

# STEAMHOUSE INDIA LIMITED

(FORMERLY KNOWN AS ANKLESHWAR ECO ENERGY LIMITED)

CONTACT NO. : +91 9099512222

CIN: U40300GJ2015PLC083493

Email Id: [compliance1@steamhouse.in](mailto:compliance1@steamhouse.in)

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## ESG SUSTAINABILITY POLICY & SOP

**STEAMHOUSE INDIA LIMITED**

**(Formerly Known as Ankleshwar Eco Energy)**

**Plot No: 8108/1, Sachin GIDC,**

**Sachin, Surat- 394230**



9727740707



[legal@steamhouse.in](mailto:legal@steamhouse.in)



[www.steamhouse.in](http://www.steamhouse.in)

REGISTERED OFFICE: PLOT NO.8108/1, ROAD NO. 2, G.I.D.C., SACHIN, SURAT - 394230

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## Status of Document Change Control

Rev. No:	Issue Date	Description of Document Change	Originator	Approved by
0	14.11.2022	1 <sup>st</sup> Edition / First Issue	Legal Officer	Managing Director

This ESG Sustainability Policy and SOP Procedure have been accepted and authorised by the Board of Directors (Governing Body) on 28<sup>th</sup> February 2023.

<b>Prepared by Legal Officer</b> <i>Ms. Shruti Pandey</i> <i>Date: 14<sup>th</sup> Nov, 2022</i>	
<b>Reviewed by Chief Financial Officer</b> <i>Mr. Vaibhav Gatani</i> <i>Date: 14<sup>th</sup> Nov, 2022</i>	
<b>Approved by MD</b> <i>Mr. Vishal S. Budhia</i> <i>Date: 14<sup>th</sup> Nov, 2022</i>	
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## 1.0 PURPOSE

- 1.1 The purpose of this ESG Sustainability Policy and SOP is to establish a systematic guideline for Steamhouse India Limited ('SHIL') and its subsidiaries, employees, personnel, suppliers, business associates and third party intermediaries who provide, or shall provide products and services and acting on behalf of the Group are aware of our clear ESG sustainable development objectives in every aspect of our ethical business acumen addressing (a) Fair Workplace with Health, Safety, Security and Environment Practices; (b) Fair Labour and Employment Practices; and (c) Fair Business Practices.
- 1.2 Steamhouse is strongly committed to the implementation of ESG sustainability within our sphere of influence to enhance long-term shareholders' value with regards to Environmental, Social and Governance (ESG) aspects and indicators.

## 2.0 SCOPE

- 2.1 The scope of this ESG Sustainable Policy and SOP applies to all personnel (as defined in Section 3.5 of this Policy and SOP) of SHIL, business associates and third-party intermediaries who provide, or shall provide products and services or acting on behalf of SHIL and extends to all internal and external multi-stakeholders to embrace the spirit of our commitment to build a culture of health and safety and achieve our high ethical ESG standards.
- 2.2 This ESG Sustainability Policy and SOP is not intended to be all-encompassing nor exhaustive, and there can be other obligations or expectations of Directors, Key Senior Management and Personnel when performing their duties. Although this Policy and SOP is not meant to address every issue, it defines the spirit in which SHIL intends to do business and guide all personnel in their daily conduct.
- 2.3 This ESG Sustainability Policy and SOP is formulated to achieve the following objectives:
- (a) Endeavour to integrate the principles of ESG sustainability into the Company's strategies, policies, and procedures.
  - (b) Promote sustainable practices.
  - (c) Ensure that the board of directors of the Company (the "Board") and senior management are involved in the implementation of this Policy and review the ESG sustainability performance of the Group; and
  - (d) Create a culture of ESG sustainability within the company and the community, with an emphasis on integrating the environmental, social, and governance considerations into decision making and the delivery of outcomes.

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2.4 This ESG Sustainability Policy applies to all the cities, territories, or jurisdictions where SHIL operates. Where local customs, standards, laws, or other local policies apply that are stricter than the provision of this Policy, the stricter rules shall be complied with. However, if this Policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this Policy shall apply.

