

SANDHYA ORGANIC CHEMICALS PVT. LTD.

(Formerly known as Sandhya Industrial Chemical Export Pvt Ltd.)

Admn & : 101, Sangam CHS Ltd, 1st Floor, A Wing, S.V. Road, Santacruz(W), Mumbai- 400054

Sales Office : Tel.: +91-22-61565555/ 26104202/26151500 • Fax : +91-22-26104201

Factory : Unit-6, Plot No.2808 to 2811, G.I.D.C., Sarigam-396155, Tal-Umbergaon, Dist-Valsad, Gujarat

: Mobile : 93770 14296, 95377 56084 E-mail : sic@sandhya-group.com, info@sandhya-group.com

Redg. Office : Plot No.808/A/2, 3rd Phase, G.I.D.C. Vapi-396195, Gujarat, India, • Ph. No. : 0260-2400235 • Mob.: 9726511195.

Website : www.sandhya-group.com

(AN ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 Certified Company)



HR/EH/001

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EMPLOYEE HANDBOOK HR Guidelines

Created By
HR Manager

Reviewed By
General Manager Works

Approved By
Director





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Welcome to Sandhya Organic Chemicals Pvt Ltd.

On behalf of staff members and management, We welcome you at **Sandhya Organic Chemicals Pvt Ltd.** and wish you success in your future.

At **Sandhya Organics Chemicals Pvt Ltd.**, we believe that each employee contributes directly to the growth and success of the company, and we hope you will take pride in being a member of our team.

This manual is developed to describe some of the expectations of our employees and to outline the policies, programme and benefits available to the eligible employees. Employees should become familiar with the contents of the HR Manual and it will answer many of the questions about the employment with **Sandhya Organic Chemicals Pvt. Ltd.**

We believe that professional relationships are easier when all employees are aware of the culture and values of the organization. This guide will help you in understanding our vision better for the future of employment, business and challenges ahead.

We hope that experience here will be challenging, enjoyable and rewarding.

With Best Wishes;

Created By

HR Manager

Reviewed By

General Manager Works

Approved By

Director



Contents

1. Code of Business Conduct and Ethics	5
1.1 In the Workplace	5
1.1.1 Respect	5
1.1.2 Equal Employment Opportunity	6
1.1.3 Sexual Harassment and Other Discriminatory Harassment.....	6
1.2 Business Conduct Certification Program	7
1.3 Conflicts of Interest	8
1.3.1 Corporate Opportunities.....	8
1.3.2 Outside Activities - Officer or Director of Another Business.....	8
1.3.3 Second Job.....	8
1.3.4 Vendors, Suppliers and Consultants	8
1.3.5 Gifts and Entertainment	8
1.3.6 Communication of Conflicts	9
1.4 Protection and Proper Use of Company Assets.....	9
1.4.1 Confidentiality	10
1.4.2 Technology	10
1.5 Administration	10
1.5.1 Reporting of Any Illegal or Unethical Behavior; Points of Contact	10
2. Terms of Employment.....	11
2.1 Terms of employment.....	11
2.2 Joining process	11
2.3 Employment Verification.....	11
3. General Administrative Matters.....	11
3.1 Working days	11
3.2 Weekly off	12
3.3 Late arrival	12
3.4 Absence from office	12
3.5 Housekeeping	13
3.6 Dress code.....	13
3.7 Smoking.....	13



Sandhya Group

PHOSPHORUS CHEMISTRY

4. Employee Development.....	13
4.1 General	13
4.2 Performance Evaluation	13
4.3 Training and development.....	14
4.4 Career Development	15
5. Compensation	15
5.1 Salary Administration	15
5.1 Salary Increases	15
6. Employee Termination.....	16
6.1 Resignation	17
6.2 Dismissal.....	17
6.3 No Dues Certificate	17
7. Leave Policy	18
7.1 General	18
7.2 Leave at Manufacturing location:.....	18
7.3: Maternity Leave	18
7.4 Public holidays	19
7.5 Unauthorized absence	19
7.6 Full & Final Settlement	19
8. Internet Use Policy	19
8.1 General	19
8.2 Policy.....	19
9. Child Labour Policy	20
10. Whistle Blower Policy.....	20
11. Disciplinary and Haraasment Action Policy 2021-2024.....	24
12. Internet Security Policy	28
13. Procedure for Information Security Incident Management Process.....	42
14. CSR Policy	48



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1. Code of Business Conduct and Ethics

This Code of Business Conduct and Ethics applies to all employees of the group and officers of the subsidiaries and affiliates of Sandhya Group, which are referred to in this Code as Company.

The Company is proud of its reputation for integrity, honesty, continual improvement and commitment. Personal responsibility is at the core of the Company's principles and culture. The Company's reputation depends on you maintaining the highest standards of conduct in all business endeavors. You have a personal responsibility to protect this reputation, to "do the right thing at first step/ trial," and to act with honesty and integrity in all dealings with customers, business partners and each other. One should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

The principles set forth in this document describe how one should conduct them self. This Code does not address every expectation or condition regarding proper and ethical business conduct. Good common sense is your best guide. It does not substitute for Company policies and procedures. In every business-related endeavour, you must follow the ethics and compliance principles set forth in this Code as well as all other applicable corporate policies and procedures. Our success depends upon the dedication of our members of the workforce; we are highly selective in choosing new members of our team. We look to you and the other members to contribute to the success of Sandhya Group.

You are accountable for reading, understanding, and adhering to this Code. Further, compliance with all laws, rules and regulations related to Company activities is mandatory and your conduct must be such as to avoid even the appearance of impropriety. Failure to do so could result in disciplinary action, up to and including termination of employment as per gravity situation.

If you are uncertain about what to do, refer to the relevant section of this Code. If you are still unsure, speak with your supervisor or, if you prefer, communicate with any of the other points of contact indicated. If you have any doubt, ask for help to HR Department.

1.1 In the Workplace

Company is committed to provide environment friendly atmosphere with all safety culture with clear direction to their sub ordinates without any discrimination including any type of harassment.

1.1.1 Respect

The Company's greatest strength lies in the talent and ability of its associates. Since working in partnership is vital to the Company's continued success, mutual respect must be the basis for all work relationships. Engaging in behaviour that ridicules, belittles, intimidates, threatens or demeans, affects productivity, can negatively impact the Company's reputation. You are expected to treat others with the same respect and dignity that any reasonable person may wish to receive, creating a work environment that is inclusive, supportive and free of harassment and any discrimination. Employees and related stakeholders are our most Important Human Resources and we value our employees / stakeholders as our most important assets. Oursuccessiscreditedtoourethusiasticteam.



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1.1.2 Equal Employment Opportunity

The talents and skills needed to conduct business successfully are not limited to any particular group of people. Company has a long-standing commitment to a meaningful policy of equal employment opportunity. The Company's policy is to ensure equal employment and advancement opportunity for all qualified individuals without distinction or discrimination because of race, color, religion, gender, sexual orientation, age, national origin, disability, covered veteran status, marital status or any other unlawful basis.

1.1.3 Sexual Harassment and Other Discriminatory Harassment

The Company is committed to providing a work environment free of unlawful harassment and discrimination. Sexual harassment and other discriminatory harassment are illegal and violate Company policies. Actions or words of a sexual nature that harass or intimidate others are prohibited. Similarly, actions or words that harass or intimidate based on race, color, religion, gender, sexual orientation, age, national origin, disability, covered veteran status, marital status or any other unlawful basis are also prohibited.

Prohibited unlawful harassment includes, but is not limited to, the following behavior:

1. Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations, or comments (including comments left on voice mail);
2. Visual displays such as derogatory and sexually oriented posters, photography, cartoons, drawings, or gestures (including written communication, such as e-mail or notes);
3. Physical conduct such as assault, unwanted touching, intentional blocking normal movement or interfering with work because of gender or race;
4. Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors, and
5. Retaliation for reporting or threatening to report harassment.
6. Communication via electronic media of any type that includes any conduct that is prohibited by state and federal law or by company policy.

Sexual harassment does not need to be motivated by sexual desire to be unlawful or to violate this policy. For example, hostile acts toward an employee because of his/her gender can amount to sexual harassment, regardless of whether the treatment is motivated by sexual desire. Prohibited harassment is not just sexual harassment but harassment based on any protected category.

If you believe you have been unlawfully harassed, submit a written complaint to your Human Resources Department as soon as possible after the incident. Your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses. If you need assistance with your complaint, or if you prefer to make a complaint in person, contact the Human Resources Department. The Company will immediately undertake an effective, thorough, and objective investigation of the harassment allegations.

In the event of a **false accusation** of the woman employee claiming to be a victim, both woman and witness will be liable for disciplinary action.

Compliant Grievance

- If an employee (he/she) is harassed, then they should inform to HR Department for



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corrective action, or if possible harassed person should tell the harasser to stop; tell the harasser that his or her advances, comments, or gestures are unwelcome and offensive.

- If you have been harassed by a co-worker, supervisor, agent, vendor or customer, or if you believe that another employee has been harassed, you have a duty to promptly report the facts of the incident or incidents, and names of the individuals involved to Human Resource Department & Directors within 10 days of occurrence of incident with her/his signature.
- The HR will maintain record of the complaint received by it and keep the content confidential. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc. to substantiate his/her complaint. HR / Director will solve the complaint within five days or based on criticality of complaint of the receipt, but no later than a Fifteen days in any case.
- Hereafter, the person against whom complaint is made may be called for a deposition and opportunity will be given to him/her to give an explanation, where after, an enquiry shall be conducted and concluded. In such case the complaint does not fall under the purview of harassment or complaint does not mean an offence of harassment the same would be dropped after recording the reasons thereof.
- If the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- In case the committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint. (Management may look into the possibility in case the victim doesn't want to lodge a police complaint).

