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BUSINESS RESPONSIBILITY POLICY

1. Introduction

The Company aims to be a good corporate citizen by subscribing to the principles of integrating its economic, environmental and social objectives, and effectively utilizing its own resources towards improving the quality of life and building capacities of the local communities, society at large and various Stakeholders.

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been framed in line with the suggested framework as provided by the SEBI based on the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs and is intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

2. Scope

The Company is committed to:

- Enhancing stakeholder's value though value-driven engagement.
- ➤ Economic and social well-being of the society, particularly the less fortunate and under-privileged members of the society.
- > Minimize the direct and indirect impact of its operations on the environment.

For sustainable development, the management of the Company will endeavor to strike proper balance between economic, social and environmental performance in dealings with various stakeholders of the Group, namely, customers, investors 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.

Principle 1: <u>Businesses should conduct and govern themselves with Ethics.</u> Transparency and Accountability

Company's Philosophy

Ethics, transparency and accountability are the founding principles of our organization. As a company we are committed to conducting our business in a responsible manner and be accountable to all our stakeholders. It is the general policy of the Company to conduct its business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable laws including proper and ethical procedures in dealing with actual or apparent conflicts of interest between personal and professional relationships. We not only promote the culture of transparency and ethical conduct but also enforce the same with robust execution mechanisms.

- i. The Company has developed a Code of Conduct for its Directors and senior management personnel. It shall develop good governance structures, procedures and practices that ensures ethical practices, transparency and accountability in conduct of affairs and dealing with stakeholders at all levels across the value chain.
- ii. The Company shall not engage in practices that are abusive, corrupt, or anticompetition.
- iii. The Company shall constantly endeavour to inculcate this ethical behavior at all levels in the organization so that it becomes an essential part of the work culture among all its employees.

- iv. Every employee of the company shall abide by the values and the commitment to ethical business practices reflected in the company's Code of Conduct.
- v. The Company shall communicate transparently and assure access to information about its decisions that impact relevant stakeholders. All business decisions and transactions shall be fair, transparent and amenable to disclosure and be visible to relevant stakeholders. The Company shall ensure maximum appropriate disclosures without jeopardizing the Company's strategic and competitive interests.
- vi. The Company shall truthfully discharge its responsibility on making timely financial and other mandatory disclosures.
- vii. The Company shall avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.
- viii. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
- ix. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct are reported in a responsible and confidential manner through its 'Whistle Blower Policy/ Vigil Mechanism

Principle 2: <u>Businesses should provide goods and services that are safe and</u> contribute to sustainability throughout their life cycle

Company's Philosophy

The Company is committed to conduct its business in an environmentally responsible manner. We strive to minimize our direct impacts on the environment while simultaneously enhancing our services to help customers.

This policy is rooted in the Company's core values of quality, reliability and trust guided by the best practices and is driven by our aspiration for excellence in the overall performance of our business.

The environmental custodianship and Corporate Citizenship are an integral part of the Company's goal to achieve ecological development along with people development. The Company recognizes the responsibility to assess and minimize the ecological impact of our business activities and protecting the ecosystem.

- i. The Company shall provide and maintain a clean, healthy and safe working environment for employees, customers, partners and the community.
- ii. The company shall ensure that its services comply with all applicable statutes and regulations;
- iii. The company shall continue to progressively factor in relevant social and environmental considerations during the process of development of services;
- iv. The Company shall strive to consistently enhance its value proposition to the customers and adhere to its promised standards of service delivery.
- v. The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating the applicable social, ethical, and environmental considerations.
- vi. The 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. The company shall work with supply chain members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment

- viii. The Company shall strive to use scarce natural resources efficiently in its facilities.
- ix. The Company shall lay emphasis on sourcing consumables in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- x. The Company shall ensure that its services comply with all applicable standards.
- xi. The Company shall strive to reduce and minimize the ecological footprint of the Company's operations and focus on dimensions of energy and water efficiency, sustainable waste management and preserving and enhancing biodiversity at all its works.
- xii. The Company believes that environmental regulations have a critical role to play as Catalysts for sustainable development and strives to comply in both letter and spirit with all environment and related laws, regulations, codes of practice and directives, as relevant and applicable to us.
- xiii. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 3: Businesses should promote the well-being of all employees

Company's Philosophy

Employees are the most valuable stakeholders who contribute significantly towards the growth of business. Hence creating an environment of comfort and welfare for our employees is very crucial to us. The Company focuses on ensuring the well-being of all its employees, their safety and health. It considers employee well-being as an imperative ingredient to achieve a profitable and sustainable growth.