## 3.0 TERMS AND DEFINITIONS

3.1 “Applicable statutory laws and regulatory requirements”: – means the principal laws that SHIL personnel are expected to understand and comply with in respective jurisdictions, but not limited to; :-

- (i) Companies Act, 2013
- (ii) Boilers Act, 1923
- (iii) Indian Boiler Regulation, 1950
- (iv) Air (prevention and Control of Pollution) Act, 1981
- (v) Water (prevention and Control of pollution) Act, 1974;
- (vi) The Environment (protection) Act, 1986
- (vii) The Water (Prevention and Control of Pollution) Rules, 1975
- (viii) The Air (Prevention and Control of Pollution) Rules, 1982
- (ix) Factories Act, 1948
- (x) Income Tax Act, 1961
- (xi) GST Act, 2017
- (xii) Industrial Disputes Act, 1947
- (xiii) Payment of Gratuity Act, 1972
- (xiv) Employees’ State Insurance Act, 1948
- (xv) Employees’s Provident Funds and Miscellaneous Provisions Act, 1952
- (xvi) Minimum Wages Act, 1948
- (xvii) Contract labour (Regulation and Abolition) Act, 1970
- (xviii) Apprentices Act, 1961
- (xix) Child Labour (Prohibition and Regulation) Act, 1986
- (xx) Maternity Benefit Act, 1961
- (xxi) Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal act, 2013)
- (xxii) Occupational Safety, Health and Working Conditions Code, 2020
- (xxiii) other applicable statutory laws and regulatory requirements related to corporate liability in term of anti-bribery and anti-corruption in the City or jurisdictions where SHIL operates.

3.2 “Board”:- means the Board of Directors of Steamhouse India Limited, also known as the Governing Body.

3.3 “Business Associate”:- means any persons who providing products or performing services for or on behalf of the SHIL, apart from the Company’s employees, including contractors or subcontractors, distributors, business contacts, agents, advisers, joint venture partners, intermediaries, sales representatives, consultants, sponsors, service providers and business partners.

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- 3.4 “Director” or “Directors”:-  
means the director(s) of the Company and its subsidiaries and shall have the meaning given in 2(34) of Companies Act, 2013.
- 3.5 “Personnel”: –  
Any person at all levels and grades, including, directors, senior managers, key senior management, managers, executives, officers, non-executives, employees (whether permanent, full-time, part-time, contract, or temporary, employed by SHIL, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors, or any other person associated with the Company.
- 3.6 “Third-Party Intermediaries”: –  
Any external individual or organisation that SHIL has, or plans to establish, some form of business relationship. This can include actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and government and agencies and public bodies – this includes (but is not limited to) their advisors, representatives, public officials.
- 4.0 APPLICABLE FORMS**
- 4.1 None
- 5.0 RESPONSIBILITIES AND AUTHORITIES**
- 5.1 The environmental committee members are responsible for establishing, implementing, and maintaining this ESG Sustainability Policy and SOP that sets forth our values, expectations, and standards to guide the Board of Directors, the management, employees, and personnel of SHIL.
- 5.2 This Policy and SOP is in accordance with all applicable statutory laws and regulatory requirements and it is the responsibility of the management of each department to ensure that all SHIL personnel, business associates and third party intermediaries are aware of this Code so as to maintain the highest levels of Governance, Integrity, Accountability and Transparency (GIAT) in the conduct of our business activities, dealings, relationships and operations and to establish an ethical corporate environment.

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**5.3** This Policy and SOP shall be reviewed on an annual basis during the Management Review Meeting and, in addition, can be reviewed from time to time to take account of, for example, changes to legislation, regulatory developments or organizational changes.

**5.4** The Legal Officer shall be responsible for incorporating any amendments and updates into this Code, obtaining approval from the MD or the Board of Directors (Governing Body) for the amendments and updates, as well as distributing the same to the relevant parties.

## **6.0 PROCEDURE**

### **6.1 Principles of ESG Sustainability Policy**

**6.1.1** SHIL believes that sustainable development is achieved when its business generates value for its shareholders and other stakeholders while supporting the environmental, social and governance aspects through (a) Environmental; (b) Social; and (c) Governance Sustainability.

**6.1.2** SHIL looks to operationalize our commitment through the following three- pronged principles such as :-

- (a) Environmental Sustainability: Fair Workplace with Health, Safety, Security and Environment Practices.
- (b) Social Sustainability: Fair Labour and Employment Practices; and
- (c) Governance Sustainability: Fair Business Practices.