1.2 Business Conduct Certification Program

The responsibility for maintaining the Company's reputation for integrity and compliance rests in large measure on associates who guide its operations and others in particularly sensitive positions. The Business Conduct Certification Program is designed to have you affirm your compliance with the standards contained in this Code and to help identify situations that may in fact, or in appearance, involve conflicts of interest or other improper conduct. If you are required to complete or update a Business Conduct Certificate, you must do so in a timely and forthright manner with accurate responses. Above all,



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you must remember that any act that gives the appearance of being improper can damage Company's reputation and impair the public's confidence in the Company. All such acts must be avoided.

You must acknowledge that you have read and understand this Employee Code of Business Conduct and Ethics. In addition, management-level associates must periodically disclose on Business Conduct Certificate information that is considered to be directly relevant to avoiding problems with compliance obligations, self-dealing and impropriety. In certain circumstances, disclosure is required even if appropriate approval is obtained. An investigation may be conducted to resolve potential problems. All associates are required to cooperate in reaching a resolution of any issues found.

1.3 Conflicts of Interest

Company policy prohibits conflicts of interest. A "conflict of interest" occurs when your vested interest in any way with the interests of Company. In addition to avoiding conflicts of interest, you should also avoid even the appearance of a conflict.

1.3.1 Corporate Opportunities

You owe a duty to Company to advance its legitimate interests. You are prohibited from competing with the Company and from using corporate property, information or position for personal opportunities or gain.

1.3.2 Outside Activities - Officer or Director of another business

You may not serve as a director, officer, trustee, and partner or in any other principal position of another for-profit or publicly held organization or company without the prior approval of Company's Directors (or a designee). You should obtain approval from Company's Directors (or a designee)/MD / Director before agreeing to serve on the board or in a principal position of a trade or professional association or of a non-profit organization. In any event, these outside activities must not impact in any way your daily job responsibilities in your current position.

1.3.3 Second Job

Unless the Company otherwise consents in its sole discretion, you will devote your entire resources and full and undivided attention exclusively to the business of the Company during the term of your employment with the Company and shall not accept any other employment or engagement (honorary or otherwise). You should not work in our competitors company or any associates or branches also not to involve in any financial transaction and will not retain any copies or extracts there from.

1.3.4 Vendors, Suppliers and Consultants

All vendors, suppliers and consultants shall be approved in accordance with Company policies and procedures. Company's business relationships must be totally based on their ability to competitively meet the Company's business needs. If your association with a current or prospective Company vendor, supplier or consultant is of a nature that gives rise, or potentially gives rise, to a conflict of interest, the Company may have to refrain from entering into the relationship and, in any event, you must not be involved in any way with approving, managing or influencing the Company's business relationship.

1.3.5 Gifts and Entertainment

The occasional exchange of inexpensive gifts and modest forms of entertainment that have no special significance attached and are reasonable in nature, frequency and cost, are normal in business and help build strong and trusting relationships with customers, suppliers and other business partners. However, receiving such gifts or entertainment must never affect your judgment or decision-making, nor should they be offered in return for favorable treatment from others.



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What constitutes good business practice with respect to gifts and entertainment varies by industry, business unit and location. Gifts from agents to individual insurance clients of other than de minimus value are generally regarded as "rebates" and as such are prohibited. No gifts to you valued at more than INR 2,500 would be allowed. Gifts to you valued between INR 1,000 and INR 5,000 or forms of business entertainment that exceed reasonable and customary practices should be politely declined, unless approved in advance by your functional head for sound business reasons.

1.3.6 Bribe & Unethical ways of business:

"Bribe" or "Bribery" means an inducement, payment, reward or advantage offered, promised or provided to a public servant or to any other commercial party in order to corruptly gain any illegal commercial, contractual, regulatory or personal advantage.

Bribes can take many forms, for example:

- Money (or cash equivalent such as shares);
- Unreasonable gifts, entertainment or hospitality;
- Kickback;
- Unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);
- Unwarranted allowances or expenses;
- "facilitation" payments/payments made to perform their normal job more quickly and/or prioritize a particular customer;
- Political/charitable contributions;
- Uncompensated use of company services or facilities; or
- Anything else of value.

Involvement in such practices shall face disciplinary actions, which could result in dismissal. We reserve our right to terminate your employment without prior notice if found guilty.

1.3.7 Communication of Conflicts

All potential and actual conflicts of interest or material transactions or relationships that reasonably could be expected to give rise to such a conflict or the appearance of such a conflict must be disclosed. If you have any doubt about whether a conflict of interest exists after consulting this Code, you should seek assistance from the appropriate persons or entities identified in the Resources section, so that you can make that determination.

Company and its associates will not directly or indirectly engage in bribery, kickbacks, payoffs or other corrupt business practices, in their relations with governmental agencies or customers.

1.4 Protection and Proper Use of Company Assets

Safeguarding and appropriately using Company assets, whether those assets take the form of paper files, electronic data, computer resources, trademarks or otherwise, is critical.



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1.4.1 Confidentiality

Company is committed to preserving customer and employee trust. All information, whether it is business, customer or employee-related, must be treated in a confidential manner, and disclosing it is limited to those people who have an appropriate business or legal reason to have access to the information. You need to take special precautions when transmitting information via e-mail, fax, the Internet or other media. Remember to treat all such communications as if they were public documents and printed on letterhead.

Any information relating to the employees like **salary**, address, and phone numbers OR company finances will not be **communicated** or **discussed** with others without knowledge of management and HR.

In addition, Company meetings are confidential. You may not use audio or video equipment to record these meetings without the specific prior authorization of the head of your department.

1.4.2 Technology

Safeguarding computer resources is critical because the Company relies on technology to conduct daily business. Software is provided to enable you to perform your job and is covered by federal copyright laws. You cannot duplicate, distribute or lend software to anyone unless permitted by the license agreement.

Company provides electronic mail (e-mail) and Internet access to assist and facilitate business communications. All information stored, transmitted, received, or contained in these systems is the Company's sole property and is subject to its review at any time. All e-mail and Internet use must be consistent with Company's policies, practices and commitment to ensuring a work environment where all persons are treated with respect and dignity. Because these systems provide access to a worldwide audience, you should act at all times as if you are representing Company to the public, and should preserve Company's system security and protect its name and trademarks.

You must act responsibly and adhere to all laws and Company policies when using e-mail or the Internet.

You must use your computer appropriately in accordance with Company standards and be sure to secure both the computer and all data from loss, damage or unauthorized access, reporting all instances of unauthorized access to the Information Technology Department. (We have separately prepare company's data protection / Cyber Security Policy)

1.5 Administration

1.5.1 Reporting of Any Illegal or Unethical Behavior; Points of Contact

If you are aware of any illegal or unethical behavior or if you believe that an applicable law, rule or regulation or this Code has been violated, the matter must be promptly reported to your supervisor or company executives.

Your supervisor is normally the first person you should contact if you have questions about anything in this Code or if you believe Company or an associate is violating the law or Company policy or engaging in conduct that appears unethical. Under some circumstances, it may be impractical or you may feel uncomfortable raising a matter with your supervisor. In those instances, you may contact the head of your department or any other company executives. Furthermore, you should take care to report violations to a person who you believe is not involved in the alleged violation. All reports of alleged violations will be promptly investigated and, if appropriate, remedied, and if legally required, immediately reported to the proper governmental authority.



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You will be expected to cooperate in assuring that violations of this Code are promptly addressed. Company has a policy of protecting the confidentiality of those making reports of possible misconduct to the maximum extent permitted by law. **In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule, regulation, internal policy or this Code.** Any supervisor intimidating or imposing sanctions on someone for reporting a matter will be disciplined up to and including termination.

2. Terms of Employment

2.1 Terms of employment

Terms of employment are as set out in the appointment letter.

2.1.1 The terms of employment are as per the details contained in the appointment letter. The company reserves the right to amend, alter, change any or all the terms and conditions governing employment. The company will also be the sole judge of the meaning and interpretation of all or any of these terms and conditions and its decision thereon shall be binding on all employees.

2.1.2 The employment contract is a contract between the individual employee and the company and the terms of contract are individual to each employee. Hence, all employees are required not to share the terms of contract with others including fellow employees.

2.2 Joining process

The copies of the following documents shall be submitted by an employee on the date of joining:

- Proof of age (Adhar Card/ Pan Card/birth certificate/school leaving certificate/passport copy);
- Duly Attested Educational and other qualification certificates and Experience Certificate;
- Relieving letter/No dues certificate from the previous employer (if applicable);
- Last 3 months pay slip
- Appointment letter of all previous organisation
- Acknowledgement for receipt of the HR Policies and Code of Conduct guidelines;

Appointment letter:

Original to be retained by the employee; and one signed copy to be handed over to Company by the employee (for the Employee file)

2.3 Employment Verification:

Appointment will be done on the basis of information provided by concern employee in the application and also at the time of interview. Original copies of certificates, Testimonials and previous employment records should be submitted along with the photocopies for verification. If any declaration given by any employee to the company prove to be false OR found to have willfully suppressed any material information, He/She will be liable to be removed/Terminated from service without any prior notice.

3. General Administrative Matters

3.1 Working days



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Offices

The working days at the Company will be from Monday to Saturday.

