



BUSINESS RESPONSIBILITY POLICY

OSWAL GREENTECH LIMITED

(effective date: June 25, 2020)

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1. INTRODUCTION

The Business Responsibility Policy is framed pursuant to Regulation 34(2) (f) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015 (“SEBI LODR”) read with SEBI circular no. CIR/CFD/CMD/10/2015 dated November 04, 2015 governing provisions related to Business Responsibility Report.

2. Scope and Purpose

Regulation 34(2) of the SEBI LODR provides for reporting of Business Responsibility Report in Annual Report as mandatory for the top 1000 listed companies based on market capitalization.

This Policy of the Company is a compilation of 9 policies framed on the basis of the principles of National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business published by the Ministry of Corporate Affairs.

3. Definitions

- 3.1. “Board” shall mean Board of Directors of the Company.
- 3.2. “Companies Act” shall mean the Companies Act, 2013 and Rules thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended.
- 3.3. “Company” shall mean Oswal Greentech Limited
- 3.4. “Policy” or “this Policy” means Business Responsibility Policy.
- 3.5. “SEBI LODR” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as notified by The SEBI, as amended, from time to time.
- 3.6. “Stock Exchange” shall mean a recognized Stock Exchange as defined under clause (f) of Section 2 of the Securities Contracts (regulation) Act, 1956.

4. Applicability

This policy is designed to ensure a unified and common approach across the Company and shall be applicable to employees, subsidiaries, affiliates, vendors, service providers, consultants and other stakeholders of Company, as may be relevant. This Policy applies to all the directors of the Company also.

The Board of Directors of the Company (Board) had approved this Policy at its meeting held on June 25, 2020.

This Policy shall be effective from the date of approval by the Board.

5. Key principles

This policy embodies the Company's philosophy and elements on the following principles which are elaborated hereinafter:

- **Principle 1:** *Businesses should conduct and govern themselves with ethics, transparency and accountability*
- **Principle 2:** *Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle*
- **Principle 3:** *Businesses should promote the wellbeing of all employees*
- **Principle 4:** *Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised*
- **Principle 5:** *Businesses should respect and promote human rights*
- **Principle 6:** *Businesses should respect, protect, and make efforts to restore the environment*
- **Principle 7:** *Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner*
- **Principle 8:** *Businesses should support inclusive growth and equitable development*
- **Principle 9:** *Businesses should engage with and provide value to their customers and consumers in a responsible manner*

Principle 1: Businesses should conduct and govern themselves with ethics, transparency and accountability

Philosophy:

The Company endeavors to conduct its businesses and strengthen relationships in a manner that is dignified, distinctive and responsible. The Company adheres to ethical standards to ensure integrity, transparency, independence and accountability in dealing with all stakeholders. The Company has adopted various codes and policies to carry out its duties in an ethical manner viz., Code of Conduct for Board Members and Senior Management, Policy on Whistle Blower, Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, Code of Conduct for Prohibition of Insider Trading, Policy on Disclosure of Material Events and Information etc. to ensure transparent business governance.

The Code of Conduct for Board Members and Senior Management of the Company embodies the Company's values and beliefs and endeavors to lay down guidelines for employees of the Company to follow in their day to day work life. The policy applies to all employees on regular rolls of the Company including Full Time Directors, Advisors, In-house Consultants and employees on contract.

As an extension of the Code of Conduct, Company has a Whistle Blower policy which also applies to third parties with concerns regarding any serious malpractice or impropriety within the Company. Third parties include Vendors, Service providers, Partners, and customers.

The Company has always been committed to good corporate governance practices, including matters relating to Related Party Transactions. The Company has formulated the Policy on Related Party Transactions through which it monitors the transactions of the Company with the related parties. The details of the transactions with related parties are placed before the Audit Committee and Board of Directors from time to time.

The Company has a 'zero tolerance' approach to bribery and corruption and is committed to act professionally, fairly and with integrity in all the business dealings and relationships, wherever it operates.