**6.1.3** SHIL has a responsibility to put sustainability at the heart of our business strategy through our pioneering leadership role, our operations and distribution of Steam service we provide. We recognize that our operations can greatly contribute to creating a more sustainable world.

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## 6.2 ESG Sustainable Policy Statement

**SHIL** is committed to promote and maintain our Core Values of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships, and operations as a recognized and reputable contract manufacturer. We have a responsibility to put sustainability at the heart of our business strategy through our pioneering leadership role, our operations and the Steam Generation and Distribution Services (SGDS) we provide. We recognize that our operations can greatly contribute to creating a more sustainable world.

To achieve this goal, **SHIL** shall :

Shall Commit to implement (a) Fair Workplace with Health, Safety, Security and Environment Practices; (b) Fair Labour and Employment Practices; and (c) Fair Business Practices.

Help the top management to implement our core values towards building a culture of governance, integrity, accountability and transparency with responsible business conduct and ethical personal conduct within and outside the premises;

Integrate and Prioritize a zero-tolerance approach against all forms of bribery and corruption and be responsible of every one of us; for our products and services;

List and ensure all our records, financial or otherwise, are accurately, completely, precisely, and timely recorded and the protection of information security, and intellectual assets.

We expect our personnel, customers, business associates and third-party intermediaries to embrace the spirit of our commitment to build a culture of GIAT and set our same high ethical standards as described in our Anti-Bribery & Corruption (ABC) Policy, Whistleblowing (WB) Policy, Code of Conduct and Ethics, and this ESG Sustainability Policy.

VISHAL S BUDHIA -

Mr. Vishal S. Budhia

Managing Director

On behalf of Board of Directors – Governing Body

Date : 14/11/2022

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## **6.3 Environmental Sustainability – Fair Workplace with Health, Safety, Security and Environment Practices**

Environmental sustainability is the responsibility to conserve natural resources and protect global ecosystems to support health and wellbeing, now and in the future. To protect the environment and conserve biodiversity, apart from complying with environmental legal and regulatory requirements, SHIL is committed to building a more sustainable society and respects the environment.

### **6.3.1 Fair Workplace**

SHIL is committed to maintaining a healthy and safe workplace that allows our personnel to balance the personal lives and work. The Company understands and strives to comply with all applicable laws and regulations related to safety and sanitation such as Occupational Safety, Health and Working Conditions Code, 2020. We maintain a Workplace that supports a Spirit of Freedom and Open-mindedness.

### **6.3.2 Free of Pandemics and other NCD threats**

SHIL is committed to maintaining a secure and conducive workplace that is free of pandemics and other non-communicable diseases (NCD) and mental disorders. Global environmental changes (GEC) have become a source of disease importation and reintroduction. The Company shall ensure that promotion of good lifestyle choices, treatment of common mental disorders and management of people at risk for heart attack and stroke.

### **6.3.3 Environmental Stewardship**

SHIL is committed to building a more sustainable society and respects the environment. The Company seeks to minimize its environmental impact and carbon footprint by conserving resources and protect our planet through promoting boilers using alternative fuel and installing advanced air pollution control system to reduce harmful emissions in the environment. To achieve net zero GHG emissions for SHIL using standard, framework, or voluntary initiative. It is everyone's responsibility to seek to reduce that impact wherever possible. Every small step counts.

### **6.3.4 To address environmental stewardship, apart from complying with environmental legal and regulatory requirements, the Group is committed:**

- (a) To minimize the level of pollutants entering into the air and water from daily business operations;
- (b) To create an ever-increasing awareness of this Policy within the Group and stakeholders;
- (c) To consider sustainability risks and opportunities, including climate-related risks and opportunities as part of our governance, risk management and strategic and financial planning framework;
- (d) Integrate practices that embrace responsible energy and resource management in daily operations, including prioritizing the use of green technologies, adopting carbon reduction

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strategies and promoting good environmental practices across the supply chain, where practicable;

- (e) Inculcate behaviour that supports the building of environmentally sustainable practices among our personnel;
- (f) Disclose environmental data, performance, and targets, in accordance with relevant globally accepted disclosure frameworks; and
- (g) Promote the adoption of good environmental practices.

**6.3.5** SHIL is also committed to maintaining a healthy, safe, secure, and conducive workplace that allows our personnel to balance the personal lives and work that is free of harassment and discrimination. We maintain a Workplace that supports a Spirit of Freedom and Open-mindedness.

