

Environmental, Social & Governance (ESG) Policy

Version 1.0

Approval and Effectiveness

This Policy was reviewed and approved by the Board of Directors of Saatvik Green Energy Limited during its meeting held on 11th December 2025. The Policy is effective from the same date and shall remain in force until amended or replaced by the Board/ ESG Council of Saatvik.

1. Prologue

Saatvik Group (“Saatvik”) envisions a future where business growth goes hand in hand with environmental responsibility, social responsibility, and governance. Saatvik recognises that its operations have a direct and indirect influence on the ecosystem, workforce, and communities it engages with. Hence, this Environmental, Social, and Governance (ESG) Policy serves as a foundational document guiding Saatvik’s journey towards sustainable excellence.

Our approach to sustainability is rooted in ethical business practices, innovation, and accountability. Through this policy, we aim to integrate ESG considerations into every business decision, process, and practice to create long-term value for stakeholders and contribute to a resilient and inclusive future.

2. Objective

This ESG Policy aims to:

- 2.1.** Establish a structured framework to embed ESG principles across Saatvik’s operations and decision-making processes.
- 2.2.** Ensure compliance with applicable laws and regulations, as well as adherence to national and international sustainability frameworks.
- 2.3.** Strengthen governance mechanisms that uphold transparency, integrity, and accountability.
- 2.4.** Promote sustainable resource management, reduce environmental impact, and contribute towards climate action.
- 2.5.** Encourage equity, and inclusion within the organisation and empower communities around our operational sites.
- 2.6.** Facilitate continuous improvement in ESG performance through monitoring, stakeholder engagement, and transparent disclosure.

3. Scope of the Policy

This Policy, titled “Environmental, Social & Governance (ESG) Policy” (“Policy”), is applicable across operations of Saatvik Green Energy Limited and its subsidiaries (collectively referred to as the “Saatvik Group” or “Saatvik”). The Policy extends to all employees (including directors, officers, permanent staff, trainees, probationers, and temporary workers), as well as contractors, suppliers, agents, business partners, and any other third parties representing Saatvik directly or indirectly along with all the operations in the entire value chain of the Company. The Policy is applicable across all operations and activities within Saatvik’s entire value chain.

4. Basic Principles and Governance

Saatvik acknowledges and aligns its practices with the principles outlined in the following international standards:

- 4.1.** Applicable local, national and international environmental and social (including occupational health and safety) legislations
- 4.2.** National Guidelines on Responsible Business Conduct (NGRBC)
- 4.3.** Global Reporting Initiative (GRI)
- 4.4.** United Nations Sustainable Development Goals (UNSDG’s)
- 4.5.** United Nations Global Compact (UNGC)
- 4.6.** United Nations Guiding Principles on Business and Human Rights (UNGP)
- 4.7.** Sustainability Accounting Standards Board (SASB)

5. ESG Framework

- 5.1.** In alignment with our ESG commitment, Saatvik has established a comprehensive ESG Framework that provides structure and direction to our sustainability initiatives. This framework is informed by international and national standards, evolving legislation, industry best practices, and the expectations of our key stakeholders.
- 5.2.** Our ESG Framework encompasses the identification of material topics across Environmental, Social, and Governance pillars, ensuring all relevant risks,

opportunities, and priorities are addressed. These material topics guide our performance disclosures, target-setting, and implementation strategies.

- 5.3. To effectively monitor and drive progress, we establish clear Key Performance Indicators (KPIs) aligned with national and international frameworks. Through regular due diligence, gap assessments, and benchmarking against best practices, we ensure continuous improvement and alignment with evolving ESG standards.
- 5.4. Our ESG Framework serves as the cornerstone of our sustainability efforts, unifying purpose and direction across the organisation while shaping collective ESG aspirations and actions.

6. Key Focus Areas

6.1. Environmental Responsibility

Saatvik is committed to minimising the environmental impact of its operations, products, and services. We strive to prevent and reduce waste, emissions, and discharges, while continuously improving the efficiency of natural resource consumption. Through proactive risk management, we identify and control environmental hazards inherent in our activities. We aim to integrate environmental responsibility into all aspects of our business management, promoting the sustainable use of our products throughout their lifecycle, and supporting customers in designing and manufacturing innovative, safe, and reliable solutions.