Policy:

- i. The Company shall have governance structures, procedures and practices that ensure ethical conduct at all levels across, where ever is applicable, its value chain.
- ii. The Company shall communicate transparently and shall assure access to information about its decisions that impact relevant stakeholders.
- iii. The Company shall not engage in practices that are abusive, corrupt, or anti-competition.
- iv. The Company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely.
- v. 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 and HR policies.
- vi. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- vii. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

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

Philosophy:

Since inception, sustainability has remained at the core of our business strategy. Besides economic performance, safe operations, environment conservation and social well-being have always been at the core of Company's philosophy of sustainable business. The Company has invested substantially and allocated other resources to proactively adopt and implement business processes to increase its adherence to environmental standards and pollution control measures and enhance its industry safety levels.

At Oswal Greentech Limited, the challenges due to the Company's operations related to Environment, Health and Safety (EHS) aspects of the business, employees and society are mapped and mitigated through a series of systematic and disciplined sets of policies and procedures. Our continuous endeavor to go beyond compliance and conserve natural resources

helps to march towards attaining excellence in environment management and efficient and sustainable operations as well.

Policy:

- i. The company shall ensure that its products and services comply with all applicable statutes and regulations.
- ii. The Company shall ensure that the manufacturing processes and technologies used by it are resource efficient and sustainable.
- iii. The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
- iv. The Company shall recognize and respect the rights of people who may be owners of traditional knowledge and other forms of intellectual property.
- v. The Company shall recognize that over-consumption results in unsustainable exploitation of our planet's resources, and should therefore promote sustainable consumption, including recycling of resources.
- vi. 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.
- vii. 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 wellbeing of all employees.

Philosophy:

The Company believes that the employees are the most valuable asset for an organization. The Company has robust process of human resource development which strives to provide all employees with opportunities for learning, professional growth and development.

The transparent HR processes and practices endeavor to provide a work atmosphere free of any discrimination.

The Company also has in place an Anti-Sexual Harassment Policy and an Internal Complaints Committee (ICC) to address complaints received regarding sexual harassment, if any. All employees (permanent, contractual, temporary, trainees) are covered under this Policy.

Policy:

- i. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- ii. The 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. The Company shall not use child labour, forced labour or any form of involuntary labour,

- paid or unpaid.
- iv. The Company shall take cognizance of the work-life balance of its employees, especially that of women.
 - v. The Company shall provide facilities for the wellbeing of its employees including those with special needs.
 - vi. The Company shall 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. The Company should communicate this provision to their employees and 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. The Company should promote employee morale and career development through enlightened human resource interventions.
 - ix. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

Philosophy:

For Oswal Greentech Limited, community is a major stakeholder of business. Whenever a business is set up, the Company surveys the surrounding communities and identifies the key stakeholders. There is a specific focus on identifying the vulnerable amongst the stakeholders. These include landless, displaced, tribal communities, socially and economically backward sections, people with disabilities, women- headed households, etc.

Need assessment studies are conducted in business locations and the needs of communities with special focus on disadvantaged and vulnerable communities are identified and all the CSR activities are planned and implemented based on the identified needs of the communities. A special focus is laid on vulnerable and marginalized sections of the community such as differently-abled persons, elders, tribals, migrant labour etc.

Policy:

- i. The Company shall systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them.
- ii. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- iii. The Company shall give special attention to stakeholders in areas that are underdeveloped.
- iv. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

Principle 5: Businesses should respect and promote human rights

Philosophy:

The Company has various policies towards promoting human rights like Code of Conduct, Whistle Blower Policy, Policy against Sexual Harassment coupled with transparent HR processes and practices adequately cover the humanrights aspects.

Policy:

- i. The Company understands the human rights content of the Constitution of India, national laws and policies and the content of International Bill of Human Rights.
- ii. The Company appreciates that human rights are inherent, universal, indivisible and interdependent in nature.
- iii. 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.
- iv. The 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.
- v. The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.
- vi. The Company shall not be complicit with human rights abuses by a third party.