Unless otherwise stated, work hours would be as follows:

Days	Monday – Saturday
General Shift Timings	09.00 hrs To 17:30 hrs.
Three Shift Duty Hours (For Manufacturing locations)	08 hrs (Grace period:10 Mins)
	Tea Break : 10 mins
Lunch-break	30 minutes

Owing to work exigencies, an employee's working hours maybe different from the timings mentioned above. Besides these

- The employees are required to sign in the muster book & swipe their thumb in the biometric machine, on their arrival as well at time of leaving.
- Employees who could not sign the muster / Biometric reader due to their outdoor assignments will have to inform the H.R Department in advance with a note of Head of Department.

3.2 Weekly off

Rotational weekly off will be scheduled for employee /worker.

3.3 Late arrival

Employees are expected to arrive at work and for meetings on time.

If an employee anticipates late arrival he/she must inform the immediate manager & HR (or a colleague in case the immediate manager is not available) in advance to allow for schedule changes and to handle coverage of working hours.

All employees are eligible for 03 late concessions (one hour) in a month. From 4th late mark, half day will be deducted for every 03 late markings.

Repeat challenges with late arrivals will be recorded as misconduct in the employee's file. All employees working with customers must ensure that all meeting commitments are met on time. Lapses in punctuality will not be acceptable.

3.4 Absence from office

- Any employee, who is outside the office during working hours, should ensure that the immediate manager (or a colleague, if the immediate manager is not available) is aware of his/her whereabouts. The concern employee must inform to HR Department by email about their outdoor duty.
- Unauthorized absence from office, or absence from office without prior approval from the immediate manager, will be recorded as misconduct in the employee's file.
- Unauthorized absence will be treated as Loss of Pay (LOP).



3.5 Housekeeping

It will be the responsibility of all employees to ensure that the offices of the company are kept neat and tidy at all times. The work area should be cleared of all files and papers every evening prior to leaving the office. All files to be kept in appropriate manner and all the documents lying on your desk are filed in their respective files or kept in drawer before leaving the office. Computers and any lights / AC in the work area need to be **switched off** during lunch break as well as before leaving.

3.6 Dress code

Men	Women
Formal / smart casual shirts, trousers and shoes. Formal clothes and Tie are mandatory for sales personnel & HOD's; and others when meeting customers / visitors.	Formal Western(shirts, slacks, pants, suits)/ Indian (saree, salwar) business wear

Casuals dress are allowed only on Saturdays at H.O.

Employees are expected to use their discretion in determining what appropriate office wear is.

3.6.1 All Manufacturing Location: Company issued uniforms are compulsory for Staff and Workers.

3.7 Smoking and consumption of Tobacco/ Guthka / Alcohol

Smoking and consumption of Tobacco / Guthka/ Alcohol is prohibited within office/ factory premises. In order to maintain a clean and healthy atmosphere in the workplace and arising out of our concern for fellow employees, smoking is prohibited within the office / Factory premises.

4. Employee Development

4.1 General

- It is the policy of the Company that the work of each employee will be evaluated half yearly by the employee's manager/supervisor, in order to monitor individual performance on the job, assess training needs and to identify future leaders.
- The process of employee development is covered by:
 - Performance Evaluation;
 - Training and Development; and
 - Career Planning

4.2 Performance Evaluation

- The process of performance evaluation provides a systematic approach for communicating goals, expectations and objectives to each employee as well as documenting individual performance.
- The process of performance evaluation is covered in three steps:
 - *Goal setting:*
 - The supervisor and employee discuss and set performance expectations for the assessment period and sign off individual performance contracts.



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- *Performance review:*
 - Performance review is conducted periodically (annually) to assess individual performance and to take necessary action to remove bottlenecks and to provide suggestions for improvement. The outcome of this review would result in the identification of training needs, rewards and recognition and career development.
- *Performance appraisal:*
 - Performance Appraisal is done based on careful consideration of employee performance for the assessment period.

4.3 Training and development

- The objective of the training and development policy at the Company is to develop relevant skills in the organization taking into account:
 - organizational requirements;
 - functional requirements; and
 - Individual learning objectives for self development (Sponsored by Company)
- It will be the responsibility of the supervisor/manager to ensure that all employees get an equal opportunity to attend training programmes based on their individual training needs.
- Training program shall include:
 - Technical training: for the Company employees;
 - Behavioral training: for the Company employees; and
 - Leadership programs: for the Company employees for specific career progression needs.
- The training needs identification will be based on the following:
 - Training needs arising out of the Corporate/regional objectives.
 - Training needs arising out of the team goals and priorities.
 - Training needs linked to individual job.
 - Training needs linked to individual potential and career progression needs.

• Training Effectiveness Evaluation

HOD should review the performance of the employee after the completion of training wherever it is possible. HR shall send the Evaluation form to HODs which has to be mandatorily filled and submitted within 15 days of completion of training. The effectiveness of training w.r.t. knowledge and work performance should be evaluated from time to time. Effectiveness of training should be highlighted while evaluating the skills of employee.

Utilization of Training

Company is investing time and money for training & skill development of employee. Hence, company expects that employee should utilize the expertise gained from training program in their working.



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In case of training by the company in India and / or outside the country, employee has to serve the company for **12 months / 18 months** from the date of completion of training. If employee leaves the company before the above schedule date then company shall have the right to recover the cost of training at the time of final settlement/ dues.

4.4 Career Development

It will be the endeavor of the Company management to provide all its employees with the opportunity for personal growth and progress. This section deals with the Career Planning policy. In case of further details, the employee may contact Human Resources.

- It will be the intention of the Company to provide all employees with growth and development opportunities.
- All career progression opportunities will be contingent upon the existing vacancies but it will not be binding on the Company to promote an employee. However company will review on the basis of the merit of the case.
- All matters with respect to promotions and career progression will be the responsibility of the Company management

5. Compensation

5.1 Salary Administration

All employees will be paid their salary on a monthly basis on the seventh working day of the subsequent month through bank transfer.

5.1 Salary Increases

Compensation review is an annual exercise, which determines the increment in salary. The increment is done on the cost of living adjustments and market trends in compensation levels. However, increment in the employee's salary is not automatic and will be subject to the employee's performance and the company's performance.

Employee Benefits

Eligible employees at Organization are provided with a wide range of benefits. A number of the programs cover all employees in the manner prescribed by law.

The following benefit programs are available to eligible employees:

- Group Medclaim Insurance
- Personal Accidental Insurance
- Provident Fund
- Gratuity (As per Government Norms)
- ESIC (wherever applicable)
- Bonus



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- Subsidized Meal
- Interest Free Loan till employee is in employment other wise 10% P.A will be charged for those employee who have left / Resign and not paid loan.

Social or Cultural Events

At Organization, we work hard and try our best to have fun as well!

We celebrate many festivals, occasions, employee birthdays, go for picnics where in all employees come together and share good moments.

Suggestion Program

As employee and associated members of Sandhya Group, have the opportunity to contribute to our future success and growth by submitting suggestions for practical work, improvement or cost savings ideas. All employees are eligible to participate in the suggestion program. A suggestion is an idea that will benefit Sandhya Group by solving a problem, reducing costs, improving operations or procedures, enhancing customer services, eliminating waste or spoilage, or making Sandhya Group a better or safer place to work. All suggestions should contain a description of the problem or condition to be improved, a detailed explanation of the solution or improvement, and the reason why it should be implemented.

Suggestion from visitors / customers / vendors can also be collected to make company environment more conducive. This process will be monitored by suggestion review committee & approved by management. The suggestion box is placed at company's entrance door - box will be opened in Once in a month in present of HR and worker representative.

6. Employee Termination

An employee will be separated from the company in the following events:

- On his/her resignation from the services of the company;
- On Dismissal / Retrenchment on various grounds
- On continues absence for more than 10 days without written information
- On the expiry of any fixed contract period;
- Medically unfit
- Retirement



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6.1 Resignation

- An employee, who wishes to leave the services of the company, has to submit a resignation letter serving as stipulated in his/her appointment letter, to his/her immediate manager and a copy of the same to Human Resource function.
- The notice period from the employee is essential for the company to ensure timely and smooth hand over of existing responsibilities to another employee. However, under special circumstances the company may make an exception and either waive off the entire notice period amount or deduct Cost to Company (CTC) pay for less than the stipulated notice period.
- On acceptance of resignation, a communication in writing shall be given to the employee with a copy to Accounts and other related departments for his/her full and final settlement of dues.
- The payment of other dues after ensuring clearance of outstanding amounts like travel allowance bills and LTA will be done. Items like computers, cellular phones, calculators, Files / books, etc have to be handed over to authorized persons.

6.2 Dismissal

Employee's services shall be liable to be terminated by the company, if he/she is indulged in act of insubordination, interference, corrupt practices, any misconduct, breach of trust, noncompliance with administrative orders or any provision of rules, or if it has been found that the declaration of information including that given in seeking employment furnished by employee found false and/or misleading and/or it has been found that employee had willfully suppressed any information to the company, or if employee is declared insolvent or convicted of any offence involving any moral turpitude, Criminal Offence or found suspected of fraud or misappropriation of money or other assets of the company, If employee is found to be medically unfit or if employee remains absent due to prolonged ill health, If there is any misrepresentation in documents provided by employee at the time of Appointment; if employees performance is not at par with Management expectation for the position held by employee; it will result to the termination of employment at any point of time.

In context to the above, employee will be liable, in addition to terminate of services to pay damage to the extent of loss suffered by the company.

