

BUSINESS RESPONSIBILITY POLICIES

1. PREAMBLE:

1.1. BACKGROUND:

The policies of the Company are in line with the nine principles of the National Voluntary Guidelines proposed by the Ministry of Corporate Affairs and requirements under Regulation 34 and other applicable provisions of the Listing Regulations which require top five hundred listed companies (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report.

SynapseIndia Outsourcing Private Limited being one of the top technology companies, has approved and adopted these policies.

1.2. OBJECTIVES:

The key objective of these policies is to reaffirm the Company's commitment to follow the principles laid down in National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Businesses. These policies will help SynapseIndia to deal with the complexities and challenges that keep emerging in the conduct of its business.

1.3. APPLICABILITY:

These policies apply to the directors and employees of the Company across all its functions and branches. The policies shall be effective from February 1, 2017 and shall also be applicable to all the subsidiaries and stakeholders of the Company.

2. DEFINITIONS:

2.1. **"Board"** shall mean the Board of Directors of the Company.

2.2. **"Companies Act"** shall mean the Companies Act, 2013 and rules notified thereunder.

2.3. **"Company"** shall mean SynapseIndia Outsourcing Private Limited.

2.4. **"Policy"** shall mean the Business Responsibility Policy.

3 IMPLEMENTATION:

The Board of Directors of the Company in its meeting held on 5th July, 2016 constituted a Business Responsibility Reporting Committee ("BRRC") to be responsible for implementation of Business Responsibility policies. Details of BRR Committee are:

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|------------------------|---|-------------------------|
| 1. Mr. Shamit Khemka | – | Managing Director & CEO |
| 2. Mr. Subhash Kothari | – | Director |

Mr. Shamit Khemka shall be the Chairman of the said Committee. He has also been designated as the Business Responsibility Head for the purpose of these policies.

The Business Responsibility Head may take support of such functional head and internal and external experts as he deems fit, for the effective implementation of the policies. These policies are also supported by other existing policies of the Company.

4. POLICIES:

The Company's environmental and social responsibility is governed by separate policy.

1. Corporate Social Responsibility (CSR) policy - Annex 1
2. Corporate Environmental policy - Point 9

The rest of the policies governing the Company's Business practices are as mentioned below:

5. POLICY FOR SUSTAINABLE PRODUCTS AND SERVICES:

Sustainability lays at the centre of all operations at SynapseIndia Outsourcing Private Limited including workplace management, greater long term profitability or more reliable services. The Company takes cognizance of its role in adoption of environmentally sustainable technologies. The policy for sustainable products and services targets to maintain the right balance between environment protection, social well-being and economic growth. To this end, this policy strives to accomplish the following:

- Assure safety & optimal use of resources over the product lifecycle and ensure that everyone connected with it are aware of their responsibilities;
- Ensure that all services are procured/delivered embedding the principles of labour practices, human rights, ethics, occupational health, safety and environment;
- The Company shall endeavour to regularly review and improve upon the technological advancement & commercialization thereof, incorporating social, ethical and environmental considerations;
- The Company will continuously encourage its business partners and third parties with whom it conducts business to abide by this policy.

6. POLICY ON EMPLOYEE WELL-BEING:

SynapseIndia Outsourcing Private Limited considers its employees as its most treasured assets. The Company ensures that efforts of all its employees are appreciated and their potential is harnessed to the fullest. The Company believes in fostering a work culture with high ethical principles and encourage our employees to perform with total integrity, commitment and ownership. A healthy and motivated workforce is the key to achieving business goals and to this end the Company shall endeavour to support the professional growth of its employees and reward performers. The Company shall be committed to partnering with employees and strengthening its talent pool by giving them career growth and development opportunities.

The employee well-being policy aims to achieve the following:

- Respecting their right to freedom of association, participation and access to appropriate grievance redressal mechanism.
- Providing & maintaining equal opportunities at the time of recruitment as well as during the course of employment without discrimination on the basis of location, caste, creed, gender, race, religion, disability or sexual orientation.
- Not using child labour, forced labour or any form of involuntary labour, paid or unpaid.
- Taking cognizance of the work-life balance of employees.
- Providing facilities for the well-being of employees including those with special needs.
- Providing a workplace environment that is safe, hygienic, and humane and which upholds the dignity of employees. Through programmes, the Company believes in influencing aspects of employee life, including physical, mental and emotional well-being.
- Creating awareness of these provisions amongst employees and training them on a regular basis.
- Ensuring 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.
- Implementing necessary systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

