

## ACME SOLAR HOLDINGS LIMITED

### ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY

#### 1. Introduction

ACME Solar Holdings Limited (“ACME” or the “Company”) is committed to conduct its business in a manner that is ethical, transparent and accountable, while integrating environmental and social considerations into its strategy, operations and stakeholder interactions. ACME has established a framework for governance, implementation and disclosure of sustainability-related practices and performance.

#### 2. Purpose

This Policy has been adopted to articulate the Company’s approach to sustainability and responsible business conduct and is aligned with the principles set out under the National Guidelines on Responsible Business Conduct (NGRBC) issued by the Government of India.

The Policy also supports compliance with applicable regulatory requirements, including the Business Responsibility and Sustainability Reporting (BRSR) framework prescribed by the Securities and Exchange Board of India (SEBI), and provides a basis for alignment with internationally recognised sustainability reporting frameworks, where considered relevant to the Company’s business and regulatory context.

#### 3. Applicability

This Policy applies to all directors, employees and officers of the Company and extends, to the extent practicable, to its subsidiaries, joint ventures, contractors, suppliers and other business partners forming part of its value chain.

All functions and business units are required to align their processes and practices with the principles set out in this Policy.

#### 4. Statement of Principles

The Company adopts the principles set out under the NGRBC as the basis for its conduct of business.

##### a. Ethics, Transparency and Accountability

The Company shall conduct its affairs in accordance with the highest standards of integrity, fairness and accountability. It shall maintain robust systems of corporate governance, internal controls and disclosures to ensure transparency in its dealings with stakeholders.

Appropriate mechanisms shall be in place to enable reporting of concerns relating to unethical conduct, and to ensure that such concerns are addressed in a fair and timely manner. The Company shall not engage in, nor tolerate, practices that are corrupt, abusive or anti-competitive, and shall seek to avoid association with any third party that engages in such practices.

##### b. Sustainable Business Practices

The Company recognises its responsibility to integrate sustainability considerations into its business activities. The Company shall seek to ensure that its projects are developed and operated: (a) in compliance with applicable environmental regulations and approvals,

including those relating to land use, biodiversity and pollution control; and (b) in a manner that minimises adverse environmental and social impacts and contributes to long-term value creation.

In its procurement and operational decisions, the Company shall seek to incorporate environmental and social criteria, including resource efficiency, responsible sourcing and lifecycle considerations.

c. **Employee Well-being**

The Company is committed to providing a safe, inclusive and respectful workplace. It shall ensure that employment practices are fair, non-discriminatory and aligned with applicable labour and employment laws.

The Company shall promote employee well-being through appropriate policies relating to health and safety, diversity and inclusion, training and development, and grievance redressal. Any form of forced labour, child labour or workplace harassment is strictly prohibited.

d. **Stakeholder Engagement**

The Company recognises the importance of its stakeholders, including employees, customers, investors, communities, suppliers and regulators. It shall seek to engage with stakeholders in a transparent and constructive manner, and to take into account their legitimate concerns in its decision-making processes.

The Company shall endeavour to balance stakeholder interests through responsible business practices and sustained engagement.

e. **Human Rights**

The Company is committed to respecting and promoting human rights in accordance with applicable laws and guided by the United Nations Guiding Principles on Business and Human Rights.

It shall seek to identify, prevent and mitigate adverse human rights impacts arising from its operations and, to the extent feasible, those linked to its business relationships. The Company expects its employees and business partners to uphold these standards.

f. **Environmental Protection**

The Company acknowledges its responsibility to protect and preserve the environment. The Company shall comply with applicable environmental laws, regulations and approvals governing its operations. It shall endeavour to minimise the environmental impact of its operations through efficient use of resources, reduction of emissions and waste, and adoption of sustainable practices.

The Company shall seek to assess environmental risks and impacts associated with its activities and integrate appropriate mitigation and management measures into its operational processes.

g. **Responsible Policy Advocacy**

The Company shall engage with governmental and regulatory authorities in a manner that is responsible, transparent and consistent with the principles set out in this Policy. Any advocacy undertaken by or on behalf of the Company shall be conducted through appropriate channels and in compliance with applicable laws and ethical standards.

**h. Inclusive Growth and Development**

The Company is committed to contributing to inclusive and equitable development. It shall undertake initiatives, including through its corporate social responsibility programmes, to support the socio-economic development of communities, particularly those in areas of its operations.

