



Satyendra Fine Chem
ETHICAL, SOCIAL & RESPONSIBLE
BUSINESS POLICIES AND PROCEDURES
HANDBOOK

Doc No.	: SFC/MG/ESG/01
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Consolidated Management System Document

Ethics • Environment • Business
Integrity • Human Rights •

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



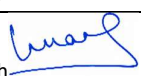
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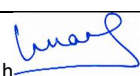
Prepared By:

Umang Shah 

Approved By:

Priyank Patel 

Issued By:

Umang Shah 

Designation: Partner- Admin

Designation: Partner-Technical

Designation: Partner- Admin



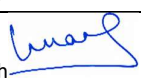


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Anti-Corruption and Bribery Policy

1. Purpose

The purpose of this policy is to ensure that SFC (Satyendra Fine Chem) upholds the highest standards of integrity and operates in compliance with all applicable anti-corruption and bribery laws. It aims to prevent, detect, and address corruption and bribery in all business activities.

2. Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, and any third parties acting on behalf of SFC. It extends to all business dealings and transactions in every country where we operate.

3. Definition of Bribery and Corruption

- Bribery: The offering, giving, receiving, or soliciting of something of value as an inducement for an action that is illegal, unethical, or a breach of trust.
- Corruption: The abuse of entrusted power for private gain, which includes acts such as fraud, embezzlement, or favouritism.

4. Prohibited Activities

Employees and representatives of SFC must not:

- Offer, promise, give, solicit, or accept bribes in any form, including cash, gifts, hospitality, or Favors.
- Make facilitation payments (small, unofficial payments to secure or expedite routine government actions) unless legally permitted and pre-approved.
- Engage in any form of corruption, including fraud, embezzlement, kickbacks, or conflicts of interest.
- Ignore or fail to report any instance of bribery or corruption.
- Giving or receiving or attempting to give or receive any bribe or inducing or attempting to induce any person to perform any corrupt act.

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- It is the policy of Satyendra Fine Chem prohibit bribery and other corrupt conduct in any form. Bribery and kickbacks involving government officials, customers, suppliers, and other counterparties in the commercial marketplace are specifically prohibited. Accordingly, neither Satyendra Fine Chem or any Company Representative may, directly or indirectly, offer, promise, pay, give, or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for Satyendra Fine Chem or improperly reward the recipient for past conduct.
- No person subject to this policy will suffer adverse consequences for refusing to offer, promise, pay, give, or authorize any such benefit, advantage or reward, even if this results in the loss of business to Satyendra Fine Chem.
- In addition, no Satyendra Fine Chem associates, partner, officer, employee, agent, or other representative may request, agree to receive, or accept anything of value from any other person as an inducement or reward for violating his or her duties to Satyendra Fine Chem or in exchange for an improper benefit.

5. Gifts and Hospitality

- Gifts and hospitality must be reasonable, proportionate, and for legitimate business purposes.
- Lavish or excessive gifts, entertainment, or hospitality that may create a conflict of interest or appear to be an attempt to influence a decision are strictly prohibited.
- Any gifts or hospitality valued above a specified threshold must be reported and approved by management.
- Employees should not as a principle, accept gifts in kind or cash or enjoy any special privileges from any business associate. Complementary / sweets may be accepted only on festive occasions/new year/special anniversaries, if it serves the purpose of maintaining proper and good relationship with our regular business associates; however, the value of such complimentary should not exceed Rs. 500/-. Moreover, it is preferable that sweets etc. if accepted on festive occasions are received only at the place of work and shared with colleagues. Employees should not accept offers to be entertained by an individual or
- Organizations with whom his/her Company transacts business. Invitations to occasional lunches/dinners hosted by our business associates may be accepted, if it serves the purpose of enhancing the relationship, after informing the immediate superior. It is essential that in the event of an employee accepting complimentary (up to value specified) or attending an occasional lunch/dinner, there should be no scope for this being construed as having influenced the judgment of the recipient.

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- Employees will be reimbursed outstation travel/local conveyance expenses incurred on account of official work as per company's travel policy. Employees should claim only expenses actually incurred and should not inflate/falsify expense claim even if these are within the prescribed limits for the individual. Under no circumstances shall personal expenses be reimbursed by the company.
- Here again, as a general rule, when in doubt, ask the.

6. Political and Charitable Contributions

- Political contributions on behalf of Satyendra Fine Chem are prohibited.
- Charitable donations must be transparent, legal, and not made to influence a business decision.

7. Due Diligence and Third-Party Compliance

- Due diligence must be conducted before engaging with third parties to ensure they comply with anti-corruption laws and standards.
- Contracts with third parties should include anti-bribery and corruption clauses.

8. Reporting Violations

- Employees must report any suspected bribery or corruption to their supervisor, compliance officer, or designated reporting channel.
- Reports will be treated confidentially, and whistleblowers will be protected from retaliation.

9. Enforcement and Consequences

- Violations of this policy may result in disciplinary action, including termination of employment and legal prosecution.
- SFC reserves the right to report unlawful activities to relevant authorities.

10. Training and Awareness

- All employees will receive training on anti-corruption and bribery policies.
- Regular updates and refresher courses will be provided to ensure continued compliance.

11. Review and Amendments

- This policy will be reviewed periodically to ensure its effectiveness and compliance with legal requirements.
- Any updates or amendments will be communicated to all relevant stakeholders.

12. Acknowledgment

All employees must acknowledge their understanding and compliance with this policy by signing an annual declaration.

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Business Integrity and Code to Conduct

Introduction

Satyendra Fine Chem (SFC) has a statutory obligation to be a good employer and we personally recognize the importance of treating staff fairly and properly in all aspects of employment.

In return, the management expects a high standard of behavior from you. All staff is expected to identify with and have a commitment to the philosophy and values of the organization, and to demonstrate that commitment in the performance of their duties.

The Code of Conduct is an elaboration of the Satyendra Fine Chem's Principles of Conduct and Action and sets out what is expected of the Company's employees. The objective of this Code is to ensure that every employee of the Company in India is aware of acceptable conduct and ethical behavior, in consonance with the Satyendra Fine Chem of Conduct and Action.

Please make yourself fully familiar with the standards in this document.

Purpose of the Code

The purpose of this Code of Conduct is to assist you to know and understand the minimum standards of conduct and behavior expected of you as an employee of the Satyendra Fine Chem. This reflects the basic requirements of professionalism, integrity and courtesy needed to ensure that we provide a quality product to our customers, and that a pleasant and safe working environment exists for all staff and customers.

Scope

The Code applies to all employees of Satyendra Fine Chem including permanent, temporary, and casual / Daily Workers / employees. This Code forms part of your employment with the Satyendra Fine Chem.

This Code applies to all employees of the Satyendra Fine Chem in India including trainees and temporary staff.

Satyendra Fine Chem believes in conducting its affairs in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity, and ethical behavior. All employees of Satyendra Fine Chem are expected to strictly adhere to this Code of Conduct.

Principles

The Code of Conduct establishes three principles of conduct which all staff are expected to observe:

- 1) You should fulfill your lawful obligations to Satyendra Fine Chem with professionalism and integrity.
- 2) You should perform your official duties honestly, faithfully, and efficiently, respecting the rights of the employees, customers, the community, society, vendors, suppliers, and your colleagues.
- 3) You should not bring your employer into disrepute through your activities, whether inside or outside company. Activities outside the company are not likely to be acceptable if they:

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- damage the standing or reputation of Satyendra Fine Chem because of the position you hold in it;
- interfere with the proper performance of your duties.
- **Use of unethical practice while doing your responsibilities**

We expect all our employees to conduct their business dealings honestly, openly, fairly, diligently, and courteously and in a manner, that enhances the image of the Company.

All employees should be aware of all policies and procedures applicable to the Company and fully abide by them. While policies and procedures could be questioned, it should happen through appropriate forums responsible for review of policies and until any such change happens, no person should violate the existing policy/procedure.

Expectations of Staff

Satyendra Fine Chem expects you to:

- Work within the law with honesty and integrity;
- Comply with all lawful and reasonable instructions;
- Comply with the policies of the Satyendra Fine Chem.
- Work diligently and meet the requirements of your employment agreement;
- Respect the rights of colleagues and customers.

Obligations of Satyendra Fine Chem to Staff

As a good employer, we are committed to meeting the following staff expectations:

- a commitment to the spirit and principles of all statutory laws and regulations;
- **opportunities for equal employment, including recognition of:**
- the aims and aspirations of ethnic or minority Company's;
- impartial and open selection and appointment procedures;
- fair rates of remuneration for skill, responsibilities, and performance;
- an up-to-date job description that provides clear statements of your duties and your employer's expectations of you;
- adequate training and equipment to perform your duties;
- regular and appropriate feedback and communication on your work performance;
- effective communication of information;
- good and safe working conditions;
- opportunity for the enhancement of your abilities;

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- freedom from harassment or discrimination in the workplace;
- a commitment to a supportive and confidential Employee Assistance Programme;
- Appropriate disciplinary and dispute procedures and the opportunity for redress against unfair or unreasonable treatment by the employer.

Equal Opportunities for All

Unless local laws or regulations require us to do otherwise, we will recruit people solely on merit and reward people based on their performance and potential without discrimination on grounds of age, race, caste, ethnic origin, religion, political or other opinion, gender, sexual orientation, marital status, or disability/disease unrelated to the role.

No employee of the company will discriminate between others based on any of the above grounds or based on any other personal prejudices or biases.

Enabling Work Environment

The Company respects the rights and dignity of all employees. We aim to establish clear values and objectives so that all employees understand and are committed to the aims of the Company and clearly see their roles within it. We will seek to create a challenging environment of empowerment and continuous learning, to recognize individual and team contributions, and to reward competitively, relative to performance.

It is expected that all employees in the Company treat the people they interact with, both within and outside the Company, with respect and in a manner, that their self-esteem and dignity are always maintained.

All employees will work together in a collaborative manner as a well-knit team towards the achievement of business goals, putting the interests of the team and the Company before their own. They will work in a manner that is open, honest, straightforward, and fair, respectful of the roles and views of others and actively listening and dialoguing with team-mates. Employees will freely share required information with each other, learn from each other, help one another to develop and grow, and contribute towards making the experience of working for Satyendra Fine Chem an enjoyable one for every member of the Satyendra Fine Chem family. The Company is committed to provide a work environment free of unlawful harassment. Sexual harassment and harassment based on age, race, religion, caste, ethnic origin, disability unrelated to the role, marital status, sexual orientation, pregnancy/ childbirth, or any other basis is prohibited.

No employee will indulge in or condone harassment of any kind. Our policy on sexual harassment spells out further details on this particular type of harassment.

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Conflict of Interest

The term “conflict of interest” describes any circumstances that could cast doubt on our ability to act with total objectivity about the Company's interests.

- a) No employee will be involved in any arrangement or circumstances, including family or other personal relationships, which might discourage him/her from acting in the best interest of the Company.
- b) No employee or his/her family member will act as a broker or on behalf of a third party in transactions involving or potentially involving his/her company.
- c) Employees or their family members will not have any financial interest in any outside enterprise which is currently doing business or seeks to do business with or is a competitor of his/her Company. If the employee comes to know that his/her Company is doing business with any organization/individual with which he/she is directly or indirectly involved for example, through a relative he/she is obliged to bring it to the notice of ombudsman through written letter/mail.
- d) An employee should not be the final decision maker for any business contract or arrangement with any organization wherein his/her relatives/close friends are employed in key positions. In the event an employee finds himself / herself in a position of having to decide on such a contract or arrangement, he/she should refrain from taking such a decision and refer the matter to his/her superior for taking a decision, clearly informing his/her superior of his/her relationship with key personnel in the concerned organization.
- e) It is obligatory for an employee to declare that he/she is related to any other employee of the Company as soon as he/she discovers it, through a written letter/mail to the Director.
- f) Employees shall not exploit for their own personal gain opportunities that are discovered through the use of corporate property, information or position.
- g) No employee shall solicit or promote any personal/public cause or organization/ association during working hours.

As a general rule, when in doubt, ask your director.

Payments, Gifts & Entertainment

- a) The Company will not make any contribution of company funds, property or services to a political party or religious organization, or to a candidate for or holder of any Government office.
- b) No employee will offer any gifts, favors or entertainment to others that are:
 - Not consistent with customary business practice.
 - Excessive in value and / or could be construed as a bribe or pay-off in violation of applicable laws or ethical standards, such that public disclosure could embarrass the Company or oneself.

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- c) Employees should get the prior approval of the Business/Functional Head to incur any expenses towards entertainment. Business /Functional Heads are responsible to monitor the incurred entertainment expense patterns of their employees to ensure that the amount is used judiciously. All expenditure which does not have the necessary documentation, bills, etc. will not be reimbursed.

Entertainment expenditure on alcoholic drinks will be permitted only with the specific approval of the Business / Functional Head.

- d) Employees should not as a principle, accept gifts in kind or cash or enjoy any special privileges from any business associate. Complementary / sweets may be accepted only on festive occasions/new year/special anniversaries, if it serves the purpose of maintaining proper and good relationship with our regular business associates; however, the value of such complimentary should not exceed Rs. 500/-. Moreover, it is preferable that sweets etc. if accepted on festive occasions are received only at the place of work and shared with colleagues. Employees should not accept offers to be entertained by an individual or

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- e) Employees will be reimbursed outstation travel/local conveyance expenses incurred on account of official work as per company's travel policy. Employees should claim only expenses actually incurred and should not inflate/falsify expense claim even if these are within the prescribed limits for the individual. Under no circumstances shall personal expenses be reimbursed by the company.

Here again, as a general rule, when in doubt, ask the.

Usage of Company Assets

Protecting the Company's assets is a key responsibility of every employee. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others, or sold or donated or mortgaged, without appropriate authorization. Employees may not use Company assets for personal use, nor may they allow any other person to use Company assets.

Every employee is personally responsible for all Company funds over which he or she exercises control. Company funds must be used only for business purposes.

Every employee must take reasonable steps to ensure that the Company receives good value for Company funds spent and must maintain accurate and timely record of expenditure.

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Compliance

It is the Company's policy to comply fully in letter and in spirit with all applicable laws, rules and regulations. In case of ambiguity of the laws or their interpretation, legal advice should be sought. All required information shall be made accessible to the Company's auditors and other authorized persons and government agencies. False or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation and approval are strictly prohibited and violate Company policy and the Law. There shall be no willful omissions of any company transactions from the books and records, no advance income recognition and no hidden bank accounts and funds. No employee in any way will cause the company's accounts or other records to not clearly describe and properly state the true nature and timing of a business activity or transaction.

Electronic Resources Usage

Employees should ensure that they use only licensed software and take back-up of all-important data. Uses that threaten the integrity of the system, the privacy of others, or that are otherwise illegal, are hence forbidden. The Company reserves the right to access and monitor all messages and files on its system, including information regarding employee internet use, as and when deemed necessary and appropriate. The electronic resources shall be used in an effective, ethical, and lawful manner. Users who receive or notice obscene or inappropriate messages are needed to report the same immediately to their immediate superior or the Human Resources Department. The Company will not be responsible for actions of employees deemed illegal with respect to the usage of electronic resources.

Handling Confidential Information

- a.) Employees should use information received during their business dealings only for the purpose it is intended or normally used and never for personal gain or for a third party's gain. They should also not release confidential data or information to others without proper authorization.
- b.) The Company has many kinds of business relationships with many companies and individuals. All employees should take special care to handle confidential information of our customers, potential customers, suppliers, potential suppliers or any other third party with responsibility.
- c.) In keeping with the terms of the Employment Contract, all employees shall, during their service with the Company, devote their full-time attention to the responsibilities entrusted to them. No employee will serve as an employee, agent, director, partner or consultant of any other business enterprise. Also, employees who resign from the services of the Company should not take up employment with a competitor for a period of at least two years.

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Media Policy

Employees should refrain from interaction/communication with the print, electronic media and social media on matters which are likely to have an impact on the image of the Company as a whole without consulting the Delegation office.

It is important to ensure that all statements made to the media are true and fair. Each business unit and division shall have selected persons who are authorized to speak to the media on identified subjects. Employees should not disclose non-public information selectively to a particular Company. One should ensure approval of customers, vendors etc. if reference is made about such customers. Posting or discussing information concerning the Company's/Company's services or business on the Internet without the prior written consent of the Head of the Company / Business is prohibited.

Advertising must not misrepresent, or be likely to mislead the consumer, as to the character, quantity, composition or safety of the product advertised. The Company requires every employee to protect all trademarks, brand names and other proprietary material of the Company and of third parties. We should not disparage products or services of competitors and should avoid political or religious remarks in advertisements.

Procurement Practices

The Company's policy is to purchase supplies based on need, quality, service, price and terms and conditions. Suppliers should be selected based on merit, price, quality and performance. The Company's policy is to, as a rule, select significant suppliers or enter into significant supplier agreements through a competitive bid process. Under no circumstances should any Company employee, agent or contractor attempt to coerce suppliers in any way. All supplier agreements must be reviewed after a 3- year period or as when required and fresh bids invited to confirm the competitiveness of the existing supplier agreement.

Supplies may be purchased from our customers when a combination of quality, price, services offered and reliability of supply warrant such purchases. In addition, the Satyendra Fine Chem "Purchasers' Policy" must be adhered to.

Relation with Customers

The Company recognizes that our customers are of paramount importance and the Company will prosper only to the extent that we meet and exceed the needs of our customers. All employees will at all times:

- a) Recommend to customers, products that are most appropriate for their needs from the Company's/Company's range of the products.
- b) Ensure that products supplied to customers are as per the stated quantity and specifications.
- c) Endeavour to meet delivery commitments to customers and inform customers well in advance in the event of inability to meet delivery commitments for unavoidable reasons.
- d) Promptly respond to all queries from customers.

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- e) Handle all customer complaints promptly and fairly.

Free and Fair Competition

Employees of the Company may not, knowingly, make false or misleading statements regarding its competitors or the products of its competitors, customers, or suppliers. Participating with competitors in a trade association or in a standards creation body is acceptable when the association has been properly established, has a legitimate purpose, and has limited its activities to that purpose.

No employee shall at any time or under any circumstances enter into an agreement or understanding, with any competitor concerning prices, discounts, other terms or conditions of sale, profits or profit margins, costs, allocation of product or geographic markets, allocation of customers, limitations on production, boycotts of customers or suppliers, or bids or the intent to bid.

Company employees may not unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, customers, and business partners. Employees should never attempt to obtain a competitor's confidential information by improper means.

Environment, Health and Safety

Employees should consider the potential impact of the activities, products, and services of the Company on human health and environment and should take necessary measures, over and above legal requirements, to reduce such impact.

Company companies are expected to take particular care to adopt measures necessary to ensure the best possible protection against health and safety risks in the workplace. They should take steps to minimize the risk of accidents at the workplace, follow-up on application of these steps, check actual results against the applicable standards. All employees must follow all safety practices and procedures and use the personal protective equipment provided.

We must ensure that employees, contractors, and visitors are well informed, and given appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner. Company companies are expected to actively promote the protection of the environment. All company sites are expected to follow management methods, which allow measurable environmental performance standards to be set and actual performance to be regularly evaluated and checked against applicable standards. Employees should take care that in the course of carrying out their responsibilities none of their acts of commission and omission adversely affect the Environment.