## **6.4 Social Sustainability - Fair Labour, Employment Practices and Our Community**

Social sustainability is focused on the development of programs and processes that promote social interaction and cultural enrichment. SHIL has many stakeholders that range from our regulators, employees, and our customers, business associates and the communities the Company. It emphasises protecting the vulnerable, respecting social diversity, and ensuring that the Group puts a priority on social capital.

### **6.4.1 Inclusive and Equal Employment Opportunity**

SHIL is committed to recruiting, hiring, training, promoting and otherwise treating applicants, employees, and personnel without discrimination. The Company strives to promote diversity and create a culture that allows all SHIL personnel to contribute their unique talents and skills to provide the best products and services to our customers. We believe in the power of people. We respect for individuals of all backgrounds, capabilities, and opinions.

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## 6.4.2 No Forced Labour and Child Labour

SHIL is committed not to use any form of forced or involuntary labour where people are forced to work against their will, including forced labour to work off a debt, prison labour or human trafficking. The Company shall not use child labour who are younger than 18 years old for the operation plant and 16 years for other post. The Company adopts sound labour and employment practices and endeavours to ensure personnel are treated in accordance with the applicable laws and regulations of the country and regions in which the Group operates.

## 6.4.3 Harassment and Discrimination

SHIL is committed to maintaining a workplace that is free of harassment and discrimination. Each of us has the right to respect human dignity. The Company ensure that any behaviour or action likely to infringe this right, and in particular any form of harassment, bullying and discrimination is not acceptable.

## 6.4.4 Contribution to Our Community

SHIL is committed to supporting the communities where our employees and personnel live and work. SHIL is a responsible stakeholder in society, a good neighbour and a concerned citizen committed to the communities in which we do business. We encourage our personnel to play an active role in the community. We also explore ways to address broader challenges in society.

## 6.4.5 To uphold our social responsibility and sustainability, apart from complying with humanrights and labour, legal and regulatory requirement, the Group is committed to:

- (a) Provide an environment free of discrimination and harassment for our employees, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities;
- (b) Respect recognized human rights as relevant to our business and operations and continuing to uphold the freedom of association and the effective recognition of the right to collective bargaining as stipulated under the International Labour Organisation conventions;
- (c) Provide and maintain a safe and healthy work environment for our employees. The Company will not tolerate any threats or acts of violence towards any of our employees, whether it is from another employee, customer, regulated person or any other person;
- (d) To use training and development as a strategic investment and a way of shaping culture and behaviour in the Company;
- (e) Develop our employees and provide an environment for them to be more innovative and able to realize their full potential;
- (f) Develop deep sustainability know-how and competency across the organisationto expedite our progress and strengthen our processes and practices as well as our sustainability reporting journey;
- (g) Implement policies and programmes to attract and retain talent;
- (h) Promote integrity and the protection of human rights across the supply chain;

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- (i) Undertake programmes to promote gender equality in the workplace, marketplace and community, based on the Women's Empowerment Principles;
  - (j) Promote education for communities, especially the underserved, to improve their livelihoods;
  - (k) To align our charitable giving with the Group's business activities;
  - (l) To engage positively with communities and stakeholders where we operate;
  - (m) To respond in a professional and timely manner to public enquiries;
  - (n) To be recognised as a good corporate citizen.

## 6.5 Governance Sustainability - Fair Business Practices

Governance sustainability is becoming more essential in gaining the confidence of investors, other stakeholders, and the public. SHIL recognises the importance of governance sustainability and incorporates it into all its functions and processes which includes strategic planning, accountability, sustainable planning, and development.

### 6.5.1 Fair Competition

SHIL is committed to working in an industry where business practices are fair and reputable. The Company respects all stakeholders in our professional sphere, including competitors. We treat them the way we would like them to treat us. Our position as leader in the Steam industry reinforces our duty to set a good example in this field.

### 6.5.2 Inside Trading

SHIL does not wish to restrict the freedom of employees and personnel to make appropriate personal investments, each of us must always bear in mind the rules with regards "insider trading". We never use or disclose material, non-public information about the Group for the purpose of buying or selling securities. Nor do we ever attempt to manipulate the price of publicly traded securities.

