applicable local and global norms and requirements.
- We strive to undertake a periodic assessment of our sites to identify any potential or existing areas of violation of human rights and aim to establish standard protocols to avoid such instances.
- We strictly stand against child labor or forced labor and expect the same standards of operations across our value chain.
- We conform to all the fundamental human rights across all our business operations including promoting freedom of association for our workforce, right to collective bargaining, and no discrimination or harassment of any form or manner.
- We shall encourage our suppliers/vendors on adopting fair human rights approach in their business operations in adherence with our ‘supplier code of conduct’, and by sharing good business practices, and working in collaboration with them.
- We are committed to train our employees on importance of human rights aspects and encourage them to come forward through an active grievance redressal mechanism in case of any concerns.

#### **F. Principle 6: Protect and Restore the Environment**

*Savita is committed to safety and preservation of the environment and has formulated ‘Occupational, Health, and Safety Policy’. We believe in conservation of natural resources and minimizing hazardous impact on the ecological environment.*

- We are committed to utilizing natural and manmade resources in an optimal and responsible manner, thereby, ensuring sustainability of resources by reducing, reusing, recycling, and managing waste.
- We are committed to continuous improvement in our environmental performance by adopting cleaner production methods, promoting use of energy conservation measures and environment friendly technologies, and usage of renewable energy in our operations.
- We shall develop Environment Management Systems and contingency plans and processes that shall help in preventing, mitigating, and controlling environmental damages and disasters, which may be caused due to our operations.
- We aim to comply with the required environmental laws, legislations, and guidelines in India such as Water (Prevention and Control of Pollution) Act, Environment (Prevention and Control of Pollution Act), Environment Protection Act as well as follow the guidelines laid out as per ISO 14001 at all our sites.
- We shall manage and regularly monitor our scope 1, scope 2 and applicable categories of scope 3 greenhouse gas (GHG) emissions to streamline processes towards sustainable operations.
- We have a strong focus on green performance through adoption of sustainable measures and developing sustainable products (synthetic esters), thereby creating a resilient future.
- We aim to constantly monitor, minimize, and identify ways to mitigate amount of waste generated at our premises. We shall identify alternative ways to recycle wastes generated as part of our processes for efficient utilization of resources.
- We endeavour to implement sufficient water management practices such as rainwater harvesting and recycle/reuse of water in our operations.

#### **G. Principle 7: Policy Advocacy**

*Savita believes that to protect the overall interest of its business and diverse stakeholders, it has to express its fair views, opinions, representations, and concerns on the policies framed by the competent authorities.*

*SOTL engagement with the relevant association/forums/chambers is guided by the values of commitment, integrity, transparency, and the need to balance interests of diverse stakeholders.*

- We are committed to engaging with our industry peers, associations, and other relevant bodies for peer learning and promoting industry cooperation for collaborative & inclusive growth and development, for a sustainable future for all.
- We are committed to adopting an ethical and non-biased stance when contributing our ideas in any discussions with any of the members of the regulatory authorities to promote the common goal of societal betterment and enhancement of positive industrial relations.
- We strive to be an active and an important participant in areas or matters of critical concern from the sustainability standpoint and participate without any malicious intent to influence or control the outcomes in our favor.

#### **H. Principle 8: Promote Inclusive Growth and Equitable Development**

*Savita's philosophy for delineating its responsibility as a corporate citizen is covered through its CSR policy which encompasses guidelines and mechanism for undertaking socially relevant programs for welfare and sustainable development of the community at large.*

- At Savita, the growth of local communities through social development initiatives and enhanced community involvement is an integral part of our overall sustainable development agenda.
- We strongly believe in empowering the lives of people by enabling them to become capable of being employed or earn a livelihood and contribute to a fair and inclusive society.
- We proactively engage with the local community to understand their issues and concerns and invite suggestions on development areas and are committed to addressing their concerns through a grievance mechanism and interactions with them.
- We also aim to undertake Social Impact Assessments in a periodic and timely manner to clearly ascertain the impacts of our operations, understand the expectations of the communities that we operate in, decide on the interventions required to arrive on a common goal and practice the same at all sites.

#### **I. Principle 9: Responsibility Towards Customers**

*Savita appreciates that customers are one of the most important stakeholders, and is based on trust, satisfaction, and loyalty of its consumers across the world. We continuously strive to make products that are safe and competitively priced for the benefits of its customers / end users.*

- We are committed to data protection and data confidentiality to ensure protection of our information assets from unintentional modification or breaches in accordance with our 'Information Technology and Security Policy'.
- We believe in transparent business operations by equipping our customers with complete information of our products to facilitate better decision-making process and promote healthy competition.
- We are committed to providing safe products which are suitable for use and comply with the required safety regulations at all sites.

- We are committed to resolve customer queries and complaints through a proper channel of communication in a manner that is most effective with a quick turn-around time to enhance customer satisfaction.
- We strive to establish robust measures to protect confidential data from being misused, adherence with ISO 27001 standards and conduct Vulnerability Assessment and Penetration Testing (VAPT) for our systems.

**VI. Governance Mechanism**

We will design an appropriate framework to govern and realize our policy commitments as mentioned above and ensure the same is being reviewed in a timely manner for incorporating the latest requirements from the regulatory standpoint. We will also ensure that the ESG data presented to our stakeholders remains consistent, fair, and authentic always through external assurances, as and when required.

**VII. Policy Approval Matrix**

<b>Reviewed by</b>	Ms. Purva Sood
<b>Approved by</b>	Mr. Siddharth G. Mehra
<b>Approval Date</b>	1 <sup>st</sup> April 2024
<b>Effective Date</b>	1 <sup>st</sup> April 2024
<b>Next Review Date</b>	31 <sup>st</sup> March 2026
<b>Issue Number</b>	1.0
<b>Approving Authority</b>	Executive Director

For **SAVITA OIL TECHNOLOGIES LTD.**



**Siddharth G. Mehra**  
Executive Director