Breaches of the Code of Conduct

This Code of Conduct describes the standards of behavior expected of staff. As outlined in the Code, behavior or actions that are considered unacceptable by Satyendra Fine Chem may result in disciplinary action against the employee concerned, which could include termination of employment.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Disciplinary Action

Disciplinary action is about problem solving. Satyendra Fine Chem is concerned to identify problems associated with performance or behavior, and to make sure that the process for fixing those problems is prompt, consistent and fair. In general, disciplinary procedures include informal or formal disciplinary action along the following lines:

1. Informal Disciplinary Action:

- discussion of the problem;
- assistance to help overcome the problem;
- referral to the Employee Assistance Programme, if appropriate;
- temporary transfer to other duties.

2. Formal Disciplinary Action:

- verbal warning;
- written warning;
- Removal of discretionary conditions of employment (i.e.: delegations, flexible working hours, etc.);
- transfer to another position at existing salary;
- transfer to another position with reduced pay (but not below the minimum rate for that position);
- suspension (with or without pay);
- dismissal with notice;
- Dismissal without notice.

Other options may be considered, depending on the circumstances of the case.

Whether disciplinary action is informal or formal, the Satyendra Fine Chem will make sure that the disciplinary procedures are fair. This means that:

- You must be told of your right, legal or other assistance and/or representation.
- You must be told of the specific behavior or performance that is causing concern, and given a reasonable opportunity to provide an explanation.
- You must be told, where appropriate, of the action that is required to amend or improve your behavior or performance, and be given a reasonable opportunity to do so.
- We must undertake an appropriate investigation before any substantive disciplinary action is taken.
- If the offence is sufficiently serious, an employee is to be placed on suspension pending investigation.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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- (f) An oral warning would usually precede a written warning, depending on the seriousness of the misconduct.
- (g) It is a requirement that the process and result of any disciplinary action are recorded in writing, read and signed by you (the employee), and then placed on your personal file.

In general terms, no disciplinary papers will go on your file unless you have seen them or have been given a genuine opportunity to see them. If you are not satisfied with the disciplinary action taken, you have the right to pursue a personal grievance. This procedure is outlined in your employment agreement.

Offences Related to Dishonesty

Disciplinary cases involving the following offences must be reported to the Human Resources Officer.

Anti-Bribery or Corruption

Giving or receiving or attempting to give or receive any bribe or inducing or attempting to induce any person to perform any corrupt act.

It is the policy of Satyendra Fine Chem to prohibit bribery and other corrupt conduct in any form. Bribery and kickbacks involving government officials, customers, suppliers, and other counterparties in the commercial marketplace are specifically prohibited. Accordingly, neither Satyendra Fine Chem nor any Company Representative may, directly or indirectly, offer, promise, pay, give, or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for Satyendra Fine Chem or improperly reward the recipient for past conduct.

No person subject to this policy will suffer adverse consequences for refusing to offer, promise, pay, give, or authorize any such benefit, advantage or reward, even if this results in the loss of business to Satyendra Fine Chem.

In addition, no Satyendra Fine Chem Associates, partner, officer, employee, agent, or other representative may request, agree to receive, or accept anything of value from any other person as an inducement or reward for violating his or her duties to Satyendra Fine Chem or in exchange for an improper benefit.

Breach of Trust

Actions or conduct of an employee that cause a reasonable suspicion of dishonesty or mistrust and for which there exist extraneous evidence to prove a breakdown in the relationship of trust between the concerned employee and Company. This will include a situation where the conduct of the employee has created mistrust, which is counterproductive to Company commercial activities or to the public interest, thereby making the continued employment relationship an intolerable one.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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ETHICAL CONDUCT

The Partner and Senior Management will deal on behalf of the Company with professionalism, honesty, and integrity, as well as high moral and ethical standards. Such conduct will be fair and transparent and be perceived to be as such by third parties.

We respect work place ethics by;

- We work smartly with passion, integrity, conviction, and commitment.
- We work in teams with a shared purpose and value individual ability and diversity as essential to promote harmony and open communication. Each of us succeeds individually ... when we, as a team, achieve success.
- **We respect and adhere to company policies, systems, and procedures**
- We will be well-informed and respect the regulations, rules, and compliance issues that apply to our businesses around the world.
- We respect the values and cultures of the communities in which we operate
- Satyendra Fine Chem is a leading global shell casting manufacture product company for product innovation
- & design, lean manufacturing process, value addition and customer service.

Mission: We deliver high-quality inorganic chemical with a strong commitment to safety, sustainability, and innovation. Guided by ESG principles, we minimize environmental impact, protect our people and communities, and uphold integrity in all our operations. Our goal is to create lasting value while enabling a cleaner, safer, and more sustainable future.

Vision: To be a global leader in inorganic chemical manufacturing, recognized for product excellence, sustainable innovation, and responsible business practices. We aim to set industry benchmarks in quality, safety, and environmental performance, while empowering people and communities to thrive. By embracing ESG values, we envision a future where industrial growth and sustainability go hand in hand.

Values:

Quality Excellence – We are committed to delivering safe, consistent, and reliable products that exceed customer expectations.

Safety First – We prioritize the health, safety, and well-being of our employees, partners, and communities in every process and decision.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Environmental Stewardship – We minimize our footprint by reducing emissions, conserving resources, and promoting sustainable manufacturing.

Innovation & Efficiency – We embrace new technologies and continuous improvement to ensure product quality, operational excellence, and sustainability.

Integrity & Transparency – We uphold ethical governance, accountability, and open communication with all stakeholders.

People & Community – We foster an inclusive, respectful workplace and contribute to the development of the communities where we operate.

Sustainable Growth – We balance profitability with responsibility, ensuring long-term value creation for our stakeholders and the planet.

Amendment:

- This policy will be reviewed periodically to ensure its effectiveness and compliance with legal requirements.
- Any updates or amendments will be communicated to all relevant stakeholders.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Code of Conduct for Directors and BOD

1. Purpose The purpose of this Code of Conduct is to establish ethical guidelines and professional standards for the Directors of Satyendra Fine Chem (SFC). It ensures that Directors act with integrity, accountability, and in the best interests of the company and its stakeholders.

2. Scope This Code applies to all members of the Board of Directors of SFC. Directors are expected to adhere to these principles in their conduct and decision-making processes.

3. Ethical Responsibilities

- Act honestly, ethically, and with integrity in all professional dealings.
- Avoid conflicts of interest and disclose any personal or financial interests that may influence decision-making.
- Uphold confidentiality regarding company matters and sensitive information.
- Ensure fair and equitable treatment of all stakeholders, including employees, shareholders, customers, and the community.

4. Compliance with Laws and Regulations

- Adhere to all applicable laws, regulations, and company policies.
- Ensure corporate governance standards are met and upheld.
- Prevent and report any fraudulent, corrupt, or illegal activities.

5. Corporate Responsibility

- Promote sustainable and responsible business practices.
- Ensure decisions consider environmental, social, and governance (ESG) factors.
- Foster diversity, equity, and inclusion in corporate leadership and operations.

6. Fiduciary Duties

- Act in good faith, with due care, diligence, and loyalty to the company.
- Protect and enhance shareholder value while balancing long-term sustainability.
- Avoid misuse of corporate assets, information, and opportunities for personal gain.

7. Board Conduct and Decision-Making

- Maintain professional decorum and respect differing viewpoints during meetings.
- Participate actively in Board discussions and decision-making processes.
- Be adequately informed and prepared for Board meetings and responsibilities.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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8. Confidentiality and Information Security

- Safeguard company information and respect the confidentiality of Board discussions.
- Do not use privileged company information for personal advantage or external disclosure.

9. Reporting and Accountability

- Report any violations of this Code promptly to the appropriate authority.
- Support a culture of transparency, accountability, and ethical leadership.
- Commit to continuous learning and self-improvement as a director.

10. Enforcement and Review

- Non-compliance with this Code may result in disciplinary action, including removal from the Board.
- This Code shall be reviewed periodically to ensure relevance and effectiveness.

11 . Amendment

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Code of Conduct for Senior Management

1. Introduction

The Senior Management of Satyendra Fine Chem (SFC) is expected to uphold the highest standards of integrity, professionalism, and ethical conduct. This Code of Conduct outlines the principles and expectations that guide the behaviour and decision-making of all senior executives.

2. Integrity and Ethical Conduct

- Act with honesty, transparency, and integrity in all business dealings.
- Avoid conflicts of interest and disclose any potential conflicts to the appropriate authority.
- Uphold the company's values and promote a culture of ethical behaviour.
- Ensure compliance with all applicable laws, regulations, and company policies.

3. Leadership and Responsibility

- Lead by example and foster a culture of accountability and respect.
- Promote a positive and inclusive workplace environment.
- Encourage ethical decision-making at all levels of the organization.
- Take responsibility for decisions and their impact on employees, stakeholders, and the company.

4. Confidentiality and Data Protection

- Safeguard confidential and proprietary information of the company and its stakeholders.
- Ensure compliance with data protection laws and maintain the privacy of sensitive information.
- Use company resources, including information, responsibly and for legitimate business purposes only.

5. Compliance with Laws and Regulations

- Abide by all relevant local, national, and international laws and regulations.
- Ensure corporate governance policies are followed diligently.
- Report any suspected legal or regulatory violations to the appropriate authority.

6. Conflict of Interest

- Avoid any situation where personal interests may conflict with those of the company.
- Disclose any financial, business, or personal relationships that could influence decision-making.
- Do not accept gifts or benefits that could compromise impartiality or influence business decisions.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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7. Fair and Respectful Treatment

- Treat all employees, customers, and stakeholders with fairness, dignity, and respect.
- Promote diversity, equity, and inclusion within the workplace.
- Foster a harassment-free work environment.

8. Corporate Social Responsibility

- Support initiatives that contribute to the well-being of society and the environment.
- Ensure the company operates in a sustainable and socially responsible manner.
- Promote ethical sourcing and responsible supply chain practices.

9. Accountability and Enforcement

- Adhere to this Code of Conduct and ensure compliance across all levels of senior management.
- Report any violations or unethical behaviour promptly.
- Understand that breaches of this code may result in disciplinary action, up to and including termination of employment.

10. Review and Amendments

This Code of Conduct will be reviewed periodically to ensure its relevance and effectiveness. Senior Management is responsible for staying informed about any updates and implementing them accordingly.

Acknowledgment: I, [Name], acknowledge that I have read, understood, and agree to abide by this Code of Conduct for Senior Management.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Conflict Mineral Policy

1. Purpose

Satyendra Fine Chem (SFC) is committed to ethical sourcing and ensuring that the materials used in our products do not contribute to human rights violations, environmental harm, or armed conflict. This policy outlines our approach to identifying and mitigating risks related to Conflict Minerals (Tin, Tantalum, Tungsten, and Gold—"3TG") in our supply chain.

2. Scope

This policy applies to all employees, suppliers, contractors, and business partners involved in the procurement and use of materials that may contain Conflict Minerals.

3. Our Commitment

SFC is dedicated to:

- Conducting due diligence on our supply chain following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Avoiding the use of Conflict Minerals sourced from the Democratic Republic of the Congo (DRC) and adjoining countries, unless they are certified as conflict-free by recognized third-party organizations.
- Encouraging suppliers to source materials from smelters and refiners validated as conflict-free by industry programs like the Responsible Minerals Initiative (RMI).
- Ensuring transparency in our sourcing practices by requiring suppliers to provide Conflict Minerals Reporting Templates (CMRTs).
- Complying with applicable laws and regulations, including the U.S. Dodd-Frank Act and the EU Conflict Minerals Regulation.

4. Supplier Expectations

We expect our suppliers to:

- Implement their own conflict minerals policies aligned with global standards.
- Source 3TG minerals only from conflict-free smelters validated by industry programs.
- Provide complete conflict minerals reporting and disclosures upon request.
- Take corrective actions if any non-compliant sourcing is identified.

5. Compliance & Reporting

Satyendra Fine Chem actively monitors compliance through regular supplier assessments, audits, and reporting. Employees, suppliers, and stakeholders can report concerns related to conflict minerals sourcing through our ethics hotline or designated compliance officer.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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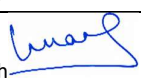
6. Continuous Improvement

We are committed to continuously improving our conflict minerals due diligence process and working with stakeholders to promote responsible sourcing.

7. Amendment

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:

Umang Shah 

Designation: Partner- Admin

Approved By:

Priyank Patel 

Designation: Partner-Technical

Issued By:

Umang Shah 

Designation: Partner- Admin



Data Privacy Policy

1. Policy:

This Data Protection Policy applies to all companies of the Satyendra Fine Chem, all its dependent Group companies, affiliated companies and their employees. "Dependent" in this instance means that Satyendra Fine Chem may enforce the adoption of this Data Protection Policy directly or indirectly. The Data Protection Policy extends to all processing of personal data. In countries where the data of legal entities is protected to the same extent as personal data, this Data Protection Policy applies equally to data of legal entities. Anonymized data, e.g., for statistical evaluations or studies, is not subject to this Data Protection Policy.

2. Scope: This policy applies to Satyendra Fine Chem.

3. Purpose and Principles for processing personal data

a) Fairness and lawfulness

When processing personal data, the individual rights of the data subjects must be protected. Personal data must be collected and processed in a legal and fair manner.

b) Restriction to a specific purpose

Personal data can be processed only for the purpose that was defined before the data was collected. Subsequent changes to the purpose are only possible to a limited extent and require substantiation.

c) Transparency

The data subject must be informed of how his/her data is being handled. In general, personal data must be collected directly from the individual concerned. When the data is collected, the data subject must either be aware of, or informed of:

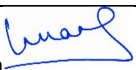
» The identity of the Data Controller

» The purpose of data processing

» Third parties or categories of third parties to whom the data might be transmitted

d) Data reduction and data economy

Before processing personal data, you must determine whether and to what extent the processing of personal data is necessary in order to achieve the purpose for which it is undertaken. Where the purpose allows and where the expense involved is in proportion with the goal being pursued, anonymized or statistical data must be used. Personal data may not be collected in advance and stored for potential future purposes unless required or permitted by national law.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

e) Deletion

Personal data that is no longer needed after the expiration of legal or business process-related periods must be deleted. There may be an indication of interests that merit protection or historical significance of this data in individual cases. If so, the data must remain on file until the interests that merit protection have been clarified legally, or the corporate archive has evaluated the data to determine whether it must be retained for historical purposes.

f) Factual accuracy up-to-datedness of data

Personal data on file must be correct, complete, and – if necessary – kept up to date. Suitable steps must be taken to ensure that inaccurate or incomplete data are deleted, corrected, supplemented or updated.

g) Confidentiality and data security

Personal data is subject to data secrecy. It must be treated as confidential on a personal level and secured with suitable organizational and technical measures to prevent unauthorized access, illegal processing or distribution, as well as accidental loss, modification or destruction.

4. Essential Elements:

Reliability of data processing

Collecting, processing and using personal data is permitted only under the following legal bases. One of these legal bases is also required if the purpose of collecting, processing and using the personal data is to be changed from the original purpose.

A - Customer and partner data

A.a Data processing for a contractual relationship

Personal data of the relevant prospects, customers and partners can be processed in order to establish, execute and terminate a contract. This also includes advisory services for the partner under the contract if this is related to the contractual purpose. Prior to a contract – during the contract initiation phase – personal data can be processed to prepare bids or purchase orders or to fulfil other requests of the prospect that relate to contract conclusion. Prospects can be contacted during the contract preparation process using the information that they have provided. Any restrictions requested by the prospects must be complied with.

A.b Data processing for advertising purposes

If the data subject contacts a Satyendra Fine Chem company to request information (e.g. request to receive information material about a product), data processing to meet this request is permitted. Customer loyalty or advertising measures are subject to further legal requirements. Personal data can be processed for advertising purposes or market and opinion research, provided that this is consistent with the purpose for which the data was originally collected. The data subject must be informed about the use of his/her data for advertising purposes. If data is collected only for advertising purposes, the

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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disclosure from the data subject is voluntary. The data subject shall be informed that providing data for this purpose is voluntary. When communicating with the data subject, consent shall be obtained from him/her to process the data for advertising purposes.

When giving consent, the data subject should be given a choice among available forms of contact such as regular mail, e-mail and phone.

If the data subject refuses the use of his/her data for advertising purposes, it can no longer be used for these purposes and must be blocked from use for these purposes. Any other restrictions from specific countries regarding the use of data for advertising purposes must be observed.

A.c Consent to data processing

Data can be processed following consent by the data subject. Before giving consent, the data subject must be informed. The declaration of consent must be obtained in writing or electronically for the purposes of documentation.

In some circumstances, such as telephone conversations, consent can be given verbally. The granting of consent must be documented.

A.d Data processing pursuant to legal authorization

The processing of personal data is also permitted if national legislation requests, requires or allows this. The type and extent of data processing must be necessary for the legally authorized data processing activity and must comply with the relevant statutory provisions.

Reliability of data processing: Collecting, processing and using personal data is permitted only under the following legal bases.

One of these legal bases is also required if the purpose of collecting, processing and using the personal data is to be changed from the original purpose.

A.e Data processing pursuant to legitimate interest

Personal data can also be processed if it is necessary for a legitimate interest of the Satyendra Fine Chem. Legitimate interests are generally of a legal (e.g., collection of outstanding receivables) or commercial nature (e.g., avoiding breaches of contract). Personal data may not be processed for the purposes of a legitimate interest if, in individual cases, there is evidence that the interests of the data subject merit protection, and that this takes precedence. Before data is processed, it is necessary to determine whether there are interests that merit protection.

A.f Processing of highly sensitive data

Highly sensitive personal data can be processed only if the law requires this or the data subject has given express consent. This data can also be processed if it is mandatory for asserting, exercising or defending legal claims regarding the data subject. If there are plans to process highly sensitive data, the director and HR/Director must be informed in advance.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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A.g User data and internet

If personal data is collected, processed and used on websites or in apps, the data subjects must be informed of this in a privacy statement and, if applicable, information about cookies. The privacy statement and any cookie information must be integrated so that it is easy to identify, directly accessible and consistently available for the data subjects.

If use profiles (tracking) are created to evaluate the use of websites and apps, the data subjects must always be informed accordingly in the privacy statement. Personal tracking may only be affected if it is permitted under national law or upon consent of the data subject. If tracking uses a pseudonym, the data subject should be given the chance to opt out in the privacy statement.

If websites or apps can access personal data in an area restricted to registered users, the identification and authentication of the data subject must offer enough protection during access.

B. Employee data

B.a Data processing for the employment relationship

In employment relationships, personal data can be processed if needed to initiate, carry out and terminate the employment agreement. When initiating an employment relationship, the applicants' personal data can be processed. If the candidate is rejected, his/her data must be deleted in observance of the required retention period, unless the applicant has agreed to remain on file for a future selection process.

Consent is also needed to use the data for further application processes or before sharing the application with other Group companies.

In the existing employment relationship, data processing must always relate to the purpose of the employment agreement if none of the following circumstances for authorized data processing apply.

If it should be necessary during the application procedure to collect information on an applicant from a third party, the requirements of the corresponding national laws have to be observed. In cases of doubt, consent must be obtained from the data subject.

There must be legal authorization to process personal data that is related to the employment relationship but was not originally part of performance of the employment agreement. This can include legal requirements, collective regulations with employee representatives, consent of the employee, or the legitimate interest of the company.

B.b Data processing pursuant to legal authorization

The processing of personal employee data is also permitted if national legislation requests, requires or authorizes this. The type and extent of data processing must be necessary for the legally authorized data processing activity and must comply with the relevant statutory provisions.