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## **6.5.3 Financial Integrity and Business Records**

SHIL is committed to making sure that all our records, financial or otherwise, are accurately, completely, precisely, and timely recorded. The Company views that these are essential part of running our business legally, honestly, and efficiently to ensure that our business activities are not used to launder money from criminal activities. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

## **6.5.4 Honest Advertising**

SHIL is committed to complying with the importance of accuracy and transparency in advertising and promotion.

## **6.5.5 Anti-money Laundering**

SHIL is committed to strengthening anti-money laundering governance and remaining vigilant in the prevention against money laundering and terrorist activities. The Group prioritizes a risk-based approach, conducting due diligence and providing timely disclosure of suspicious transactions to the relevant law enforcement agencies.

## **6.5.6 Tax and Trade Controls**

SHIL is committed to be a good corporate citizen and complies with applicable tax and trade control laws and regulations wherever it operates. The Company shall scrupulously respect tax laws and trade control laws and regulations which prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals, or entities to secure international peace and security.

## **6.5.7 Bribery and Facilitation Payments**

SHIL is committed to promoting and maintaining the highest levels of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships, and operations as a recognized and as reputable Steam manufacturer. The Company shall not offer or accept any form of payment or incentive intended to improperly influence a business decision.

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## **6.5.8 Gifts and Hospitality**

SHIL is committed to promoting the practise of giving and receiving business gifts and hospitality that help to build understanding and improve working relationships. The Company recognises that gifts and hospitality vary between companies, regions, cultures, and religions, so the “golden rules” are full disclosure to your management, staying within reasonable limits and always asking oneself how this would be perceived by the wider public.

## **6.5.9 Charitable Donations and Political Contributions**

SHIL, as part of its corporate citizenship, is committed to undertaking social and philanthropic programmes that are in line with their respective business strategies or that will benefit the broader interests of the community, while complementing the efforts of the industry and Government. The Company encourages contributions to charitable organizations and has a policy of strict political neutrality.

The Company does not make political donations or contributions to any political parties, organisations, or individuals engaged in politics nor does it incur any political expenditure. The Company is committed to respecting its personnel’s right to participate as individuals in the political process – so long as they make sure that, in doing so, they do not represent the Group.

## **6.5.10 Political Activities and Lobbying**

SHIL is committed to respecting its personnel’s right to participate as individuals in the political process – so long as they make sure that, in doing so, they do not represent the Company. The Company does not contribute to political parties, politicians, or related institutions. However, Company, as a leader in the Steam industry, believes it is our duty to be proactive and take part in the public decision- making process in the sector in which it operates.

## **6.5.11 Conflict of Interest**

SHIL is committed to acting in the best interests of the company rather than for personal gain. The Company aims to avoid situations where our personal interests might come into conflict with the interests of SHIL.

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A full disclosure of all the facts is important and directors shall be governed by the Companies Act 2013 on matters relating to disclosures of conflict of interest.

## **6.5.12 Fraud, Breach of Trust, and Abuse of Power**

SHIL is committed to promoting and maintaining our core values of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships, and operations. The Company shall ensure that all personnel are (a) not engage in any transaction involving dishonesty and fraud; (b) not engage in a behaviour that constitutes a breach of trust and confidence with us; (c) not abuse of authority or power for personal gain or preferential treatment.

## **6.5.13 Fair Purchasing**

SHIL is committed to selecting business associates fairly and objectively to ensure the best value for the Group as it is integral to our long-term success of our business. The Company is proud of our reputation for dealing with business associates in a mutually supportive and open way are based on the principles of impartiality, fairness and loyalty without any preferential treatment.

## **6.5.14 Cybersecurity Protection of Personal and Company Devices**

SHIL is committed to protecting data and keep the data safe and reliable. The Company shall undertake various IT tools and methodologies to reduce the likelihood of security breaches to gain their trust and to proactively protect our systems and databases.

## **6.5.15 Privacy, Data Protection, and Confidential or proprietary Information**

SHIL is committed to respecting the confidentiality of personal information of all our stakeholders, including its personnel, business associates and third-party intermediaries. We all have right to privacy. The Company shall ensure the protection of all data and information as unauthorized disclosure of such information can lead to a loss in value and be detrimental to the Company. Confidential or proprietary information includes all information that is not generally known to the public and is valuable to us or would be helpful to competitors.

