

Business Responsibility Policy

1. Preamble

Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') as amended by SEBI (Listing Obligation and Disclosure Requirements) (Fifth Amendment) Regulations, 2019 effective 26th December, 2019 mandates top 1000 listed entities (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report.

India Glycols Limited ('the Company') is one of the top 1000 Company as per the given criteria. Therefore, in compliance of the applicable provisions, the Board of Directors of the Company has approved and adopted this Business Responsibility Policy ("Policy") in its meeting held on 10th February, 2020.

2. Scope and purpose

This Policy has been framed in line with the requirements of the Listing Regulations and is based on the guiding principles laid down in the National Guidelines on Responsible Business Conduct published by the Ministry of Corporate Affairs which provide guidance to businesses.

The key objectives of the Policy is to ensure a unified and common approach to the dimensions of Business Responsibility across the Company and act as a strategic driver that will help the Company respond to challenges that keep emerging and be abreast with changes in regulations.

3. Applicability and Effective Date

This Policy applies to all the directors and employees of the Company across all its functions, units and divisions.

This Policy shall be effective from 10th February, 2020.

4. Implementation

The Chairman and Managing Director (CMD) of the Company shall be responsible for the implementation of this Policy. He shall also be responsible for providing clarifications on the Policy. Also, any grievances, redressal related to this policy shall be appropriately addressed by him.

Shri Sudhir Agarwal, Executive Director shall act as the BR Head and shall be responsible for implementing the Business Responsibility initiatives.

The CSR Committee of the Board shall be the reviewing authority of this Policy and also oversee the implementation of this Policy.

Principle 1 - Ethics, Transparency and Accountability

- The Company maintains highest standards of ethics in all spheres of its business activities. The Company has adopted Code of Conduct for directors/senior management, and employees at all levels will ensure good governance, ethical practices, transparency and accountability in conducting affairs of the Company and dealing with stakeholders across the value chain.

- The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- The company shall not engage in practices that are abusive, corrupt, or anti-competition.
- The Company shall ensure that all business decisions and transactions shall be fair, transparent, and shall be timely disclosed and be visible to the concerned stakeholders as per the applicable laws and statutory requirements subject to confidentiality for the purpose of protection of the Company's business interests.
- The Company will avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.

Principle 2 - Safety and Sustainability of Goods and Services

- The company shall ensure that its products and services comply with all applicable statutes and regulations;
- The company shall work towards safe and optimal resource use over the lifecycle of its products, including recycling of resources wherever possible;
- The company shall work towards building capacity such that all the value chain partners, namely the third party manufacturers, service providers including transporters and suppliers of significant raw materials, are sensitised about their roles and responsibilities towards sustainability.
- The Company shall raise the consumer's awareness with regard to their rights, through education, product labelling, appropriate and helpful marketing communication, full details of the contents and composition and promotion of safe usage and disposal of products and services.
- The Company shall ensure that the manufacturing processes and technologies required to produce its products are resource efficient and sustainable.
- The Company shall regularly review to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- 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.
- The Company shall strive to treat all its stakeholders and customers with dignity, respect and due understanding.
- The Company shall make sure that the waste products generated during the process of manufacturing are re-cycled or the by-products generated are put to best possible use to safeguard the environment and minimize the hazards.
- The Company shall continue to implement Integrated Management System Policy comprising of Quality Management System and Food Safety Management System requirements for Safety and Sustainability of Goods and Services.

Principle 3 - Employees' Wellbeing

- The Company shall ensure an environment which generates sense of belongingness, loyalty and commitment amongst the employees.
- The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
- The Company shall provide and maintain equal opportunities at the time of recruitment and provide a work environment that is free from any form of discrimination irrespective of caste, creed, gender, race, religion, disability or sexual orientation.