If there is some legal flexibility, the interests of the employee that merit protection must be taken into consideration.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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B.c Collective agreements on data processing

If a data processing activity exceeds the purposes of fulfilling a contract, it may be permissible if authorized through a collective agreement. Collective agreements are pay scale agreements or agreements between employers and employee representatives, within the scope allowed under the relevant employment law.

The agreements must cover the specific purpose of the intended data processing activity, and must be drawn up within the parameters of national data protection legislation.

B.d Consent to data processing

Employee data can be processed upon consent of the person concerned. Declarations of consent must be submitted voluntarily. Involuntary consent is void. The declaration of consent must be obtained in writing or electronically for the purposes of documentation.

In certain circumstances, consent may be given verbally, in which case it must be properly documented.

In the event of informed, voluntary provision of data by the relevant party, consent can be assumed if national laws do not require express consent.

B.e Data processing pursuant to legitimate interest

Personal data can also be processed if it is necessary to enforce a legitimate interest of the Satyendra Fine Chem.

Legitimate interests are generally of a legal (e.g., filing, enforcing or defending against legal claims) or financial (e.g., valuation of companies) nature.

Personal data may not be processed based on a legitimate interest if, in individual cases, there is evidence that the interests of the employee merit protection.

Before data is processed, it must be determined whether there are interests that merit protection. Control measures that require processing of employee data can be taken only if there is a legal obligation to do so or there is a legitimate reason. Even if there is a legitimate reason, the proportionality of the control measure must also be examined.

The justified interests of the company in performing the control measure (e.g., compliance with legal provisions and internal company rules) must be weighed against any interests meriting protection that the employee affected by the measure may have in its exclusion and cannot be performed unless appropriate.

The legitimate interest of the company and any interests of the employee meriting protection must be identified and documented before any measures are taken.

Moreover, any additional requirements under national law (e.g. rights of co-determination for the employee representatives and information rights of the data subjects) must be taken into account before Processing of highly sensitive data.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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BUSINESS POLICIES AND PROCEDURES
HANDBOOK

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Highly sensitive personal data can be processed only under certain conditions.

Highly sensitive data is data about racial and ethnic origin, political beliefs, religious or philosophical beliefs, union membership, and the health and sexual life of the data subject.

Under national law, further data categories can be considered highly sensitive or the content of the data categories can be filled out differently.

Moreover, data that relates to a crime can often be processed only under special requirements under national law.

The processing must be expressly permitted or prescribed under national law.

Additionally, processing can be permitted if it is necessary for the responsible authority to fulfil its rights and duties in the area of employment law.

The employee can also expressly consent to processing. If there are plans to process highly sensitive data, the Director and HR/Director or his/her local representative (Local Data Protection Officer) must be informed in advance.

B.g Automated decisions

If personal data is processed automatically as part of the employment relationship, and specific personal details are evaluated (e.g., as part of personnel selection or the evaluation of skills profiles), this automatic processing cannot be the sole basis for decisions that would have negative consequences or significant problems for the affected employee.

To avoid erroneous decisions, the automated process must ensure that a natural person evaluates the content of the situation, and that this evaluation is the basis for the decision.

The data subject must also be informed of the facts and results of automated individual decisions and the possibility to respond.

B.h Transmission of personal data

Telecommunications and internet Telephone equipment, e-mail addresses, intranet and internet along with internal social networks are provided by the company primarily for work-related assignments. They are a tool and a company resource, and they can be used within the applicable legal regulations and internal company policies.

In the event of authorized use for private purposes, the laws on secrecy of telecommunications and the relevant national telecommunication laws must be observed if applicable.

There will be no general monitoring of telephone and e-mail communications or intranet/ internet use.

To defend against attacks on the IT infrastructure or individual users, protective measures can be implemented for the connections to the SFC network that block technically harmful content or that analyse the attack patterns.

For security reasons, the use of telephone equipment, e-mail addresses, the intranet/internet and internal social networks can be logged for a temporary period.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Evaluations of this data from a specific person can be made only in a concrete, justified case of suspected violations of laws or policies of the Satyendra Fine Chem. The evaluations can be conducted only by investigating departments while ensuring that the principle of proportionality is met. The relevant national laws must be observed in the same manner as the Group regulations.

C. Transmission of personal data

Transmission of personal data to recipients outside or inside the Satyendra Fine Chem. is subject to the authorization requirements for processing personal.

The data recipient must be required to use the data only for the defined purposes.

This does not apply if transmission is based on a legal obligation.

A legal obligation of this kind can be based on the laws of the domiciliary country of the Satyendra Fine Chem transmitting the data. In the alternative, the laws of the domiciliary country.

If data is transmitted by a third party to a Satyendra Fine Chem it must be ensured that the data can be used for the intended purpose.

D. Contract data processing

Data processing on behalf means that a provider is hired to process personal data, without being assigned responsibility for the related business process.

In these cases, an agreement on Data Processing on Behalf must be concluded with external providers.

The client retains full responsibility for correct performance of data processing. The provider can process personal data only as per the instructions from the client.

When issuing the order, the following requirements must be complied with; the department placing the order must ensure that they are met.

1. The provider must be chosen based on its ability to cover the required technical and organizational protective measures.
2. The order must be placed in writing. The instructions on data processing and the responsibilities of the client and provider must be documented.
3. The contractual standards for data protection provided by the Director and HR/Director or his/her local representative
4. Before data processing begins, the client must be confident that the provider will comply with the duties. A provider can document its compliance with data security requirements in particular by presenting suitable certification. Depending on the risk of data processing, the reviews must be repeated on a regular basis during the term of the contract.

E. Rights of the data subject

Every data subject has the following rights.

Their assertion is to be handled immediately by the responsible unit and cannot pose any disadvantage to the data subject.

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1. The data subject may request information on which personal data relating to him/her has been stored, how the data was collected, and for what purpose. If there are further rights to view the employer's documents (e.g., personnel file) for the employment relationship under the relevant employment laws, these will remain unaffected.
2. If personal data is transmitted to third parties, information must be given about the identity of the recipient or the categories of recipients.
3. If personal data is incorrect or incomplete, the data subject can demand that it be corrected or supplemented.
4. The data subject can object to the processing of his or her data for purposes of advertising or market/opinion research. The data must be blocked from these types of use.
5. The data subject may request his/her data to be deleted if the processing of such data has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing has lapsed or ceased to be applicable for other reasons. Existing retention periods and conflicting interests meriting protection must be observed.
6. The data subject generally has a right to object to his/her data being processed, and this must be taken into account if the protection of his/her interests takes precedence over the interest of the data controller owing to a particular personal situation.

This does not apply if a legal provision requires the data to be processed.

F. Data protection control

- Confidentiality of processing Personal data is subject to data secrecy.
- Any unauthorized collection, processing, or use of such data by employees is prohibited.
- Any data processing undertaken by an employee that he/she has not been authorized to carry out as part of his/her legitimate duties is unauthorized.

The "need to know" principle applies. Employees may have access to personal information only as is appropriate for the type and scope of the task in question.

This requires a careful breakdown and separation, as well as implementation, of roles and responsibilities.

Employees are forbidden to use personal data for private or commercial purposes, to disclose it to unauthorized persons, or to make it available in any other way.

Supervisors must inform their employees at the start of the employment relationship about the obligation to protect data secrecy.

This obligation shall remain in force even after employment has ended.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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G. Processing security

Personal data must be safeguarded from unauthorized access and unlawful processing or disclosure, as well as accidental loss, modification or destruction. This applies regardless of whether data is processed electronically or in paper form. Before the introduction of new methods of data processing, particularly new IT systems, technical and organizational measures to protect personal data must be defined and implemented.

These measures must be based on the state of the art, the risks of processing, and the need to protect the data (determined by the process for information classification).

In particular, the responsible department can consult with its Local Data Protection Officer.

The technical and organizational measures for protecting personal data are part of Corporate Information Security management and must be adjusted continuously to the technical developments and organizational changes.

H. Data protection control

Compliance with the Data Protection Policy and the applicable data protection laws is checked regularly with data protection audits and other controls. The performance of these controls is the responsibility of the director or HR/Director and/or his/her delegate at local level, the local data protection officers, and other company units with audit rights or external auditors hired.

The results of the data protection controls must be reported to the Director or HR/Director. Satyendra Fine Chem. Management Committee must be informed of the primary results as part of the related reporting duties. On request, the results of data protection controls will be made available to the responsible data protection authority. The responsible data protection authority can perform its own controls of compliance with the regulations of this Policy, as permitted under national law.

I. Data protection incidents

All employees must inform their supervisor, local data protection officer or the director or HR/Director immediately about cases of violations against this Data Protection Policy or other regulations on the protection of personal data (data protection incidents)

The manager responsible for the function or the unit is required to inform the responsible local data protection officer or the HR/Director immediately about data protection incidents and follow the Risk Management Policies and Procedures.

In cases of

» **Improper transmission of personal data to third parties,**

» **Improper access by third parties to personal data, or**

» **Loss of personal data the required company**

reports must be made immediately so that any reporting duties under national law can be complied with.

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Umang Shah	Priyank Patel	Umang Shah	
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5. Responsibility:

Director and HR/Director is responsible for the implementation of this policy.

Therefore, they are required to ensure that the legal requirements, and those contained in the Data Protection Policy, for data protection are met (e.g., national reporting duties).

Management staff are responsible for ensuring that organizational, HR, and technical measures are in place so that any data processing is carried out in accordance with data protection.

Compliance with these requirements is the responsibility of the relevant employees.

If official agencies perform data protection controls, the HR/Director must be informed immediately.

The managers must ensure that their employees are sufficiently trained in data protection. Improper processing of personal data, or other violations of the data protection laws, can be criminally prosecuted in many countries and result in claims for compensation of damage.

Violations for which individual employees are responsible can lead to sanctions under employment law.

Name: Prashant Thakur (Local Data Protection Officer)

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Human Right Policy

Satyendra Fine Chem is committed to the protection and preservation of human rights. We are focus on following points.

1. Prohibition of Forced Labour

All people working at Satyendra Fine Chem shall be voluntary.

2. Prohibition of Child Labour

Satyendra Fine Chem shall not allow children to work. It shall not have its employees under 18 years of age engage in a job which is likely to endanger their health and safety.

Children as used herein shall refer to those who are under 15 years of age (14 if the law of the relevant country or area permits) or those under the age of finishing the compulsory education or under the minimum age for admission to employment as stipulated in respective countries and areas.

3. Consideration for Work Hours

Satyendra Fine Chem shall respect the global standards and adequately control work hours, holidays, and vacation by observing the applicable laws and regulations of respective countries.

4. Adequate Wages

Satyendra Fine Chem shall pay salaries to its employees by respecting all the wage-related laws stipulating the minimum wage, overtime compensation and legal benefits.

5. Prohibition of Inhuman Treatment

Satyendra Fine Chem shall prohibit sexual harassment and abuse, corporal punishment, physical and mental coercion, verbal abuse and harassment, and inhuman treatment of employees.

6. Prohibition of Discrimination

Satyendra Fine Chem shall prohibit discrimination in employment and labor by reason of race, ethnicity, nationality, descent, skin color, age, sex, sexual orientation, presence/ absence of handicaps, pregnancy, religion, political orientation, marital status, family status and infection of HIV/ AIDS.

7. Employees' Right to Organize

Satyendra Fine Chem respects employees' right to organize as a means of labor-management consultation on labor environment, wage levels and other relevant matters in line with local laws and regulations.

8. Safe and Healthy Working Environment

Satyendra Fine Chem shall place top priority on industrial safety and health of employees for them to work safely, and prevent accidents and disasters as well as physical and mental diseases.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
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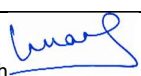
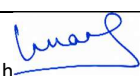
Land Right Policy

Land is vital to our lives, whether we use it for shelter, for food, for natural resources or for operating a business. It provides livelihoods, supports communities and generates vital natural resources on which we all depend.

“Land is not a mere commodity, but an essential element for the realization of many human rights.”

(The United Nations offices of the High Commissioner on Human Rights)

By endorsing the 10 Principles of the United Nations Global Compact (UNGC), Satyendra Fine Chem is committed to supporting, as well as respecting, the protection of internationally proclaimed Human Rights and has adopted policies to protect against human rights abuses, including the rights to land and natural resources of local communities, safeguarded land rights of Scheduled Tribes, and through the inclusion of the fundamental right to property, guaranteed equal property rights to all Indians, including women, Dalits or Scheduled Castes, indigenous peoples and tribes. SFC is always committed to conducting its business in compliance with national laws, internationally accepted best practices and in assessing, as well as minimizing, the social, economic and environmental impacts, or potential impacts, of its business activities on local communities, including land rights, such as the right of indigenous peoples to their ancestral lands. SFC has a zero tolerance to all forms of illegal land acquisitions and/or land acquisitions with adverse social, economic or environmental impacts on communities. All negotiations on land transactions, or land use, are conducted in accordance with national laws, with transparency and no action is taken over the land of communities and indigenous people without their free, prior and informed consent. The protection of land rights, and all that this entails, ensures a sustainable future for generations to come.

Prepared By:	Approved By:	Issued By:	
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Procedure cum Policy for Prevention & Redressal of Sexual Harassment

1. Preamble & Objective

The policy provides guidelines to all Employees for prevention and redressal against complaints of Sexual Harassment of Employee at Workplace.

Preventing Sexual Harassment of Employees at the Workplace and providing them a safe and harassment free atmosphere is a matter of great importance and Responsibility for the management. Right to protection from Sexual Harassment and right to work with dignity are recognized as universal Human rights and the Management endorses the same.

Accordingly, keeping in view these factors and the law of the land the present policy is being framed with the objective to redress, prevent/deter the commission of any act of Sexual Harassment against an employee.

2. Definitions:

In this Policy the following words and expressions are used in the following senses, unless a contrary intention appears from the context

“ACT” 2013

“ACT” refers to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made there under

“Aggrieved Employee” means any Employee who alleges that she/he has been subjected to Sexual Harassment at the Workplace.

“Company” means Satyendra Fine Chem.

“Complainant” means any Aggrieved Employee for himself/herself and on behalf of others and in case more than one Aggrieved Employee, it would also include a union or representative body acting on behalf of the Aggrieved Employee or Her/his legal heirs.

“Employee” means a person employed at the Workplace for any regular, temporary, daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

“Employer” means Satyendra Fine Chem.

“Complaints Committee” means the Internal Complaints Committee Constituted to deal/dispose the matters relating to sexual harassment at the workplace.

“Management” means the committee consisting of the Partners and Human Resource

“Respondent” means a person against whom an allegation of Sexual Harassment is made.

“Sexual Harassment” Without limiting to the general meaning of the word ‘Sexual Harassment’ of Employees and with the exclusion of any consensual conduct between the Employees, it would also include the following:

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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- Any unwelcome sexually determined conduct whether physical, verbal, or non-verbal, including but not limited to, sexual advances, demands or requests for sexual favours, molestation, sexually nuanced gestures, comments, remarks or jokes either verbal, textual, graphic or electronic or by any other means or action
- Any unwelcome physical contact and advances or forcible physical touch or molestation of an employee
- Sexually colored remarks to an employee
- Showing pornography or other offensive or derogatory pictures, cartoons, pamphlets or saying to an employee
- Jokes causing or likely to cause awkwardness or embarrassment to an employee
- Unwelcome sexual overtone in any manner such as over telephone and the like to an employee
- Touching or brushing against any part of the body and the like of an employee
- Physical confinement of any employee and/or any other act likely to violate her/his privacy.
- Any act or conduct by an employee in authority which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace discriminatory, hostile, or intimidating to an employee as a consequence of her/his refusal to accept any unwelcome sexually determined conduct.

Explanation: where any act is committed against any employee and such person has a reasonable apprehension that it can be detrimental to his/her Privacy, career progression, freedom or personal life, or it will lead to discriminatory treatment, as for instance, when the employee has reasonable grounds to believe that his/her objection would disadvantage her/him in connection with her/his employment or recruitment or promotion and it would result in adverse consequence if she/he does not consent to the unwelcome conduct or raises any objection, it shall deemed to be act of sexual harassment.

Any act of a person in charge of the Management or Internal Complaints Committee, using the authority to exploit the sexuality of a subordinate Employee in a manner which prevents or impairs the Employee's full utilization of employment benefits or opportunities. It also includes behavior that impliedly or explicitly uses the power inherent in the status of the person to affect negatively on an employee's work experience or career opportunities and/or to threaten, coerce or intimidate an Employee to accept sexual advances or making employment decision affecting Employee or create an intimidating, hostile or offensive working environment that may be humiliating and may constitute a health and safety problem.

"Workplace", in relation to an Employee, means any place where an Aggrieved Employee or Respondent or both is/are employed, deployed or work(s) or visit(s) in connection with work during the course of or arising out of employment, in the Establishment. Workplace also includes the transportation provided by the employer for undertaking any journey connected with the employment.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
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3. Complaints Committee

- I. The Internal Complaints Committee of the Company consists of the following members:

Presiding Officer, who shall be a Woman, Employed at a senior level in the Company. If there is no senior woman employee in the Company, a senior woman employee from some other organization may be nominated as presiding officer. who is independent women not associated with non-governmental organization an committed for the social cause of women appointed as Presiding Officer.

- II. Two or more than two members may be nominated from amongst employees who have commitment towards social causes of women. At present no women employee working at organization in future if we appoint any women employee, we will add her name in committee.

One member to be nominated from amongst a non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to sexual harassment. As per cell shall be the member. As per the Sexual Harassment Act, the Company is committed to nominate at least $\frac{1}{2}$ (one-half) of the above-mentioned members as women. The Presiding Officer and every member of the Committee shall not hold office for more than 3 (three) years from the date of their nomination and a minimum of 3 (three) members, including the Presiding officer, shall be present while the inquiry is being conducted by the Committee.

4. Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

B.1.

An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division, and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

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B.2.

The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

B.3.

If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

B.4.

Where such conduct, on the part of the accused, amounts to a specific offence under the law, the company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

B.5.

The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the partners as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The partners will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology**
- b. Counselling**
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.**
- d. Work assignment / transfer for either the perpetrator or the victim.**
- e. Suspension or termination of services of the employee found guilty of the offence**

B.6.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

5. Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

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6. Appeal:

An Aggrieved Employee aggrieved by from the recommendations of the Internal Complaints Committee or in case of noncompliance of the recommendations may prefer an appeal to the appropriate authority, as notified from time to time, within a period of 90 days of the recommendations.

7. Applicable Law:

This policy is subject to the provisions of The Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal Act 2013), the rules made thereunder and other laws in force.

8. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

9. Committee Member

Presiding Officer: Mr. Umang Shah

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Bio Diversity Policy

We are Satyendra Fine Chem support the diversity conservation through the merit, performance, engagement, and communication and shall drive identify and implement required action with in organization and entire chain of business with stakeholders. We execution of best practices to protect the and preserve the biodiversity.

Our commitments are

- Comply with the biodiversity law of country.
- We commit not to cause any harm to biodiversity with plant and vicinity.
- We commit not to have any business activity near sites which are globally or nationally declared important biodiversity for example world heritage area, IUCN Category I-IV protected area.
- We undertake mitigation plan to avoid damage, minimising damage and restoring biodiversity close to operational area.
- We attempt to no deforestation across operational area and we promote tree plantation in organization any nearby area.
- We commit long term partnership with government, non-government, local communities and interested parties to ensure the conservation of indigenous species nearby operational area and support local, national, and global conservation initiative.
- We will organize awareness program on conservation of biodiversity among the locals, employee, and local communities.
- We will implement best operational practices to reduce environmental impact on biodiversity, implement climate change mitigation plans, minimize pollution, and promote recycling.
- Observe, analyse biodiversity performance against the measurable biodiversity goals to continual improvement.

