



**SHARE INDIA SECURITIES LIMITED**  
***BUSINESS RESPONSIBILITY &  
SUSTAINABILITY POLICY***

<b>Effective Date:</b> November 02, 2022
<b>Approval Date:</b> November 02, 2022
<b>Revision Dates:</b> -
<b>Version:</b> 1.0
<b>Approved By:</b> Board of Directors

## **BACKGROUND**

Ministry of Corporate Affairs (MCA), Government of India, in July 2011, came out with the 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' (NVGs). In order to align the NVGs with the emerging global concerns, the Sustainable Development Goals (SDGs) and the United Nations Guiding Principles on Business & Human Rights (UNGPs), the NVGs were revised and released as the National Guidelines on Responsible Business Conduct (NGRBCs) in March 2019.

MCA constituted a 'Committee on Business Responsibility Reporting' ('Committee') for finalizing Business Responsibility Reporting format for companies, based on the framework of the NGRBCs. Securities and Exchange Board of India (SEBI) vide a circular dated May 10, 2021 has made Business Responsibility & Sustainability Report (BRSR) mandatory for the top 1000 listed entities by market capitalization with effect from 2022-23.

The BRSR is a significant step towards bringing sustainability reporting at par with the financial reporting. SEBI Circular further states that the BRSR is an initiative towards ensuring that investors have access to standardized disclosures on ESG parameters. Access to relevant and comparable information will enable investors to identify and assess sustainability-related risks and opportunities of companies and make better investment decisions.

## **OBJECTIVE**

In view of the requirements of SEBI for BRSR reporting, Share India Securities Limited ('SISL') has formulated the 'Business Responsibility and Sustainability Policy' ('Policy').

The Policy is based on nine principles enunciated in MCA's National Guidelines on Responsible Business Conduct (NGRBC). The primary objective of the Policy is to align and ensure adherence of all business activities in line with the core requirements of each NGBRC principle.

The objectives of this policy are as follows:

- To ensure a unified approach to the dimensions of business responsibility across SISL
- Act as a strategic driver that will help SISL respond to the emerging complexities and challenges and to align with the best of the global business conduct

This Policy reaffirms the Company's commitment to adhere to the requirements of BRSR as outlined in the NGRBC guidelines, as well as to contribute to sustainable development and fulfil its social, environmental, and economic responsibilities. The Company aims to establish itself as a sustainable, long-term business that delivers value to all its stakeholders.

## **SCOPE AND APPLICABILITY**

This policy is designed to ensure a unified and common approach across Share India, its subsidiaries, and affiliate entities, its management, and its employees. We also urge our suppliers, vendors, distributors, partners, and other collaborators to follow it.

---

The BRSR Policy is compendium of various policies and codes of the SISL which is governed and subject to reviewed by various departments as and when required.

### **PRINCIPLE WISE ALIGNMENT**

SISL's business practices shall be governed by the guiding principles of NGRBC.

The NGRBC comprises nine thematic pillars of business responsibility known as principles. These principles are interdependent and non-divisible. SISL's policies fulfill the guidelines of these principles as given below:

#### **Principle 1: Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable**

- The company shall establish appropriate governance structures, procedures, and practices to uphold ethical behavior at all levels and encourage the implementation of this principle throughout its value chain. The 'Code of Conduct' of SISL ('Company') is applicable to all employees and members of the Board of Directors ('BoD') to adhere to the principles of its 'Code of Conduct'. The Company shall also expect its business partners including suppliers, service providers, agents, channel partners (dealers, distributors, and others) to follow the same.
- The Company shall adhere to timely and appropriate disclosure of information that may impact stakeholders, maintaining high standards of transparency and accountability. The Company endeavors to achieve an appropriate balance between requisite transparency and confidentiality.
- The Company shall establish suitable frameworks, guidelines, policies, and protocols to prevent the involvement of the business in unlawful and unethical practices, including bribery and corruption. The Company shall ensure prompt and equitable actions are taken in the event of detecting such violations.
- The company shall truthfully fulfill its responsibility to provide financial and mandatory disclosures and such decisions that affect its stakeholders, particularly those who are most susceptible to business impacts and communities that are vulnerable or marginalized.