6.5.16 SHIL is committed to working in the Steam industry where business practices are fair and reputable. We treat them the way we would like them to treat us.

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6.5.17 SHIL is committed:

- (a) To promote good corporate governance culture within the Company which reinforces ethical, prudent and professional behaviour;
- (b) To making sure that all our records, financial or otherwise, are accurately, completely, precisely and timely recorded;
- (c) To strengthen anti-money laundering governance and remaining vigilant in the prevention against money laundering and terrorist activities;
- (d) To be a good corporate citizen and complies with applicable tax and trade control laws and regulations wherever it operates;
- (e) To promote and maintain our core values of Governance, Integrity, Accountability and Transparency (GIAT) in all our business activities, dealings, relationships and operations ensuring that all personnel are (a) not engage in any transaction involving dishonesty and fraud; (b) not engage in a behaviour that constitutes a breach of trust and confidence with us; (c) not abuse of authority or power for personal gain or preferential treatment in fighting bribery and corruption;
- (f) To promote the practice of giving and receiving business gifts and hospitality that help to build understanding and improve working relationships without violating any bribery and corruption laws;
- (g) To undertaking social and philanthropic programmes that are in line with their respective business strategies or that will benefit the broader interests of the community, while complementing the efforts of the industry and Government;
- (h) To respect its personnel's right to participate as individuals in the political process – so long as they make sure that, in doing so, they do not represent the Company;
- (i) To act in the best interests of SHIL rather than for personal gain avoiding conflict of interests;
- (j) To select business associates fairly and objectively to ensure the best value for the Group as it is integral to our long-term success of our business;
- (k) To protect data and keep the data safe and reliable and respecting the confidentiality of personal information of all our stakeholders, including its personnel, business associates and third-party intermediaries.
- (l) Never to use or disclose material, non-public information about the Group for the purpose of buying or selling securities such as 'inside trading'. Nor do we ever attempt to manipulate the price of publicly traded securities.

## 6.6 Supplementary to ESG Sustainability Policy & SOP

6.6.1 This ESG Sustainability Policy & SOP shall be read in conjunction with SHIL's various policies and procedures such as:-

- (a) Code of Conduct Policy
- (b) Our Core Values and Vision;
- (c) Corporate Environment Responsibility Report
- (d) Corporate Social Responsibility Policy

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- (e) Health and Safety Policy
  - (f) Human Rights Policy
  - (g) Labour and Modern Slavery Policy
  - (h) Prevention of Sexual Harassment at the workplace Policy
  - (i) Risk Management Policy
  - (j) Whistle Blower Policy.

## 6.7 Review of ESG Sustainability Policy and SOP

6.7.1 The Board of Directors, ESG Sustainability Oversight Committee, and Key Senior Management of SHIL shall monitor the implementation of this Code of Conduct Policy and review this Policy at planned interval to ensure that it continues to remain relevant and appropriate for its suitability, effectiveness and efficiency keeping with the changing business environment, administrative or operational needs as well as changes to statutory laws and regulatory requirements.

6.7.2 The Board and ESG Sustainability Oversight Committee shall review this ESG Sustainability Policy to take account of evolving policies, standards, best practices, and technology. Directors, employees, and business associates of the Company, as well as members of the public, are welcomed to provide feedback on aspects of this Sustainability Policy to the following contact: -

- (a) Corporate Unit
  - (i) Mr. Lalan Kumar Yadav Executive Director; Email: [publicrelation@steamhouse.in](mailto:publicrelation@steamhouse.in)
  - (ii) Mr. Vishal S. Budhia, Managing Director; Email: [vishal@steamhouse.in](mailto:vishal@steamhouse.in)
- (b) Legal Department  
Ms. Shruti Pandey; Email: [legal@steamhouse.in](mailto:legal@steamhouse.in)

Such feedback shall be compiled by the Corporate Affairs and Legal Department and presented to the Board for deliberation on an annual basis, or as and when necessary.

6.7.3 The ESG Department shall review and update (when necessary) this Code on a regular basis before forwarding to the Board of Directors, ESG Sustainability Oversight Committee, and Key Senior Management for approval. This Code is subject to updating and modifications from time to time to be in line with applicable statutory laws and regulatory requirements and organizational changes within SHIL.

This policy is brought into immediate effect on signing. The ESG Committee shall meet once in 60 days and record the minutes of the meetings.