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Procedure cum Policy for Prevention of force labour, protecting employees from Human Trafficking and Slavery

1. Objective:

The purpose of this policy is to support a workplace that is free from force labour and protecting employees from Human Trafficking.

2. Scope

This policy applies to all full time, part time, casual employees, volunteers and contractors.

This policy applies to all practice operations and functions, including those situations where employees are required to work off site.

3. Definition:

Force Labour is work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. Forced labour can involve practices such as threats of dismissal or physical violence, the withholding of identity documents or wages, threats to denounce workers to immigration authorities where their status is illegal, or entangling workers in fraudulent debt.

Human trafficking, or “trafficking in persons”, can lead to forced labour. It is defined as the recruitment, transportation, transfer, harbouring or receipt of people by means of a threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Modern slavery is an umbrella term that covers forced labour, human trafficking, as well as other exploitative practices such as forced marriage.

Forced labour can take many different forms, including the following:

Coercion in employment Coercion leading to forced labour can include:

- withholding, delay or non-payment of wages
- the retention of passports or other identity documents
- threats to denounce a worker to the authorities
- threats of dismissal or other penalty to force workers to work overtime
- locking-in of workers at the workplace or accommodation.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Migrant workers and forced labour

- There are important links between migration and forced labour because migrant workers are vulnerable to exploitation, particularly if they have no valid work permit or employment contract, or are in breach of the terms of their visa.
- Often migrant workers are hired through a recruitment agent, who may use the coercive practices described above. If trafficked workers are charged recruitment fees this may result in debt bondage (see next point).

Debt bondage

- Debt bondage can arise where a worker takes a loan or wage advance from an employer or labour broker so that they can pay excessive recruitment and processing fees. The size of the loan means that the worker is unable to pay off the loan and is effectively trapped.

Prison labour

- Work carried out by prisoners for private companies does not always amount to forced labour. Forced labour arises where a prisoner is made to work for the benefit of a private company without his or her voluntary consent (see next page).
- Prisoners' conditions of employment (especially wages, social security and health and safety) should be, as far as possible, the same as those enjoyed by non-prisoners carrying out similar work.

Using prison labour in the private sector

Prisoners may undertake voluntary work in connection with private commercial activities inside or outside the prison, provided that certain requirements are met in order to ensure true consent. The primary requirement is voluntariness: a prisoner's work for a private company must be done on a voluntary basis. There are two main indicators of voluntariness:

1. Formal consent

- Formal written consent must be obtained from prisoners working for private enterprise to indicate that they are undertaking the work on a voluntary basis.
- Workers should not have been subjected to any pressure or threatened loss of privileges to sign the consent.

2. Wages and conditions

- Employers should offer the same level of health and safety and similar terms and conditions of employment (such as wages and social security) to those offered to workers who are not in prison.
- It may not be appropriate for an employer to offer prisoners all the conditions that are applicable in a free market. The wages do not have to be the same as those paid in the open market, but should be approximately the same. However, it is permissible for prison authorities to deduct from prisoners' wages appropriately identified sums to cover food and

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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lodging costs, if the process is transparent. Other factors that should be considered to indicate voluntariness include the opportunity to learn new professional or personal skills which may assist the prisoner after release.

In India, trafficking is primarily an offence under the Indian Penal Code, 1860. It defines trafficking as (i) recruitment, (ii) transportation, (iii) harbouring, (iv) transfer, or (v) receipt of a person for exploitation by use of certain forceful means

3. Applicable law

Bonded Labour System (Abolition) Act, 1976. Long Title: An Act to provide for the abolition of bonded labour system with a view to preventing the economic and physical exploitation of the weaker sections of the people and for matters connected therewith or incidental thereto.

4. Contents

The Satyendra Fine Chem is committed to prohibit bonded labour, human trafficking in persons and slavery in the organization. We will follow following principle

1. We will respect human rights of employee and other in our business operation.
2. We compensate employee with minimum wages and other benefits prescribed by law country.
3. We will not utilize misleading and unethical recruitment practices like force and bounded labour.
4. We will not hold any custody of original document of employee. Ensure that workers always remain in possession of their original documents like academic certificates and citizen identity card. Employers should provide workers with individual secure storage facilities for their documents.
5. Ensure that workers are free to leave the worksite and accommodation, subject only to appropriate security or logistical restrictions where necessary.
6. Ensure that any non-cash benefits (such as accommodation) are valued appropriately and do not impose a substantial financial burden on workers.
7. Do not use prison labour without guarantees that it is voluntary (for example, formal written consent from the prisoner) and ensure that prison labourers are paid and treated the same as non-prison workers.
8. Ensure that overtime is within the limits imposed by national legislation and is not imposed by using threats, including the threat of dismissal.
9. We will offer employment to in language which is understand by worker.
10. We will not use any force labour or bounded labour.
11. Take steps to ensure that all work is carried out voluntarily.
12. Seek to ensure that no fees are charged to workers either directly or by recruitment agencies or by the client (including for travel or accommodation). The client's "no-fees" policy should be prominently stated in job advertisements and in contracts with recruitment agencies.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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13. Use only legitimate and reputable recruitment and employment agencies, and put due diligence procedures in place to check their practices and policies before doing business with them and on an ongoing basis

Set out below is a list of questions that provide guidance. If the answer to any of the questions is yes, immediate, and concrete steps must be taken to ensure that the employment in question does not give rise to forced labour.

1. Are workers not free to terminate their employment?
2. Are workers not free to leave their workplace as they wish?
3. Are wages not paid in full and on time? Are wage advances or loans made to workers?
4. Are workers provided by their employer with services for which they must pay?
5. Are workers required to work excessive amounts of overtime?

5. Breach of the policy

If we reasonably believe that you have not complied with this policy, we may do any one or more of the following:

- ✓ **Disciplinary action**
- ✓ **Dismissal**
- ✓ Notification to an external agency, including state police.

6. Responsibilities

HR Head, Other HOD and Management

7. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Policy For Non-Discrimination and Equal Opportunities

Policy

Satyendra Fine Chem is committed to treating Employees with respect and fairness. This goal is reflected in the Company's Managerial Statements and Code of Business Ethics. As such Satyendra Fine Chem does not condone discrimination or harassment and any occurrence will be dealt with in accordance with the following policy.

2. Scope

This policy applies to employees of Satyendra Fine Chem.

3. Content

Satyendra Fine Chem recruits, develops, and promotes personnel based on merit.

Satyendra Fine Chem strives to maintain a work environment free from discrimination and harassment.

What is equal opportunity?

Equal opportunity means treating individuals fairly and without discrimination in all aspects of their employment. Discrimination means treating an individual less favourably than others on grounds prohibited by law.

1.1 Unlawful discrimination

Grounds of unlawful discrimination include:

- Sex
- Pregnancy
- Marital Status
- Family Responsibilities.
- Disability or Impairment.
- Race
- Political Belief or activity.
- Religious belief or activity.
- Age
- Sexual Orientation.
- Physical features.
- Personal association (whether as a relative or otherwise) with person with protected attribute.
- Freedom of association.
- Victimization (e.g., whistle-blower)
- Breast feeding, gender identity, industrial activity, parental status, or status as a career.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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1.2 Discrimination

Discrimination may take many forms, e.g., direct, indirect, harassment or vilification. All forms are unlawful unless exempted by law.

1.2.1 Direct discrimination

Direct discrimination occurs when an individual is treated less favourably than others without that attribute or with a different attribute.

1.2.2 Indirect discrimination

Indirect discrimination occurs when a policy or practice is fair on its face but when applied, discriminates against an individual or a particular group and is unreasonable.

1.2.3 Harassment

Harassment occurs when an individual engages in offensive, abusive, belittling, or threatening behaviour directed at an individual or a group because of a real or perceived attribute or difference of the other person(s). The behaviour is unwelcome, unsolicited, usually unreciprocated, and usually (but not always) repeated.

1.3.31 Sexual harassment

Sexual harassment means any verbal, written or physical conduct that is unwelcome and uninvited resulting in an individual being offended, humiliated, or intimidated where that result was reasonably anticipated. A single act may be sufficient. The intention of the person is not relevant. It includes subjecting a person to any act of physical intimacy or making any action or comment of a sexual nature in a person's presence.

1.3.3.2 Racial harassment

Racial harassment means any verbal, written or physical conduct that is unwelcome and uninvited resulting in an individual being offended, humiliated, or intimidated where that result was reasonably anticipated. A single act may be sufficient.

1.3.3.3 Workplace bullying

Where a person feels that they are being bullied or intimidated in the workplace, the procedure set out in this policy should (to the extent appropriate) be followed. Bullying can include verbal abuse, psychological harassment, victimization, intimidation, and actions that humiliate.

Note: that workplace bullying, or intimidation may not breach anti-discrimination laws.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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1.3.3.4 Victimization

It is unlawful to victimize an individual who has made a report of discrimination or harassment, or an individual who has given information/evidence on behalf of another, or who makes a report to or against the employer in circumstances where the report is made in good faith.

1.3.3.5 Vilification

Vilification means conduct which incites hatred towards, serious contempt for, or severe ridicule of a person or group of persons for a prohibited reason. For example, a person's race.

1.2.4 Discrimination in the employment cycle.

It is unlawful to discriminate at any stage of the employment cycle, including in:

- advertising
- recruitment and selection
- terms and conditions of employment;
- training
- transfers
- promotion;
- retrenchment or dismissal

1.3 Consequences

A breach of this policy or of the anti-discrimination laws may result (among other things) in one or more of the following:

- disciplinary action against the offender**
- legal proceedings against the offender**
- legal proceedings against the employer of the offender**
- legal proceedings against an individual who has somehow facilitated the commission of the unlawful conduct/behaviour by the offender**
- defamation proceedings in the civil courts**

For procedures regarding the process in reporting a complaint, refer Appendix A.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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4. Appendix A

Dealing with complaints

If an individual has an issue about discrimination at work, Satyendra Fine Chem encourages the individual to first address the issue directly with the colleague who has given rise to the concerns and to make it clearly known to that person that the behaviour/conduct is unwelcome and ask the person to desist.

Complaints of an equal opportunity nature should follow the rules stated by the Code of Business Ethics and related Policies and Procedures.

5. Appendix B

1. Sexual Harassment - expanded definitions and examples.

The definition of sexual harassment is that a person sexually harasses another person:

- If that person makes an unwelcome sexual advance, or unwelcome request for sexual favours, to the person harassed, or engages in other unwelcome conduct of a sexual nature in relation to the person harassed
- In circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the person harassed would be offended, humiliated or intimidated "Conduct of a sexual nature" includes making a statement of a sexual nature to a person or in the presence of a person. It includes both oral and written statements.

Unlawful conduct may occur when:

- Acceptance or rejection of the conduct is used to make employment decisions (hiring, promoting, allocating work assignments, pay increases) that affect the person claiming harassment
- The conduct has the purpose or effect of unreasonably interfering with the Employee's job performance
- The conduct creates an intimidating, hostile, offensive, or sexually permeated work environment

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Sexual harassment may consist of any of the following:

- **Physical contact such as kissing, patting, pinching, or touching in a sexual way, unnecessary familiarity such as deliberately brushing against a person or putting an arm around another person's body**
- **Sexually explicit conversation**
- **Unwelcome remarks or insinuations about a person's sex or private life**
- **Suggestive comments about a person's appearance or body**
- **Gender based insults**
- **Sexual propositions**
- **Persistent requests for dates**
- **Sexual jokes, abusive language, innuendos, offensive telephone calls or emails, displays of obscene or pornographic photographs, pictures, emails, posters or objects but is not limited to conduct of this type.**

Unwelcome conduct of this type is harassment, whether the conduct is related directly or indirectly to the continuance of the employment of the harassed person, or his or her promotion, or otherwise affects or is seen as affecting conditions of employment.

Developing friendships with other workers is not sexual harassment.

Satyendra Fine Chem has no concern with the private life of a staff member, unless it affects an employee's job performance and/or behaviour in the workplace or the standing of the Company.

6. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Social Policy

Satyendra Fine Chem is committed for social responsibilities. As responsible company we shall,

- To contribute within the scope of our capabilities to improving economic, environmental and social conditions through our business activities, open dialogue with stakeholders and active participation in common efforts to support social progress.
- To respect statutory and regulatory requirement, as well as national standards on human rights in our premises.
- To ensure as far as feasible there is no child, forced, slave or trafficked labour in our premises.
- To require that all employees enter into employment with the company of their own free will and have the choice to leave their employment freely upon reasonable notice.
- To provide a safe and healthy working environment for employees, visitors and contractors, and to take adequate steps to prevent accidents and injury to health arising in the course of work by minimizing, so far as is reasonably practicable, the risks inherent in the working environment.
- To facilitate regular consultation with all employees to address areas of concern. To respect the right of all personnel to form and join trade unions of their choice and to bargain collectively. To ensure that representatives of personnel are not the subject of discrimination and those representatives have access to their members in the workplace. To make sure, in any case of major layoffs, that a social benefits and guidance plan is in place, and already known to employees or their official representatives.
- To comply with applicable laws and industry standards on working hours, including over-time.
- To ensure that wages paid meet or exceed the legal or industry minimum standards and are always sufficient to meet basic needs of personnel and to provide some discretionary income. To ensure that wage and benefits composition are detailed clearly and regularly for workers, and that compensation is rendered in full compliance with all applicable laws and in a manner convenient to workers. To ensure that labour-only contracting arrangements and false apprenticeship schemes are not used to avoid fulfilling SFC obligations under applicable laws pertaining to labour and social security legislation and regulations.
- To promote and participate in community engagement activities that actively foster economic, environmental, and social development, as part of SFC commitment to the communities where it operates.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Whistle-blower Procedure

1. Preface

- a) Our Company, that is SFC and its subsidiaries referred to herein after as the Company is committed to conduct its business by adopting the highest standards of professional integrity and ethical behaviour and comply with all the regulatory requirements under the laws and regulations prevailing from time to time. The Whistle Blower Policy is a mechanism to reinforce implementation of the Company's Code of Conduct which encourages all concerned to take positive actions which not only commensurate with the Company's values and beliefs, but are also perceived to be so. Any violations of the Code shall be reported by Employees, Supplier, Partners and Other Interested parties under this Policy. Through this
- b) Policy, the Company seeks to provide a procedure for all the Employees and Partners of the Company and its subsidiaries to disclose any concerns about any Improper Act. The Company provides adequate safe guards against victimization to all Whistle Blowers for making Protected Disclosures.
- c) Section 177(9) and (10) of the Companies Act makes it mandatory for prescribed companies to establish a vigil mechanism called the "Whistle Blower Policy" for all its Employees and Partners to report Improper Acts. Accordingly, this Policy is formulated with a view to provide such a mechanism.

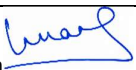
2. Objective

- To provide all Associates, Partners and Stack Holders a mechanism to report Improper Acts.
- To provide adequate safeguards against victimization for making Protected Disclosures.
- Non-Retaliation for associates or interested parties who report the violation of law.
- Confidentially guarantee to associates and stack holders who act as whistle-blower.

3. Definitions

The definitions of some of the key terms used in this Policy are given below. In case any terms are not defined herein, they shall have the same meaning assigned to them under the Code of Conduct of the Company.

- a) "Investigation Committee" means the Investigation Committee constituted by the Partners of the Company in accordance with Section 177 of the Companies Act, 2013.
- b) "Code" means the Code of Conduct of the Company.
- c) "Partners" means a member of the Partners of the Company.
- d) "Employee" means every employee of the Company (whether working in India or abroad) including the Partners in the employment of the Company.
- e) "Improper Act" means any concern about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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- f) "Investigator" means the person authorized, appointed, consulted or approached by the Ombudsman of the Audit Committee including Auditor of the Company and the police.
- g) "Policy" means this Whistle Blower Policy.
- h) "Protected Disclosures" means any communications made by a Whistle Blower in good faith that expresses concerns of Improper Acts.
- i) "Whistle Blower" means an Employee or a Partners making a Protected Disclosure under this Policy.
- j) Interested parties means person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity

4. Scope

This policy is an extension of the Company's Code of Conduct. The Whistle Blower's role is that of a reporting party with reliable information. A Whistle Blower is not required or expected to act as an investigator or finder of the acts, nor would the Whistle Blower have a right to participate in any investigative activities unless requested by the ventilator.

5. Eligibility

All Employees and Partners of the Company are eligible to make Protected Disclosures under the Policy.

6. Disqualification

- a. Any abuse of the protection given under this Policy to the Whistle Blower will warrant disciplinary action.
- b. In case any person is found misusing this Whistle Blower Policy, or making disclosures which are found to be mala fide, malicious, baseless, frivolous or reported otherwise than in good faith, such person will be disqualified from reporting any further Protected Disclosures under this Policy.

7. Procedure

- a. Protected Disclosures shall be reported in writing to ensure clear understanding of the issue/s raised and should be typed or handwritten in legible handwriting in English, Hindi or regional language of place of employment of the Whistle Blower or communicated by mail on the reporting channels.
- b. Protected Disclosures shall be forwarded with a covering letter which shall bear the identity of Whistle Blower. The Ombudsman of the Investigation Committee shall detach the covering letter and identity of the Whistle Blower before sending the matter for investigation to the Investigator.
- c. Anonymous disclosures shall not be entertained under this Policy.

Prepared By:

Approved By:

Issued By:

Umang Shah

Priyank Patel

Umang Shah

Designation: Partner- Admin

Designation: Partner-Technical

Designation: Partner- Admin





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8. Investigation

- a. All Protected Disclosures received will be recorded and looked into by the Ombudsman of the investigating Committee. If initial enquiries made by the Ombudsman of the Investigation Committee indicate that the Protected Disclosure has no basis, or it is not a matter to be pursued under this Policy, it may be dismissed at this stage, and shall be sent to the Managing Partners, if any, or the Partners, of the Company and the decision shall be documented with the justification for arriving at such decision. In such cases, the Ombudsman of the Investigation Committee will also give proper feedback to the Whistle Blower, explaining the reasons of such dismissal. The Ombudsman of Investigation Committee, to the extent feasible, shall endeavour to take all these steps within a period of 15 working days from the date of receipt of the Protected Disclosure.
- b. If initial enquiries made by the Ombudsman of the Investigation Committee indicate that further investigation is necessary, this will be carried through either by the Ombudsman of the Investigation Committee under the guidance of Ombudsman or by an Investigation Committee. In case the Ombudsman of the Investigation Committee decides to get the investigation carried out by an Investigation Committee, he shall form the Committee within 7 working days of arriving at such decision.
- c. The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt. To the extent feasible, the Ombudsman of the Investigation Committee or the Investigation Committee, as the case may be, shall conclude the Investigation within a period of 30 working days from the commencement of the Investigation, and shall make a written report of the findings on the conclusion of such Investigation.