- i. The Company should ensure an environment which generates sense of belongingness, loyalty and commitment amongst the employees.
- ii. The Company shall ensure that there is a systematic chain or hierarchy which allows better flow of information, ideas, suggestions and understanding amongst the employees and the Senior Management and there is in place a proper channel through which the grievances of the employees are taken up and addressed by the Senior Management.
- iii. The company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
- iv. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- v. The Company shall take cognizance of the work-life balance of its employees.
- vi. The Company shall provide facilities for the wellbeing of its employees including those with special needs. They should ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- vii. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees. Business should communicate this provision to their employees and strive to train them on a regular basis.
- viii. The 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. It shall focus on learning and development, to enhance the knowledge & skill and preparing its people to face challenges

- ix. The Company shall conduct programs/meets for enhancing the skills of its employees through various sensitization programs, on-the-job training, job rotation or training through various programmes.
- x. The Company shall create stringent policies, systems and practices to ensure that the employees especially female employees do not suffer harassment and create the environment where they feel safe and secure in discharging their responsibilities.
- xi. The Company shall take initiatives to maintain its talent pool to match organizational growth, creating a performance culture and encouraging learning element across the organization.
- xii. the Company shall strive to provide a safe working environment to all employees and protect them from sexual and mental harassment by all means.
- xiii. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.

Principle 4: <u>Businesses should respect the interest of, and be responsive towards all</u> stakeholders, especially those who are disadvantaged, vulnerable and marginalized

Company's Philosophy

The principle recognizes that businesses have a responsibility to think and act beyond the interests of its shareholders to include all their stakeholders. The Principle, while appreciating that all stakeholders are not equally influential or aware, encourages businesses to proactively engage with and respond to those that are disadvantaged, vulnerable and marginalized.

The Company's stakeholders include employees, suppliers, customers, business associates, investors, regulatory agencies and local communities around its sites of operations. Our Investors comprise of shareholders (including Institutional Investors). The Company values

the support of its stakeholders and respects the interests and concerns they have towards it. The Company and its employees shall provide value based services to all the stakeholders.

- i. The Company shall regularly and systematically identify its stakeholders.
- ii. The Company shall strive to maintain contact with all its stakeholders in order to understand their concerns and assess their requirements and subsequently respond to their needs in a most effective manner
- iii. The Company shall acknowledge, assume responsibility and be transparent about the impact of its policies, decisions, services and associated operations on the stakeholders.
- iv. The Company shall Identify the vulnerable and marginalized stakeholders and support them through various CSR programs undertaken by the organization.
- v. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.
- vi. The Company shall strive to undertake initiatives to engage with and ensure sustainable development of the marginalized groups in the local communities around its area of operation.
- vii. The employees of the Company shall be motivated to offer assistance, encouragement and service to the customers in fair, equitable and consistent manner.
- viii. Educate stakeholders about the procedures of reporting/ disclosing any actual and suspected instances of unethical behavior, fraud or violation of the Code of business ethics

Principle 5: Businesses should respect and promote human rights

Company's Philosophy

The Company recognizes and appreciate that human rights are inherent, universal, indivisible and interdependent in nature. The Company is committed to respect and protect the human rights of all individuals and strive to achieve them with honesty, just management and fairness. The Company understands that human rights are inherent, universal, indivisible and inter-dependent in nature. The Company upholds the fundamental human rights in line with the legitimate role of business. Its approach includes adherence to corporate business policies and compliance with applicable laws, human rights content of the Constitution of India, National laws and policies.

- i. The Company shall ensure to inculcate and integrate values of human rights in the management systems and all departments throughout the organisation.
- ii. The Company shall strive to integrate respect for 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.
- iii. The Company shall endeavour to promote the awareness and realization of human rights across its value chain.
- iv. The Company shall strictly prohibit child labour, forced labour and or human trafficking and encourage all our value chain partners to follow the same. Third party contracts are liable to terminations in case they are found to be non-compliant.
- v. The Company shall seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.

vi. The Company shall strive to encourage its business partners and third parties with whom it conducts business to abide by this policy.

vii. The Company shall ensure compliance and adherence to all the applicable human rights laws and national laws and strive to percolate these values at all levels in the organization.

