

CAPRI GLOBAL CAPITAL LIMITED

BUSINESS RESPONSIBILITY POLICY

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1. INTRODUCTION

This Policy on Business Responsibility (“**BR Policy**” or “**Policy**”) is framed in line with the requirements of Regulation 34 and other applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements), 2015 (“**Listing Regulations**”) and is intended to ensure that Capri Global Capital Limited (“**Company**” or “**Capri Global**”) contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

The Company’s ethical and responsible behaviour complements its corporate culture. In line with its governance philosophy, Company recognizes and owns its responsibilities towards all its stakeholders – customers, suppliers, vendors, investors, employees and the community and strives to create long term sustainable value for their betterment.

2. SCOPE AND PURPOSE

Being a public listed company, the Company recognizes that its accountability is not limited only to its shareholders from a financial perspective but also to the larger society in which it operates. Hence, this Policy on Business Responsibility (Policy) lays down the broad principles guiding the Company in delivering its various responsibilities to its stakeholders. The Policy is intended to ensure that the Company adopts responsible business practices in the interest of the social set up and the environment so that it contributes beyond financial and operational performance.

This Policy reaffirms the Company’s commitment to follow principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs towards conducting its business.

The Policy is designed to ensure a unified and common approach across the Capri Global Group including across all its functions and branches and shall be applicable to all the employees and Directors of Capri Global Group.

In view of the above and being one of the top five hundred listed companies, the Board of Directors of the Company (“**Board**”) approved this Policy at its Board Meeting held on November 8, 2019.

3. IMPLEMENTATION

- 3.1. This Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company’s website at www.capriglobal.in;
- 3.2. The Managing Director of the Company through the functional heads of the Departments of the Company shall be responsible for ensuring that this Policy is implemented throughout the Company;
- 3.3. This Policy may be reviewed and amended from time to time by the Managing Director in line with the changes in the regulatory requirements as well as changes in Company policies and all material changes may be placed before the Board for approval.;
- 3.4. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary and Compliance officer.

4. EFFECTIVE DATE

This Policy shall be implemented with immediate effect from the date of approval by the Board.

5. KEY PRINCIPLES

At Capri Global, our guiding principles form our foundation, governing and driving for all our stakeholders. The Company shall conduct its business practices/ activities in alignment with the following Key Principles which are broadly based on the Principles envisaged in the National Voluntary guidelines in the interest of social set up, environment and governance::

Principle 1 (P1): Ethics, Transparency and Accountability:

- 1) The Company shall develop necessary governance structures, procedures and practices to ensure ethical conduct at all levels; and to promote the adoption of this principle across the value chain; Commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, senior management and all employees of the Company.
- 2) Communication must be transparent and the Company shall assure access to information about its decisions that impact relevant stakeholders;
- 3) The Company shall not engage in practices that are abusive, corrupt, or anticompetition;
- 4) The Company shall truthfully discharge its responsibility on financial and other mandatory disclosures timely;
- 5) The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism;
- 6) The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy;
- 7) The Company shall report on the status of adoption of these guidelines, as and when necessary;
- 8) The Company shall avoid complicity with the violative practices by any third party to the extent possible.

In line of the aforesaid principles, the Company has the following policies in place and it adheres to the highest standards of ethics, moral and legal conduct of its business operations:

- a. Policy on Code of Conduct for Board Members, Senior Management Personnel and Employees of the Company;
- b. Whistle Blower Policy;
- c. Fair Practices Code Policy;
- d. Code of Conduct for Prevention of Insider Trading;
- e. Policy on Sexual Harassment.

Any violation of the ethical guidelines shall be viewed strictly leading to disciplinary action. The Human resource division of the Company, Division Heads as well as functional Heads shall in all employee engagement initiatives reiterate the significance of ethical conduct to ensure that this culture permeates in the organization.