- **Renewable Energy Integration:** Saatvik is committed to increasing the use of renewable energy across its operations. We aim to reduce dependence on non-renewable sources and target a 50% share of renewable energy by FY 2028. This includes adopting solar, wind, and other clean energy solutions wherever feasible.
- **Emissions Management:** Saatvik strives to prevent and minimise emissions and environmental discharges from our operations. We continuously monitor, report, and improve processes to reduce our carbon footprint and mitigate environmental hazards. We strive to invest in and adopt advanced technologies, such as energy-efficient systems, low-emission equipment,

and smart process controls, to reduce emissions across our operations. We aim to explore cleaner production methods and carbon reduction solutions that support our transition to a low-carbon, sustainable business model. Saatvik commits to minimising air pollution from its operations by adopting cleaner technologies, preventive maintenance, process optimisation, and compliance with applicable air emission standards.

Saatvik commits to achieving a minimum 1% Year-on-Year reduction in Scope 1 and Scope 2 GHG emissions intensity across its operations through energy efficiency improvements, process optimisation, and increased use of renewable energy.

- **Circular Economy:** We promote sustainable resource management by integrating circular economy principles into our operations. This includes reducing waste generation, reusing materials, and recycling end-of-life products to minimise environmental impact.

Saatvik commits to achieving zero waste to landfill across its operations by 2030 through waste reduction, segregation, recycling, and responsible disposal practices.

Saatvik commits to conducting a Life Cycle Assessment (LCA) for at least one product by FY 2026 to identify environmental impacts across the product lifecycle and inform design and improvement decisions.

- **Water Management:** Saatvik shall manage water resources responsibly across all operations, ensuring efficient use, conservation, and protection of local water bodies. Saatvik shall monitor water consumption and discharge, implement water-saving measures including recycling, reuse, and rainwater harvesting, and treat effluents in compliance with applicable laws and regulations. Periodic audits and risk assessments shall be conducted to address water-related risks, particularly in high-stress regions. Employees and stakeholders shall be engaged to promote water stewardship and sustainable water practices. Saatvik aims to achieve Zero Liquid Discharge (ZLD) at its manufacturing facilities by optimising water usage, maximising reuse and recycling, and ensuring no untreated effluent is discharged outside operations.

- **Environmental services & advocacy:** Saatvik promotes environmental responsibility across its products by integrating sustainability considerations into product design, manufacturing, use, and end-of-life stages. The Company supports customers and stakeholders through responsible product information, compliance with environmental standards, and promotion of energy-efficient and low-impact solutions.

Saatvik engages with industry platforms, suppliers, and communities to encourage environmentally responsible practices, knowledge sharing, and continuous improvement in product environmental performance.

- **Biodiversity Conservation:** Saatvik is committed to protecting biodiversity by minimising impacts on local ecosystems, complying with applicable environmental clearance requirements, and promoting greenbelt development and nature-positive initiatives around its operational sites. Saatvik undertakes environmental and biodiversity impact assessments, obtain all statutory approvals, and integrate mitigation measures during project planning, development, and operations to avoid, minimise, and manage impacts on biodiversity for all existing and upcoming projects.
- **Training & Awareness:** We educate and train employees and contractors on environmental responsibility, ensuring sustainable practices are embedded in daily operations. Regular workshops, awareness campaigns, and capacity-building programmes are conducted to enhance environmental stewardship across all levels of the organisation. Our target is for 100% of employees to undergo at least one mandatory environmental responsibility training annually, with progress monitored and reported to ensure full participation.

6.2. Social Responsibility

Saatvik recognises its responsibility towards society, employees, and stakeholders, and seeks to contribute positively to sustainable development while promoting human welfare, safety, and inclusivity. Our social responsibility framework encompasses the following key areas:

- **Human Rights:** We uphold the highest standards of human rights across all operations and business interactions. Saatvik is committed to preventing human rights abuses and ensuring equality, dignity, and respect for all individuals, including employees, contractors, suppliers, and communities.