9. Limits and Safeguarding

- 9.1 Associates** who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by the above policy statement and may be subject to disciplinary action, including termination of their employment. In addition, except to the extent required by law, the Company does not intend this Policy to protect Associates who violate the confidentiality of any applicable lawyer-client privilege or physician-patient privilege to which the Company or its agents may be entitled under statute or common law principles, or to protect Associates who violate their confidentiality obligations about the Company's trade secret information. Associates considering providing information that may violate these privileges or reveal Company trade secrets are advised to consult an attorney before doing so.
- 9.2 Harassment or Victimization:** Harassment or victimization of individuals submitting hotline reports will not be tolerated.
- 9.3 Confidentiality:** Every effort will be made to protect the reporter's identity by our Hotline vendors and/or Ombudsman. Please note that the information provided in a hotline/Ombudsman report may be the basis of an internal and/or external investigation into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known to us during our investigation.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

9.4 Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed

anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised and
- The credibility of the concern and
- The likelihood of confirming the allegation from attributable sources.

9.4 Malicious Allegations

Malicious allegations may result in disciplinary action.

10. Investigator

- Investigators are required to conduct a process towards fact finding with detailed analysis and reasoning. Investigators
- Derive their authority and rights from the Ombudsman of the Investigation Committee during investigation.
- Investigations will be launched only after a preliminary review by the Ombudsman of the Investigation Committee, as the case may be establishing that an investigation is necessary under this Policy.

11. Decision

If an investigation concludes that an Improper Act has been committed, the Ombudsman of the Investigation Committee shall recommend to the Managing Partners, if any, or the Partners, of the Company to take corrective or disciplinary action as may be deemed fit.

12. Reporting

The Company has identified different channels that can be used for serious and sensitive issues. Reporters to the Ombudsman will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting, and your anonymity will be protected to the extent possible by law. However, your identity may become known during the investigation because of the information you have provided.

Serious concerns relating to financial reporting, unethical or illegal conduct should be reported in either of the following ways:

In Local Knowledge or in English Language to:

Name- Prashant Thakur

Email Id: pgthakur2012@gmail.com

Prepared By:	Approved By:	Issued By:	
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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13. Reporting

The Company identified independent Ombudsman who is responsible for administering this, Policy. The Ombudsman is responsible for receiving, collecting, reviewing, processing, and resolving concerns and reports by Associates and others on the matters described above and other similar matters.

Associates are encouraged to discuss issues and concerns of the type covered by this Policy with their Supervisor, who is in turn responsible for informing the Ombudsman of any concerns raised. If the Associate prefers not to discuss these sensitive matters with his or her own supervisor, the Associate may instead discuss such matters with the Ombudsman.

The Director will refer complaints submitted, as he or she determines to be appropriate or as required under the directives of the Management Committee.

14. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Procedure cum policy for Prevention of Child Labour and Child remediation plan

1. Preamble & Objective

The policy provides guidelines to all Employees for prevention child labour at Workplace.

Accordingly, keeping in view these factors and the law of the land the present policy is being framed with the objective of prevention of child labour.

2. Definitions:

Child labour refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling.

3. Applicable Law

This child labour policy is based on the International Labor Organization (ILO)

- Convention No. 138 on the minimum age (1973),
- Convention No. 182 on the worst forms of child labour (1999),
- Convention No. 29 on forced labour (1930),
- Convention No. 105 on the abolition of forced labour (1957),
- Protocol No. 29 to the Forced Labour
- Convention No. 29 (2014),
- The Child Labour (Prohibition and Regulation Act.1986)

Satyendra Fine Chem commitment to ensuring all employees are of the local minimum employment age of 18 (Eighteen) years.

4. Scope:

This policy applies to employees of Satyendra Fine Chem.

5. Content:

Satyendra Fine Chem does not accept child labor. Child labour is defined as work undertaken by a child which the child is legally prohibited from undertaking or is likely to be harmful to the Child's health or physical, mental, spiritual, moral, or social development, or interferes with a Child's education.

Satyendra Fine Chem supports the United Nations and ILO conventions specifying

- All actions concerning the child shall take full account of his or her best interests
- The right of the child to be protected from economic exploitation, from performing any work that is likely to be hazardous or interferes with the child's education, or is harmful to a child's health or physical, mental, spiritual, moral or social development.

Prepared By:	Approved By:	Issued By:	
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Implementation

Satyendra Fine Chem will take the appropriate measures to ensure no child labour occurs within the local Organizations/Units/Plants including all subcontractors and homeworkers contracted.

This includes but is not limited to:

- Recruitment policies verifying age documentation of employees.
- Daily Verification.
- Issue of Identity card.
- Display of signages and prevention policy in available documents and contracts.

Child - A "Child Worker" is defined as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work. The legal minimum age of work can suppliers should seek guidance from national law.

Child Labour – Is often defined as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to their social, physical and development. This refers to work that is mentally, physically, socially or morally dangerous and harmful to children, and interferes with their school opportunity attend school, obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work

Hazardous Work - Any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of Children This includes working with chemicals, machinery or electrics; working in confined spaces, at height or in excessively hot or cold conditions; being exposed to dust, fumes or loud noise; lifting or carrying heavy loads; working overtime or working at night

Young Workers

Satyendra Fine Chem supports the legal employment of young workers in non-hazardous work, as per the ILO Convention. 138

Young workers of legal age have until the age of 18, the right to be protected from any type of employment or work deemed hazardous and likely to jeopardize the health, safety or morality of this worker including night time work and extended working shifts. Limits on working hours and overtime are set in accordance with local law and with special consideration of young workers ages.

Register of labour force

Satyendra Fine Chem will collect and maintain documentation (in each local organizations/Unit/Plant) from every worker verifying the age of each employee. This will be copies of original documents such as Identification cards, birth certificates, passports, visas etc.

Satyendra Fine Chem will not collect, or hold on to, original documentation for any reason.

Where such documentation is not available, all efforts will be made to assess and verify age of employees as per local practice or law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Remediation

If child labor is found within the workforce, Satyendra Fine Chem will seek a resolution in the best interests of the child, finding a responsible solution including a corrective action plan to meet discriminated against because of their age.

In the event that underage worker/s found in working it is necessary to

- Act quickly and appropriately their safety.
- Record the names, ages and contact details of the workers concerned.
- Explain the legal requirements and restrictions on working age carry out an age verification check.
- Consult with child focused organizations authorities regarding any child allegedly or confirmed to be involved in child labour.
- Terminate the employment relationship.
- Treat each situation of child labour on a case-by-case basis to ensure the best interest of the child considering their remediation programme.
- **The programme is to include:**
 1. Assisting them to education (vocational training or formal education).
 2. Compensating the child's family for at least the wage they were earning. These wages will be paid monthly (not as a lump sum) unt legal minimum age for working.
 3. At the end of the period of education guarantee child worker at the same level in which they were previously employed wish to return.
 4. Agreed monitoring period by SFC.
 5. A full investigation should be carried out to identify how this has happened and action taken to prevent reoccurrence.

No child found working at Satyendra Fine Chem will be disrespected, discriminated against, or threatened during the process of remediation.

7. Responsibilities

Supervisor, Managership and Management

8. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Procedure for handling grievance and redressal by Disciplinary & Grievance Committee.

1. Purpose:

- The purpose of this Policy is to provide a mechanism for individual employees to raise a grievance arising from their employment.
- To achieve consistent treatment in the handling of personal grievances in the workplace and provide a procedure to follow in the event a personal grievance arises.
- The Policy will also ensure that such grievances are dealt with promptly, fairly and in accordance with other related Policies of the Organization.
- This includes concerns from an employee about an action that has been taken and or an in-action, or a contemplated action in relation to them by the head of the department, another employee or from the Management

2. Scope:

- Limited to employees (regular and contract) only and are non-gender related grievances.
- To enable employee to air his/her grievance.
- To clarify the nature of grievance.
- To investigate the reasons of dissatisfaction.
- To obtain where possible a speedy resolution to the problem.
- To take appropriate actions & ensure that the promises are kept.
- To inform the employee his /her right to voice the grievance & take it to next stage of the procedure.

3. Definitions:

Dissatisfaction - Anything that disturbs an employee, whether or not the unrest is expressed in words.

Complaint - A spoken or written dissatisfaction brought to the attention of the head of the department.

A grievance is a formal complaint that is raised by an employee towards an employer within the workplace. The grievances must be specific and not of general nature.

Reasons for filing a grievance in the workplace can be as a result of, but not limited to,

1. **Economic** - disagreement over salary(fixation/revision), overtime pay, performance related pay awards, claim for equal pay.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

2. **Working conditions** – undesirable and unsatisfactory condition – light, space, water, poor quality equipment/materials, unreasonable workloads, disagreement over hours of work, inequitable work schedules.
3. **Attitude of supervisor** – lack of recognition, neglect, bias, favourism, nepotism, caste affiliations, regional feelings, and inter-employee disputes.
4. Discrimination based on age, gender, sexual orientation, caste, creed, religion, national origin, physical and mental disability.
5. Bullying and harassment that demeans, humiliates, or embarrasses a person.
6. Inappropriate use of disciplinary process.
7. Workplace health and safety.
8. Grievance regarding transfer, facilities, and training opportunities,
9. Disagreement in promotions/recruitments (except the promotions/recruitments made on the recommendations of selection committee, in accordance with the provision of the Bye-laws/Rules).

Grievant - The employee who initiate a grievance.

Respondent - The person or persons whose decision, action, or failure to act is the basis of the grievance.

Procedure of handling grievance:

The procedures outlined herein may be employed only for matters for which other procedures have not otherwise been established by the SFC.

Specifically excluded are grievances related to sexual harassment which will be dealt by the Internal Complaints committee.

These procedures may not be used to challenge, modify, or eliminate any existing policies or established practices.

Whenever the grievance procedure is being followed, it is important that issues are dealt with fairly. The following elements shall be considered in doing so:

1. All employees should always try to resolve problems in the work place at the earliest possible opportunity and usually with the least possible formality.
2. All efforts shall be put to address matters (by immediate head along with employees) before they reach the stage of becoming a formal grievance issue.
3. All employees should raise and deal with issues promptly and should not unreasonably delay meetings, decisions, or confirmation of those decisions

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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All employees should act consistently.

- The SFC recognizes that a formal grievance procedure can be a stressful and upsetting experience for all employees involved. Hence, employees involved in the process are entitled to be treated calmly with respect while upholding confidentiality.
- The SFC will not accept and/or tolerate abusive or insulting behaviour from anyone taking part in or conducting grievance procedures. Any such behaviour will be treated as misconduct under the disciplinary Policies of the SFC.
- The SFC also recognizes the diverse needs of the services provided as well as that of the workforce. Hence this Policy is aimed to provide a common platform that ensures the processes implemented under this Policy does not place any employee at a disadvantage over others.
- This Policy applies to grievances filed once the Policy comes into effect.
- No grievance shall be heard unless it has been filed under the process of lodging within 90 calendar days after the act or the condition giving rise to the grievance.

Procedure of registering a grievance

- The grievant shall report to immediate head about his/her grievance.
- The immediate head shall try to solve the problem at his/her level. He/she shall have the discretionary power whether to solve at his/her level or to be forwarded to the HR Head or Director
- When decided to solve, the process of arriving at a solution as well as the solution /decision offered by the immediate head shall be recorded along with response of the employee "accepted/not accepted" or otherwise by the (grievant) which shall be recorded.
- The immediate head shall file the document in the department. Half yearly report of the same to be submitted to Director.
- If the grievance is not solved /not agreed by the grievant at immediate head level then it shall be forwarded by HR Head or Director. Further it shall go to grievance committee through HR Head or Director.
- HR Head or Director will decide whether to solve the grievance administratively or refer it to Grievance committee.
- If the grievance is against the immediate head, then also it should come through HOD duly forwarded or otherwise with his/her comments. The grievant can also submit an advance copy to the immediate head directly, in case he/she has any apprehension on his/her letter not being forwarded by the immediate head.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Tenure of the committee members: For 24 months

Roles and responsibilities

The Grievance Committee shall be responsible to ensure that grievances are dealt with effectively in accordance with the Grievance Procedures set out for the implementation of this Policy.

In doing so, the Committee shall adhere to the following principles

- Take grievances seriously taking on board because the employee feels aggrieved, unhappy or dissatisfied.
- Investigate the facts and surrounding circumstances, and showing the employees that this been done thoroughly and sensitively.
- Actively look for a solution that will satisfy the employee, where practical, without causing disproportionate difficulty for the organization or the Employee's colleagues
- Provide feedback to the employee about what can, and cannot be done to resolve the grievance
Take necessary follow-up action
- The Grievance Redressal Committee may complete its proceedings within thirty days on receipt of a written application by or on behalf of the aggrieved party.

Committee meeting to be held on 1st Saturday of every month between 3 PM and 4 PM in the Office.

Records:

The Committee should ensure that the following minimal set of records is kept for matters attended by the Committee. It shall be the responsible unit that ensures the filing and safekeeping of the records.

- The nature of the grievance
- Written grievance statement
- Action taken with reasons for it to be taken
- A written statement of the decisions
- Minutes of meeting

Confidentiality:

All members of the Grievance Committee and those assigned for record keeping, as well as any staff member questioned in relation to an issue at hand, are bound by the duty of confidentiality and all times and hold in confidence, all documentation and information exchanged in the process.

Note: Follow the Whistle-blower Procedure Doc.No. SFC MG P 14 complainer want to keep his/her name confidential.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Procedure cum Policy for Association, Bargaining and Work Organization

1. Objective

Satyendra Fine Chem supports a person's right to come together with others to promote, pursue, and defend common interests.

2. Definitions:

Freedom of Association:

It is the enabling right to allow effective participation of non-state actors in economic and social policy, lying at the heart of democracy and the rule of law.

Collective bargaining

Is the process in which working people, through their unions, negotiate contracts with their employers to determine their terms of employment, including pay, benefits, hours, leave, job health and safety policies, ways to balance work and family, and more.

3. Applicable Law

- Freedom of association²⁴ is a fundamental human right proclaimed in the Universal Declaration of Human Rights 25 (1948). It is the enabling right to allow effective participation of non-state actors in economic and social policy, lying at the heart of democracy and the rule of law.
- Article 19(1) (c) of the Constitution of India guarantees to all its citizens the right "to form associations, or unions or Co- Operative Societies

3. Scope:

This policy applies to employees of Satyendra Fine Chem Corporate and Subsidiaries.

4. Content:

Satyendra Fine Chem supports a person's right to come together with others to promote, pursue, and defend common interests.

Satyendra Fine Chem respects national and local laws on freedom of association in the communities where we do business, including the International and Regional Laws and regulations.

Satyendra Fine Chem strives to create a positive workplace with open lines of communication, making third-party representatives for its employees unnecessary. It also respects the right of all people to join or not join a trade union to bargain collectively.

Satyendra Fine Chem Does not discriminate against anyone because of their membership or non-membership in trade unions.

The International Labour Organization created the Declaration on Fundamental Principles and Rights at Work.

This declaration expresses a commitment by governments, employers, and workers' organizations to uphold basic human values in the workplace.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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The declaration covers:

1. freedom of association and the right to collective bargaining
2. eliminating all forms of forced or compulsory labour
3. abolishing child labour
4. eliminating discrimination in employment

Satyendra Fine Chem Recognizes that all these values are vital to social and economic development and commits to upholding them in the workplace.

– Right to collective bargaining

Satyendra Fine Chem respects employees right to collective bargaining and ensures labour agreements are developed with employee representatives and, at a minimum, comply with local rules and regulations.

The business encourages open dialogue and transparency, so that management and unions are encouraged to work together, in compliance with non-disclosure principles, to achieve a prosperous outcome.

Satyendra Fine Chem are committed to engaging the local Works Council on issues that relate to relevant countries.

- We respect the autonomy and independence of trade unions. Employees with responsibilities within the trade unions shall not be discriminated against, notably with respect to access to training, pay raises and career development.
- We respect the right of our employees to join, form or not join a trade union, elect their representatives, and be elected to hold representation positions.

Where employees are represented by a legally recognized union, the company is committed to bargaining in good faith with such representatives. respects employees right to collective bargaining and ensures labour agreements are developed with employee representatives and, at a minimum, comply with local rules and regulations.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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- We respect the right of our employees to join, form or not join a trade union, elect their representatives, and be elected to hold representation positions.

Where employees are represented by a legally recognized union, the company is committed to bargaining in good faith with such representatives.

- Fair wages, benefits and working hours

Satyendra Fine Chem strives to provide employees with a pay and benefits package in line with market practices and adapted to their skillset and performance.

Wages and benefits shall be equal or superior to the applicable minimum legal and regulatory requirements and shall comply with negotiated agreements with legally established trade unions.

All affiliates shall ensure the attractiveness of their compensation policies with respect to market practices.

Corporate and Local Compensation policies must be designed to be objective, accountable and fair and respect the principle of equal remuneration for men and women for work of equal value.

Whenever possible, we shall give preference to sustainable and stable jobs rather than use non-standard contracts. An annual paid leave period shall be provided to every employee regardless of whether it is mandated or not in local or national law.

Satyendra Fine Chem respects the need for employees to have a balance between work and leisure.

Working hours shall comply with laws and regulations including applicable wages and benefits.

All employees receive at least one continuous 24-hour rest period during a seven-day work period.

5. Responsibilities

HOD, HR and Director

6. Amendment

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Responsible Business Policy

1. Purpose

This policy outlines SFC's commitment to conducting business in a responsible, ethical, and sustainable manner. It ensures that our operations align with social, environmental, and economic responsibilities while fostering trust with stakeholders.

2. Scope

This policy applies to all employees, management, directors, suppliers, and business partners engaged with SFC.

3. Ethical Business Conduct

- Conduct business with integrity, transparency, and fairness.
- Comply with all applicable laws, regulations, and international standards.
- Prevent and report any fraudulent, corrupt, or unethical practices.

4. Environmental Responsibility

- Minimize environmental impact by reducing waste, energy consumption, and emissions.
- Promote sustainable resource use and environmentally friendly practices.
- Ensure compliance with environmental laws and encourage continuous improvement.

5. Social Responsibility

- Respect human rights and ensure fair labour practices.
- Promote diversity, equity, and inclusion in the workplace.
- Support local communities through responsible corporate citizenship and charitable initiatives.

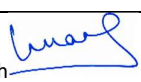
6. Corporate Governance & Accountability

- Maintain transparent and responsible corporate governance.
- Ensure accountability for decision-making and ethical business practices.
- Engage in fair competition and avoid conflicts of interest.

7. Supplier & Partner Responsibility

- Work with suppliers and partners who align with our responsible business values.
- Encourage ethical sourcing and responsible supply chain practices.
- Require compliance with labor, environmental, and ethical standards.

Prepared By:

Umang Shah 

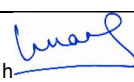
Designation: Partner- Admin

Approved By:

Priyank Patel 

Designation: Partner-Technical

Issued By:

Umang Shah 

Designation: Partner- Admin





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8. Employee Responsibility

- Uphold company values and report any violations of this policy.
- Participate in training and awareness programs on responsible business conduct.
- Foster a culture of responsibility and continuous improvement.

9. Monitoring & Compliance

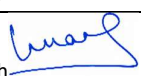
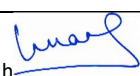
- Regularly assess and review business activities to ensure adherence to this policy.
- Implement mechanisms to report concerns and take corrective action when necessary.
- Review and update the policy periodically to align with evolving best practices.

10. Commitment to Continuous Improvement

- Strive for continuous enhancement of responsible business practices.
- Engage with stakeholders to address concerns and opportunities for improvement.
- Innovate and adopt best practices to ensure long-term sustainability.