#### **Principle 2: Businesses should provide goods and service in a manner that is sustainable and safe**

- SISL is into the business of financial products and services. It doesn't have any manufacturing plant. However, every human/business activity has some carbon footprint indirectly. The Company shall endeavor to provide a safe and secure environment for its employees, vendors, and customers. The Company would also ensure the robustness of its trading platforms to provide secure environment to its customers.
- The Company shall ensure that Products and services are available to all customers through various channels to enable them to conduct transactions at their own convenience. This shall be done through universal touch points such as communication and disclosure platforms including websites, Mobile platforms and other Alternate channels.
- The Company shall adhere to all the environment related local and central acts and rules.
- The Company shall always strive to treat all its stakeholders with dignity, respect and due

understanding.

- The Company shall, at all times, strive to upgrade the work culture and take such initiatives that work towards the conservation of the surrounding environment.
- Company shall ensure that all sourcing from value chain partners is sourced through sustainable means.

**Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains**

- The Company shall be committed to recognizing and respecting human rights within.
- The Company shall ensure equal opportunities at the time of recruitment, during course of the employment and at the time of separation, without any discrimination.
- The Company shall respect the right to freedom of association, participation of workers, and collective bargaining of all employees including contract and casual labor, if any.
- The Company shall ensure continuous upgradation of skill and competence of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis.
- The Company shall strive to provide each employee with a safe, healthy and hygienic work environment.
- The company shall provide facilities for the well-being of all employees, including those with special needs, and ensure timely payment of fair living wages that meet the basic needs and economic security of employees, including casual and contract labor. The Company requires all its suppliers to be compliant with the provision of a safe and healthy working environment.
- The Company shall ensure a work environment free of sexual harassment. In case of any such unfortunate instance, appropriate action is taken to resolve the matter. The Company focuses on sensitizing employees through training programs and escalation procedure for reporting the incidents as per the provisions of Policy on prevention, prohibition, and redressal of sexual harassment instances.
- The Company is strictly against employment of child labor or forced labor, in any form, paid or unpaid.
- The Company shall take cognizance of work-life balance of its employees, especially that of women.

**Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders**

- The Company shall systematically identify and prioritize its stakeholders based on their level of impact and interest in the company's operations.
  - The Company shall engage with its stakeholders, understand their concerns, establish a clear purpose and scope of engagement and commit to ongoing communication with them.
  - Company shall acknowledge responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders and take steps to mitigate any negative impacts.
  - The Company shall address any conflicts with stakeholders in a manner that is just, fair, and equitable and commit to resolving any differences and redressing grievances in a fair, just and constructive manner.
-

**The stakeholder identification process for Share India involves identifying:**

- Internal stakeholders - Employees, Management, Shareholders
- Industry stakeholders - Stock Exchanges, Clearing Corporations, Depositories
- Customers and users – Institutional and Corporate Clients, FPIs, HNIs, Retail Investors
- Business partners - Authorized Persons, Franchisee & Distribution Partners besides software and hardware vendors
- Community and public stakeholders - Local communities, Advocacy groups
- Government and Regulatory Bodies.

For any online share market trading and investing platform company, identifying stakeholders and actively engaging with them is crucial for long-term success and is essential for building trust and delivering value, thereby sustaining a competitive edge.

The next step includes analysing their influence, impact, and dependence on the company, prioritizing their engagement, and developing effective communication strategies to meet their needs and expectations. Regular evaluation and adaptation of strategies ensure ongoing stakeholder management and relationship building.

A proactive and inclusive stakeholder identification process is an ongoing effort that requires continuous evaluation, adaptation, and a commitment to meeting the evolving needs of stakeholders in the ever-changing landscape of online share market trading and investing. Therefore, implementing a comprehensive stakeholder identification process is essential to identify, analyse, and prioritize the various individuals and groups who have a significant interest in or influence over the company's operations.