Principle 6: Businesses should respect, protect, and make efforts to restore the environment

Philosophy:

The Company places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. Oswal Greentech Limited sets high standards in the area of environmental responsibility — striving for performance that does not merely comply with regulations but reduces environmental impacts. The Company understands the global thrusts for minimizing the effect of developmental projects towards global warming. The Company has developed various projects voluntarily and some of the projects are under development stage, which ultimately reduces Green House Gases (GHG) emissions into the atmosphere and thus, minimizing the global warming effect. The Company believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for future generations. The Company understands the thrust of achieving energy efficiency, and effectively utilizes the available clean technology and renewable energy resources in all its business developments.

Policy:

- 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. The Company shall take measures to check and prevent pollution. The Company should assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
 - iii. 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.
 - iv. 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.
 - v. The Company shall report their environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
 - vi. The Company shall proactively persuade and support its value chain to adopt this principle.

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

Philosophy:

Oswal Greentech Limited believes that a lot can be achieved by the company if it works together with the Government, legislators, trade bodies and regulators to create positive social and environmental outcomes. The Company has always strived to create a positive impact in the business eco-system and communities by practicing pro-active advocacy not for securing certain benefits for industry, but for advocating certain best practices for the benefit of society at large. The Company engages with industry bodies and associations to influence public and regulatory policy in a responsible manner.

Policy:

- i. The Company, while pursuing policy advocacy, shall preserve and expand public good and shall not advocate any policy change to benefit the Company or select few alone.
- ii. To the extent possible, 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.

Philosophy:

The Company works with the communities surrounding its business operations with a vision to make sustainable impact on the human development of under-served communities through initiatives in Education, Health and Livelihoods. The programs are designed based on the local needs identified through the baseline studies at each location. Thus, all the programs are sensitive to the needs of local communities and ensure a high level of participation from the

communities.

In compliance with section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, the company has adopted a CSR policy through which it undertakes the projects in accordance with Schedule VII of the Companies Act, 2013.

Policy:

- i. The Company understands its impact on social and economic development, and respond through appropriate action to minimise the negative impacts.
- ii. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- iii. The 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 their business operations.
- iv. The Company shall be sensitive to the local concerns while operating in regions that are underdeveloped.
- v. The company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR committee and as per the CSR policy of the company.

Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.

Philosophy:

The foundation of the Company is based on the trust, satisfaction and loyalty of our consumers across India. The Company is dedicated to delivering products that excite customers and meet their need gaps.

As part of Customer focus initiatives, at regular intervals, the satisfaction levels of Clients (Internal as well as External) are captured to trace their stated and unstated needs and expectations.

Policy:

- 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. The Company shall ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
- iii. The Company shall promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- iv. The 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.
- v. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.

6. Implementation and monitoring

The Managing Director of the Company shall have the authority to oversee the implementation of this Policy. The Chief Financial Officer shall be responsible for implementing the Business Responsibility initiatives. He shall be responsible for, providing clarifications on the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment, etc.

In view hereof:

- Mr. Anil Kumar Bhalla, Managing Director & CEO, is nominated as the Director responsible for implementation of the Business Responsibility policy/policies and
- Mr. Vipin Kumar Vij, Chief Financial Officer is nominated as the Business Responsibility Head (“BR Head”).

The Managing Director shall be the reviewing authority of this Policy and may make suitable changes in this Policy from time to time, however, such alterations shall not be inconsistent with the provisions of any law for the time being in force.

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.

Any grievance/ complaints with respect to violation of this Policy may be reported to the BR Head of the Company.

7. Disclosures

This policy shall be available on the website of the Company for the internal and external stakeholders.

8. Policy review and amendments

This Policy would be subject to modification in accordance with the guidelines / clarifications as may be issued from time to time by relevant statutory and regulatory authorities.

This policy is also supported by a series of existing policies, and the principles set out in this document are reflected in the existing policies and would be reflected in such other new policies that would be put in place from time to time, as relevant.

Any exceptions to the Business Responsibility Policy must be consistent with the SEBI LODR and must be approved in the manner as may be decided by the Board of Directors.