6. Amendment

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Sustainable Procurement Policy and Procedure

1. Purpose

Satyendra Fine Chem is committed to promoting sustainable practices and responsible consumption of natural resources, materials, energy and products throughout its operations and relevant value-chain activities.

2. Policy Commitment

The organization shall:

- Promote responsible and efficient consumption of energy, water, raw materials, chemicals and other resources.
- Minimize unnecessary consumption and prevent waste, loss and pollution.
- Promote Reduce, Reuse, Recycle and Recover principles wherever practicable.
- Prefer durable, resource-efficient, recyclable and environmentally responsible products and materials where feasible.
- Promote energy efficiency and reduction of GHG emissions through improved processes and responsible resource use.
- Encourage employees, suppliers, contractors and relevant customers to adopt sustainable consumption practices.
- Provide appropriate information and awareness on safe, efficient and environmentally responsible use, storage and disposal of products and materials, where applicable.
- Promote responsible management of packaging and encourage reuse and recycling wherever practicable.
- Consider environmental and sustainability aspects throughout the relevant product life cycle.
- Establish appropriate objectives, targets and KPIs to monitor sustainable consumption and continual improvement.
- Provide awareness and training to relevant employees on sustainability and responsible consumption practices.
- Comply with applicable environmental, legal and other sustainability requirements.

3. Continual Improvement

Satyendra Fine Chem shall periodically review its sustainability performance and identify opportunities to improve resource efficiency, reduce environmental impacts, increase recycling and strengthen sustainable consumption practices.

4. Amendment

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

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Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Vigil Mechanism Policy

1. Introduction

SFC is committed to maintaining the highest standards of integrity, transparency, and accountability in all aspects of its operations. This Vigil Mechanism Policy is established to provide employees, directors, and stakeholders with a secure and confidential channel to report unethical behavior, fraud, or violations of company policies without fear of retaliation.

2. Objective

The primary objectives of this policy are:

- To provide a safe and anonymous mechanism for employees and stakeholders to report misconduct.
- To ensure that all complaints are investigated thoroughly and impartially.
- To prevent unethical practices and promote corporate governance.
- To protect whistleblowers from victimization or retaliation.

3. Scope

This policy applies to all employees, directors, contractors, vendors, and other stakeholders associated with Satyendra Fine Chem. It covers reports related to:

- Fraud, corruption, and financial misconduct.
- Violation of company policies, code of conduct, or ethical standards.
- Workplace harassment, discrimination, or abuse of authority.
- Non-compliance with legal or regulatory obligations.
- Any other activity detrimental to the company's interests.

4. Reporting Mechanism

- Whistleblower Email: Complaints can be reported through a designated email

ID- pgthakur2012@gmail.com

- Anonymous Reporting: The whistleblower may choose to remain anonymous while reporting concerns.
- Written Complaints: Reports can also be submitted in writing to the Vigilance Officer or designated authority.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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5. Investigation Process

- The complaint will be acknowledged within 10 days of receipt.
- A preliminary review will determine whether an investigation is warranted.
- The investigation will be conducted confidentially and impartially by an internal or external committee.
- A report of findings will be submitted to the Audit Committee or Board of Directors for appropriate action.
- Corrective measures will be implemented as required to prevent future misconduct.

6. Protection for Whistleblowers

- The identity of the whistleblower will be kept confidential to the extent permitted by law.
- No employee or stakeholder will face retaliation for reporting concerns in good faith.
- Any acts of retaliation or victimization against the whistleblower will be subject to disciplinary action.

7. Responsibilities

- Vigilance Officer: Oversees the implementation of this policy and ensures all reports are addressed appropriately.
- Audit Committee: Monitors the functioning of the vigil mechanism and ensures proper resolution of cases.
- Employees & Stakeholders: Are encouraged to report concerns responsibly and in good faith.

8. Review and Amendments

This policy will be reviewed periodically and updated as necessary to ensure its effectiveness. Any amendments will be approved by the Board of Directors.

Prepared By:	Approved By:	Issued By:	
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[Whistleblower List](#)

Name: Contact for Any Complaint related Social Issues and Raising Complaint.

In Local Knowledge or in English Language to:

Name- Mr. Prashant Thakur

Mob. No.+91 9909509018

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin



Energy Management Policy

Satyendra Fine Chem is committed to improving energy efficiency across all aspects of its transport operations. We aim to reduce our energy consumption, minimize fuel dependency, and promote sustainable energy practices to reduce environmental impact and operating costs.

The purpose of this policy is to establish a framework for managing and reducing energy use in our transport activities, facilities, and offices. This includes:

- **Fuel consumption**
- **Electricity use**
- **Equipment efficiency**
- **Employee behaviour**

Objectives

We will:

- Reduce fuel and electricity consumption through efficient practices.
- Use energy-efficient vehicles, technologies, and infrastructure.
- Monitor, measure, and report energy usage across all departments.
- Raise employee awareness and promote energy-saving behaviour.
- Comply with national and state energy conservation laws and standards.

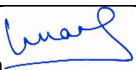
Scope

This policy applies to:

- **All company-owned and leased vehicles**
- **Office buildings, warehouses, and transport hubs**
- **Equipment and machinery used in operations**
- **All employees and contractors**

Key Strategies

- **Fuel Efficiency:** Regularly maintain vehicles and encourage route optimization to reduce fuel use.
- **Smart Driving:** Train drivers in energy-efficient driving practices (e.g., avoiding idling, maintaining optimal speed).
- **Technology Use:** Implement GPS, telematics, and fleet management software to monitor energy performance.
- **Infrastructure:** Use energy-efficient lighting, appliances, and HVAC systems in all facilities.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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- **Renewable Energy:** Explore installation of solar panels or purchase of green energy where feasible.
- **Data Monitoring:** Establish systems to track energy use and identify areas for improvement.

Roles & Responsibilities

- **Top Management:** Endorse and support energy-saving initiatives. Develop action plans, review consumption data, and suggest improvements.
- **Drivers & Operators:** Follow fuel-efficient driving practices and report energy waste.

Legal & Regulatory Compliance

We shall comply with the **Energy Conservation Act, 2001**, and all other applicable rules and guidelines issued by the **Bureau of Energy Efficiency (BEE)** and relevant transport authorities.

Performance Review & Continuous Improvement

We will review our energy consumption quarterly, assess progress toward goals annually, and update this policy as needed. Action plans and measurable targets will be set to continually improve our energy efficiency.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Environment Policy

At Satyendra Fine Chem, we recognize our responsibility to protect the environment, prevent pollution, and contribute to the global fight against climate change while manufacturing high-quality acid products. Guided by ISO 14001:2015 principles, we are committed to sustainable development and continual improvement in our environmental performance.

Our Commitments

1. Compliance & Legal Obligations

- Fulfill all applicable environmental laws, regulations, standards, and other compliance obligations relevant to our operations, products, and services.

2. Pollution Prevention & Resource Efficiency

- Minimize emissions, effluents, and waste through cleaner production techniques, safe handling of hazardous materials, and efficient resource utilization.
- Promote water conservation, energy efficiency, and circular economy practices.

3. Climate Change & Carbon Management

- Identify and address climate-related risks and opportunities in line with international climate goals.
- Reduce greenhouse gas (GHG) emissions by adopting renewable energy, energy-efficient technologies, and low-carbon logistics.
- Support customers and stakeholders in reducing their carbon footprint through sustainable product innovation.

4. Environmental Protection & Biodiversity

- Safeguard local ecosystems, biodiversity, and natural resources impacted by our operations.
- Implement spill prevention, emergency preparedness, and response programs to avoid environmental harm.

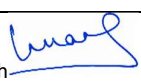
5. Continuous Improvement

- Set, monitor, and review measurable environmental objectives and targets for reducing environmental impacts and enhancing sustainability performance.
- Use data-driven decision-making and continual improvement to strengthen our Environmental Management System (EMS).

6. Employee & Stakeholder Engagement

- Educate and empower employees to follow best environmental practices, ensuring safety and responsibility at every stage of acid manufacturing.
- Engage suppliers, contractors, and business partners to align with our sustainability and climate change commitments.
- Communicate transparently with stakeholders about our environmental performance and progress.

Prepared By:

Umang Shah 

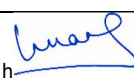
Designation: Partner- Admin

Approved By:

Priyank Patel 

Designation: Partner-Technical

Issued By:

Umang Shah 

Designation: Partner- Admin





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This Environmental Policy is communicated to all employees and stakeholders, made publicly available, and regularly reviewed to ensure its continuing suitability, relevance, and alignment with ISO 14001 and climate change requirements.

Monitoring & Review

This policy will be reviewed annually or when significant changes occur in our operations or regulations. We will measure our environmental performance through regular audits and seek feedback from stakeholders.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Waste Management Policy

At Satyendra Fine Chem, we are committed to minimizing the environmental impact of our operations by adopting sustainable waste management practices. We recognize that acid manufacturing generates both hazardous and non-hazardous wastes, and we pledge to handle all waste responsibly, safely, and in compliance with applicable environmental laws and standards.

Policy Commitments

1. Compliance & Legal Requirements

- Comply with all applicable national and international regulations governing hazardous and non-hazardous waste.
- Maintain all required records, manifests, and reporting as per legal obligations.

2. Waste Minimization & Prevention

- Reduce waste generation at source through cleaner production technologies, process optimization, and efficient resource use.
- Promote reuse and recycling wherever feasible, including recovery of acid and by-products.

3. Hazardous Waste Management

- Identify, classify, and label all hazardous wastes (e.g., spent acids, sludge, contaminated containers, effluents) as per GHS and regulatory norms.
- Store hazardous waste in **dedicated, secure, and clearly marked areas** with spill containment measures.
- Ensure **zero uncontrolled discharge** of hazardous waste to land, air, or water.
- Dispose of hazardous waste only through **authorized Treatment, Storage, and Disposal Facilities (TSDFs)** or approved recyclers.

4. Non-Hazardous Waste Management

- Segregate non-hazardous waste (e.g., packaging materials, general scrap, office waste) from hazardous streams.
- Promote recycling, composting, or safe disposal of non-hazardous waste in line with circular economy practices.

5. Safe Handling & Transportation

- Ensure all waste is handled, packaged, labeled, and transported in compliance with applicable safety and environmental regulations.
- Maintain emergency preparedness plans for spills, leaks, or accidents during storage and transport.

Prepared By:

Umang Shah 

Designation: Partner- Admin

Approved By:

Priyank Patel 

Designation: Partner-Technical

Issued By:

Umang Shah 

Designation: Partner- Admin





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6. Training & Awareness

- Provide regular training to employees and contractors on waste identification, segregation, handling, and emergency response.
- Encourage a culture of responsibility and accountability in waste management practices.

7. Continuous Improvement & Monitoring

- Establish and monitor measurable targets to reduce waste generation and improve waste recovery.
- Conduct regular audits and reviews to ensure compliance and identify opportunities for improvement.
- Adopt new technologies and practices to minimize hazardous waste and maximize resource recovery.

This Waste Management Policy is communicated to all employees, contractors, and stakeholders. It is reviewed periodically to ensure relevance, effectiveness, and alignment with ISO 14001, legal requirements, and global sustainability goals.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Water Conservation Policy

At Satyendra Fine Chem, we recognize water as a critical natural resource and are committed to its sustainable use in our acid manufacturing operations. We pledge to minimize water consumption, prevent pollution, and support the global fight against water scarcity and climate change while ensuring high product quality and operational efficiency.

Policy Commitments

1. Efficient Water Use

- Optimize water consumption in all manufacturing processes through recycling, reuse, and advanced treatment technologies.
- Monitor and reduce water usage per ton of acid produced.

2. Pollution Prevention & Effluent Management

- Ensure zero untreated discharge of wastewater.
- Operate and maintain Effluent Treatment Plants (ETPs) to treat, recycle, or safely dispose of wastewater.
- Prevent groundwater and surface water contamination through robust storage, handling, and spill control measures.

3. Rainwater Harvesting & Alternative Sources

- Implement rainwater harvesting systems to recharge groundwater and supplement industrial water use.
- Explore alternative water sources (e.g., treated wastewater reuse, condensate recovery) to reduce dependency on freshwater.

4. Climate Change & Water Stewardship

- Assess and manage risks related to water scarcity and climate change impacts.
- Contribute to local water conservation initiatives and support UN Sustainable Development Goal (SDG 6: Clean Water and Sanitation).

5. Continuous Improvement & Monitoring

- Establish measurable water conservation objectives and targets, such as:
 - Reduce freshwater consumption by 10% within 3 years.
 - Achieve minimum 60% reuse/recycling of treated effluents.
- Conduct regular water audits to identify further opportunities for efficiency.

Prepared By:

Umang Shah 

Designation: Partner- Admin

Approved By:

Priyank Patel 

Designation: Partner-Technical

Issued By:

Umang Shah 

Designation: Partner- Admin





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6. Awareness & Engagement

- Train employees and contractors on water conservation practices and wastewater management.
- Collaborate with suppliers, communities, and regulatory bodies to promote sustainable water management.

This Water Conservation Policy is communicated to all employees and stakeholders, made publicly available, and reviewed annually to ensure ongoing relevance, effectiveness, and alignment with ISO 14001 and climate change requirements.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Waste Management Plan

1. Purpose

This Waste Management Plan (WMP) provides a structured approach to managing all types of waste generated at Satyendra Fine Chem's acid manufacturing facility. It ensures compliance with ISO 14001, Hazardous Waste Rules, and other applicable regulations while minimizing environmental impact and supporting circular economy practices.

2. Scope

This plan applies to:

- All wastes generated from production, maintenance, laboratories, and administrative activities.
- **Hazardous and non-hazardous wastes, including:**
 - **Spent acids and contaminated sludge**
 - **Effluents and treatment residues**
 - **Used oil, solvents, chemical containers**
 - **Packaging, scrap metal, office waste, general refuse**

3. Objectives

- Ensure safe, compliant, and sustainable waste handling.
- Minimize waste generation at source.
- Maximize reuse, recycling, and recovery of materials.
- Prevent pollution and protect human health and the environment.
- Establish KPIs to track and improve waste performance.

4. Roles & Responsibilities

- Top Management: Approves and reviews the WMP, allocates resources.
- Environmental Manager: Oversees implementation, compliance, reporting, and audits.
- Department Heads: Ensure segregation, safe handling, and reporting within their units.
- Employees & Contractors: Follow waste segregation and handling guidelines.
- Authorized Vendors: Collect, transport, treat, and dispose of waste as per regulations.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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5. Waste Identification & Classification

a) Hazardous Waste

- Spent acids (H_2SO_4 , HCl, HNO_3 residues)
- Sludge from effluent treatment plant (ETP)
- Contaminated chemical containers/drums
- Used oil, solvents, and grease
- Spills and contaminated PPE

b) Non-Hazardous Waste

- Scrap metals
- Wooden pallets, packaging materials
- Recyclable plastics and paper
- Food and organic waste from canteen

6. Waste Handling & Storage Procedures

- Segregation: Separate hazardous and non-hazardous waste at the source.
- Labeling: Clearly mark waste containers with hazard symbols and contents.
- **Storage:**
 - Hazardous waste stored in designated secure areas with secondary containment.
 - Non-hazardous waste stored separately for recycling/disposal.
- Transportation: Only licensed transporters used for hazardous waste.
- **Disposal:**
 - Hazardous waste → Authorized TSDF/recyclers.
 - Non-hazardous waste → Recyclers or municipal disposal channels.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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7. Monitoring & KPIs

KPI	Target	Frequency	Responsible
Hazardous waste disposed safely (%)	100%	Monthly	Env. Manager
Reduction in hazardous waste (year-on-year)	≥5%	Annual	Plant Head
Number of non-compliance incidents	0	Continuous	All Staff
Employee training coverage (%)	100% annually	Annual	HR/Env. Manager

8. Training & Awareness

- Mandatory induction and refresher training for employees and contractors.
- Toolbox talks on hazardous waste handling.
- Posters and signage at waste generation points.

9. Emergency Preparedness

- Spill containment kits placed in high-risk areas.
- Emergency drills conducted twice annually.
- Incident reporting and corrective actions within 24 hours.

10. Documentation & Reporting

- Maintain records of waste generation, transport, and disposal (manifests, permits).
- Submit periodic reports to regulatory authorities.
- Review WMP annually in Management Review Meetings.

11. Continuous Improvement

- Conduct internal audits twice a year.
- Review waste minimization technologies.
- Set new targets annually for waste reduction and recycling.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Environmental Sustainability Policy

Purpose:

To minimize environmental impact, prevent pollution, reduce carbon emissions, and promote sustainable practices in all aspects of acid manufacturing operations.

Scope:

This policy applies to all employees, contractors, and operations, including production, storage, transport, and distribution of acids.

Policy Statement:

Our company is committed to protecting the environment and mitigating climate change by preventing pollution, reducing greenhouse gas emissions, conserving resources, and promoting sustainable practices. We prioritize proactive environmental management and compliance with all applicable regulations and international standards, including ISO 14001 and ISO 14064.

Key Principles:

1. Pollution Prevention:

- Minimize waste, effluents, and emissions at the source.
- Substitute raw materials with safer alternatives where feasible.
- Implement cleaner production technologies and continuously improve operational processes.

2. Air, Water, and Hazardous Waste Management:

- Reduce emissions of gases, fumes, and particulates with appropriate control equipment.
- Treat and recycle effluents, ensuring compliance with discharge regulations.
- Manage hazardous waste safely, including segregation, storage, transport, and disposal.

3. Climate Change & Carbon Emission Reduction:

- Monitor and report carbon emissions (Scope 1, 2, and relevant Scope 3).
- Optimize energy use and adopt renewable energy sources where feasible.
- Implement measures to reduce carbon intensity across production, transportation, and operations.

4. Resource Efficiency & Conservation:

- Optimize consumption of energy, water, and raw materials.
- Encourage sustainable practices in all operations to reduce environmental footprint.

5. Climate Risk & Resilience:

- Identify climate-related risks and implement mitigation strategies.
- Build resilience in operations and supply chains to adapt to climate change impacts.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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6. Awareness, Training, and Engagement:

- Train employees and contractors on environmental protection, pollution prevention, and carbon reduction practices.
- Engage suppliers, partners, and stakeholders in sustainability initiatives.

7. Compliance & Continuous Improvement:

- Comply with all applicable environmental and climate regulations.
- Periodically review, audit, and improve environmental and sustainability practices.

8. Reporting & Transparency:

- Maintain transparent records of pollution prevention measures, carbon emissions, and sustainability actions.
- Report environmental performance to management, stakeholders, and regulatory authorities as required.

9. Responsibility:

The Environmental and Sustainability Team oversees implementation, monitoring, and continuous improvement. All employees and contractors are responsible for adhering to this policy and promoting environmental sustainability.

10. Review:

This policy will be reviewed at least annually or whenever significant changes occur in operations, regulations, or sustainability goals.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Fair Competition / Anti-Trust Policy

1. Purpose

This policy outlines Satyendra Fine Chem 's commitment to conducting business ethically and in full compliance with fair competition and anti-trust laws. It aims to prevent anti-competitive practices and promote a fair, transparent, and open market environment.

2. Scope

This policy applies to all employees, management, contractors, agents, and representatives of Satyendra Fine Chem in all business operations and interactions with competitors, customers, suppliers, and regulators.