7. POLICY FOR STAKEHOLDER ENGAGEMENT:

SynapseIndia Outsourcing Private Limited considers stakeholder engagement as a channel of dialogue with its Employees, Customers, Investors, Business Associates, Suppliers and Community Stakeholders. The Company believes that this aids in addressing its duty of social responsibility by providing an informed basis to its stakeholders for all its decisions. Various engagement mechanisms have been identified for each of the stakeholder groups. The Company strongly believes that an effective stakeholder engagement is based on good faith and goes beyond public relations. The Company is conscious of and respects the interests and needs of all its stakeholders and their relative capacity to engage with the Company:

Stakeholders	Modes of Engagement	Frequency
Shareholders and Investors	Annual General Meeting	Quarterly & Annual
	Investor Grievance Cell	
	Board Meetings / Communications	
	Annual Report	
Customers	Satisfaction Surveys / Grievance Forms	Throughout the Year
	Ongoing and Annual Feedbacks	
	Ombudsman Function	
Employees	Employee Engagement Surveys – HR Surveys, Administration Surveys,	Throughout the Year
	Townhall, functions and programmes	
	Magazines/Intranet/Newsletters	
	Trainings and Development Programme	
	Whistle Blower Mechanism	
Business Associate Groups	One on One meetings	Throughout the Year
Community Stakeholder Group	CSR initiatives	Throughout the Year

8. POLICY FOR PROVIDING VALUE TO CUSTOMERS:

The mission and value statements of SynapseIndia Outsourcing Private Limited provides guidance in its engagement with customers. These statements emphasize on providing continuous delight to customers in current and new businesses by delivering superior value through enhanced offerings on the internet and other platforms. The Company’s policy on providing value to customer embraces the following:

- Taking into account the overall prosperity of the customers.
- Ensuring that the Company does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its services.
- Making full disclosures of all information truthfully and factually through appropriate means.
- Ensuring that the promotion & advertisements of services do not mislead or confuse the customers or violate any of the principles in these policies.
- Providing adequate grievance handling mechanisms to address customer concerns and feedback.

9. POLICY FOR REDUCING ENVIRONMENTAL IMPACT:

We at SynapseIndia Outsourcing Private Limited are conscious of all our activities and decisions impacting the environment and we assume responsibility for the environmental burdens caused by our activities and services. We constantly strive to improve energy efficiency, use renewable energy, procure greener products and manage wastes with an aim to reduce the impact on the environment. We identify ways to optimise resource consumption in our operations. . Our Environmental Policy is built around the following:

- Utilizing natural and manmade resources in an optimal and responsible manner.
- Ensuring the sustainability of resources by reducing, reusing, recycling and managing waste.
- Improving environmental performance by promoting use of energy efficient and environment friendly technologies.
- Proactively persuading our value chain and sphere of influence to adopt this principle.
- Constantly monitoring our activities to ensure that they do not cause any environmental imbalance at any point of time.

10. POLICY FOR PROTECTING HUMAN RIGHTS:

At SynapseIndia, the Human Rights Policy governs activities regarding employees across the Company and its subsidiaries. Respecting human rights is the fundamental part of SynapseIndia.

Business Partners of the Company are also advised to follow the policy. The Company discourages dealing with any supplier/contractor if it is in violation of human rights. We aim to identify, assess, and manage the human right impacts of our business activities based on the operational context, our leverage and business relationships.

The human rights policy of the Company has the following elements:

Prohibits Discrimination

SynapseIndia believes in the philosophy of non-discrimination amongst its employees and endeavours to maintain meritocracy. The Company employs people on the basis of their ability to do the job and any discrimination based on employees' personal characteristics, conditions or beliefs is strictly prohibited.

No Forced or Child Labour

The Company prevents and mitigates the adverse use of forced labour and it complies with local laws and requirements. Also, SynapseIndia never employs any child labour for conducting its business.

Safe, healthy, respectful working conditions and training

SynapseIndia endeavours to provide a safe, healthy and respectful work environment to its employees. The Company also protects its employees from harassment and any conduct that may foster an offensive or hostile work environment, including unwelcome or unsolicited sexual advances, threats of physical harm or violent behaviour. Training and awareness raising, is continuously developed and integrated into our training plan and implemented in relevant training programs for employees as well as for our suppliers.

Reporting and transparency

The Company encourages its employees to report, on a confidential basis, potential violations of human rights and other policies through a number of channels across the company and its subsidiaries, including the whistleblower mechanism and customer service channels.

6. DISCLOSURES:

The policies shall be disclosed in the Annual Report and shall also be communicated to the stakeholders through appropriate channels in the Company.

7. GENERAL:

- a) Any or all provisions of these BRR policies would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time.
- b) The Company reserves the right to modify, add, delete or amend any of the provisions of these policies.
- c) In case of any doubt with regard to any provision of the policies and also in respect of matters not covered herein, a reference shall be made to the BRR Committee. In all such matters, the interpretation and decision of the BRR Committee shall be final.