



BUSINESS RESPONSIBILITY POLICY

1. INTRODUCTION

The Policy on Business Responsibility ('BR Policy') has been prepared in accordance with the provisions of SEBI (Listing Obligations & Disclosures Requirements) Regulations, 2015 and is based on National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business ('Guidelines') published by Ministry of Corporate Affairs.

This Policy reaffirms Company's commitment to follow the guidelines and ensures that the Company contributes towards sustainable development and fulfill its social, environmental and economic responsibilities. The Company aims to develop itself as a long term, sustainable business that delivers value for all its Stakeholders.

For sustainable development, the management of the Company will endeavour to strike proper balance between economic, social and environmental performance in dealings with various stakeholders of the Group, namely, customers, investors, lenders, deposit holders and the society. The policy and its elements are applicable to all Departments and Verticals in the Company. The Company will also make its best efforts to impress upon other entities in the value chain and its subsidiaries to participate in the Business Responsibility initiatives depending upon their means and resources.

This policy shall be supported by existing policies of the Company.

2. OBJECTIVE

The objective of this policy is to ensure a unified and common approach to the dimensions of Business Responsibility across the Company and shall be applicable to all employees of the Company

3. KEY PRINCIPLES

The Company's business practices would be governed by the following nine guiding principles:

3.1 Conduct Business with Ethics, Transparency and Accountability

- i. The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels and constantly endeavour to inculcate this ethical procedures at all levels in the organization so that it becomes an essential part of the work culture among all its employees.
- ii. The Company shall communicate transparently with its stakeholders and assure access to information about its decision that impact relevant stakeholders. The Company shall ensure maximum appropriate disclosures without jeopardizing the Company's strategic interest.
- iii. Company shall not engage in practices that are abusive, corrupt or anti competition.
- iv. Company shall truthfully discharge its responsibility on financial and other mandatory disclosures.
- v. Company shall report on the status of the adoption of these guidelines as necessary.

- vi. Company shall avoid complicity with the actions of any third party that violates any of the principles contained in these guidelines.

3.2 Product Safety and Lifecycle Sustainability

- i. Company should provide products that assure safety and optimal resources use over the life cycle of the product and ensure that connected persons are aware of their responsibilities.
- ii. Company shall ensure that its products and services comply with all applicable standards.
- iii. Company shall raise consumer's awareness of their rights through education, product labeling, appropriate marketing and shall provide details of contents and composition and promote safe usage and disposal of its products and services, wherever applicable.
- iv. In designing the product, Company should ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
- v. Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical and environmental considerations.
- vi. Company shall recognize and respect the rights of people who may be owners of traditional knowledge and other forms of intellectual property, wherever relevant.
- vii. Company shall promote sustainable consumption including recycling of resources.

3.3 Promote Wellbeing of all employees

- i. Company shall respect the right to freedom of association, participation, collective bargaining and provide access to appropriate grievance redressal mechanisms.
- ii. Company shall provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
- iii. Company shall not use child labour, forced labour or any other form of involuntary labour, paid or unpaid.
- iv. Company shall take cognizance of work life balance of its employees, especially that of women.
- v. Company shall provide facilities for the well being of its employees including those with special needs.
- vi. Company shall ensure timely payment of fair living wages to meet the basic needs and economic security of the employees.
- vii. Company shall provide a workplace environment that is safe, hygienic, humane and which upholds the dignity of the employees.
- viii. Company shall create awareness of these provisions to the employees and train them on a regular basis.
- ix. Company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities on an equal and non-discriminatory basis. Company shall promote employee morale and career development through enlightened human resource intervention.
- x. Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.
- xi. The Company shall provide its employees and workers access to appropriate grievance redressal mechanism.

2.4 Respecting and Protection of Stakeholders Interest

- i. The Company shall systematically identify its stakeholders, understand their concerns, define purpose and scope of engagement and commit to engaging with them.

- ii. Company shall acknowledge responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- iii. Company shall give special attention to stakeholders in the areas that are underdeveloped.
- iv. Company shall resolve differences with stakeholders in a just, fair and equitable manner.

2.5 Respecting and Promoting Human Rights

- i. Company shall appreciate that human rights are inherent, universal, indivisible and interdependent in nature and should understand the human right principles of the Constitution of India and national and international laws and polices.
- ii. Company shall integrate principles of human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
- viii. Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- iv. Company shall within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- v. Company shall not be complicit with human right abuses by third parties.

2.6 Protecting, Preservation and Restoring of Environment

- i. The Company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- ii. Company shall take measures to check and prevent pollution and shall assess environmental damage and shall take steps towards pollution abatement in public interest, wherever possible.
- ix. Company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- x. The Company shall continuously seek to improve their environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- xi. Company shall develop systems and contingency plans and processes that shall help in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations or that of a member of the value chain.
- xii. Company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
- xiii. Company shall persuade and support its value chain to adopt these principles.

2.7 Behaving responsibly when involved in influencing Public & Regulatory Policy

- i. While pursuing policy advocacy, Company must ensure that their advocacy positions are ethical and consistent with these policies and sub policies.
- ii. Company shall to the extent possible utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

2.8 Support Inclusive Growth & Equitable Development and Enrichment

- i. Company shall understand impact of its operation on social and economic development and respond through appropriate action to minimize the negative impacts.
- ii. Company shall innovate and invest in products, technologies and processes that promote the wellbeing of the society.
- iii. Company shall make efforts to complement and support the development priorities at local and national levels and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to our business operations.
- iv. Company shall be sensitive to local concerns while operating in regions that are underdeveloped.

2.9 Responsible Customer & Consumer Engagement

- i. Company while serving the needs of their customers, shall take into account the overall well-being of the customers and that of the society at large.
- ii. Company shall ensure that that they donot restrict the freedom of choice and free competition in any manner while designing, promoting and selling its products.
- iii. Company shall fully disclose all information truthfully and factually as per applicable laws, through labeling and other means, including the risks to the individual, to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Company shall also educate its customers on the safe and responsible usage of its products and services, wherever required.
- iv. Company shall promote and advertise its products in ways that do not mislead or confuse the customers or violate any of the principles of these policies.
- v. Company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- vi. Company shall provide adequate customer grievance handling mechanisms to address customer concerns and feedback.

4. IMPLEMENTATION AND MONITORING

- i. The Business Responsibility Policy of the Company is circulated across all Departments and verticals and is also displayed on the Company's intranet.
- ii. The Corporate Social Responsibility Committee (CSR Committee) shall monitor implementation of this policy through various projects / activities / initiatives undertaken for this purpose.
- iii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iv. The Managing Director will update the CSR committee on the implementation of the policy and feedbacks and suggestions received in connection therewith.
- v. Compliance with the Policy shall be monitored and evaluated by the respective Functional Heads of the Departments/ Unit Heads of the Company on a regular basis.
- vi. Any grievances/ complaints with respect to violation of the policy shall be reported to the Head - Internal Audit or the Company Secretary who would in turn place the same before the CSR Committee.

5. AMENDMENTS

The Board of Directors based on the recommendation of CSR Committee are authorized to make alterations to this policy as considered appropriate from time to time, however such alterations shall not be inconsistent with the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other regulatory provisions.