3. Policy Statement

Satyendra Fine Chem is committed to supporting and complying with all applicable fair competition and anti-trust laws. We do not engage in, tolerate, or support practices that unfairly limit competition, manipulate markets, or harm consumer choice.

4. Prohibited Practices

4.1 Price Fixing

We do not agree with competitors to fix prices, discount levels, or any pricing terms.

4.2 Market Allocation

We do not engage in dividing or allocating customers, territories, or services among competitors.

4.3 Bid Rigging

We do not collude with other bidders to manipulate or pre-arrange outcomes of tenders or contracts.

4.4 Abuse of Dominant Position

We do not use a dominant market position to unfairly limit competition, restrict market access, or impose unfair pricing.

4.5 Exchange of Sensitive Information

We do not exchange non-public, commercially sensitive information with competitors, such as pricing, capacity, or customer lists.

Prepared By:

Umang Shah 

Designation: Partner- Admin

Approved By:

Priyank Patel 

Designation: Partner-Technical

Issued By:

Umang Shah 

Designation: Partner- Admin





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5. Compliance Obligations

- All staff must avoid discussions with competitors regarding pricing, capacity, or strategic business plans.
- Employees must report any suspicious behaviour or pressure to engage in anti-competitive practices to the Compliance Officer or Management.
- Participation in trade associations or meetings with competitors must be pre-approved and documented.

6. Training and Awareness

- Regular training sessions will be provided to employees on fair competition and anti-trust compliance.
- Managers are responsible for promoting awareness and monitoring adherence to this policy.

7. Monitoring and Reporting

- The company will conduct internal audits and compliance checks periodically.
- Any employee who suspects a breach of this policy must report it confidentially to management.
- Retaliation against whistleblowers is strictly prohibited.

8. Consequences of Violation

- Violations of this policy may lead to disciplinary action, up to and including termination of employment.
- Legal consequences may include fines, penalties, or imprisonment under applicable laws.

9. Amendment

This policy will be reviewed annually or as required by changes in law or business practices. Updates will be communicated promptly to all relevant stakeholders.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Supplier Code of Conduct

1. Introduction

At **Satyendra Fine Chem** we are committed to conducting business with integrity, respect, and fairness. This Supplier Code of Conduct outlines the minimum standards of ethical, social, and environmental behaviour expected from our suppliers, contractors, and business partners (hereafter referred to as "suppliers").

2. Compliance with Laws and Regulations

Suppliers must comply with all applicable local, national, and international laws, regulations, and industry standards in the countries where they operate.

3. Ethical Business Practices

- **Anti-Corruption:** Suppliers must not engage in bribery, corruption, or fraudulent activities in any form.
- **Conflict of Interest:** Suppliers must disclose any conflicts of interest that may arise in their dealings with Satyendra Fine Chem.
- **Fair Competition:** Suppliers must adhere to antitrust and competition laws, ensuring fair business practices.

4. Labor and Human Rights

- **Freely Chosen Employment:** Suppliers must not engage in forced, bonded, or involuntary labor.
- **Child Labor:** Suppliers must not employ individuals under the legal working age as defined by local laws.
- **Non-Discrimination:** Suppliers must provide a workplace free from discrimination based on race, gender, age, religion, sexual orientation, disability, or any other status.
- **Fair Wages and Working Hours:** Suppliers must comply with applicable wage laws and regulations, including minimum wage, overtime, and legally mandated benefits.
- **Safe Working Conditions:** Suppliers must provide a safe and healthy work environment, complying with all applicable safety regulations.

5. Environmental Responsibility

- **Environmental Compliance:** Suppliers must comply with all applicable environmental laws and regulations.
- **Sustainable Practices:** Suppliers are encouraged to adopt practices that minimize environmental impact, including waste reduction, efficient energy use, and sustainable sourcing of materials.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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6. Confidentiality and Data Protection

Suppliers must safeguard the confidentiality of Satyendra Fine Chem 's proprietary information and ensure compliance with applicable data protection laws.

7. Monitoring and Enforcement

- Audits: Satyendra Fine Chem reserves the right to audit suppliers to ensure compliance with this Code of Conduct.
- Corrective Action: If non-compliance is identified, suppliers are expected to take corrective actions promptly.
- Termination: Repeated or severe violations of this Code may result in the termination of the business relationship.

8. Reporting Concerns

Suppliers must report any suspected violations of this Code of Conduct to Satyendra Fine Chem through the designated reporting channels. Retaliation against those who report in good faith will not be tolerated.

9. Acknowledgment

By accepting this Code of Conduct, suppliers agree to uphold the standards outlined herein and ensure their own suppliers and subcontractors comply with these principles Satyendra Fine Chem.

14. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Training Policy

1. Purpose

This policy establishes the framework for ensuring that all employees, contractors, and relevant stakeholders are trained and aware of their responsibilities related to ethics, safety, and environmental protection in the course of their duties.

2. Scope

Applies to all employees (permanent, temporary, and contractual), and includes drivers, administrative staff, and depot personnel involved in road transport operations.

3. Policy Statement

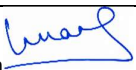
Satyendra Fine Chem is committed to fostering a culture of integrity, safety, and environmental responsibility. We ensure that all personnel are appropriately trained and competent to perform their duties in a safe, ethical, and sustainable manner.

4. Training Objectives

- Promote understanding of ethical behavior, anti-corruption, and fair practices.
- Ensure awareness and compliance with workplace safety procedures.
- Encourage environmental responsibility, resource efficiency, and legal compliance.

5. Types of Training Provided

Training Area	Frequency	Audience	Method
Ethics & Code of Conduct	Annually	All employees	Online / classroom / handbooks
Health & Safety (HSE)	Quarterly / on induction	Drivers, depot & operations staff	Safety drills, toolbox talks
Environmental Awareness	Bi-annually	All operational staff	Seminars, videos, posters
Emergency Response	Annually / mock drill	Drivers, maintenance staff	Practical training, mock drills
POSH Awareness (if applicable)	Annually	All staff	Classroom / HR sessions

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Training Area	Frequency	Audience	Method
Driver-Specific Training	Quarterly Monthly	/ Fleet/drivers	Defensive driving, spill response, fire safety

6. Responsibilities

Role	Responsibility
HR / Training Lead	Maintain training calendar, records, and content
Department Heads	Ensure team members complete mandatory training
Safety Officer	Conduct and monitor safety-related training
Sustainability Officer	Ensure environmental and ethical training compliance
Employees	Participate actively in scheduled training and refreshers

7. Training Records & Evaluation

- Attendance and performance will be documented for each session.
- Employees may be evaluated through written tests, role plays, or observation.
- Refresher courses will be conducted regularly or when procedures or laws change.

8. Continuous Improvement

- Feedback will be gathered from training participants to enhance future sessions.
- Training needs assessments will be conducted annually.
- External experts may be engaged for advanced or legal compliance training.

9. Compliance

Failure to participate in mandatory training or comply with learned practices may result in disciplinary action.

10. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Community Engagement and Social Investment Policy

1. Purpose

This policy outlines Satyendra Fine Chem's commitment to contributing positively to the communities where we operate through meaningful engagement, responsible partnerships, and targeted social investments.

2. Scope

Applies to all employees, locations, operations, and business activities of Satyendra Fine Chem, including contractors and partners who represent the company in any community context.

3. Policy Statement

We recognize that as a road transport company, our operations intersect with numerous communities. We are committed to engaging with local stakeholders, understanding their concerns, and investing in initiatives that promote long-term social well-being, safety, education, health, and environmental stewardship.

4. Principles of Engagement

- Transparency: Open communication with community stakeholders.
- Respect: Honouring local cultures, traditions, and values.
- Inclusiveness: Involving diverse community members in dialogue and decision-making.
- Mutual Benefit: Supporting projects that create shared value for the company and communities.

5. Key Focus Areas for Social Investment

- **Road Safety Awareness (for schools, drivers, and local residents)**
- Employment & Skill Development (driver training programs, vocational support)
- Environmental Projects (tree planting, clean-up drives, pollution prevention education)
- **Health & Wellness (medical camps, support during health crises)**
- Education Support (infrastructure development, scholarships, school supplies)

6. Community Engagement Mechanisms

Method	Description
Stakeholder Consultations	Regular meetings with local leaders and communities
Feedback Channels	Suggestion boxes, helplines, and surveys
Grievance Redressal	Defined procedure for community complaints

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Method	Description
Public Communication	Awareness campaigns, newsletters, local events

7. Roles & Responsibilities

Role	Responsibility
Top Management	Approve budget and strategy for social investment
CSR Committee	Plan, monitor, and evaluate initiatives
Community Liaison Officer	Engage directly with community stakeholders
Employees	Volunteer, support, and promote local initiatives

8. Monitoring & Evaluation

- Social investment activities will be tracked and reviewed annually.
- KPIs may include number of beneficiaries, community satisfaction, volunteer hours, and project impact reports.
- Results will be published in the annual Sustainability or CSR Report.

9. Compliance & Ethics

All community engagement efforts must comply with local laws and uphold ethical practices. Bribery, political influence, or religious bias in investment decisions is strictly prohibited.

10. Amendment:

This Policy is liable to be amended, modified anytime at the sole discretion of the Management as per law.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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Supplier Selection, Evaluation & Management Procedure

1. Purpose

To establish a systematic process for evaluating, selecting, monitoring, and reviewing suppliers to ensure compliance with product quality standards, environmental sustainability, social responsibility, and governance requirements in line with ISO 9001, ISO 14001, ISO 45001, ESG principles, and industry best practices for acid manufacturing.

2. Scope

This procedure applies to all suppliers of raw materials (e.g., sulfur, catalysts), packaging materials, logistics services, contractors, and third-party service providers associated with the company.

3. Responsibilities

- **Purchase Department:** Evaluate, select, and maintain approved supplier list.
- **Quality Department:** Verify quality requirements, conduct audits, and monitor performance.
- **ESG/Environment Team:** Assess ESG risks, environmental performance, and social compliance.
- **Management:** Approve critical suppliers and ensure alignment with company ESG goals.

4. Procedure

4.1 Supplier Evaluation & Selection

- **Suppliers shall be evaluated based on the following criteria:**
 - **Quality:** ISO 9001 certification, product consistency, lab test reports, COA compliance.
 - **Environment (E):** ISO 14001 certification, waste disposal practices, carbon footprint reporting, water and energy efficiency.
 - **Social (S):** No child labor/forced labor, safe working conditions (ISO 45001 preferred), fair wages, diversity and inclusion.
 - **Governance (G):** Business ethics, anti-corruption policy, compliance with local/international regulations.
- Risk assessment shall be conducted for critical suppliers (raw material, logistics of hazardous acid).

4.2 Supplier Approval

- Only suppliers scoring $\geq 70\%$ on evaluation checklist shall be approved.
- High-risk suppliers must undergo an on-site audit before approval.
- Approved suppliers shall be added to the **Approved Supplier List (ASL)**.

4.3 Supplier Performance Monitoring

- **Supplier performance shall be reviewed quarterly based on:**
 - Quality of material (defect rate, rejections, compliance with COA).

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Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

- On-time delivery performance.
- Incident records (spills, accidents in logistics, ESG violations).
- Corrective action responses.
- **Performance rating system:**
 - **A (Excellent): >90% compliance**
 - **B (Satisfactory): 75–90% compliance**
 - **C (Poor): <75% compliance → corrective action or removal from ASL**

4.4 ESG & Compliance Monitoring

- **Annual supplier ESG questionnaire covering:**
 - GHG emissions, water usage, waste disposal methods.
 - Labor rights, employee health & safety practices.
 - Ethical sourcing, anti-bribery commitments.
- Suppliers must sign **Code of Conduct Agreement** ensuring compliance with ESG principles.
- Periodic ESG audits for critical suppliers.

4.5 Supplier Development & Improvement

- Feedback shared with suppliers on quality and ESG performance.
- Corrective actions requested for non-conformances.
- Training/workshops may be arranged for supplier awareness on ESG and safety requirements.

4.6 Supplier Re-evaluation

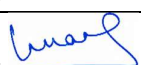
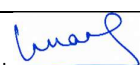
- Conducted annually or when significant non-conformance occurs.
- Suppliers failing to meet requirements shall be downgraded or blacklisted.

5. Records

- **Supplier Evaluation Forms**
- **Approved Supplier List (ASL)**
- **Supplier Performance Reports**
- **ESG Audit Reports**
- **Code of Conduct Agreements**

6. References

- **ISO 9001: Quality Management Systems**
- **ISO 14001: Environmental Management Systems**
- **ISO 45001: Occupational Health & Safety**
- **UN Global Compact – ESG Principles**
- **Responsible Care Guidelines for Chemical Industry**

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Working Hours and Wages Policy

1. Purpose

This policy ensures fair, safe, and legally compliant working hours and wage practices for all employees and contract workers of the acid manufacturing company. It aligns with **labor law requirements, International Labour Organization (ILO) conventions, ESG (Social responsibility) principles, and the company's Code of Conduct.**

2. Scope

This policy applies to all employees, operators, supervisors, contract labor, and temporary workers engaged at company facilities, warehouses, and acid transportation operations.

3. Policy Statement

The company is committed to:

- Providing fair wages at or above statutory minimum wages.
- Regulating working hours to safeguard health, safety, and productivity.
- Preventing forced, bonded, or child labor.
- Maintaining transparency in wage calculations and payments.
- Ensuring compliance with ESG, labor laws, and occupational safety standards.

4. Working Hours

1. Standard Working Hours

- Maximum **8 hours per day** and **48 hours per week**, as per local laws.
- Shifts shall be structured to avoid excessive fatigue, especially in high-risk acid handling areas.

2. Overtime

- Overtime shall not exceed **2 hours per day** and **12 hours per week**.
- Overtime shall be **voluntary** and compensated at **twice the normal wage rate** as per law.

3. Weekly Rest

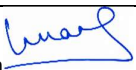
- Every employee is entitled to **one full day of rest per week** (preferably Sunday).

4. Night Shifts

- Workers on night duty shall receive adequate rest intervals and additional allowances as per statutory requirements.

5. Breaks

- Minimum **30 minutes rest break** after 5 hours of continuous work.
- Acid handling areas shall have **mandatory hydration breaks** to prevent heat stress.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

5. Wages

1. Fair and Transparent Compensation

- Wages shall comply with or exceed the **Minimum Wages Act** applicable to the region.
- Equal pay for equal work, without discrimination (gender, caste, religion, etc.).

2. Payment Method

- Wages shall be paid through **bank transfer** or other legal, traceable methods.
- Payment cycle shall be **monthly**, not later than the 7th of the following month.

3. Deductions

- Deductions shall only be made as permitted by law (PF, ESI, tax, authorized advances).
- No unauthorized or exploitative deductions allowed.

4. Allowances & Benefits

- Statutory benefits: Provident Fund, ESI, gratuity, and bonus as applicable.
- Additional benefits: Shift allowance, risk allowance for acid handling, safety PPE provided free of cost.

5. Record Keeping

- Payroll and attendance records shall be maintained transparently for audits.
- Employees shall receive wage slips showing complete break-up of salary, allowances, overtime, and deductions.

6. ESG & Social Responsibility Commitments

- No Child Labor or Forced Labor** is permitted.
- Commitment to **fair wages, safe working conditions, and decent working hours** in line with ILO principles.
- Regular **third-party ESG audits** to verify compliance with labor standards.
- Continuous improvement programs to enhance worker welfare.

7. Responsibilities

- HR Department:** Monitor compliance, maintain records, and conduct awareness programs.
- Supervisors:** Ensure adherence to shift schedules, rest breaks, and safety protocols.
- Finance Dept.:** Ensure timely wage disbursement and statutory compliance.
- Top Management:** Provide oversight and resources for fair labor practices.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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8. References

- The Factories Act, 1948 (India) / applicable local labor laws
- Minimum Wages Act, 1948
- Payment of Wages Act, 1936
- ILO Conventions on Working Hours and Wages
- UN Global Compact (Social Principles)
- ESG Reporting Standards

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin



Greenhouse Gas (GHG) Emissions Policy

1. Purpose

This policy establishes the company's commitment to **monitor, control, and reduce greenhouse gas (GHG) emissions** arising from acid manufacturing processes, transportation, and related operations, in line with **climate change mitigation goals, ISO standards, and ESG principles**.

2. Scope

This policy applies to:

- All manufacturing units, utilities, and process emissions (SO₂, CO₂, N₂O, etc.)
- **Energy consumption (electricity, steam, fuel)**
- **Transportation and logistics (raw material & product movement)**
- Indirect emissions from suppliers and contractors (Scope 3, where feasible)

3. Policy Statement

The company is committed to:

- Measuring and reporting GHG emissions in line with **ISO 14064 and GHG Protocol**.
- Reducing direct (Scope 1), indirect (Scope 2), and value chain (Scope 3) emissions.
- Improving **energy efficiency** and promoting **renewable energy**.
- Supporting national and global climate change goals, including India's **Net Zero commitments** and the **Paris Agreement**.
- Maintaining transparency through annual sustainability/ESG reports.

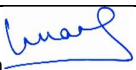
4. GHG Emissions Management Approach

4.1 Monitoring & Measurement

- Establish a **GHG Inventory** covering Scope 1, 2, and 3 emissions.
- Use recognized calculation methods (IPCC Guidelines, GHG Protocol).
- Install **Continuous Emissions Monitoring Systems (CEMS)** for critical stacks.

4.2 Reduction Strategies

- **Process Optimization:** Improve reaction efficiency to minimize SO₂ and CO₂ emissions.
- **Energy Efficiency:** Use energy-efficient boilers, motors, and variable frequency drives.
- **Renewable Energy:** Increase share of solar, wind, or biomass power.
- **Waste Heat Recovery:** Capture process heat for reuse in operations.
- **Green Logistics:** Promote cleaner fuels, optimize routes, and prefer low-emission transporters.
- **Carbon Capture & Utilization (CCU):** Explore capturing CO₂ for reuse in industrial processes.

Prepared By:	Approved By:	Issued By:	 SATYENDRA FINE CHEM www.satyendrafinechem.com
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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4.3 Compliance & Reporting

- Comply with **local emission norms** under the Pollution Control Board.
- Report GHG performance in **Sustainability Reports/ESG Disclosures**.
- Benchmark emissions against **sectoral best practices**.

4.4 Offsetting & Neutrality

- Invest in **carbon offset projects** (afforestation, renewable energy, community programs).
- Progressively work towards **carbon neutrality**.

5. Roles & Responsibilities

- **EHS/ESG Team:** Maintain GHG inventory, monitor emissions, and implement reduction projects.
- **Operations Team:** Ensure process efficiency, control leaks, and minimize energy waste.
- **Procurement Team:** Prefer low-carbon suppliers and sustainable raw materials.
- **Top Management:** Review performance and allocate resources for reduction projects.

6. Review & Continuous Improvement

- Annual review of GHG emissions and progress against reduction targets.
- Continuous improvement through new technologies, employee training, and supplier engagement.
- Revision of policy every **3 years** or as required by regulations.

7. References

- **ISO 14064: Greenhouse Gas Quantification and Reporting**
- **ISO 14001: Environmental Management Systems**
- **GHG Protocol (World Resources Institute & WBCSD)**
- **UN Sustainable Development Goals (SDG 7, 12, 13)**
- **Paris Agreement Commitments**

Record-GHG Inventory Register

Prepared By:	Approved By:	Issued By:	
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Health and Safety Policy

At Satyendra Fine Chem, the health, safety, and well-being of our employees, contractors, visitors, and communities are our top priority. Our operations involve hazardous chemicals, including strong acids, which pose significant risks if not properly managed. We are committed to providing a safe working environment and preventing accidents, injuries, and occupational illnesses while ensuring compliance with all applicable laws and industry standards.