**Principle 5: Businesses should respect and promote human rights**

- The Company shall embody sensitivity of Human Rights laws and policies within the organization.
- The Company shall disseminate its policy on Human Rights to all employees and provides ample communication channels for grievance redressal. The Company also provides a secure grievance redressal mechanism for its stakeholders through its 'Whistle Blower Policy'
- The company shall ensure that where the Company is causing, contributing or otherwise linked to adverse human rights impacts, takes corrective actions to address such impacts.
- To promote, within their sphere of influence, the awareness and realization of human rights across its value chain.

**Principle 6: Businesses should respect and make efforts to protect and restore the environment**

- The Company shall use natural and manmade resources in a responsible and sustainable manner, with respect to water management, waste management, emissions, protection of biodiversity and ecosystem within the organization.
- The Company shall consistently strive to establish business practices that utilize resources in an optimal manner by integrating sustainability principles like reduce, reuse, recycle, recover, and

replenish (5R) into all aspects of its business.

- The Company shall strive to learn from industry best practices for promoting reduction, reuse, recycling and recovery of resources and encourages its stakeholders, particularly consumers and business partners, to do the same.
- The Company shall keep track of and disclose the advancements made in the environmental, social and governance domains.

**Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**

- The Company shall strive to remain unbiased, and transparent in its business dealings to ensure that it does not undertake any activity against the nation's interest or those that might have any adverse social impact.
- The Company shall engage with trade associations to raise industry related issues with the regulatory authorities and to exchange the best business practices. Further, the Company shall actively participate in public policy discussions to share industry perspective and expertise.
- The Company shall ensure that its advocacy positions in policy-making promote fairness in competition and respect for human rights.
- The Company while engaging in public forums shall ensure that the engagement is responsible, transparent and in public interest.

**Principle 8: Businesses should promote inclusive growth and equitable development**

- The Company shall strive to minimize any adverse impact on social, cultural, and economic aspects which may arise from its' business operations.
- The Company shall strive to identify and address the needs of local communities, particularly vulnerable and marginalized groups through the implementation of focused CSR programs. The Company shall operate with sensitivity to local concerns in regions that are underdeveloped.

**Principle 9: Businesses should engage with and provide value to their customers in a responsible manner**

- The Company shall consider the holistic well-being of its customers and society while catering to their needs.
  - The Company shall compete in an ethical and legitimate manner and prohibit anti-competitive activities.
  - The Company shall strive to maintain transparency and clarity in its offerings through timely, factual and responsible marketing and communications.
  - The Company shall take utmost care in maintaining privacy of data for its customers. The Company shall collect and retain personal information only to the extent necessary for the effective operations or as mandated by a statute. The Company shall keep such information confidential and discloses only to those who have a legitimate need to know.
  - The Company shall engage with the customers on an ongoing basis, recognize their concerns and address them in a timely and responsible manner.
  - The Company shall strive to make continuous efforts to ensure universal accessibility of its services
-

to all, without any discrimination.

- The Company shall strive to invest in R&D and technology to bring advancement in its products and services, enabling ease of access of its products/services to customers at large.

### **ADMINISTRATION AND REVIEW OF THE POLICY**

The Company Secretary shall be responsible for the administration, interpretation, application and review of this Policy and shall be empowered to bring about necessary changes to this Policy, if required at any stage.

In the event of any conflict between the provisions of this Policy and of the Listing Regulations or any other statutory enactments or rules, such provisions or statutory enactments or rules shall prevail over this Policy. Further, in case of any subsequent amendment(s), clarification(s), circular(s), etc., issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc., shall prevail upon the provisions in this Policy and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

### **DISSEMINATION OF THE POLICY**

The approved Policy shall be uploaded on the website of the Company at [www.shareindia.com](http://www.shareindia.com).

### **AMENDMENT**

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments or rules, such provisions or statutory enactments or rules shall prevail over this Policy. Further, in case of any subsequent amendment(s), clarification(s), circular(s), etc., issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc., shall prevail upon the provisions in this Policy and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.