6.3 No Dues Certificate

On termination of employment with the company, employees must surrender all business related documents, confidential company data or the like which may have been entrusted to the employee and get a No Dues certificate signed by his/her immediate manager.

Retirement Policy:

Employee is getting retired as per appointment letter terms & condition and once he/she attains the age of retirement then Company is giving him full and final settlement account and if required review for his or her extension of services with mutual agreement for a period of 1 or 2 or 3 by issuing separate letter of contract agreement.



7. Leave Policy

7.1 General

- For the purpose of calculating leave accounts, "year" shall mean the calendar year commencing on the first day of January and ending on the last day of December of the next year.
- Leave, other than maternity leave, cannot be claimed as a matter of right. Discretion is reserved with the authority empowered to sanction leave, to refuse or revoke leave at any time, depending on exigencies of the company's work. **Leave cannot be considered as an approved leave unless and until there is an authentication on leave application by HOD and concern directors.**
- All leave must be applied for at least 2 days prior (for 3 & more days – One month prior) for approval to immediate manager, with the exception of sick leave, which may be intimated verbally and post facto approval sought upon resumption of work. In case of unavoidable circumstances, if prior approval was not taken; employees must submit leave application within 2 days after resuming duly signed by the respective superior.
- Leave records are being maintained HR. It will be the employee's responsibility to plan and avail their leaves as per eligibility.
- Leave application to be used for approvals. **If no approvals on leave application**, it will be considered as **LOP (Loss of payment)**.
- Any Holiday or weekly off falls within leave period, shall be counted as part of the leave.
- Employees should give their tentative leave planning in the beginning of the year so that manager / HR Department will review the same.

7.2 Leave at Manufacturing Location: 30 Leave or prorate (based on joining) will be credited at the beginning of the year *An employee will be entitled to get leave if they have worked 240 days or more in calendar year*

- Employees desirous of availing leave in excess of 3 consecutive working days will need to submit a leave application to their immediate manager, before one month in advance. Approval on leave card is must for availing the said leave.
- Employees may take leave only after obtaining permission. In the event an employee goes on leave without notifying the company, it will be deemed that the employee has been absent from work without permission, and the period of absence will be treated as leave without pay.
- Leave has to avail within a calendar year.

7.3: Maternity Leave Twenty Six Weeks

- Subject to the provisions of the Maternity Benefit Act, 1961, women employees will be allowed maternity leave for Twenty four (26) weeks, of which a maximum of 12 weeks can be availed before delivery. An approved medical practitioner should certify the confinement and the employee must not take up any employment, temporary or part-time, or otherwise, during this period.
- This leave shall be limited to two children. The maternity benefit will not be applicable for a third child, when the first two children are living.
- An applicant for maternity leave must give notice to the company supported by a medical certificate not less than 8 weeks prior to the start of the leave period. The application should be supported by a medical certificate confirming the pregnancy and expected date of delivery
- Maternity leave may be availed in combination with other leave entitlements.
- No pay shall be due or payable in lieu of unavailed maternity leave.



7.4 Paid holidays: 07 days

- Seven public holidays may be availed, as notified by the company at the beginning of each year.
- In case the working of the office is likely to be hampered on account of strike, power cut, Flood etc, the company may declare, a public or a weekly holiday (except national holidays) to be a normal working day and declare the affected day to be a holiday.

7.5 Unauthorized absence

- Unauthorized absence refers to absence from work without requisite approval.
- The employee will need to offer an explanation to the immediate manager in the event of any unauthorized absence.
- The employee will not be eligible for payment of salary for this period of absence.

7.6 Full & Final settlement

Employee will be given relieving and experience letter on his last day of working. Amount of F&F settlement, Gratuity, Variable pay, Bonus, Balance Leave etc. will be given within 7 days of last working date. If there are any dues pertaining to employee, recovery of amount will be adjusted against the F&F Settlement.

7.7 Overtime:

Overtime will be calculated who will worked beyond their duty hours.

8. Internet Use Policy

8.1 General

Company supports the use of the Internet to conduct business by or on behalf of Company. Because the Internet provides access to a worldwide audience, Company associates should act at all times as if they are representing Company to the public, and should preserve Company's system security and protect Company's name and trademarks. **Company associates must act responsibly and adhere to all laws and Company policies when using the Internet to conduct business by or on behalf of the Company and/or when the Company or its products or services are identified.**

This Policy applies to all business units, Company associates and consultants with access to the Internet from any computer used to conduct business by or on behalf of Company (on Company premises or from home or any other location), or under any circumstances in which Company's name or its products or services are used.

8.2 The Policy

- The Company recognizes that the Internet can be a helpful tool in dealing with family and other personal matters; however, its use must not interfere with work responsibilities, conflict with business needs, or violate any Company policy or law. **Company reserves the right at all times to monitor, access and decrypt associates' use of the Internet, Company property, equipment, phone lines, computers (including disks, drives, storage media, electronic mail, etc.) and information.**



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- All users are expected to use good judgment when using the Internet. Company strictly prohibits:
 - displaying, uploading, downloading, disseminating, participating in bulletin board or electronic forum discussions regarding subject matters containing inappropriate materials or information that may be offensive to others;
 - in accordance with the Company's standards of business conduct, hacking or other attempts to penetrate non-public systems or any dishonest, defamatory, fraudulent, immoral, illegal and/or unethical activities; and
 - using Company's name or property or a Company-provided Internet access ID to conduct business on behalf of an entity other than Company or on behalf of any individual, including yourself; to represent yourself as someone else; or to solicit Company associates.

All users must respect Company's, its **affiliates'** and third parties' intellectual property rights (patents, copyrights, trademarks, trade secrets, as well as rights of privacy and publicity) and must take precautions to protect software, information and data that are owned, licensed or managed by Company. No software, information or data may be used or distributed in a manner that infringes upon any intellectual property right or violates a license agreement or jeopardizes Company's trade secrets.

No one may conduct business by or on behalf of Company with third parties using personal access accounts or IDs.

9. CHILD LABOUR POLICY:

We, at Sandhya Organic Chemicals Pvt Ltd. is committed to providing a transparent working environment that is characterized by equality and mutual respect. The company will not use child or forced labour, nor exploitation of children in any form during its operations and facilities.

Definition:

Child labour, as defined by the International Labour Organisation (ILO) Convention is "work by children under the age of 14; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 that is hazardous to the physical or mental health of the child.

During the conduct of its business, we

- Will does not employ children that falls into the definition as stipulated by ILO Convention, notwithstanding any national law or local regulation;
- are against all forms of the exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities i.e. 18years.

10. Whistle Blower Policy:



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Objective

The Company has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Company and its employees. Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company. The role of employees in pointing out such violations of the Code cannot be undermined. Accordingly, this Whistle Blower Policy has been formulated with a view to provide a mechanism for employees of the Company to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

Scope

Various stakeholders of the Company are eligible to make Protected Disclosures under the Policy. These stakeholders may fall into any of the following broad categories:

- Employees of the Company
- Employees of other agencies deployed for the company's activities
- Contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company
- Customers of the Company
- Any other person having an association with the Company

The Policy covers malpractices and events which have taken place/ suspected to take place involving:

- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records
- Financial irregularities, including fraud or suspected fraud or Deficiencies in Internal Control and check or deliberate error in preparations of Financial Statements or Misrepresentation of financial reports
- Any unlawful act whether Criminal/ Civil
- Pilferage of confidential/propriety information
- Deliberate violation of law/regulation
- Wastage / misappropriation of company funds/assets
- Bribery or corruption
- Sexual Harassment
- Retaliation
- Breach of IT Security and data privacy
- Social Media Misuse



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- Breach of Company Policy or failure to implement or comply with any approved Company Policy

Protection to Whistle Blower

If one raises a concern under this Policy, he/she will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes discrimination, reprisal, harassment or vengeance in any manner. Company's employee will not be at the risk of losing her/ his job or suffer loss in any other manner like transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle blower's right to continue to perform his/her duties/functions including making further Protected Disclosure, as a result of reporting under this Policy. The protection is available provided that:

- The Whistle blower has chosen to identify themselves
- The communication/ disclosure is made in good faith
- The Whistle blower reasonably believes that information, and any allegations contained in it, are substantially true; and
- The Whistle blower is not acting for personal gain

Accountabilities of Whistle Blowers

- Bring to early attention of the Company any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern. Delay in reporting may lead to loss of evidence and also financial loss for the Company.
- Avoid anonymity when raising a concern.
- Co-operate with investigating authorities, maintaining full confidentiality.
- The intent of the policy is to bring genuine and serious issues to the fore and it is not intended for petty Disclosures. Employees are expected to avoid invoking their rights under this Policy to settle personal scores or to give vent to their malicious intentions. Malicious allegations by employees may attract disciplinary action.

Accountabilities of Whistle Officer / Policy Process Owner / Management

- Conduct the enquiry in a fair, unbiased manner
- Ensure complete fact-finding
- Maintain strict confidentiality, especially of the whistle blower's identity (if available)
- Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom



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- Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures
- Record Committee deliberations and document the final report.
- Management also can take action against an employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures. Further this policy may not be used as a defense by an employee against whom an adverse personnel action has been taken independent of any disclosure made by him and for legitimate reasons or cause under Company rules and policies.
- Management will conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Whistle Officer as soon as practically possible and in any case, not later than 30 days from the date of receipt of the Disclosure. The Whistle Officer may allow additional time for submission of the report based on the circumstances of the case.
- The Company is entitled to amend, suspend or rescind this policy at any time. Whilst, the Company has made best efforts to define detailed procedures for implementation of this policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad intent of the policy. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this policy and further the objective of good corporate governance.