Guided by the principles of **ISO 45001:2018 Occupational Health & Safety Management System**, we are committed to:

Objectives

- Prevent work-related injuries, illnesses, and incidents.
- Ensure safe handling, storage, and transportation of acids and other chemicals.
- Foster a proactive culture of health, safety, and environmental responsibility.
- Continuously improve safety performance through monitoring, training, and innovation.

Scope

This policy applies to all employees, contractors, visitors, and anyone engaged in activities at or on behalf of Satyendra Fine Chem, including production, storage, transportation, and disposal of chemicals.

Key Commitments

1. Regulatory Compliance:

- Comply with all applicable local, national, and international health, safety, and environmental regulations.
- Follow standards such as ISO 45001 and ISO 14001 where applicable.

2. Risk Assessment & Control:

- Identify, assess, and control risks associated with acid manufacturing processes.
- Implement engineering, administrative, and personal protective measures to eliminate or minimize hazards.

3. Safe Chemical Handling:

- Maintain proper labeling, storage, segregation, and containment of acids and hazardous materials.
- Use appropriate personal protective equipment (PPE) at all times.
- Ensure all employees are trained in safe handling procedures and emergency response.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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4. Emergency Preparedness & Response:

- Establish and maintain emergency plans, including fire, spill, exposure, and evacuation procedures.
- Conduct regular drills and training sessions to ensure readiness.

5. Health Monitoring:

- Conduct regular medical examinations for employees exposed to hazardous chemicals.
- Promote occupational health programs, including hygiene and wellness initiatives.

6. Incident Reporting & Investigation:

- Encourage prompt reporting of all accidents, near-misses, and unsafe conditions.
- Investigate incidents thoroughly to identify root causes and implement corrective actions.

7. Training & Awareness:

- Provide regular training on HSE procedures, chemical hazards, and safe operational practices.
- Promote a culture of safety awareness and accountability among all employees.

8. Continuous Improvement:

- Set measurable HSE objectives and monitor performance.
- Regularly review and update policies, procedures, and practices to achieve zero-harm goals.

Responsibilities

- Top Management: Lead by example, allocate resources, and ensure implementation of the HSE policy.
- HSE Manager: Oversee HSE programs, audits, and compliance reporting.
- Supervisors: Ensure safe work practices, training, and adherence to procedures.
- Employees & Contractors: Follow safety instructions, wear PPE, report hazards, and participate in training.

Policy Review

This Health and Safety Policy will be reviewed annually or following significant changes in operations, regulations, or incidents, to ensure continued effectiveness and relevance.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	

Carrier Development Policy

1. Policy Statement

At Satyendra Fine Chem, we recognize that our employees are our most valuable asset. Our commitment to excellence in acid manufacturing depends on the skills, knowledge, and motivation of our workforce. This Career Development Policy aims to provide structured opportunities for learning, growth, and career advancement, ensuring employees can reach their full potential while contributing to the company's long-term success.

2. Objectives

- Support continuous learning and skill development aligned with business needs.
- Promote internal mobility, career progression, and succession planning.
- Retain and motivate talent through clear development pathways.
- Foster a culture of high performance, innovation, and safety awareness.

3. Scope

This policy applies to all permanent employees of Satyendra Fine Chem across all departments, including production, R&D, maintenance, quality, safety, administration, and management.

4. Key Principles

4.1 Learning & Development:

- Provide training programs in technical, operational, safety, environmental, and managerial skills.
- Encourage participation in workshops, certifications, seminars, and professional courses relevant to acid manufacturing.

4.2 Performance Management & Feedback:

- Conduct regular performance reviews to identify strengths, improvement areas, and career aspirations.
- Align development plans with individual performance goals and organizational objectives.

4.3 Career Pathing & Internal Mobility:

- Define clear job roles, competencies, and promotion criteria.
- Encourage internal job transfers, role rotations, and promotions to support skill diversification and career growth.

4.4 Mentorship & Coaching:

- Assign mentors or senior advisors to guide employees in skill enhancement, career planning, and leadership development.

4.5 Succession Planning:

- Identify high-potential employees for key roles and provide structured development opportunities.
- Ensure continuity in critical operations and leadership positions.

Prepared By:	Approved By:	Issued By:	
Umang Shah 	Priyank Patel 	Umang Shah 	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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4.6 Health, Safety & Compliance Integration:

- Include HSE knowledge and compliance training as part of career development.
- Ensure all employees understand safe practices in handling acids and hazardous chemicals.

4.7 Recognition & Rewards:

- Recognize employees' achievements in skills development, certifications, and performance improvements.
- Integrate career progression with merit-based rewards and incentives.

5. Responsibilities

- **Management:** Provide resources, training opportunities, and support for employee growth.
- **HR Department:** Facilitate career development programs, track progress, and maintain training records.
- **Employees:** Take ownership of personal development, participate actively in programs, and apply learning on the job.

6. Monitoring & Review

- Regularly monitor the effectiveness of development programs through employee feedback, performance metrics, and career progression statistics.
- Review and update the policy annually to ensure alignment with business needs, industry trends, and regulatory requirements.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Work-Life Balance and Family Support Policy

1. Policy Statement

At Satyendra Fine Chem, we recognize that employee well-being is essential for a productive, safe, and engaged workforce. Manufacturing acids and handling hazardous materials can be physically and mentally demanding. We are committed to supporting our employees in achieving a healthy balance between work responsibilities and personal or family life, while maintaining high standards of safety, productivity, and compliance.

2. Objectives

- Promote employee health, well-being, and job satisfaction.
- Support employees in managing family responsibilities alongside work duties.
- Reduce stress, burnout, and absenteeism by creating flexible and supportive work arrangements.
- Foster a positive workplace culture that values employee welfare and safety.

3. Scope

This policy applies to all employees of Satyendra Fine Chem, including permanent, contractual, and temporary staff.

4. Key Commitments

4.1 Flexible Working Arrangements:

- Offer flexible working hours, shift rotations, and work-from-home options where operationally feasible.
- Enable part-time or adjusted schedules for employees with family or personal responsibilities.

4.2 Leave and Time-Off Support:

- Provide paid parental leave, maternity leave, paternity leave, and compassionate leave as per applicable laws.
- Encourage employees to take earned leave to recharge and manage personal or family matters.

4.3 Health and Wellness Programs:

- Provide access to health check-ups, fitness programs, counseling services, and stress management initiatives.
- Promote mental health awareness and support through workshops and resources.

4.4 Childcare and Family Support:

- Explore options such as on-site or nearby childcare facilities, emergency childcare assistance, or partnerships with childcare providers.
- Support employees in attending family-related appointments or emergencies through flexible scheduling.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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4.5 Safe and Ergonomic Work Environment:

- Ensure workplaces, particularly production and chemical handling areas, are ergonomically designed to minimize physical strain and injury.
- Maintain high safety standards to reduce workplace hazards and occupational stress.

4.6 Employee Assistance Programs (EAP):

- Provide confidential counseling and guidance for personal, family, or work-related challenges.
- Encourage utilization of EAP for conflict resolution, financial planning, or mental health support.

4.7 Culture of Respect and Understanding:

- Foster a workplace culture where employees feel supported in balancing personal and professional life.
- Encourage managers and supervisors to consider employees' personal commitments while planning work schedules.

5. Responsibilities

- **Management:** Lead by example, support flexible arrangements, and promote employee well-being.
- **HR Department:** Develop, implement, and monitor programs related to work-life balance, leave policies, and family support initiatives.
- **Supervisors:** Ensure fair implementation of flexible schedules, leave requests, and supportive practices in their teams.
- **Employees:** Communicate needs transparently, plan leaves responsibly, and participate in wellness programs.

6. Monitoring and Review

This policy will be reviewed annually to ensure it meets employees' needs and aligns with business operations and legal requirements. Feedback from employees will be incorporated to enhance programs and support mechanisms.

Prepared By:

Umang Shah

Designation: Partner- Admin

Approved By:

Priyank Patel

Designation: Partner-Technical

Issued By:

Umang Shah

Designation: Partner- Admin





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Quality Policy

At **Satyendra Fine Chem**, we are committed to manufacturing and supplying high-quality inorganic chemicals products that meet customer requirements, comply with applicable standards, and contribute to sustainable industrial growth. Guided by ISO 9001 principles, our quality system ensures reliability, consistency, and continuous improvement.

Our Commitments:

1. **Customer Satisfaction** – Deliver products that consistently meet or exceed customer expectations in quality, safety, and performance.
2. **Compliance** – Adhere to all applicable legal, statutory, and regulatory requirements in acid manufacturing and distribution.
3. **Continuous Improvement** – Strive for excellence by regularly reviewing and improving processes, technology, and systems.
4. **Employee Involvement** – Empower and train employees to uphold quality standards and encourage active participation in problem-solving and innovation.
5. **Sustainability** – Promote efficient use of resources, minimize waste, and ensure environmentally responsible manufacturing practices.
6. **Risk Management** – Identify, assess, and mitigate risks in manufacturing and quality processes to maintain consistent product reliability.

Our Objective:

To be a trusted partner in the chemical industry by delivering safe, sustainable, and high-quality acid products through innovation, integrity, and excellence in every process.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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CODE OF CONDUCT & RESPONSIBLE BUSINESS PRINCIPLES

Aligned with the Ten Principles of the United Nations Global Compact

1. Our Commitment

Satyendra Fine Chem is committed to conducting its business ethically, responsibly and sustainably. We support the principles of the United Nations Global Compact (UNGC) and commit to integrating these principles into our business operations, workplace practices, supply chain and relationships with customers, suppliers, employees and other interested parties.

Our Code of Conduct is based on the four fundamental areas of the UNGC Ten Principles: Human Rights, Labour, Environment and Anti-Corruption.

2. Human Rights

We are committed to respecting and supporting internationally recognized human rights.

We shall:

- Respect the dignity, equality and fundamental rights of all persons.
- Not tolerate human rights abuses within our operations or supply chain.
- Take reasonable steps to identify and address potential human rights risks.
- Treat employees, workers, customers, suppliers and other stakeholders with dignity and respect.
- Provide a workplace free from harassment, intimidation, violence and abuse.

UNGC Principles 1 & 2: Respect and support internationally proclaimed human rights and avoid complicity in human rights abuses.

3. Labour Practices

We are committed to fair, safe and respectful employment practices.

We shall:

- Respect freedom of association and the right to collective bargaining, where applicable.
- Prohibit forced, bonded, trafficked and compulsory labour.
- Prohibit child labour and comply with applicable legal requirements concerning minimum age.
- Provide equal employment opportunities and prohibit discrimination.
- Not tolerate harassment or unfair treatment based on gender, caste, religion, race, nationality, disability, age or other protected characteristics.
- Provide safe and healthy working conditions.
- Respect applicable working-hour, wage and benefit requirements.
- Encourage employee consultation, participation and grievance reporting.

Prepared By:	Approved By:	Issued By:	
Umang Shah	Priyank Patel	Umang Shah	
Designation: Partner- Admin	Designation: Partner-Technical	Designation: Partner- Admin	



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UNGC Principles 3–6: Freedom of association, elimination of forced labour, abolition of child labour and elimination of discrimination.

4. Environmental Responsibility

We recognize our responsibility to protect the environment and minimize environmental impacts arising from our activities.

We shall:

- Comply with applicable environmental laws, regulations and other requirements.
- Identify and control significant environmental aspects and risks.
- Prevent pollution and minimize waste generation.
- Promote efficient use of energy, water and natural resources.
- Encourage reduction, reuse and recycling of materials wherever practicable.
- Manage hazardous and non-hazardous waste responsibly.
- Consider climate change risks and opportunities in relevant business decisions.
- Promote environmentally responsible technologies and practices.
- Continually improve our environmental performance.

UNGC Principles 7–9: Apply a precautionary approach to environmental challenges, promote greater environmental responsibility and encourage environmentally friendly technologies.

5. Ethics & Anti-Corruption

Satyendra Fine Chem has zero tolerance for bribery and corruption.

We shall:

- Not offer, give, solicit or accept bribes or improper payments.
- Prohibit fraud, extortion, kickbacks and other corrupt practices.
- Maintain accurate and transparent business records.
- Avoid conflicts of interest and disclose them where they arise.
- Conduct business fairly and transparently.
- Expect our suppliers, contractors and business partners to follow ethical business practices.
- Provide appropriate channels for reporting suspected unethical conduct without retaliation.

UNGC Principle 10: Work against corruption in all its forms, including extortion and bribery.

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6. Responsible Supply Chain

We expect our suppliers, contractors and business partners to respect the principles contained in this Code of Conduct.

Where appropriate, Satyendra Fine Chem will:

- Communicate responsible business expectations to suppliers.
- Consider ethical, social and environmental criteria in supplier evaluation.
- Encourage suppliers to comply with applicable laws and responsible business principles.
- Take appropriate action where serious violations are identified.

7. Reporting & Non-Retaliation

Employees and interested parties are encouraged to report suspected violations of this Code of Conduct through designated company channels.

Satyendra Fine Chem will not tolerate retaliation against any person who raises a genuine concern in good faith.

8. Management Responsibility

Top Management is responsible for supporting this Code of Conduct and ensuring that the principles are incorporated into relevant policies, processes and business practices.

The Code shall be communicated to relevant employees and, where appropriate, suppliers and business partners.

MANAGEMENT DECLARATION

We hereby confirm that Satyendra Fine Chem supports and is committed to conducting business in accordance with the principles of responsible business conduct described in this Code of Conduct, aligned with the Ten Principles of the United Nations Global Compact.

We commit to continually improving our performance in the areas of:

Human Rights | Labour | Environment | Anti-Corruption

Reference: United Nations Global Compact – Ten Principles. The UNGC principles are derived from the Universal Declaration of Human Rights, ILO fundamental principles and rights at work, the Rio Declaration and the UN Convention Against Corruption.

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Product Life Cycle Policy

Satyendra Fine Chem is committed to considering environmental impacts throughout the relevant life cycle of its products, from raw material procurement, manufacturing and packaging to storage, transportation, customer use and end-of-life management, as applicable.

The organization shall:

- Promote responsible sourcing and consider environmental criteria for relevant suppliers and materials.
- Reduce consumption of energy, water, raw materials and other natural resources.
- Prevent and minimize air emissions, wastewater, chemical spills, pollution and environmental incidents.
- Reduce waste generation and promote reuse, recycling and recovery of materials and packaging.
- Improve energy efficiency and reduce GHG emissions associated with relevant activities.
- Promote environmentally responsible packaging, transportation and product handling.
- Consider product durability, resource efficiency, recyclability and end-of-life management, where applicable and within its control or influence.
- Comply with applicable environmental legal and other requirements.
- Establish relevant environmental objectives and targets and continually improve environmental performance.

Satyendra Fine Chem shall periodically review relevant life-cycle environmental aspects and implement appropriate controls and improvement actions.

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CUSTOMER HEALTH AND SAFETY POLICY

Satyendra Fine Chem is committed to protecting the **health and safety of customers and end users** by ensuring that products supplied by the organization meet applicable quality, safety, statutory and regulatory requirements.

The organization shall:

- Ensure products conform to applicable **customer, statutory, regulatory and safety requirements**.
- Identify and control potential **health and safety risks** associated with products, packaging, storage, transportation and intended use.
- Provide appropriate **Safety Data Sheets (SDS), labels, handling, storage and safety information** wherever applicable.
- Ensure appropriate controls for **hazardous chemicals and substances** throughout procurement, manufacturing, storage and dispatch.
- Maintain product quality through **inspection, testing and release controls** before dispatch.
- Communicate relevant **safe-use, handling and emergency information** to customers where required.
- Promptly investigate and address **customer complaints, product nonconformities and safety-related concerns**.
- Take appropriate corrective and preventive actions, including **product withdrawal/recall**, where required by applicable requirements.
- Continually improve product safety and customer satisfaction through monitoring, review and corrective actions.

Satyendra Fine Chem shall comply with all applicable legal, regulatory and customer requirements relating to **product health and safety**.

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PRODUCT DEVELOPMENT & CUSTOMER-SPECIFIC FORMULATION STATEMENT

1. Purpose

This statement defines the approach followed by **Satyendra Fine Chem** for product development, formulation and modification of chemical products according to customer-specific requirements, approved specifications and intended applications.

2. Product Development Approach

Satyendra Fine Chem develops and manufactures chemical products primarily based on:

- Customer specifications and requirements.
- Intended product application.
- Required product characteristics and performance.
- Approved technical specifications.
- Applicable statutory and regulatory requirements.
- Customer sample, formulation or technical requirements, where applicable.
- Results of laboratory testing and product evaluation.

Product formulation and process parameters are reviewed and controlled to ensure that the supplied product meets the agreed requirements.

3. Customer-Specific Formulation

Where a customer requires a specific chemical formulation or performance characteristic, the requirement is reviewed by the relevant technical/R&D and quality personnel.

The review may consider:

Parameter	Consideration
Product application	Intended use/application identified by customer
Performance	Required functional/performance characteristics
Dosage	Customer-specified dosage, where applicable
Application frequency	Customer requirement, where applicable
Physical/chemical characteristics	As defined in the approved specification
Raw materials	Suitable materials selected according to formulation requirements
Quality parameters	Testing against approved product specifications
Regulatory requirements	Applicable legal and customer requirements

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4. Dosage and Application Optimization

Satyendra Fine Chem does **not make a general claim that its products require lower dosage or less frequent application than similar products**, unless such performance is specifically established through documented customer requirements, product trials, testing or comparative evaluation.

Where a customer specifically requires optimized dosage, improved efficiency or reduced application frequency, such requirements may be considered during product development and evaluated through appropriate technical trials or testing.

Any confirmed improvement is documented through applicable product specifications, test reports, development records or customer trial reports.

5. Product Testing and Evaluation

Where required, products may be evaluated through:

- Laboratory testing.
- Product performance testing.
- Trial batches.
- Customer sample evaluation.
- Customer feedback.
- Comparison against approved product specifications.
- Process and formulation review.

Test results are reviewed by authorized personnel before final product approval.

6. Customer Approval

Where applicable, customer-specific products are supplied based on:

- Approved customer specification.
- Customer-approved sample.
- Agreed technical parameters.
- Customer trial/validation results.
- Purchase order or other documented requirements.

Changes to an approved formulation or specification are subject to appropriate review and approval.

7. Environmental Consideration

During product development and formulation activities, Satyendra Fine Chem considers opportunities to:

- Minimize unnecessary use of raw materials.
- Reduce product wastage during manufacturing.

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- Improve process efficiency.
- Maintain required product performance.
- Avoid unnecessary changes in product formulation.
- Consider customer requirements for efficient product application where specified.

Environmental improvement claims are made only where supported by documented technical or operational evidence.

8. Records Maintained

Where applicable, the following records are maintained as objective evidence:

1. Customer specifications.
2. Product development/formulation records.
3. Product specifications/TDS.
4. Laboratory test reports.
5. Trial batch records.
6. Customer sample approval records.
7. Customer trial/evaluation reports.
8. Change control records.
9. Customer feedback records.

The company maintains appropriate documentation to demonstrate customer-specific product development and formulation activities.

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