



GREENLAM INDUSTRIES LIMITED BUSINESS RESPONSIBILITY POLICY

1. INTRODUCTION:

Greenlam Industries Limited (**'the Company'**) is a public limited company incorporated on August 12, 2013 under the Companies Act, 1956 (Corporate Identity Number: L21016AS2013PLC011624). The equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Ltd. and as such the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') are applicable and binding on it.

2. SCOPE AND PURPOSE:

Regulation 34 of the Listing Regulations, has made reporting of Business Responsibility Report in the Annual Report mandatory for the top 500 listed companies based on market capitalization (calculated as on 31st day of March every year). The Company, being one of the top five hundred companies listed with National Stock Exchange of India Ltd. (NSE) on the basis of market capitalization as on March 31, 2018, therefore it requires to comply with the requirements of Regulation 34 of the Listing Regulations.

This Policy on Business Responsibility (**'BR Policy'** or **'Policy'**) has been framed and adopted by the Board of Directors in their meeting held on February 13, 2019 in line with requirements of Listing Regulations, 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 towards conducting its business.

3. APPLICABILITY:

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

4. IMPLEMENTATION:

Mr. Ashok Kumar Sharma, Chief Financial Officer of the Company shall act as Business Responsibility Head (BR Head) and shall be responsible for implementing the Business Responsibility initiatives. He shall be responsible for, providing clarifications, if any, required with respect to the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment, etc.

Mr. Saurabh Mittal, Managing Director & CEO of the Company shall be responsible for overseeing the implementation of this Policy.

5. INTERPRETATION:

“Executive Management” shall mean Executive/Whole-time Directors and Senior Management Personnel of the Company.”

“Senior Management Personnel” means officers/personnel of the Company who are members of its core management team excluding directors and this shall normally comprise all members of management one level below the executive directors, including the functional heads.”

6. KEY PRINCIPLES:

6.1 Ethics, Transparency and Accountability

The Company maintains the highest standards of ethics in all spheres of its business activities. The Board of Directors and Senior Management strive and endeavor to set examples of utmost ethical behavior. The Executive Management aims at inculcating ethical behavior at all levels across the Company making it an essential part of the work culture so that every employee of the Company conduct himself/herself and lead on behalf of the Company with professionalism, honesty and integrity, and confirm to high moral and ethical ground.

Apart from the Code of Conduct required as per various laws, rules and regulations from time to time, the Company additionally frame a Code of Conduct/Business Ethics for all its Executive Management and officers and employees of the Company. All those concerned are required to strictly adhere to this Code of Conduct/Ethics. Any violation of any Code of Conduct shall be viewed strictly and lead to disciplinary action. All business decisions and transactions shall be fair, transparent and amenable to disclosure and be visible to the concerned stakeholder. The Company shall ensure maximum appropriate disclosure to its various stakeholders without impacting its strategic intent.

The Company shall strive to ensure that transparent, correct and relevant information, pertaining to its products, is disseminated through its advertising material and information displayed on the digital platforms. The Company shall ensure that the disclosures required to be made in business documents, statutory forms, declarations, advertisements are correct and complete in all sense. Disclosures shall be governed by the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, Determination of Materiality Policy and such other applicable policy as may be framed by the Company, from time to time.

The Company shall have a zero tolerance for bribery and corruption in its business dealings. The employees of the Company shall not, directly or indirectly, solicit or accept any personal fee, commission or any form of remuneration arising out of a transaction involving the Company which might be extended at times to influence business decisions. Any offer or grant of gift customary and/or are of a commemorative nature is not covered under this clause.

The Company believes in free and open competition and shall not indulge in any anti-competitive or unfair practice or abuse its dominant position in the market. The Company shall avoid, to the extent possible, involvement in practices that are in violation of this Policy.

6.2 Safety and Sustainability of Goods

The Company shall, at all times, ensure that the goods it produces are safe and sustainable. The Company shall continuously make efforts to improve the quality of its products. The Company should endeavour to educate the architects, designers, contractors, builders, carpenters, distributors and the end-customers about the products manufactured by the Company.

The Company shall ensure adequate safety standards from manufacture to delivery i.e. from acquisition of raw materials through manufacturing and processing, packaging, distribution and transportation. There should be monitoring done of product such that the quality, safety and environmental requirements are met through a series of milestone reviews. The Company shall remain committed to provide full satisfaction to its customers with respect to quality, reliability and delivery and attain quality leadership for all products that are offered by it.

