

Business Responsibility Policy

Effective Date	Responsible Dept.	Approved by	Version	Approval Date
05.08.2023	Purchase / Sales / Company Affairs	Board of Directors	1	05.08.2023
			2	02.08.2025

Stakeholder Engagement and Identification

Our stakeholders are integral to our sustainable growth and overall success at Epigral. We place great emphasis on conducting all dealings with our partners based on principles of safety, transparency, accountability, regulatory framework, sustainability, integrity, and high quality. We strive to work with partners who offer competitive prices, innovative solutions, and the best suitability for our needs.

At Epigral, we hold ourselves and our stakeholders to the highest standards. We expect all our partners, including suppliers, consultants, distributors, advisers, and agents, to comply with all applicable laws, regulations, guidelines, industry codes, and contractual terms. Additionally, we expect them to adhere to widely accepted sustainability standards, such as safeguarding human rights, ensuring safety and environmental protection, prohibiting child or forced labour, and demonstrating a commitment to anti-corruption and bribery efforts.

Respecting confidentiality is of utmost importance to us. We trust that our stakeholders will treat Epigral's data, information, and trade secrets with the utmost care, taking appropriate measures to maintain confidentiality and protect against disclosure and misappropriation.

To uphold responsible supply chain management, we have outlined our expectations in the Epigral Supplier Code of Conduct. Before engaging in any business relationship, we conduct a risk-based due diligence process to ensure our potential partners demonstrate the integrity, quality, suitability, credibility, and commitment to sustainability that aligns with our values. Once a partnership is established, we continue to monitor compliance to ensure our shared principles are upheld.

We encourage open communication and cooperation between Epigral and our stakeholders. If any stakeholder requires assistance with implementing the Epigral Code of Conduct or encounters a potential non-compliant situation in connection with an Epigral business, they are encouraged to reach out directly to the Epigral Compliance Officer (designated as per requirements set forward by SEBI and the Stock Exchange).

While we seek to foster long-term, positive relationships, we recognize the need for appropriate action when necessary. If a stakeholder is found to be non-compliant with our principles, we will request appropriate remedial measures. In severe cases, termination of the cooperation may be necessary.



At Epigral, we are committed to conducting business ethically, sustainably to, and in a manner that positively impacts our stakeholders, society, and the environment. Our stakeholders are crucial allies in this journey, and together, we can drive positive change in the world. Through integral partnerships and exceptional solutions, we drive sustainable growth and maximize benefits for our stakeholders, embodying the commitment "Enhance to Exceed."

- **Commitment to Sustainable Partnerships:**

Through integral partnerships and exceptional solutions, we commit to upholding integrity in all interactions with business partners, fostering transparency and mutual respect as intrinsic values aligned with our purpose of driving sustainable growth and maximizing benefits for our stakeholders.

- **Commitment to Rigorous Due Diligence:**

Before and during any business engagement, we pledge to diligently assess and ensure the integrity, quality, suitability, credibility, compatibility and sustainability of our stakeholders. This commitment forms the cornerstone of our dedication to exceptional solutions and sustainable partnerships.

- **Continuous Monitoring Assurance:**

In pursuit of sustainable growth, we are committed to continuous monitoring of our stakeholders' adherence to share principles and standards. This ongoing assurance reinforces our commitment to delivering exceptional solutions and fostering sustainable collaborations.

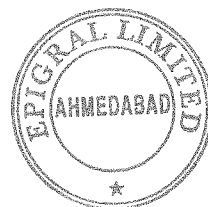
- **Timely Remedial Action Commitment:**

If any non-compliance issue arises with a stakeholder, we commit to promptly requesting to resolve and, if necessary, insisting on appropriate remedial measures. This commitment underscores our dedication to proactive and corrective actions, ensuring our partnerships consistently align with our purpose and tagline, "Enhance to Exceed."

Bribery and Corruption

At Epigral, we maintain a steadfast commitment to conducting business with the highest ethical standards. Our policy unequivocally prohibits any form of bribery, offering, promising, soliciting, or accepting improper advantages—whether directly or indirectly—from any individual, or agent or organization to obtain or retain business.

Improper advantages encompass a range of illicit practices, including illegal rebates, bribes, kickbacks, and under-the-table payments. These may take various forms, such as payments, gifts, meals, entertainment, travel expenses, or even forged agreements.



Granting of Improper Advantages

Equally, it is strictly forbidden to provide or promise an improper advantage without a specific business purpose in mind. Unlike bribery, there is no expectation of a "service in return" for such favours. Instead, they may be perceived as "goodwill" gestures intended to foster favouritism or biased treatment.

We emphasize the importance of perception and the potential consequences of behaviour that could be construed as bribery or granting of improper advantages, regardless of the individual's intention.