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Disciplinary and Harassment Action Policy 2021-2024

Object:

To provide equal opportunity and zero tolerance at workplace to maintain discipline and no harassment within and outside factory premises without any discrimination.

Company is committed to maintain discipline and safety precaution and if required may impose penalty and/ or fine as the case may be.

Applicability: It will be applicable with immediate effect i.e. from 01-08-2021 to 31-03-2024 and will review each after three years

Utilization of collection: This disciplinary action collection will be utilized for the welfare of the staff and workers within the same year

	Particulars	First time	Penalty or fine in Rs.	If repeat in the same month
	Non wearing of Helmet in Plant Area/construction work is going on	To issue a warning letter	100	200



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	---do --- face mask / hand-gloss /safety shoes/goggles as the case may be at in Plant Area/construction work/ welding work is going on	To issue a warning letter	100 per each default	200
	Internal fighting worker to worker	To issue warning letter and show cause notice	500	1000
	Internal fighting worker to supervisor	To issue a warning letter and show cause notice	750	1500
	Internal fighting worker to Manager	To issue a warning letter and show cause notice	1000	2000
	Unauthorized	Deduction	Deduction of	



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	absenteeism	of pay	pay and warning letter	
	Misbehavior like abusing to workers or staff	To issue a warning letter and show cause notice	100	200
	Negligence towards work in spite of instruction or regular work	To issue a warning letter and show cause notice	200	400
	Damages to the company's property	As per the nature of incidence	As per the nature of incidence	As per the nature of incidence
	Unauthorized leave for more than 10days	To issue a warning letter and show cause notice Deduction in pay as loss of pay	To issue a warning letter and show cause notice Deduction in pay as loss of pay	Termination of service



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Harassment of any nature to Co-workers / subordinate / Superior / colleague etc	To issue a warning letter and show cause notice for Harassment / misconduct	Fine Rs.250/- and issue a warning letter and show cause notice for Harassment / misconduct	Fine Rs.500/- and issue a warning letter and show cause notice for Harassment / misconduct and if required may be terminated his service
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Date: 01-11-2021

sd/-

Place: Sarigam

Snehal Patel, Director

12. IT Security Policy

↓ Policy Statement

This Policy applies to all IT-related systems, hardware, services, facilities, and processes owned or otherwise made available by the **Sandhya Organic Chemicals Pvt Ltd.** or on its behalf, whether utilizing the network and servers or those provided through cloud-based environments.

↓ Purpose

The purpose of the IT Security Policy is to ensure business continuity and to minimize operational damage by reducing the opportunity for and impact of security incidents.

↓ Scope

1. Employees

This policy applies to all Employees, Contractors, and third Party Employees, who use, process, and manage information and business processes of **Sandhya Organic Chemicals Pvt Ltd.**

2. Documentation

The Compliance Policy document and all other referenced documents shall be controlled. Version control shall be to preserve the latest release and the previous version of any document. However, the previous version of the documents shall be retained only for a period of two years for legal and knowledge preservation purpose.

3. Records

Records being generated as part of this Policy shall be retained for a period of two years. Records shall be in hard copy or electronic media. The records shall be owned by the respective system administrators and shall be audited once a year.

4. Distribution and Maintenance

This Policy document shall be made available to all the employees covered in the scope. All the changes and new releases of this document shall be made available to the persons concerned. The maintenance responsibility of the document shall be with the CISO and system administrators.

↓ Privacy



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This Policy document shall be considered as "confidential" and shall be made available to the concerned persons with proper access control. Subsequent changes and versions of this document shall be controlled.

↓ Responsibility

This Policy shall be implemented by the CISO and designated personnel (if any). This policy has full support from the management and human resources. This policy is a living document and may be modified at any time by the IT manager, human resources, or the management.

↓ Policy

1. Introduction

- The **Sandhya Organic Chemicals Pvt Ltd.** is facing increasing security threats from a wide range of sources. Systems and networks may be the target of a variety of attacks, including computer based fraud, data theft, surveillance or vandalism. Such threats to IT security are generally expected to become more widespread, more ambitious and increasingly sophisticated.
- Because of increasing dependence on IT systems and services, the **Sandhya Organic Chemicals Pvt Ltd.** is becoming more vulnerable to security threats. The growth of networking, cloud services and mobile devices presents new opportunities for unauthorized access to computer systems or data and reduces the scope for central, specialized control of IT facilities.
- In addition, legislation has been introduced, which places legal requirements on **Sandhya Organic Chemicals Pvt Ltd.** to protect personal privacy and to ensure the confidentiality and security of information and that its use is within the law.

2. Information Handling

- **Classification of information**
 - An inventory will be maintained of all the **Sandhya Organic Chemicals Pvt Ltd.**' major IT assets and the ownership of each asset will be clearly stated. Within the inventory, the information processed by each IT asset will be classified according to sensitivity.
- **Precautions against hardware, software or data loss**



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- All IT equipment must be safeguarded appropriately, especially when left unattended. Files downloaded from the internet carry a risk and should only be downloaded from trusted sites and scanned with an anti-virus product. Email poses a significant threat and files attached to and links within email must be treated with caution to safeguard against Phishing type attacks which seek to harvest personal information and deliver malicious code including ransomware that can lead to the encryption of important business data. IT users have a duty to check the address of the recipient each time an email is sent to reduce the chance of accidental data loss through email.
- Individuals must avoid the automatic forwarding of email from their company account to personal email accounts where there is the possibility for confidential or sensitive information being delivered to their company mailbox. The use of USB storage devices is a common cause of compromise through infections from computer viruses, malware and spyware and should be avoided. USB storage devices which are not from a trusted source must not be attached to a company computer. Files on trusted USB storage devices must be scanned with an anti-virus product before use or transfer to **Sandhya Organic Chemicals Pvt Ltd.** systems and network drives.
- **Disposal of equipment**
 - When permanently disposing of equipment containing all types of storage media, including but not limited to hard disk drives, backup tapes and USB removable media all sensitive or confidential data and licensed software should be irretrievably deleted during the disposal process. Damaged storage devices containing sensitive or confidential data will undergo assessment to determine if the device should be destroyed, repaired or discarded. Such devices will remain the property of **Sandhya Organic Chemicals Pvt Ltd.** and only be removed from site with the permission of the information asset owner. Secure disposal verification certificates should be sought for media which has contained sensitive and confidential data.
- **Working practices**
 - The organization advocates a clear screen policy particularly when employees are absent from their normal desk and outside normal working



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hours. Employees must log out or lock their workstations when not in use. Screens on which sensitive or confidential information is processed or viewed should be fitted with a privacy filter or be sited in such a way that they cannot be viewed by unauthorized persons. This applies to both fixed desktops, laptops, and mobile devices. Additionally, screens should be positioned so that they are not easily visible through external windows.

- Whilst sharing screens on video conferencing and collaboration platforms additional care should be taken to ensure sensitive information cannot be viewed by unauthorized persons. Wherever possible computer applications should be closed before permitting remote access to IT support colleagues undertaking support and maintenance. Individuals must ensure that any screenshots provided to initiate a support ticket or aid with troubleshooting a problem do not contain sensitive and confidential data.
- **Off-site removal and cloud storage of data**
 - Removal off-site of the **Sandhya Organic Chemicals Pvt Ltd.**'s sensitive or confidential information, either in print or held on any type of computer storage medium, including tablets, phones or USB drives whether owned by the **Sandhya Organic Chemicals Pvt Ltd.**, or not, should be authorised by the relevant Dean or Director and only in accordance with the **Sandhya Organic Chemicals Pvt Ltd.** Data Protection Policy.
 - Cloud storage introduces complexities relating to where data is stored and this is often in Countries without UK equivalent data protection laws. Sensitive or confidential information must not be kept in a cloud storage service which is not approved by the **Sandhya Organic Chemicals Pvt Ltd.** Due diligence must be undertaken to assess the risk to sensitive and confidential data before being uploaded to cloud-based storage and systems.
- **Backup and recovery**
 - Backups of the **Sandhya Organic Chemicals Pvt Ltd.**'s information assets and the ability to recover them are important priorities. Information owners must ensure that system backup and recovery procedures are in place and that these are routinely tested. Backup copies of data must be protected throughout their lifecycle from accidental or malicious alteration and destruction, particularly against the threat of ransomware for which



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offline; air-gapped; immutable backup technologies provide the strongest safeguards.

- Access to data backups and supporting infrastructure must be restricted to those persons who are authorized to perform systems administration or management functions. All system managers must ensure that safeguards are in place to protect the integrity of information during the recovery and restoration of data files; especially where such files may replace files that are more recent.
- **Archiving**
 - The archiving of information must take place with due consideration for legal, regulatory and business issues, with liaison as needed between IT staff, records managers and data owners, and in keeping with the **Sandhya Organic Chemicals Pvt Ltd.'s** Retention and Disposal Schedule.
 - Storage media used for the archiving of information must be appropriate to its expected longevity. The format in which the data is stored must also be carefully considered, especially where proprietary formats are involved.
- **Information lifecycle management**
 - All users of information systems must manage the creation, storage, amendment, copying and deletion or destruction of data files in a manner which safeguards and protects the confidentiality, integrity and availability of such files. Day to day data storage must ensure that current information is readily available to authorised users. Any archives created must be accessible in case of need.
- **Sensitive or confidential information**
 - Sensitive or confidential data may only be transferred across networks, or copied to other media, when the confidentiality and integrity of the data can be reasonably assured and in accordance with the **Sandhya Organic Chemicals Pvt Ltd.** Data Protection Policy. As a minimum this data must be encrypted in transit and while stored.
 - Sensitive or confidential data should only be accessed from **Sandhya Organic Chemicals Pvt Ltd.** owned equipment in secure locations and



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files must never be printed on a networked printer that does not have adequate protection or security. The Using Your Own Device Policy describes the secure use of non-Sandhya Organic Chemicals Pvt Ltd. owned equipment.