Principle 6: <u>Businesses should respect, protect and make efforts to restore the</u> environment

Company's Philosophy

The Company understands its responsibility towards the environment and endeavours to continuously promote environmental sustainability, ecological balance, conservation of natural resources and maintaining the quality of soil, air and water. The Company shall remain committed towards taking proper steps to replenish the resources used by it in the course of its business, to the extent possible. The Company is committed to continually improving environmental performance and believes that it is the duty to responsibly engage in sustainable methods and practices and accordingly the company has in place its environmental policy

- i. The Company shall continuously endeavour to use the latest energy efficient technologies to ensure optimal utilisation of the resources without having to compromise with the quality of its services.
- ii. 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, wherever applicable.

- iii. The Company shall consider and integrate energy and environmental considerations into the design and construction of new/further infrastructural facilities;
- iv. The Company shall take measures to check and prevent pollution.
- v. The Company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- vi. The Company shall continuously seek to improve its environmental performance by adopting cleaner production methods, promoting use of energy efficient environment friendly technologies and use of renewable energy.
- vii. The Company from time to time may report to the stakeholders in a fair and transparent manner, the initiatives taken by the Company to address and minimise environmental issues related to production.

Principle 7: <u>Businesses</u>, when engaged in influencing public and regulatory policy, should do so in a responsible manner

Company's Philosophy

As a corporate citizen, the Company understands its responsibility to operate within the democratic setup and constitutional framework. The Company recognizes that it operates within the specified legislative and policy frameworks prescribed by the Government, which guide its growth and also provide for certain desirable restrictions and boundaries. The Company acknowledges that in a democratic set-up, such legal frameworks are developed in a collaborative manner with participation of all the stakeholders including peer players.

- The Company shall strive to engage with the Government and be a part of various chambers and associations to make recommendations/ representations before regulators and associations for advancement and improvement of the industry it does business.
- ii. The Company, while pursuing policy advocacy, shall ensure that their advocacy positions are consistent with the principles and core elements contained in this policy enhancing business responsibility and transparency.
- iii. The Company shall interact with Government and strive to provide support to shaping public policy related to our business.
- iv. The company shall work with industry organisations that are engaged in policy advocacy in a responsible manner. To the extent possible, the Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

Principle 8: Businesses should support inclusive growth and equitable development

Company's Philosophy

The Company considers the society as its integral part and believes that it cannot work in isolation without society and therefore, as it develops, the society should also progress. The Company focuses on responsible business practices that emphasize on social and economic issues to achieve inclusive growth. The Company approach towards CSR is based upon its core values, which include fostering inclusive growth by sharing some of the wealth we create with the society at large. It believes in equitable development, taking into account the interests of the business community and locals, fairness in the treatment of employees, and sustainability in protecting and enhancing resources (human and others) in responding to an array of social and environmental needs.

- i. The Company therefore, through its CSR activities, shall continuously participate in activities related to promoting employment, enhancing vocational skills as also, healthcare, education, development of sports, rural development and poverty alleviation, promoting well-being of the overall society, etc.
- ii. The Company shall innovate and invest in technologies and processes that promote the well-being of society.
- iii. The Company shall make efforts to complement and support the development priorities at local and national levels, and strive to assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
- iv. The Company shall, in regions that are underdeveloped, be especially sensitive to local concerns.

Principle 9: <u>Businesses should engage with and provide value to their customers and</u> consumers in a responsible manner

Company's Philosophy

The Company acknowledges that no business can survive in absence of customers. The Company shall continuously strive to provide such services to its consumers in a manner that creates value for both. The Company is committed to continuously exceed customer expectations. Customer satisfaction is the key to our growth and success in this line of business. The Company strives hard to provide better services and greatest value to its customers.

- i. The Company, while serving the needs of their customers, shall take into account the overall well-being of the customers and that of society.
- ii. Deliver the best possible services to our customers and clients as they are the cornerstone of our business.
- iii. The Company shall ensure that it does do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their services.
- iv. The Company shall promote and advertise its services in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- v. The Company shall provide adequate training to employees continuously to meet the challenges of a dynamic business environment and will also provide adequate grievance handling mechanisms to address customers concerns and feedback.
- vi. The Company shall maintain privacy of consumers' confidential data in the normal course of its business.

3. Implementation and Monitoring

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

4. Review

The CSR Committee shall from time to time review implementation of this policy and consider amendments therein in the light of changes in applicable laws, rules and regulations.