

**SUZLON ENERGY LIMITED**  
**PRODUCT STEWARDSHIP POLICY**

**Policy History**

<b>Date of Board Approval</b>	<b>Particulars</b>	<b>Effective Date</b>
12 <sup>th</sup> March 2025	Introduction and Implementation of Product Stewardship Policy	12 <sup>th</sup> March 2025
<b>Document History:</b> First Revision: Second Revision:		

**Purpose of this Policy**

Suzlon Energy Limited (“SEL” or the “Company”) is steadfast in its commitment to fostering a sustainable future by designing, manufacturing, and harnessing renewable energy with a comprehensive focus on environmental sustainability, social responsibility, and circularity throughout the lifecycle of our products and operations.

This Product Stewardship Policy outlines our approach to achieving this goal by managing the environmental, social, and economic impacts of our products throughout their lifecycle, ensuring long-lasting value for business, environment, and society at large, by embedding the precautionary principle into all facets of our decision-making and practices. Central to our commitment is adherence to the principles of refuse, restore, reuse, and recycle, driving sustainable practices and innovative solutions for the responsible end-of-life management of our products and services, which also includes life extensions for increased longevity of our products

We strive to achieve this by fostering meaningful collaborations with value chain partners, actively promoting and supporting life cycle assessments (LCA), and advancing research and development initiatives that embrace design thinking to integrate sustainable practices from cradle to grave. Our commitment extends to reinforcing robust health and safety processes for our employees, supply chain partners, and customers, ensuring a holistic approach to sustainability and well-being across all facets of our operations.

This policy aligns with the United Nations Sustainable Development Goals (SDGs), IEC 61400: Wind Turbine Standards, Circular Economy Principles, ISO 14040, ISO 14044, ISO 14067 and ISO 59004 standards.



## Applicability of this Policy

This Policy applies to Suzlon Energy Limited (the “Company”), and all its subsidiaries, including business functions. **Definitions**

Unless repugnant to the context:

- “Act” shall mean the Companies Act, 2013 including the Rules made thereunder, as amended from time to time.
- “Applicable Laws” shall mean the Act and Rules made thereunder, the Listing Regulations, the NGRBC Guidelines and/or such other Act, Rules or Regulations which are/may be applicable to the objective and/or subject matter of this Policy.
- “Board” or “Board of Directors” shall mean the Board of Directors of the Company.
- “Company” or “SEL” shall mean Suzlon Energy Limited.
- “Guidelines” or NGRBC Guidelines shall mean the National Guidelines on Responsible Business Conduct issued by the Ministry of Corporate Affairs on 15th March 2019.
- “Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force.
- “Policy” or “this Policy” shall mean this Product Stewardship Policy.

Interpretation – In this Policy unless the contrary intention appears, words and expressions used and not defined in this Policy but defined in the Applicable Laws shall have the meanings respectively assigned to them in those Applicable Laws.

## Review of the Policy and Disclosure Requirements

This Policy has been developed and adopted on 12<sup>th</sup> March 2025.

This Policy is subordinate to the Listing Regulations or other applicable statutory provisions including the Companies Act, 2013, as amended, and in the event of disparity between this Policy and the Applicable Laws (including due to subsequent amendments to the Applicable Laws), the provisions of the Applicable Laws will prevail.

The Board shall oversee the implementation of this Policy and review this Policy and allied management systems periodically to ensure their continuing applicability and relevance to its operation and evolving stakeholder expectations. This exercise shall be conducted once a year or as and when there are changes or future developments to incorporate the best practices and changes required in terms of compliance with Applicable Law.

The Board reserves any right to alter, modify, add, delete or amend any of the provisions of this Policy subject to Applicable Laws.

The content and robustness of implementation of this policy will be reviewed periodically and revised accordingly.

### **Policy Statement**

The Company is committed to advancing product stewardship by integrating circularity at every stage of the product life cycle, while upholding our values of social responsibility, resource efficiency, and innovation, across the value chain. This Product Stewardship Policy aligns with our broader goal of being responsible by design, while minimizing environmental impacts, enhancing product safety, and promoting a sustainable future for the planet and society.

### **Our Commitment**

We aim to power a world on green energy while ensuring our products are sustainable and safe.