Principle 2: Business Lifecycle Sustainability:

- 1) The Company is a non-banking financial company and is not engaged in the business concerning design of products / services that could raise social concerns, economic risks and/or hazardous opportunities;

- 2) The Company while lending to real estate developers, shall promote construction as per the guidelines as applicable. The Company shall undertake technical assessment of properties and projects financed by it as a part of its approval and disbursement procedures;
- 3) The Company shall at all times create consumer awareness about their rights as borrowers, terms and conditions of loans etc. in the marketing communication as per the regulatory norms and Fair Practice Code as adopted by the Company;
- 4) While designing its products that largely pertain to loan customers, the Company shall give due regard to social, ethical and environmental considerations as also respect the rights of people who may be the owners of traditional knowledge and other forms of intellectual property;
- 5) The Company shall always strive to treat all its stakeholders and customers with dignity, respect and due understanding;
- 6) 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.
- 7) The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy.
- 8) The Company shall regularly review and improve upon the technological advancement & commercialization of, incorporating Social, Ethical & Environmental consideration.

In line of the aforesaid principles, the Company has Fair Practices Code Policy in place and the Company aims to promote a culture where all efforts are directed towards providing good quality and safe products to all our customers.

Principle 3: Wellbeing of all Employees:

- 1) The Company is committed to providing equal opportunities both at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability etc. The Company will respect the right to freedom of association, participation, collective bargaining, and will provide access to appropriate grievance redressal mechanisms.
- 2) The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid;
- 3) The Company shall take cognizance of the work-life balance of its employees, especially that of women;
- 4) The Company shall provide facilities for the wellbeing of the employees including those with special needs and ensure timely payment of fair living wages to meet basic needs and economic security of the employees;
- 5) The Company shall identify needs and grant necessary training to the employees to develop their skills and overcome such gaps as may be identified during the appraisal processes. On-the-job training, job rotation or training through various programmes – internal, external or international shall be offered to employees to upgrade their competencies;
- 6) The Company would Provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. The Company shall create awareness of these provisions to the employees and training them on a regular basis;
- 7) The Company would ensure continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis and promote employee morale and career development through enlightened human resource interventions;
- 8) The company shall implement necessary systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities;
- 9) The Company shall comply with the statutory provisions with regard to health, safety and well-being of its employees. Specific provisions contained in the labour laws ensuring health, safety, hygiene, comforts and well-being of employees shall be complied in letter and spirit.

In line of the aforesaid principles, the Company has incorporated various policies for the well being of its employees including but not limited to Policy for prevention of sexual harassment, leave policy, health insurance policy, term insurance, policy on maternity benefits for female employees, policy for ensuring safety of women at workplace, policy on training and education of employees, policy on providing loans to the employees including home loans, car loans etc.

Principle 4: Stakeholder's Engagement:

- 1) The Company would Systematically identify stakeholders, understand their concerns, define the purpose and scope of engagement, and commitment to engage with them;
- 2) The Company follows ethical practices so as to ensure that no inconvenience is caused to any of its internal and external stakeholders. The Company shall proactively engage with and respond to those sections in the society that are disadvantaged, vulnerable and marginalized;
- 3) The Corporate Social Responsibility (CSR) initiatives undertaken by the Company shall be driven towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders;
- 4) The website of the Company shall provide for feedback mechanism for stakeholders to assess the impact of the Company's policies, decisions and services;
- 5) The Company would resolve differences with stakeholders in a just, fair and equitable manner.

The Company values all its stakeholders and will continue its engagement with them through various mechanisms to identify their concerns and build effective communication and the Company has CSR Policy to guide the aforesaid principles.

Principle 5: Human Rights:

- 1) The Company appreciates that human rights are inherent, universal, indivisible and interdependent in nature. Conscious efforts to understand the regulatory aspects of human rights both nationally and internationally need to be undertaken and the Company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms;
- 2) The Company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups;
- 3) The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain;
- 4) The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy.

The Company seeks to conduct business in a manner that respects each and every individual associated with the Company. In this regards, the Company has Policy on Code of Conduct and encourages a work place environment which is free from any kind of human rights violations.