We actively promote fair labour practices, prohibit child and forced labour, and support freedom of association and collective bargaining.

- **Occupational Health and Safety:** We implement robust occupational health and safety management systems to minimise workplace risks, prevent accidents, and maintain a safe and healthy work environment. Regular safety audits, risk assessments, drills, and training programmes are conducted to foster a culture of safety and well-being throughout the organisation.
- **Employee Engagement:** We strive to foster an inclusive culture of open communication, participation, and feedback. Employees are encouraged to share ideas, contribute to decision-making processes, and participate in initiatives that support Saatvik's sustainability and social goals. Engagement surveys, recognition programmes, and skill development initiatives are conducted regularly to ensure high employee motivation and satisfaction.
- **Non-Discrimination:** Saatvik shall provide a workplace free from discrimination, ensuring equal opportunities for all employees and stakeholders irrespective of race, gender, age, religion, caste, disability, sexual orientation, or any other characteristic protected by law. Saatvik shall implement fair employment practices, equitable treatment, and unbiased decision-making in recruitment, compensation, promotion, training, and other employment-related matters. Regular awareness programmes and monitoring mechanisms shall be conducted to prevent discriminatory behaviour and promote an inclusive and respectful work environment. Saatvik aims to achieve 100% awareness among employees on non-discrimination policies and practices by FY 2027.
- **Safe Working Conditions:** Saatvik is committed to providing workplaces that are safe, secure, and conducive to productivity. Facilities are designed and maintained to meet high safety standards, with regular inspections, hazard assessments, and improvements to ensure that all employees and contractors work in a risk-free environment.
- **Diversity, Equity, and Inclusion:** We strive to create a diverse and inclusive workforce where all individuals have equal opportunities to thrive. Saatvik promotes gender equality, cultural diversity, and equitable practices across recruitment, development, and career progression. Inclusion is embedded in

our organisational culture, ensuring that differences are respected and valued.

- **Empowering Communities:** Saatvik engages with local communities through initiatives that promote education, healthcare, livelihood enhancement, and sustainable development. Our CSR programmes focus on empowering marginalised groups and creating long-term societal impact. We actively collaborate with NGOs, government bodies, and community organisations to ensure our interventions are effective, inclusive, and aligned with local needs.

6.3. Ethical Governance and Oversight

Saatvik is committed to strong corporate governance practices, ensuring transparency, accountability, and ethical conduct in all aspects of business operations. Our governance framework is designed to protect stakeholder interests, strengthen business resilience, and support sustainable growth.

- **Risk Management:** We have established a comprehensive enterprise risk management framework to identify, assess, and mitigate risks across strategic, operational, financial, and compliance areas. Risk assessments, audits, and continuous monitoring enable proactive mitigation and ensure business continuity.
- **Board Oversight:** Our Board of Directors provides strategic guidance, oversight, and accountability for the company's operations and sustainability initiatives. The Board regularly reviews governance practices, operational performance, ESG progress, and strategic priorities to align business objectives with long-term stakeholder value creation.
- **Transparent and Ethical Practices:** Saatvik conducts its business with integrity, transparency, and adherence to all applicable laws and regulations. Ethical practices are embedded in our operations through robust policies on anti-corruption, whistleblower mechanisms, and responsible business conduct. We maintain open communication with stakeholders, ensuring honesty, fairness, and accountability in all dealings.
- **Training & Awareness on Ethical Practices:** Saatvik ensures that all employees, officers, and contractors are well-versed in ethical standards,

corporate governance principles, and compliance requirements. Regular training programmes, workshops, and awareness sessions are conducted to promote integrity, accountability, and responsible decision-making across all levels of the organisation. These programmes, including workshops and interactive sessions, are designed to embed integrity, accountability, and responsible decision-making across the organisation. Our target is to ensure 100% of employees are trained in ethical practices and governance by FY 2026.