- **Use of electronic communication systems**
 - The Sandhya Organic Chemicals Pvt Ltd. advocates the use of modern communications methods over email to share information, as described in the Guidance on Managing Emails document. Teams, OneDrive and SharePoint provide greater security through granular access rights management and the ability to revoke access to shared information.
 - The identity of online recipients, such as email addresses and fax numbers should be checked carefully prior to dispatch, especially where the information content is sensitive or confidential. Verifying the correct document has been attached to an email prior to sending will reduce the opportunity for sensitive data loss via email. In most cases an email and its attachments cannot be revoked once sent externally.
 - Sensitive or confidential information should only be sent via email where modern methods are not possible to external recipients and must be encrypted or protected by a password.
- Information received electronically must be treated with care due to its inherent information security risks. Files received from external persons should be scanned for possible viruses or other malicious code. **Additional data protection declaration requirement**
 - Where a role requires access to specific business systems that contain sensitive personal or financial information, individuals may be required to sign a data protection declaration before they are sanctioned to carry out these duties.

3. Mobile and Remote Computing

- **Authorization**
 - Those remotely accessing information systems, data or services containing sensitive or confidential information must be authorised to do so by an appropriate authority.



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- **Use of computing equipment off-site**
 - Irrespective of ownership, computers or other devices should only be used off site for **Sandhya Organic Chemicals Pvt Ltd.** related activities if adequate security controls are in place. Where sensitive or confidential information is being stored or accessed from off site, an approved access solution, such as via AnyDesk, should be used as data then remains within **Sandhya Organic Chemicals Pvt Ltd.** systems.
 - Where staff owned computers are used sensitive or confidential information must not be stored on the device unless approved by the **Sandhya Organic Chemicals Pvt Ltd.**. The member of staff concerned should take steps to ensure other users of the equipment cannot view or access **Sandhya Organic Chemicals Pvt Ltd.** information. Staff are responsible for ensuring all devices adhere to the highest levels of security as defined in the Using Your Own Device Policy.
 - Microsoft BitLocker hard disk encryption is not available on Windows 10 Home edition. Guidance on encrypting OneDrive and local storage on staff owned devices can be found here (KI 1126). Any loss or theft of **Sandhya Organic Chemicals Pvt Ltd.** equipment or personal equipment which has been used to access sensitive **Sandhya Organic Chemicals Pvt Ltd.** data must be reported at the earliest opportunity. Multifactor authentication (MFA) will be enforced on access to **Sandhya Organic Chemicals Pvt Ltd.** systems when being used from off-campus. This validates the account holder and reduces the risks relating to weak, shared or compromised passwords.
- **Travelling**
 - Portable computing or storage devices are vulnerable to theft, loss or unauthorized access when travelling and information stored on them should be kept to a minimum.
 - Approved mobile device management software must be installed and activated on **Sandhya Organic Chemicals Pvt Ltd.** always owned mobile and portable devices. All devices, including portable storage, must be provided with an appropriate form of access protection including authentication and encryption to prevent unauthorized access to their contents. In addition to passwords, more modern means of authentication



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such as Touch-ID or Face ID are also acceptable forms of access protection.

- Equipment and media should not be left unattended in public places and portable devices should be carried as hand luggage. To reduce the opportunities for unauthorized access, automatic shutdown features should be enabled. Passwords or other similar security tokens for access to the **Sandhya Organic Chemicals Pvt Ltd.**' systems should never be stored on or with the mobile devices they are protecting or in their carrying cases.
- Screens on which sensitive or confidential information is processed or viewed should be fitted with a privacy filter or be sited in such a way that they cannot be viewed by unauthorized persons. Export and import controls apply when travelling to certain countries which restrict the use of encrypted devices. Advice should be taken from IT Support before any travel arrangements are made.

4. Outsourcing and Third Party Access

- **External suppliers**

- All external suppliers who have access to **Sandhya Organic Chemicals Pvt Ltd.** IT Systems or data must work under the supervision of **Sandhya Organic Chemicals Pvt Ltd.** staff and in accordance with this Policy. A copy of the Policy will be provided by the system owner to each third-party supplier at the commencement of any new contract or as this policy changes.
- Wherever possible supplier remote access accounts should remain disabled by default and enabled temporarily, as required to undertake a specific task, at the request of the system owner or administrator limiting access to agreed time frames to reduce the opportunity for unauthorized activities that may lead to data loss or unintended disruption. Accounts must be immediately deleted when no longer required.
- All activities undertaken by third party suppliers must be agreed in advance.

- **Security and confidentiality verification**



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- The **Sandhya Organic Chemicals Pvt Ltd.** will assess the risk to its information where accessed, stored or processed by third-party suppliers and, where deemed appropriate because of the confidentiality, sensitivity or value of the information being disclosed or made accessible, will require external suppliers of services to satisfy the **Sandhya Organic Chemicals Pvt Ltd.** through verification that their security controls, confidentiality practices or contractual clauses reflect our expected standards. This will be the responsibility of the system owner.
- Persons responsible for agreeing maintenance and support contracts will ensure that the contracts being signed are in accord with the content and spirit of this Policy.
- **Service level agreements**
 - Any facilities management, outsourcing or similar company with which the **Sandhya Organic Chemicals Pvt Ltd.** may do business must be able to demonstrate compliance with the **Sandhya Organic Chemicals Pvt Ltd.**'s IT Security Policy and must enter into binding service level agreements that specify the performance to be delivered and the remedies available in case of non-compliance.

5. Operations

- **Building access control**
 - Areas and offices where sensitive or confidential information is processed will be given an appropriate level of physical security and access control. Managers will provide information on the potential security risks and the measures used to control them to staff with authorisation to enter such areas. Managers must continue to ensure access is appropriate to staff duties and remove access when it is no longer required. Physical access control activity will be logged.
- **Operational procedures**
 - System owners must ensure that the procedures for the operation and administration of the **Sandhya Organic Chemicals Pvt Ltd.**'s business systems and activities are documented and that those procedures and documents are regularly reviewed and maintained. Duties and areas of responsibility must be segregated to reduce the risk and consequential

impact of IT security incidents that might result in financial or other material damage to the Sandhya Organic Chemicals Pvt Ltd..

- **Procedure for reporting of concerns**

- System owners must ensure that procedures are established and widely communicated for the reporting to IT Support of security incidents and suspected security weaknesses in the Sandhya Organic Chemicals Pvt Ltd.'s IT Systems. They must also ensure that mechanisms are put in place to monitor and learn from those incidents. Procedures must be established for the reporting of software malfunctions and faults in the Sandhya Organic Chemicals Pvt Ltd.'s IT Systems. Faults and malfunctions must be logged and monitored and timely corrective action taken.

- **Change management**

- Changes to operational procedures, software or hardware must be controlled to ensure continuing compliance with the requirements of this Policy and must have management approval.
- Development and testing facilities for business-critical systems will be separated from operational facilities and the migration of software from development to operational status will be subject to formal change control procedures. Development systems should utilise artificial or pseudonymised data and not personal data relating to individuals.
- Acceptance criteria for new information systems, upgrades and new versions will be established and suitable tests of the system carried out prior to migration to operational status. Tests involving live data or periods of parallel running may only be permitted where adequate controls for the security of the data are in place.
- Procedures will be established to control the development or implementation of all operational software, which must be approved by the Strategic Projects, Processes and Infrastructure Board (SPPIB) before introduction and a Privacy Impact Assessment must be completed and approved by the Records Management Service for any new system that will involve the processing of personal data. All systems developed for or procured within the Sandhya Organic Chemicals Pvt Ltd. must follow a formalised development process.



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- **Risk assessment**

- The security risks to the information assets of all system development projects will be assessed by system owners and access to those assets will be controlled.

- **Security Testing**

- IT systems hosted and maintained by the Sandhya Organic Chemicals Pvt Ltd. will be periodically tested for known vulnerabilities and weaknesses caused by mis-configured security controls.
- Applications hosted and maintained by third party providers, such as cloud Software as a Service (SaaS) systems, must be tested by the vendor at least annually. Proof of testing must be provided by the vendor prior to Sandhya Organic Chemicals Pvt Ltd. data being uploaded or entered into the application.

6. System Planning

- **Authorisation**

- New IT Systems relating to teaching, research or the administration of the Sandhya Organic Chemicals Pvt Ltd., or enhancements to existing systems, must be authorised by the Strategic Projects, Processes and Infrastructure Board (SPPIB). The business requirements of all authorised systems must specify appropriate security controls. The implementation of new or upgraded software or hardware must be carefully planned and managed, to ensure that the information security risks associated with such changes are mitigated using a combination of procedural and technical controls.

- **Risk assessment and management**

- System owners must ensure that the information assets associated with any proposed new or updated systems are identified, classified and recorded, and a risk assessment, including, where relevant, a privacy impact assessment, is undertaken to identify the probability and impact of security failure. Equipment supporting business systems must be given adequate protection from unauthorized access, environmental hazards and electrical power failures.