Principle 6: Protection of Environment:

- 1) In its effort to respect, protect and restore the environment, the Company shall utilize its resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste;
- 2) The Company shall take measures to check and prevent pollution and assess the environmental damage and bear the cost of pollution abatement with due regard to public interest;
- 3) The Company shall continuously seek to improve environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy;

- 4) The Company shall develop Environment Management Systems and contingency plans and processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations;
- 5) The Company shall also persuade and encourage the builders and developers that have business interest with it, to move towards environmentally friendly constructions.

Given that the Company is Non-Banking Finance Company, the applicability of the aforesaid principles is limited. However, the Company evaluates the social and environmental risks in its lending policies and abstain from lending to environmentally irresponsible projects and business. In addition, the employees of the Company are sensitized to prevent wasteful usage of natural resources and conserve energy.

Principle 7: Policy Advocacy:

- 1) The Company shall perform the function of policy advocacy in a transparent and responsible manner while engaging with all the authorities and shall take into account the Company's as well as the larger national interest;
- 2) The Company, being a NBFC, shall strive to be a part of various chambers and associations and make recommendations / representations before regulators and associations for advancement and improvement of its business. The executives of the Company shall, upon invitation, participate and play an active role in committees, associations etc. constituted for financial sector reforms and infrastructure development.

While the Company may share its expertise to help in formulation of public policy, it does not directly engage in lobbying or advocacy activities and hence, does not have specific policy for this purpose.

Principle 8: Inclusive Growth and Equitable Development:

- 1) The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society;
- 2) The Company shall make efforts to complement and support the development priorities at local and national levels, and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations;
- 3) The Company shall be sensitive to local concerns while operating in regions that are underdeveloped;
- 4) The Company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR Committee and as per the CSR Policy of the Company.

In line of the aforesaid principles, the Company has CSR Policy which is focussed on the marginalized and vulnerable section of the society including offering scholarship and financial assistance to meritorious students from underprivileged communities, developing, augmenting and supporting infrastructure in educational institutions, providing financial assistance for treatment and supplementary medications to needy patients etc.

Principle 9: Customers' Value:

- 1) The overall well-being of the customers and that of society must be taken into account while serving the needs of customers. The Company will not indulge in restricting the freedom of choice or free competition either at the time designing, promoting or selling the products.
- 2) Care should be taken that all requisite information will be truthfully and factually, disclosed through notices or other means, including wherever required, for information on the products and terms and conditions, so that the customers can
- 3) exercise their freedom to engage in a responsible manner. Where required, customers may be educated on the safe and responsible usage of the products/services.

- 4) The Company shall provide a facility to its customers to record their grievances/ feedback as required under regulatory norms which also enables the Company to redress the same and maintain high service standards. Senior personnel shall be deputed to ensure redressal within the prescribed turnaround times;
- 5) Wherever required, the Company shall escalate the complaints to the level of business heads, regional heads/ functional heads and the Managing Director;
- 6) The Company also ensures that the promotion and advertisement of its products do not mislead or confuse the customers and other stakeholders or in any way violate the principles of this Policy.

The Company seeks to provide quality goods and services to all its customers. The Company core objective is to continuously research, identify and make available new products and categories to fulfil customers' everyday needs at the best value. The Company has Code of Conduct Policy and it has strong emphasis on excellence in customer service.

The Company's Customer Grievance Redressal mechanism, Shareholder Servicing Policy Whistle Blower Policy etc. which have been laid down shall provide a facility to its customers, shareholders and others to record their grievances/ feedback. Further, grievances can also be addressed to..... and to the Compliance/ Nodal officer.

6. AMENDMENTS

In case of any subsequent changes in the provisions of the Companies Act or any other regulations, including the Listing Regulations, which makes any of the provisions in the Policy inconsistent with the Companies Act or such other regulations, such provisions of the Companies Act or such other regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

This Policy shall be reviewed by the Board. Any changes or modification on the Policy would be presented for approval of the Board. The Board can from time to time authorise Managing Director to make changes in the policy due to regulatory or legal requirement and such changes made to be brought to the attention of the Board at the first meeting following the amendment.
