

**BUSINESS RESPONSIBILITY POLICY**

**1. BACKGROUND, OBJECTIVE, SCOPE AND APPLICABILITY**

This is an overarching policy in line with the nine principles of the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business proposed by the Ministry of Corporate Affairs and required under Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

As per Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Fifth Amendment) Regulations, 2019, top one thousand listed companies (based on market capitalization of every financial year) shall disclose in their annual report a business responsibility report describing the initiatives taken by the listed entity from an environment, social and governance perspective, in the format as specified by the SEBI.

Astra Microwave Products Limited, being one of the top one thousand companies as per the criteria mentioned above, the Company has to adopt the Business Responsibility Policy. The Policy is applicable to all Directors and Employees of the Company.

**2. DEFINITIONS**

- i. "Board of Directors" or "Board" means the board of directors of the Company as constituted/re-constituted, from time to time.
- ii. "Company" means Astra Microwave Products Limited.
- iii. "Companies Act" means the Companies Act, 2013 and the rules framed there under, each as amended.
- iv. "Policy" means Business Responsibility Policy.
- v. "LODR Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, from time to time.
- vi. "Stock Exchange(s)" means BSE Limited and National Stock Exchange of India Limited.



### 3. AUTHORITY & RESPONSIBILITY:

The Managing Director of the Company shall have the authority to oversee and implement this Policy.

This Policy may be reviewed and amended from time to time by the Managing Director of the Company in line with changes in the regulatory requirements as well as changes in Company policies. All material changes may be placed before the Board of Directors of the Company ("Board") for its approval.

### 4. KEY PRINCIPLES:

The company has adopted the following nine key principles of Business Responsibility, prescribed in the SEBI guidelines.

Principle 1	Business should conduct and govern themselves with Ethics, Transparency and Accountability.
Principle 2	Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
Principle 3	Business should promote the wellbeing of all employees.
Principle 4	Business should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
Principle 5	Business should respect and promote human rights.
Principle 6	Business should respect, protect and make efforts to restore the environment.
Principle 7	Business, when engaged in influencing public and regulatory policy, should do so in a responsible manner.
Principle 8	Business should support inclusive growth and equitable development.
Principle 9	Business should engage with and provide value to their customers and consumers in a responsible manner.

Our Business Practices would be governed by the following guiding principles:

#### **Principle 1: To conduct and govern business with Ethics, Transparency and Accountability**

- 1) Developing governance structures procedures and practices to ensure ethical conduct at all levels; and promote the adoption of this Principle across the value chain, communicating transparently and assuring access to information about the decisions that impact relevant stakeholders.
- 2) Not engaging in practices that are abusive, corrupt, or anti-competition.
- 3) Truthfully discharging responsibilities on financial and other mandatory disclosures.
- 4) Reporting on the status of the adoption of these Guidelines, as suggested in the reporting framework in this document.





- 5) Avoiding complicity with the actions of any third party that violates any of the principles contained in these Guidelines.

The Company is committed to the highest standards of corporate governance in all its activities and processes. The above principle is enshrined in the various policies laid down by the Company from time to time including the Code to regulate, monitor and report trading by Insiders in the Company's securities and the Astra Code of Conduct and Ethics policy that shall act as a guide and govern the employees.

**Principle 2: To provide goods and services that assure safety and contribute to sustainability through their life cycle.**

- 1) Ensuring Safety and optimal resource use over the life-cycle of the product - from design to disposal - and ensure that everyone connected with it- designers, producers, value chain members, customers and recyclers are aware of their responsibilities.
- 2) Raising consumer awareness with regard to their rights, through education, product labeling, appropriate and helpful marketing communication, full details of the contents and composition and promotion of safe usage and disposal of their products and services.
- 3) Ensuring that the product design considers resource efficiency and principles of sustainability in the manufacturing processes.
- 4) Conducting regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- 5) Recognizing and respecting the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.
- 6) Recognizing that over-consumption results in unsustainable exploitation of our planet's resources, and therefore to promote sustainable consumption, including, recycling of resources.

**Principle 3: Promote the wellbeing of all employees.**

- 1) Respecting the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- 2) Providing and maintaining equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
- 3) Ensuring that there is no use of child labour, forced labour or any form of involuntary labour, paid or unpaid.