The Company should strive to use all the resources viz. raw materials, natural resources and other resources like electricity, air, power etc. sustainably with maximum optimisation at all stages and also recycle the same to the extent possible. The Company shall regularly advise and train its employees and workers on optimum utilisation of resources. The Company should strive to continuously review and improve its manufacturing process and technology used so as to increase the productivity with reduced usage of resources without any compromise on the quality of the goods.

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 from over utilization of resources and minimize the hazards. While manufacturing its products the Company shall give due regard to social, ethical and environmental considerations as also respect the rights of people who may be the owners of traditional knowledge and other forms of intellectual property.

The Company shall always strive to treat all its stakeholders and customers with dignity, respect and due understanding. The Company shall, at all times, strive to upgrade the work culture and take such initiatives that work towards the conservation of the surrounding environment.

6.3 Well Being of All Employees:

The Company understands the worth of a healthy and sound human resource. The Company should ensure an environment which generates sense of belongingness, loyalty and commitment amongst the employees. 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.

The Company shall refrain from employing child labour, forced labour or any form of involuntary labour, paid or unpaid in any of its offices, units, branches or depots. The Company shall advocate a business environment that favors the concept of equal employment opportunities both at the time of recruitment as well as during the course of employment for all without any discrimination with respect to caste, creed, gender, race, religion, disability or sexual orientation. The Company shall strictly abide with the rules and regulations stipulated by local governments or Central Government on minimum wages to be paid to employees.

The Company shall promote work-life balance among all its employees. The Company shall ensure payment of minimum wages to the workers to support their livelihood. The Company shall strive to provide a safe working environment to all employees and protect them from sexual and mental harassment by all means. Any such instance shall be dealt promptly, sensitively and confidentially in the most judicious and unbiased manner. The Company has in place a policy for sexual harassment of women at workplace.

The Company shall provide a workplace environment that is hygienic, humane, comfortable, facilitating and which upholds the dignity of the employees. It shall provide facilities for the well-being of its employees including those with special needs. The Company shall comply with the statutory provisions with regard to health, safety and well-being of its employees. Specific provisions contained in the labour laws ensuring health, safety, hygiene, comforts and well-being of employees shall be complied in letter and spirit. The Company commits to regularly communicate the safe and hygienic health habits to its employees on a continuous basis.

The Company shall conduct programs/meets for enhancing the skills of its employees through various programs, on-the-job training, or training through various programmes - internal or external and shall be offered to employees to upgrade their skills and competencies which shall include training to workers in units to handle machines and products used during manufacturing of the products. The Company should have programmes to regularly boost the morale of its employees. The Company shall have effective system for attracting and retaining talents including awards, recognitions, appraisals, mentoring, training and career development. The knowledge so acquired by the individual should supplement his/her domain expertise as well as blend with the business goals of the Company. Employees mentoring would help in spreading and blossoming talent.

The Company has in place a whistle blower/vigil mechanism policy in place wherein detailed procedure would be mentioned for the employees to make disclosure regarding any unfair, unethical practice or improper activity observed within the organisation in an undisclosed manner, which will then be investigated by such person / group of person / committee as may be mentioned therein and such disciplinary actions may be taken against the person who has done such wrongful / unethical activity.

The Company should strive to timely communicate to its employees all the policies related to them so as to keep them aware of the same.

6.4 Protection of Stakeholders' Interest:

The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of not only its shareholders and employees, but all the stakeholders. The Company shall regularly and systematically identify its internal stakeholders like promoters, employees and workers and external stakeholders like shareholders, investors, suppliers, customers, government including regulators, banks and financial institutions. 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. The Company should follow ethical practices so as to ensure that no inconvenience is caused to any of its internal and external stakeholders.

The Corporate Social Responsibility (CSR) initiatives undertaken by the Company shall be driven towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders.

Apart from statutory disclosures and subject to business confidentiality, the Company shall ensure to disclose all the relevant information with respect to the Company and its product to the relevant stakeholders so as to enable the stakeholders to take a reasoned decision. The Company believes that it is the responsibility of the Company to remain transparent about its policies and decisions on its stakeholders. The Company shall ensure, while formulating any policy, that the interests of the stakeholders are not compromised.

