



SARDA ENERGY & MINERALS LIMITED

Regd. Off: 73-A, Central Avenue, Nagpur (MH.) 440018
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URL: www.seml.co.in CIN: L27100MH1973PLC016617

Stakeholder Engagement Policy

1. Preamble

SEML ("the Company") recognises that sustained business performance and long-term value creation are closely linked to meaningful engagement with its stakeholders. Constructive dialogue with stakeholders enables the Company to understand expectations, identify emerging risks and opportunities, and strengthen trust across its operating ecosystem.

SEML is committed to engaging with stakeholders in a transparent, inclusive, and responsive manner. This Policy establishes a structured yet flexible framework to guide stakeholder interactions in a way that supports responsible decision-making, social accountability, and sustainable growth.

2 Objectives of the Policy

The objectives of this Policy are to:

- i) Define a consistent approach for identifying and engaging with key stakeholder groups;
- ii) Facilitate effective communication and dialogue to understand stakeholder perspectives, concerns, and priorities;
- iii) Integrate stakeholder feedback into business strategy, risk management, and sustainability initiatives;
- iv) Promote long-term, trust-based relationships that support organisational resilience; and
- v) Ensure stakeholder engagement practices are aligned with the Company's values and governance framework.

3 Effective Date

This Policy comes into effect from 23.05.2026.

4. Scope and Applicability of Policy

This Policy applies to all SEML operations, functions, and locations. The Policy:

- i) Articulates the principles governing stakeholder engagement across the Company;
- ii) Applies to interactions with both internal and external stakeholders;
- iii) Forms part of SEML's broader governance and sustainability framework; and
- iv) Is to be read in conjunction with the Company's policies on ethics, code of conduct, ESG, risk management, and corporate social responsibility.

5 Definitions

For the purpose of this Policy:

Company / SEML means Sarda Energy & Minerals Ltd.

Policy means this Stakeholder Engagement Policy.

Stakeholders include, but are not limited to:

- a) Employees and contractual workforce
- b) Shareholders and investors
- c) Customers and business partners
- d) Suppliers and service providers

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- e) Regulators, government bodies, and local authorities
- f) Communities in and around areas of operation
- g) Media, civil society organisations, and the environment

6 Guiding Principles

SEML's engagement with stakeholders shall be guided by the following principles:

- a) Transparency: Communicating openly and honestly, subject to confidentiality and regulatory requirements.
- b) Inclusivity: Considering diverse stakeholder perspectives, including vulnerable or underrepresented groups.
- c) Responsiveness: Addressing stakeholder concerns in a timely and constructive manner.
- d) Consistency: Ensuring engagement practices are applied uniformly across the organisation.
- e) Accountability: Clearly defining responsibilities for stakeholder engagement within the Company.

7 Stakeholder Engagement Approach

The Company shall adopt engagement mechanisms that are appropriate to nature, materiality, and frequency of interaction with each stakeholder group. Engagement may take place through, inter alia:

- a) Structured meetings and consultations.
- b) Surveys, feedback tools, and grievance mechanisms.
- c) One-on-one interactions and relationship management.
- d) Disclosure through statutory filings, sustainability reporting, and the Company website; and
- e) Participation in forums, workshops, and community interactions.

The nature and frequency of engagement shall be periodically reviewed to ensure continued relevance and effectiveness.

8 Feedback & Communication

SEML values stakeholder feedback as an important input into its decision-making processes. Feedback may be received through:

- a) Formal surveys and consultations;
- b) Customer and vendor feedback channels;
- c) Employee engagement forums;
- d) Community interactions and outreach initiatives; and
- e) Digital and other communication platforms.

Where appropriate, stakeholder feedback shall be evaluated and considered while formulating policies, strategies, and operational decisions.

9 Accountability & Grievance Procedure

Stakeholder engagement at SEML is decentralised and embedded within business and functional responsibilities.

- a) Department heads and managers are accountable for managing stakeholder relationships

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relevant to their areas of operation.

- b) Employees are expected to engage with stakeholders in a professional, ethical, and respectful manner.

Stakeholders who wish to raise concerns or grievances may do so through appropriate channels made available by the Company. Where feasible, mechanisms allowing confidentiality or anonymity shall be provided to ensure fair representation of stakeholder concerns.

In case the Stakeholders so desire, they may also raise their grievances with the members of Stakeholders' Relationship Committee on the following email ids:

- ✓ amaldebmath@gmail.com
- ✓ parikh.binoy92@gmail.com
- ✓ pkjain@seml.co.in
- ✓ psarda@seml.co.in

10 Roles & Responsibilities

- a) Board of Directors: Provides overall oversight of stakeholder engagement philosophy and alignment with long-term strategy.
- b) Senior Management: Ensures integration of stakeholder considerations into business planning and risk management.
- c) Functional and Site Heads: Responsible for implementing stakeholder engagement practices within their respective domains.
- d) Employees: Expected to uphold the principles of this Policy in all stakeholder interactions.

11 Review and Amendment

The implementation of this Policy shall be monitored periodically to assess its effectiveness and alignment with organisational objectives.

The Policy shall be reviewed and updated as required to reflect changes in regulatory requirements, stakeholder expectations, or business context.