- 4) Taking cognizance of the work-life balance of its employees, especially that of women.
- 5) Providing facilities for the wellbeing of the employees including those with special needs ensuring timely payment of fair living wages to meet basic needs and economic security of the employees.
- 6) Providing a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees. Ensuring awareness of these provisions to the employees and training them on a regular basis.
- 7) Ensuring continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities on an equal and non-discriminatory basis. Promoting employee morale and career development through enlightened human resource interventions.
- 8) Creating systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

The above Principles have been appropriately enshrined in its policies put in place from time to time by the Company to ensure well-being of its employees including the following:

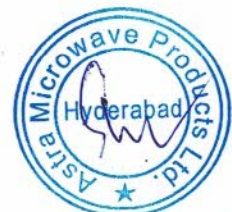
- Whistle blower policy
- Policy on prevention of Sexual Harassment.
- Leave Rules
- Travel Policy

**Principle 4: The Company should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.**

- 1) Systematically identifying stakeholders, understanding their concerns, defining purpose and scope of engagement, and commitment to engage with them.
- 2) Acknowledging and assuming responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- 3) Giving special attention to stakeholders in areas that are underdeveloped.
- 4) Resolving differences with stakeholders in a just, fair and equitable manner.

The Company's Corporate Social Responsibility (CSR) policy that drives the initiatives undertaken by the Company towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders shall ensure the above principles.

The grievance redressal and the feedback mechanism available for shareholders and customers to assess the service levels and other complaints shall follow the spirit laid down herein.





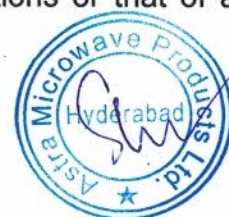
## **Principle 5: The Company should respect and promote human rights.**

- 1) Understanding the human rights content of Constitution of India, national laws and policies and the content of International Bill of Human Rights, as well as acknowledging that, human rights are inherent, universal, indivisible and interdependent in nature.
- 2) Integrating and respecting the principles of human rights in management systems, in particular by way of assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
- 3) Recognizing and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- 4) Promoting awareness and realization of human rights across the value chain, which is within the sphere of our influence.
- 5) Not being complicit with human rights abuses by a third party.

The Company in its business operations shall treat all customers with fairness and shall adhere to the Astra Code of Conduct and Ethical policy. The Company will recognize and respect the human rights of all relevant stakeholders, including that of its customers, shareholders, investors, public at large. The Company will strive to abide with the aforesaid principle and discourage violating practices by any third party to the extent possible.

## **Principle 6: The Company should respect and make efforts to restore the environment.**

- 1) Utilizing natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- 2) Taking measures to check and prevent pollution and assessing the environmental damage and bearing the cost of pollution abatement with due regard to public interest, wherever possible.
- 3) Ensuring that, benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- 4) Continuously seeking to improve environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- 5) Developing Environment Management Systems (EMS) and contingency plans and processes that help in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to our operations or that of a member of our value chain.





- 6) Reporting our environmental performance, including the assessment of potential environmental risks associated with the operations, to the stakeholders in a fair and transparent manner.
- 7) Proactively persuading and supporting the value chain to adopt this policy.

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

- 1) Ensuring that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.
- 2) Utilizing to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.

**Principle 8: The Company should support inclusive growth and equitable development.**

- 1) Understanding the impact of inclusive growth and equitable development on social and economic development, and responding through appropriate action to minimise the negative impacts.
- 2) Innovating and investing in products, technologies and processes that promote the wellbeing of society.
- 3) Making best efforts to complement and support the development priorities at local and national levels, and assuring appropriate resettlement and rehabilitation of communities who have been displaced owing to our business operations.
- 4) While operating in regions that are underdeveloped, be especially sensitive to local concerns.

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

- 1) Ensuring that, while serving the needs of their customers, we take into account the overall well-being of the customers as well as society at large.
- 2) Ensuring that we do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling our products.
- 3) Making full disclosures of all information truthfully and factually, through labelling and other means, including the risks to the individual to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, education of customers on the safe and responsible usage of our products and services will be undertaken.



- 4) Ensuring that promotion and advertisements of our products do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- 5) Exercising due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- 6) Providing adequate grievance handling mechanisms to address customer concerns and feedback.

#### **5. Disclosures:**

The Business Responsibility Policy shall be disclosed in the Annual Report and on the website of the Company i.e. at [www.astramp.com](http://www.astramp.com).

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**For Astra Microwave Products Ltd.**

  
**S. Gurnatha Reddy**  
**Managing Director**