This Product Stewardship Policy underscores the Company's commitment to evaluate and seek opportunities in enhancing the sustainability of our products across their lifecycle. We aim to set targets aligned with our mission of providing solutions that minimise, and ultimately, eliminate our impact on the environment, supporting the UN Sustainable Development Goals. To ensure the seamless implementation of this policy, we will actively engage with key stakeholders to align on sustainable practices and integrate them effectively within our supply chain; Allocate sufficient resources, including technology, training, and personnel, to support robust product stewardship management.

We shall strive to identify and implement appropriate actions within our operating locations, supply chains, and work with stakeholders across the lifecycle of our products as follows:

#### **1. Design and Development:**

- Ensure and maintain compliance with product-related laws and regulations.
- Assess potential risks associated with the product and evaluate the design features and management systems in place to mitigate and control those risks. Commit to using sustainable materials and reducing hazardous substances in our products.
- Integrate life cycle thinking and eco-design principles aligned with ISO 14040, ISO 14044, ISO 14067 and ISO 59004, Circular Economy Principles to minimize environmental impacts.

- Reduce material consumption and prioritize the use of sustainable materials.
  - Strive to reduce carbon footprint and environmental impacts at Product level
  - Aligned towards circularity to the extent feasible in accordance with ISO 59004 standards
- 2. Manufacturing:** Evaluate potential uses and misuses of the product, and identify design features that can minimize associated hazards
- Strive to reduce waste, energy consumption, and emissions in our manufacturing processes.
  - Ensure compliance with requirements and specifications for purchased materials through verification processes.
- 3. Use and Maintenance:** Provide clear and comprehensive information on the safe use and maintenance of our products.
- Monitor, review, and assess product performance against sustainability targets for continuous improvement and transparent reporting.
  - Encourage customers to adopt sustainable practices, and product stewardship in the use and maintenance of our products.
  - Develop procedures and provide training to personnel to ensure consistent product quality that aligns with product specifications.
- 4. End-of-Life Management:** Implement procedures and conduct training to ensure the safe delivery, storage, and application of products by customers
- Prioritize reuse, recycling, and responsible disposal of products at the end of their life.
  - Collaborate with stakeholders to develop and implement take-back and recycling programs.
  - Commit to reducing the environmental impact of our products at the end of their life.
  - Develop procedures to identify products that are no longer suitable for customer use, and ensure they are refurbished, replaced, or disposed of in an environmentally responsible manner.
- 5. Suppliers:** Engage suppliers in our product stewardship efforts, ensuring they adhere to our sustainability standards and practices.
- Assess and monitor suppliers' environmental and social performance, encouraging continuous improvement.

- Collaborate with suppliers to reduce the environmental impact of materials and components used in our products.
- Support suppliers in implementing sustainable practices and achieving their own sustainability goals.

## 6. Training and Awareness:

Suzlon commits to building awareness and capacity on product stewardship through the following actions:

- **Employees:** Provide regular training and development programs to enhance employees' understanding of product stewardship principles and practices. Encourage a culture of sustainability and continuous improvement.
- **Suppliers:** Offer training and support to suppliers to help them align with Suzlon's sustainability standards and practices. Facilitate knowledge sharing and capacity building within the supply chain.
- **Communities:** Engage with local communities to raise awareness about the importance of product stewardship and sustainable practices, through community outreach programs, partnerships with NGOs, educational campaigns in collaboration with the corporate social responsibility functions. Support community initiatives that promote environmental and social well-being.
- **Other Stakeholders:** Collaborate with investors, and partners, and other relevant stakeholders to promote product stewardship and sustainability. Share best practices and foster a collective approach to sustainability.

## Responsibility and Accountability

The Company will at minimum review this Policy on an annual basis to ensure its effectiveness and alignment with evolving regulations, standards and best practices. In addition, reviews will be initiated in response to any updates or modifications in compliance requirements, standards, or frameworks relevant to this policy. We are committed to continuously improving our practices and ensuring that we meet the highest product stewardship standards. The results of these reviews will be communicated to stakeholders and used to guide future strategies.

The implementation, adherence and review of implementation of this policy are the responsibility of the Company's Senior Leadership Team, with support provided by the functional teams.

**Date:** 12<sup>th</sup> March 2025



JP Chalasani  
Group CEO  
Suzlon Energy Limited