Sandhya Group
PHOSPHORUS CHEMISTRY

- **Access control**

- System owners must ensure that access controls for all IT Systems are set at appropriate levels in accordance with the value and classification of the information assets being protected. Access to operating system commands and application system functions must be restricted to those persons who are authorised to perform systems administration or management functions. Use of administrative commands and privileges should be logged and monitored wherever practicable.

- **Testing**

- System owners, in consultation with Computing and Library Services, must ensure that prior to acceptance, all new or upgraded systems or hardware are tested to ensure compliance with this Policy, access control standards and requirements for ongoing information security management. For new applications hosted and maintained by third party providers, such as cloud Software as a Service (SaaS) systems proof of security testing must be provided by the vendor prior to Sandhya Organic Chemicals Pvt Ltd. data being uploaded or entered into the application.

7. IT Systems Management

- **Staffing**

- IT Systems must be managed by suitably trained and qualified staff to oversee their day to day running and to preserve security and integrity in collaboration with individual system owners. All systems management staff must have relevant training in IT security issues.

- **Access control**

- System owners must ensure that access controls are maintained at appropriate levels for all IT Systems and that any changes of access permissions are authorised by the manager of the system or application. A record of access permissions granted must be maintained. Access to all IT Systems must use a secure login process and access may also be limited by time of day or by the location of the initiating terminal, or both.
- System owners must ensure that all access to systems containing sensitive or confidential information is logged to identify potential misuse of systems or information. They must also ensure that password



Sandhya Group

PHOSPHORUS CHEMISTRY

management procedures are put into place to ensure the implementation of security procedures and to assist users in complying with best practice guidelines.

- Remote access to the network must be subject to robust authentication as well as appropriate levels of security. Virtual Private Network, wireless, and other connections to the network are only permitted for authorised users.
- Access to operating system commands must be restricted to those persons who are authorised to perform systems administration or management functions. Use of such commands should be logged and monitored.
- **Privileged Access Accounts**
 - System owners and IT staff may have higher privilege or unrestricted access over applications and operating systems to carry out their administrative duties. Accounts with privileged access (including global, domain and local administrator rights) must not be used for day-to-day activities. Non-privileged accounts should be used as default and privileged access rights elevation used only as required. Privileged accounts that provide administrator level access to server and end point operating systems must not be used to read email or access the internet as malware introduced through these common infection routes could then execute with unrestricted access rights. Privilege accounts must provide no more than the rights needed to perform the operation the account is created for, following the principle of least privilege.
 - Wherever practicable multifactor authentication (MFA) and privileged access management (PAM) controls must be applied to Administrator and privileged account access to systems.
 - System owners should routinely review accounts with privileged access and remove access when no longer required.
- **Change management**
 - Changes to operational procedures, software or hardware must be controlled to ensure continuing compliance with the requirements of this Policy and have management approval. System owners should employ



Sandhya Group

PHOSPHORUS CHEMISTRY

appropriate mechanisms for the planning, communication and testing of such changes that safeguard the security of systems.

- Development and testing facilities for business-critical systems will be separated from operational facilities. Where possible development systems should utilise artificial or pseudonymised data and not personal data relating to individuals, or have security controls which are equivalent to the live system.
 - Acceptance criteria for new information systems, upgrades and new versions will be established and suitable tests of the system carried out prior to migration to operational status. Tests involving live data or periods of parallel running may only be permitted where adequate controls for the security of the data are in place.
 - Procedures will be established to control the development or implementation of all operational software, which must be approved by the Strategic Projects, Processes and Infrastructure Board (SPPIB) before introduction and a Privacy Impact Assessment must be completed and approved by the Records Management Service for any new system that will involve the processing of personal data. All systems developed for or procured within the Sandhya Organic Chemicals Pvt Ltd. must follow a formalised development process.
 - The implementation, use or modification of all software on the Sandhya Organic Chemicals Pvt Ltd.'s business systems must be controlled. All software must be checked before implementation to protect against malicious code.
 - Moves, changes and other reconfigurations of users' network access points will only be carried out by staff authorised by Computing and Library Services according to procedures laid down by them. All changes must be properly tested and authorised before moving to the live environment.
- **Logging**
 - System owners must ensure that where possible security event logs, operational audit logs and error logs are created, properly reviewed and managed by qualified staff. System clocks must be regularly synchronised between the University's various processing platforms.



Sandhya Group
PHOSPHORUS CHEMISTRY

- The logs created by critical servers and security systems will be exported to a Security Information and Event Management (SIEM) system for secure storage and to provide real-time analysis.
- **System Patching**
 - System owners must ensure that applications they are responsible for remain within vendor support and that these are regularly patched with software security updates to reduce the opportunity for the exploit of known vulnerabilities.

8. Laws, regulations and policies

You must comply with relevant laws, regulations and policies applying to the use of computers and information. Software licensing has already been mentioned and privacy laws are another example. Various corporate security policies apply to laptops, the data they contain, and network access (including use of the Internet).

↓ Enforcement

Any employee found to have violated this policy may be subjected to disciplinary action in line with the HR Policy.

13. Procedure for Information Security Incident Management Process

1. Purpose

The purpose of the incident management policy is to provide organization-wide guidance to employees on proper response to, and efficient and timely reporting of, computer security related incidents, such as computer viruses, unauthorized user activity, and suspected compromise of data. It also addresses non-IT incidents such as power failure.

2. Scope

This policy provides guidance regarding the need for developing and maintaining an incident management process within **Sandhya Organic Chemicals Pvt Ltd.**

3. Responsibility



The Incident Management Policy shall be implemented by the CISO (Chief Incident Security Officer) / designated personnel. The primary responsibilities associated with incident management are to identify and respond to suspected or known security incidents, contain or limit the exposure to loss, and mitigate (to the extent practical) the harmful effects of security incidents. The division will manage incidents at the facility level and will alert the **Sandhya Organic Chemicals Pvt Ltd.** CISO to potential company-wide threats. Where facilities are leased or ITS support is provided by an affiliate(s), a Division/Office security representative shall be assigned to facilitate the handling of security incidents. The nature of the incident may require the assignment of staff from other divisions/offices. In all cases, division/office management shall be informed of the incident and the steps recommended or taken to mitigate the incident.

4. Applicability

4.1. Employees

This policy applies to all Employees, Contractors, and Third Party Employees, who use, process, and manage information from individual systems or servers.

4.2. Documentation

The documentation shall consist of Incident Management Policy, and related procedures.

4.3. Document Control

The Incident Management Policy document and all other referenced documents shall be controlled. Version control shall be to preserve the latest release and the previous version of any document. However, the previous version of the documents shall be retained only for a period of two years for legal and knowledge preservation purpose.

4.4. Records

Records being generated as part of the Incident Management Policy shall be retained for a period of two years. Records shall be in hard copy or electronic media. The records shall be owned by the respective system administrators and shall be audited once a year.

4.5. Distribution and maintenance

The Incident Management Policy document shall be made available to all the employees covered in the scope. All the changes and new releases of this document shall be made available to the persons concerned. The maintenance responsibility of the document shall be with the CISO and system administrators.



Sandhya Group

PHOSPHORUS CHEMISTRY

5. Procedure

5.1. Incident Management procedure shall enable response to a major incident or disaster by implementing a plan to restore the critical business functions of **Sandhya Organic Chemicals Pvt Ltd..** The number of computer security incidents and the resulting cost of business disruption and service restoration rise with increase in dependence on IT-enabled processes. Implementation of sound security policies, blocking of unnecessary access to networks and computers, improvement in user security awareness, and early detection and mitigation of security incidents are some of the actions that can be taken to reduce such risks and decrease the cost of security incidents.

5.2. The organizational management shall ensure that:

- a. Incidents are detected as soon as possible and properly reported.
- b. Incidents are handled by appropriate authorized personnel with 'skilled' backup as required.
- c. Incidents are properly recorded and documented.
- d. All evidence is gathered, recorded and maintained in the Security Incident Reporting form that will withstand internal and external scrutiny.
- e. The full extent and implications relating to an incident are understood.
- f. Incidents are dealt with in a timely manner and service(s) restored as soon as possible.
- g. Similar incidents will not recur.
- h. Any weaknesses in procedures or policies are identified and addressed.
- i. The risk to **Sandhya Organic Chemicals Pvt Ltd..**' reputation through negative exposure is minimized.
- j. All incidents shall be analyzed and reported to the designated officer(s).
- k. Learning from the incidents is recorded.

5.3. The procedure shall apply throughout the organization, including information resources, data stored and processed on those systems, data communication and transmission media, and personnel who use information resources.

5.4. Implementation



Sandhya Group

PHOSPHORUS CHEMISTRY

This shall develop, maintain and implement an incident management and response plan that addresses information technology security incidents. The following paragraphs specify the incident management plan requirements. These requirements shall be in compliance with relevant State and policies and standards.