Global Application

These principles extend across all public and private business transactions involving Epigral, irrespective of location. As we are all expected to operate globally, we recognize the varied legal landscapes governing bribery and improper advantages, and we remain committed to full compliance with the stringent laws and regulations in each country.

Consequences of Non-Compliance

Epigral takes a firm stance against any violation of this policy. Non-compliance with our bribery policy may result in severe consequences, both for Epigral as an organization and for the individuals involved. Criminal and civil actions may be pursued, in accordance with applicable laws and regulations.

Permissible Advantages

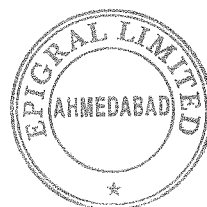
We understand that certain business transactions may require providing legitimate advantages to our business partners and other third parties. Such actions may be permissible if they meet all the stipulated requirements outlined in the Epigral Code of Conduct and Ethics and have obtained the necessary management approvals.

Political and Charitable Contributions

At Epigral, we recognize the importance of political and charitable contributions, as they can have a significant impact on the communities we serve and the causes we support. To ensure utmost compliance with relevant laws and internal policies, our Management has established clear and comprehensive guidelines for making Political and Charitable contributions.

Transparency and Accountability

Our guidelines are designed to promote transparency and accountability in all political and charitable activities undertaken by the company. We strive to ensure that all contributions align with legal requirements and are consistent with our internal policies.



Responsible Engagement

By adhering to these guidelines, we engage responsibly in political and charitable initiatives, ensuring that our contributions make a positive and meaningful impact. We are committed to being active participants in the betterment of society, while always upholding the highest ethical standards.

Personal Charitable Giving

While Epigral values and supports personal charitable giving by our employees, it is essential to note that any charitable gifts or donations using Epigral's funds require prior approval from the appropriate committee or legal department. This process ensures that all contributions made on behalf of Epigral align with our strategic objectives and are in full compliance with relevant guidelines and regulations.

Transparency in Charitable Contributions

Seeking approval before utilizing company funds for charitable purposes is a testament to our commitment to transparency. It allows us to maintain a focused approach to our philanthropic initiatives and ensures that resources are directed to the causes that align with our mission and values.

Grievance Mechanism

At Epigral, we firmly believe that employees who courageously speak up in good faith when they suspect a breach of the Epigral Code of Conduct exemplify our core values.

We encourage and support such actions as they are instrumental in upholding our commitment to integrity and responsible conduct.

Ensuring Timely and Trustworthy Resolution

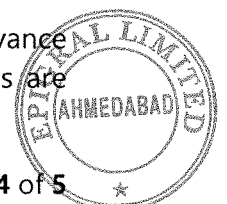
Epigral Management relies on the timely awareness of integrity issues to address them promptly and transparently. By raising compliance concerns, employees play a vital role in safeguarding themselves, their colleagues, and Epigral's interests and rights.

Accessible Channels for Raising Concerns

If any employee has a compliance concern, the first step is to approach their Line Manager. However, we understand that this may not always be comfortable, which is why we offer alternative avenues for communication. Employees may also contact their local Compliance Officer, Chief Compliance Officer, Legal, HR, or utilize the available affiliate or Group Functions Speak Up lines.

The Epigral Group Internal Grievance Redressal Process

At Epigral, we prioritize an inclusive and transparent work environment. Our internal grievance redress process is designed to address concerns promptly and effectively. Employees are



encouraged to raise their issues by sending an email at helpdesk@epigral.com dedicated to grievance resolution. This streamlined communication channel ensures confidentiality and expeditious handling of grievances. We believe that open dialogue is crucial for fostering a positive workplace culture, and this internal email mechanism serves as a responsive platform for addressing and resolving issues, promoting a harmonious and collaborative work environment across the Epigral.

Protecting Employees Against Retaliation

We commend and protect employees who raise compliance concerns in good faith. Epigral strictly forbids any form of retaliation against employees who speak up. Line Managers and other employees who engage in retaliation will be held accountable for their actions. If any employee believes this principle is not adhered to, they are encouraged to report the matter to the *Chief Executive Officer, the Chief Compliance Officer, the Group Head of HR, or any member of the Audit Committee or such other specific Committee, if any formed, of the Board.*

Zero Tolerance for Misuse of Internal Grievance Redressal Process

The Epigral Group maintains a zero-tolerance policy for the misuse of our internal grievance redress process. Any attempt to falsely or maliciously exploit this system will be met with swift and appropriate disciplinary action, emphasizing our commitment to upholding the integrity and purpose of the grievance resolution mechanism.

Together, by actively promoting a culture of transparency and ethical conduct, we can build a stronger Epigral and continue making a positive impact on the lives of customers and communities worldwide.



Maulik Patel
Chairman & Managing Director
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