- **Sustainable Supply Chain and Procurement Practices:** Saatvik shall ensure that its supply chain and procurement activities are conducted responsibly, ethically, and sustainably. Saatvik shall engage suppliers who adhere to ESG standards, including compliance with applicable laws, labour rights, and human rights. Sustainable sourcing practices shall prioritise local procurement, responsible material selection, and minimising environmental impact throughout the supply chain. Regular assessments, audits, and supplier engagement programmes shall be conducted to monitor compliance, identify risks, and drive continuous improvement. The Company shall integrate sustainability criteria into procurement decisions and collaborate with suppliers to promote transparency, ethical practices, and circular economy principles. Saatvik aims to achieve 100% compliance of critical suppliers with Saatvik's ESG standards by FY 2030.

6.4 Career Management & Training

Saatvik is committed to implementing structured career management and training practices to support employee development across all stages of the employment lifecycle, including recruitment, performance evaluation, training, career mobility, and professional development.

The Company shall ensure that recruitment, promotion, and career progression processes are conducted in a transparent, objective, and merit-based manner. Performance evaluation mechanisms shall be implemented to provide regular feedback, identify development needs, and support employee growth and succession planning.

Saatvik shall provide training and development opportunities to enhance technical, functional, behavioural, leadership, and sustainability-related

competencies. Training needs shall be identified based on role requirements, business priorities, regulatory obligations, and future skill requirements.

The Company commits to ensuring 100% employee coverage for at least one structured training programme annually by FY 2027.

Training effectiveness and workforce capability requirements shall be reviewed periodically to support continuous improvement and long-term employability.