- The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- The Company shall take cognizance of the work-life balance of its employees, especially that of women.
- The Company shall provide a workplace environment that is safe, hygienic humane, harassment free and which upholds the dignity of the employees. The Company shall provide facilities for the wellbeing of its employees including those with special needs, ensuring timely payment of fair living wages to meet basic needs and economic security of the employees.
- The Company shall attract and retain talent involves many facets including employee engagement, mentoring, training and career development, empowerment and providing various perquisites as per the rules of the Company.
- The Company shall identify needs and grant necessary training to the employees to develop their skills and overcome such gaps as may be identified during the appraisal processes.
- The Company shall strive to communicate to its employees all the policies related to them so as to keep them aware of the same and allow them to take optimum advantage of the same.
- The Company shall continue to implement Integrated Management System Policy comprising of Social Accountability and Occupational Health & Safety Management System requirements that help employees' wellbeing.

Principle 4 - Protection of Stakeholders' Interest

- The Company's key 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 Group and its employees shall provide value based services to all the stakeholders.
- The Company has continuous engagement with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.
- The company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- The company shall strive to give special attention to stakeholders in areas that are underdeveloped.
- The company shall resolve differences, if any with stakeholders in a just, fair and equitable manner.

Principle 5 - Respecting and Promoting Human Rights

- The Company understand the human rights content of the Constitution of India, national laws and policies and also the guidelines of the International bill of Human Rights, as well as acknowledging that human rights are inherent, universal, indivisible and interdependent in nature.
- The Company shall 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, wherever applicable.

- The Company shall recognize and respect the human rights of all associated stakeholders and groups including its customers, shareholders, investors with in and beyond the workplace including that of communities, customers and vulnerable and marginalized groups.
- The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy. The Company shall also not be complicit with human rights abuses by a third party.

Principle 6 - Respecting, Protecting and Restoring the Environment

- The Company understands its responsibility towards the environment and endeavors to continuously promote environmental sustainability, ecological balance, conservation of natural resources. The Company strives to utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- The Company shall continuously seek to improve its environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- 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.
- The company shall continue take measures to check and prevent pollution and shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest, wherever possible.
- The Company shall continue to implement Integrated Management System Policy comprising of Environmental Management System and Energy Management System requirements that help in energy conservation, environment conservation and preventing, mitigating, controlling environmental damages and disasters, which may be caused due to its operations.
- The 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.
- The Company shall strive to procure products or services from locally-based suppliers who comply with the local and national regulations pertaining to their business.
- The Company shall promote ecological sustainability and green initiatives by adopting energy saving mechanisms, sensitising employees to reduce carbon footprint of the Company.
- As a part of Green initiative, the Company shall continue to organize tree plantation campaigns regularly and ensure participation of local communities into it.

Principle 7 - Responsibility towards Public and Regulatory Policy

- The Company shall operate 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 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

with. The executives of the Company shall participate and play an active role in committees, associations etc. constituted for industry reforms and advancement.

- The Company shall ensure that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.
- The Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake policy advocacy in a transparent and responsible manner.
- The Company believes that the policy advocacy must preserve and expand public good and thus shall never advocate any policy change to benefit itself along or select few.

Principle 8 - Inclusive Growth and Equitable Development

- The Company considers the society as its integral part and believes in giving back to the society. The Company shall understand the impact of inclusive growth and equitable development on the social and economic development and respond through appropriate action to minimize the negative impacts, if any being created by the Company in the course of its business.
- The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- The Company shall undertake, as and when applicable, CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR committee and as per its CSR policy.

Principle 9 - Engaging and Enriching Customer / Consumer Value

- The Company shall take into account the overall well-being of the customers and that of society.
- The Company shall ensure that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its products.
- The Company shall disclose all information truthfully and factually as per applicable laws, through labelling and other means to the customers/consumers, so that they can exercise their freedom to consume in a responsible manner.
- The Company shall ensure to promote and advertise its products in ways that do not mislead or confuse the consumers.
- The Company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources.
- The Company shall provide an adequate grievance handling mechanism for consumers and also address customer concerns and feedback.

MODIFICATION/ AMENDMENT IN THE POLICY

The Board may on the recommendation of reviewing authority modify, add, delete or amend any of the provisions of this Policy in accordance with the guidelines on the subject as may be issued by the Central Government or Ministry of Corporate Affairs or SEBI and/ or any other statutory authorities from time to time. In case of any ambiguity, the Chairman and Managing Director would provide the appropriate clarification.