Such initiatives shall be aligned with statutory requirements and the Company's broader sustainability objectives.

**i. Responsible Customer Engagement**

The Company shall engage with its customers in a fair, transparent and responsible manner, consistent with applicable laws, contractual obligations and regulatory requirements.

The Company shall endeavour to maintain appropriate standards of quality, reliability and integrity in the conduct of its business, and to address customer concerns in a timely and structured manner.

The Company shall seek to adopt practices relating to customer engagement, data protection and grievance redressal, having regard to the nature of its business and its customer base.

*The principles set out in this Policy are aligned with the nine principles prescribed under the National Guidelines on Responsible Business Conduct (NGRBC). The mapping of the Policy sections to the corresponding NGRBC principles is set out in Annexure 1.*

**5. Value Chain Responsibility**

The Company recognises that its responsibility extends beyond its own operations to its value chain. It shall seek to promote responsible business conduct among its suppliers, contractors and business partners through appropriate policies, contractual provisions and engagement mechanisms. The Company shall comply with applicable environmental laws, regulations and approvals governing its operations.

Where feasible, the Company shall incorporate environmental, social and governance considerations into its vendor selection, evaluation and monitoring processes.

**6. Risk Management and Controls**

The Company recognises the importance of integrating environmental, social and governance considerations into its risk management processes. It shall endeavour to identify and assess material ESG risks and opportunities, and progressively incorporate such considerations into its overall risk management framework, having regard to the nature and scale of its operations. Appropriate internal controls and monitoring mechanisms shall be developed to support implementation of this Policy.

**7. Disclosures and Reporting**

The Company shall make appropriate disclosures on its sustainability performance in accordance with applicable regulatory requirements, including the BRSR framework.

The Company may, from time to time, align its disclosures with internationally recognised sustainability reporting frameworks, to the extent considered relevant to its business, stakeholders and regulatory context.

It shall endeavour to ensure that such disclosures are accurate, balanced and reflective of its performance. The Company shall seek independent assurance of its sustainability disclosures to the extent required under applicable laws and regulatory frameworks. It may, in addition, seek independent assurance of other ESG disclosures, where considered appropriate.

**8. Governance and Implementation**

The Board of Directors is responsible for the approval and oversight of this Policy. The Corporate Social Responsibility and Sustainability Committee of the Board shall oversee the implementation of this Policy and review its effectiveness periodically. Senior management and the relevant functional heads shall be responsible for operationalising this Policy across the Company's operations and ensuring compliance with its requirements.

**9. Review and Amendment**

This Policy is approved by the Board of Directors of ACME. This Policy shall be reviewed periodically, or earlier if warranted by changes in applicable laws, regulations, business operations, or stakeholder expectations. Any material changes to this Policy shall be subject to the approval of the Board of Directors.

**10. Version History**

Date of Board Approval	Particulars	Effective Date
27 <sup>th</sup> March 2026	Introduction and implementation of Environmental, Social and Governance (ESG) Policy	27 <sup>th</sup> March 2026

**ANNEXURE 1**

**MAPPING OF POLICY PRINCIPLES TO THE NATIONAL GUIDELINES ON RESPONSIBLE BUSINESS CONDUCT (NGRBC)**

The principles set out in this Policy are aligned with the nine principles prescribed under the National Guidelines on Responsible Business Conduct (NGRBC). The mapping of the Policy sections to the corresponding NGRBC principles is set out below.

<b>Sr. No.</b>	<b>Policy Section</b>	<b>NGRBC Principle</b>	<b>Principle Description (NGRBC)</b>
1	Ethics, Transparency and Accountability	Principle 1	Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent and accountable
2	Sustainable Business Practices	Principle 2	Businesses should provide goods and services in a manner that is sustainable and safe
3	Employee Well-being	Principle 3	Businesses should respect and promote the well-being of all employees, including those in their value chains
4	Stakeholder Engagement	Principle 4	Businesses should respect the interests of and be responsive to all their stakeholders
5	Human Rights	Principle 5	Businesses should respect and promote human rights
6	Environmental Protection	Principle 6	Businesses should respect and make efforts to protect and restore the environment
7	Responsible Policy Advocacy	Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a responsible and transparent manner
8	Inclusive Growth and Development	Principle 8	Businesses should promote inclusive growth and equitable development
9	Responsible Customer Engagement	Principle 9	Businesses should engage with and provide value to their consumers in a responsible manner