The website of the Company shall display all such policies and other relevant information from time to time whose display as such has been mandated by any statute to keep the stakeholders aware about position of the Company.

The Company shall resolve the differences with stakeholders in a just, fair and equitable manner.

6.5 Respecting and Promoting Human Rights:

The Company appreciates and believes that human rights are inherent, universal, indivisible and interdependent in nature. The Company understands and continuously strives to promote human rights as mentioned in the Constitution of India in the provisions of Fundamental Rights and Directive Principles of State Policy and also the guidelines of the International Bill of Human Rights. The Company shall ensure to inculcate and integrate values of human rights in the management systems and all departments throughout the organisation. The Company shall endeavour to respect the human rights of all stakeholders associated with it.

6.6 Respecting, Protecting and Restoring the Environment:

The Company understands its responsibility towards the environment and endeavours to continuously promote environmental sustainability, ecological balance and maintaining the quality of soil, air and water. The Company shall remain committed towards taking proper steps to optimize the resource utilization in the course of its business, to the extent possible.

The Company commits to be responsible in the utilization and to continuously take all necessary initiatives towards optimum utilization of resources, both natural and manmade. The Company shall also remain committed towards equal and fair utilisation of benefits arising out of access and commercialization of natural resources.

The Company shall ensure undertaking of pollution control measures not only at all stages of production but also within the workplace i.e. within the administrative offices, units, branches, depots and such other places where the Company operates. Further, the Company shall endeavour to train its staff, workers including contractors to adopt such measures which help in preventing pollution and protecting environment like using paperless manner of communication as far as possible. The Company shall at all times ensure safe disposal of wastes and effluents through proper disposal channels. The Company shall ensure that the amount of emission, fumes and waste water is within the permissible limits by the State Pollution Control Board and Central Pollution Control Board.

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 products. The Company endeavours to review its existing practices and procedures and the extent to which such practices can be modified so as to mitigate the environmental damage and to reduce adverse impact on environment by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.

The Company shall have in place a mechanism which shall deal with the preventing, mitigating and controlling environmental damages and disasters which may be caused due to its operations including plans to deal with contingencies.

6.7. Responsibility towards Public and Regulatory Policy:

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 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. The executives of the Company shall

strive to participate and play an active role in committees, associations etc. constituted for industry reforms and advancement.

The Company shall in case of any grievance with any legislative / regulatory authority or framework, seek redressal of the same and resort to policy advocacy consistent with the principles and policies contained in the policy through the trade and industry chambers and other such collective platforms related to the products of the Company.

The Company shall perform the function of policy advocacy in a transparent and responsible manner while engaging with all the authorities and shall take into account the Company's as well as the larger national interest.

The Company believes that policy advocacy must preserve and expand public good and thus shall never advocate any policy change to benefit itself alone or a select few.

6.8 Inclusive Growth and Equitable Development:

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 is committed towards minimizing the negative impact on society, if any, being created by the Company in the course of its business.

The Company therefore, through its CSR activities, shall continuously participate in activities related to promoting healthcare including preventive health care and sanitation, promoting education, including special education and employment enhancing vocational skills, etc.

6.9 Engaging and Enriching Customer Value:

The Company acknowledges that no business can survive in absence of customers. The Company shall continuously strive to provide such goods to its customers in a manner that creates value for both. The Company shall not indulge in any unfair or disruptive trade practice at any stage while manufacturing, promoting and selling its products that may affect the right of freedom of choice of customers from the range of other competitive products available in the market.

The Company shall ensure that all the information related to products, its handling and manner to use the same are disclosed truthfully and factually to the customers through brochures and / or manuals so that the customers can exercise their freedom to choose the product in a responsible manner.

The Company has also to ensure that the advertisements and promotions of its products should not mislead or confuse the customers or in any way violate any of the principles of this Policy.



The Company has in place adequate grievance redressal mechanisms for the customers and also for addressing the customer concern and feedbacks.

7. REVIEW AND AUTHORITY TO MAKE ALTERATIONS IN THE POLICY:

The Board or such other person/committee authorised by the Board may review the Policy from time to time as may be required, subject, however, to the condition that such alterations shall not be inconsistent with any provision of any law for the time being. Changes, if any, shall be effective only upon approval by the Board.

**By order of the Board
For Greenlam Industries Limited**

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Saurabh Mittal
Managing Director & CEO

Place: New Delhi

Date of Approval: February 13, 2019