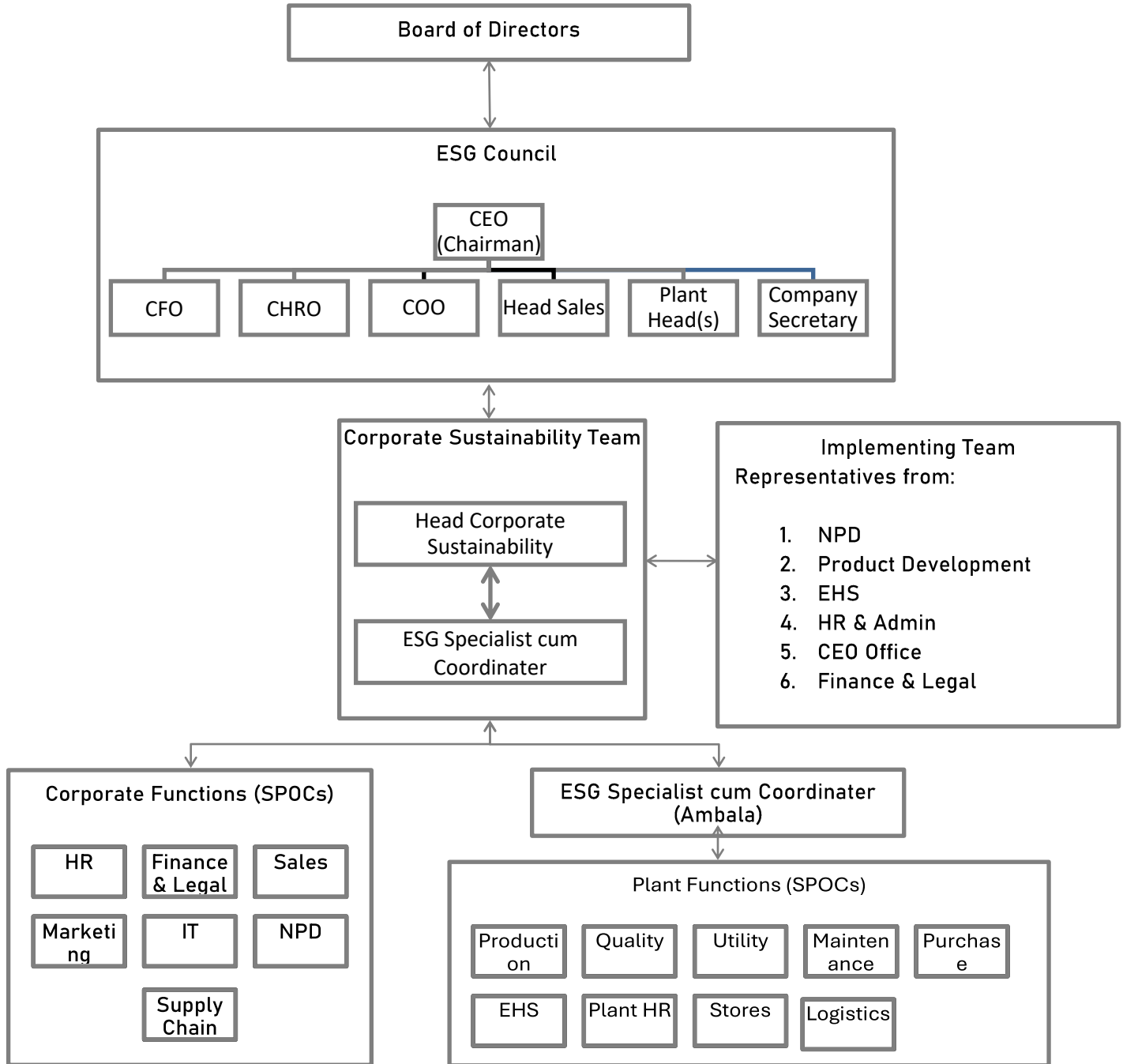
7. Roles and Responsibilities

Saatvik recognises that successful ESG implementation requires accountability at every level. Saatvik has established a formal ESG Governance Structure to oversee, manage, and implement ESG initiatives across the Group. This structure applies to all Saatvik entities and is reviewed annually or in response to significant regulatory changes. The following roles and responsibilities are defined in the Governance Structure to ensure effective execution of the ESG Policy:

- **Board of Directors:** The Board serves as the apex body for ESG governance. It provides strategic oversight, approves ESG policies and targets, reviews performance reports and disclosures, and ensures ESG integration into risk management, corporate strategy, and decision-making.
- **ESG Council:** The ESG Council, chaired by the CEO, meets quarterly to review performance, assess progress against sustainability goals, and guide the Corporate Sustainability Team. It acts as a bridge between the Board and management, translating strategic directives into actionable initiatives and promoting a culture of sustainability across the Group.
- **Corporate Sustainability Team:** This team leads the development and implementation of ESG policies, programmes, and key performance indicators. It ensures compliance with national and international standards such as SEBI BRSR, EcoVadis, CDP, GRI, and UN SDGs, conducts materiality assessments, maintains ESG data systems, and prepares the annual Sustainability Report.
- **Implementing Team:** Comprising representatives from key functions such as EHS, HR, Procurement, and Operations, the Implementing Team executes ESG projects within their areas of responsibility. It embeds ESG considerations into

routine processes, monitors performance, and reports outcomes to the Corporate Sustainability Team for consolidation and review.

- **Plant-level ESG Specialists and Coordinators:** These specialists oversee ESG implementation at manufacturing and project sites. They coordinate cross-departmental activities, collect and validate ESG data, ensure compliance with EHS regulations, and support both internal and external audits and certifications.
- **ESG Single Points of Contact (SPOCs):** SPOCs act as departmental ESG ambassadors across corporate and plant functions. They facilitate implementation of ESG policies, provide data inputs for sustainability reporting, promote awareness, and share best practices and improvement opportunities within their respective teams.



8. Review and Amendments

This Policy shall be reviewed annually, or in the event of significant regulatory or operational changes, to ensure its continued alignment with best practices, stakeholder expectations, and legal requirements. Any amendments to this Policy shall be made in writing and will become effective upon approval of ESG Council of Saatvik.

Disclaimer:

This Policy supersedes all previous policies or practices in Saatvik. The Sustainability Department of Saatvik is the final authority in interpreting and deploying the clauses, rules, and procedures mentioned in the Policy. Saatvik reserves the right to modify the Policy from time to time.