- a. **Incident Management Training:** This shall provide incident management training to the Divisions/Offices on how to identify and report security incidents.
- b. **Identifying and Prioritizing Types of Incidents:** This will develop and maintain guidelines for identifying and prioritizing security incidents. The Divisions/Offices or their affiliated staff designated by agreement or assignment shall evaluate the potential for the occurrence of certain types of incidents. All security incidents shall be classified by severity level and type. The following five event severity levels as defined in the ITS Incident Response Standard shall be used for classification purposes. In addition, each incident shall be identified as to type: email, hacking, virus/worm, inappropriate use, social engineering and other.
- c. **Incident Monitoring:** The CISO shall develop and maintain guidelines on how to monitor for security incidents. The Divisions/Offices or their affiliated staff designated by agreement or assignment, as part of their risk management program, shall continuously monitor for security incidents (both physical and ITS – related incidents) according to the guidelines listed above.
- d. **Incident Detection:** The Sandhya Organic Chemicals Pvt Ltd.. CISO shall develop and maintain enterprise-wide procedures for collecting, analyzing and reporting data. The integrity of all data relating to criminal acts must be preserved as possible evidence and will be collected using generally accepted forensic procedures. The forensic procedures to be followed will be developed and disseminated by the CISO.
- e. **Incident Reporting:** The CISO shall define the basic procedure to be followed for reporting incidents. The procedure shall be expanded upon by the Divisions/Offices as necessary to include the internal communications and escalation procedures that will be used. Security incidents classified as level 3, 4, or 5 shall be reported to the CISO and the division/office information security official within a period of 24 hours from the time the incident was discovered. The CISO is responsible for reporting the incidents to ITS and the Assistant Secretary for the OPP and Compliance within 24 hours of receiving the report. The Assistant Secretary for OPP and Compliance will be responsible for letting appropriate departmental staff know about the issue. The division should not report directly to ITS, as it could result in duplicate incidents being reported. A manual form may be completed and forwarded to the division/office information security official for processing. An incident reporting template is Available with the CISO and IT Manager. Reporting of security instances classified as level 2 or greater should be reported, at a minimum, to the division/office security official. Division/office specific procedures



Sandhya Group
PHOSPHORUS CHEMISTRY

may require all levels of security incidents to be reported to the CISO. If there is a question regarding classification level, the division/office security official should consult with the CISO.

- f. **Security Incident Response Team (SIRT):** The CISO shall establish and utilize an SIRT. The CISO will work with the Divisions/Offices to develop a cross-functional incident response team that will handle a variety of incidents. The roles and responsibilities of the team members will be clearly defined. The SIRT shall be adequately staffed and trained to handle the incident(s). Since incidents may be far-reaching, requiring expertise or authority that does not reside within a division/office, the SIRT may include outsourced vendors, internal and external entities, as well as other key facility/agency personnel.
- g. **Organization Protocols:** Security incidents may occur across network boundaries. The CISO shall define the protocols for handling these incidents and the contacts between Divisions/Offices, state agencies and outsourced entities.
- h. **Impact Assessment:** The CISO shall evaluate the impact of security incidents. Assessments may be required at various stages of the incident life cycle to assist management in deploying the proper risk management strategy.
- i. **Incident Handling and Escalation Procedures:** The CISO shall develop and maintain the primary procedures for handling the containment, eradication and recovery aspects of incidents and the guidelines for development of an escalation procedure. The Divisions/Offices shall develop escalation procedures that are tailored to their individual circumstances.
- j. **Documentation:** All security incidents shall be thoroughly documented by the Divisions/Offices with as much detail as possible to describe the incident, time discovered and impacted area for subsequent investigation. The incident report shall indicate who was notified and what actions were taken. The CISO may be called on to assist in the documentation process.
- k. **Record Retention:** Divisions/Offices shall maintain the incident logs and corresponding documentation for a minimum of one year following the discovery of an incident or until an investigation is completed. Incident logs should be stored in a secure location.
- l. **Post-Incident Analysis:** The post-mortem analysis provides feedback to improve the existing process and its related procedures. Following actions taken to resolve each security incident, an analysis shall be performed by the CISO and the impacted division or office, with assistance of their affiliated staff designated by agreement or assignment, to evaluate the procedures taken and what further steps could have been taken to minimize the impact of the incident.
- m. **Emergency Planning:** If an incident occurs that impacts the safety of citizens, personnel, facilities or results in a situation where agency services are interrupted for an extended period of



Sandhya Group

PHOSPHORUS CHEMISTRY

time, the incident may be declared an emergency. The **Sandhya Organic Chemicals Pvt Ltd.** CISO shall work with the Disaster Response Team to provide guidelines regarding the criteria for identifying an emergency and notification procedures. The Divisions/Offices shall develop the appropriate procedures for identifying and declaring emergencies using the established Business Continuity and Disaster Recovery Policy.

- n. **Media Relations:** Serious security incidents that are likely to result in media attention shall be reported immediately to the Department of Public Affairs Office.

5.5. Privacy

The Incident Management procedure document shall be considered as “confidential” and shall be made available to the concerned persons with proper access control. Subsequent changes and versions of this document shall be controlled.

- 5.6. Any employee found to have violated this policy may be subjected to disciplinary action in line with the HR Policy.



Corporate Social Responsibility Policy

Sandhya Organic Chemicals Pvt Ltd

Purpose:- To Provide Guidline for :

1.CSR Activities

2. Applicability and Scope of Framework

Background

At the outset, CSR activities at Sandhya Organic Chemicals Pvt Ltd is already in existence for the benefit of the employees and their immediate family members in the areas of extending loan to employees, participation at festivals and best worker award etc. It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures the long term success, competitiveness and sustainability. Further, CSR makes a business sense as companies with effective CSR, have image of socially responsible companies, achieve sustainable growth in their operations in the long run and their products and services are preferred by the customers.

Objective

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society. Sandhya Organic Chemicals Pvt Ltd will act as a good corporate citizen and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.

Measures

In the aforesaid backdrop, policy on CSR of Sandhya Organic Chemicals Pvt Ltd is broadly framed taking into account the following measures: The CSR activities shall be undertaken by Sandhya Organic Chemicals Pvt Ltd, as stated in this Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business. The CSR activities which are exclusively for the benefit of Sandhya Organic Chemicals Pvt Ltd employees or their family members shall not be considered as CSR activity Sandhya Organic Chemicals Pvt Ltd shall give preference to the local area or areas around it where it operates, for spending the amount earmarked for CSR activities.



Sandhya Group

PHOSPHORUS CHEMISTRY

The Board of Sandhya Organic Chemicals Pvt Ltd may decide to undertake its CSR activities as recommended by the CSR Committee, through a registered trust or a registered society or a company established by the company or its holding or subsidiary or associate company pursuant to Section 135 of the Companies Act, 2013 and rules made there-under. The following is the list of CSR projects or programs which Sandhya Organic Chemicals Pvt Ltd plans to undertake pursuant to Schedule VII of the Companies Act, 2013:

1. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
3. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
5. protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts:.
6. measures for the benefit of armed forces veterans, war widows and their dependents;
7. training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
8. contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
10. rural development projects
11. Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under

Organisational mechanism and responsibilities

Constitution of Corporate Social Responsibility Committee The Board of Directors of the Company shall constitute a Corporate Social Responsibility Committee of the Board (“CSR Committee”) consisting of three or more directors, out of which at least one director shall be an independent director.

1. Formulate and recommend to the Board, a CSR policy and activities to be undertaken by the company as per Schedule VII;
2. Recommend the amount of expenditure to be incurred on the activities; and
3. Monitor the Policy of the company from time to time.

The Board of the company shall after taking into account the recommendations made by the CSR Committee, approve the policy for the company and disclose contents of such Policy in its report and also place it on the company’s website and ensure that the activities as are included in the CSR Policy of the company are undertaken by the company Sandhya Organic Chemicals Pvt Ltd provide the vision under the leadership of its Chairman, **Mr. Kantilal M Koli**. At the Company, the Managing Director takes on the role of the mentor, while the onus for the successful and time bound implementation of the CSR activities/projects is on the HR Head and CSR teams. To measure the impact of the work done, a social satisfaction survey / audit is carried out by an external agency.

Activities, setting measurable targets with timeframes and performance management

Prior to the commencement of CSR activities/projects, we carry out a baseline study of the nearby area/villages of the Company’s factory location Vapi and Sarigam GIDC

The study encompasses various parameters such as – health indicators, literacy levels, sustainable livelihood processes, and population data – below the poverty line and above the poverty line, state of infrastructure, among others.

From the data generated, a 1-year plan and a 5-year rolling plan are developed for the holistic and integrated development of the affected people.

All activities/projects of CSR are assessed under the agreed strategy, and are monitored every quarter/year, measured against targets and budgets. Wherever necessary, midcourse corrections are made.



Sandhya Group
PHOSPHORUS CHEMISTRY

Partnerships

Collaborative partnerships are formed with the Government, the District Authorities, the village panchayats, NGOs and other like-minded stakeholders. This helps widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the table.

Budgets

A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy.

In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount.

Approving authority for the CSR amount to be spent would be any one Director or the Managing Director or VP (F)/Chief Financial Officer of the Company after due recommendation of CSR Committee and approval of the Board of Directors of the Company.

The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.

CSR expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board on the recommendation of the CSR Committee, but does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act 2013.

Tax treatment of CSR spent will be in accordance with the Income Tax Act as may be notified by CBDT.

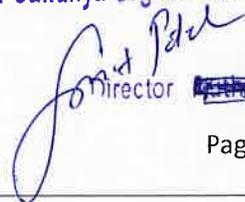
Update

CSR Committee of Board of Sandhya Organic Chemicals Pvt Ltd will review the policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary

Compliance with Companies Act, 2013

Our Corporate Social Responsibility policy conforms to the Section 135 of the Companies Act, 2013 on Corporate Social Responsibility as spelt out by the Ministry of Corporate Affairs, Government of India.

For Sandhya Organic Chemicals Pvt. Ltd.


Director 