

Policies on Business Responsibility

SCOPE AND PURPOSE:

The business environment has acknowledged the importance of sustainability time and again. Organizations across the globe recognize the need to engage with stakeholders to continually improve the quality of their business performance. The Policies on Business Responsibility ('Policies') are in line with the requirements of Regulation 34 and other applicable provisions of the Listing Regulations and are intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

These Policies affirm the Company's commitment to follow principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs towards conducting its business.

In view of the above, the Board of Directors of the Company (Board) approved these Policies at its meeting held on 12th November, 2021.

Applicability:

These Policies apply to all the directors and employees of the Company.

These Policies shall be effective from 12th November, 2021.

Policy 1: Ethics Transparency & Accountability

- The Company shall develop necessary governance structures, procedures and practices to ensure ethical conduct at all levels; and to promote the adoption of this principle across the value chain.
- To maintain equality and fair justice while dealing on behalf of the Company, the Directors / Senior management personnel shall be committed to provide a work environment free from unlawful discrimination, harassment and intimidations of any nature.
- The Company shall assure access to information about its decisions that impact relevant stakeholders.
- The Company shall not engage in practices that are abusive, corrupt, or anti competition.
- The Company shall truthfully discharge its responsibility on financial and other mandatory disclosures timely.
- The Directors/ Senior Management personnel shall discharge their duties in good faith and integrity in business judgement and in the best interests of the Company and its stakeholders.
- 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 encourage its business partners and third parties with whom it conducts business to abide by this policy.
- No Director/ Senior Management personnel shall provide any information related to Company's business, performance, its customers, suppliers, etc., which is not in the public domain either formally or informally, to a person or a party, the press or any other publicity media, unless specially authorized
- The Company shall report on the status of adoption of these Guidelines, as necessary.
- The Code of conduct is compliant with Regulation 17(5) of the LODR and The Whistle blower policy is an outcome of Section 177(9) of the Companies Act, 2013 and Regulation 22 and Regulation 22 and Regulation 4(d)(IV) of the LODR.

Policy 2: Business Lifecycle Sustainability

- The Company shall be committed to provide best services to its customers while reducing environmental & social impact across our business locations.
- The Company shall use environmentally friendly materials and upgraded process & technology available in market for our business and customers.
- The Company shall continuously innovate and explore alternate materials wherever possible in our operations that reduces the environmental footprint and enhance safety of our customers.
- The Company shall work on prevention of soil, water, air and noise pollution from construction activities by continuously monitoring different parameters and taking required measures.
- Through our projects and techniques, we shall strive to minimize waste, energy consumption and water usage.
- Encourage local suppliers for the raw materials based on the project requirements.

Policy 3: Wellbeing of all Employees

- To inform and assure about the protection available to an employee making any disclosure under the Whistle Blower Policy
- The Company shall provide & 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.
- The Company shall work on skill up-gradation of its employees, contract workers and labour by providing access to necessary learning opportunities, on an equal and non discriminatory basis.
- 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 would provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. The Company shall create awareness of these provisions to the employees and training them on a regular basis.
- To provide for leave to women in employment with the organization for period before and after child-birth. The policy has been formulated in accordance of provisions as prescribed in The Maternity Act, 1961.

Policy 4: Stakeholder Engagement

- The Company would systematically identify stakeholders, understand their concerns, define the purpose and scope of engagement, and commitment to engage with them.
- The Company will regularly communicate with all the key stakeholders of the Company and ensure to understand their concerns and feedback on the areas of operation concerning them.
- The Company would resolve differences with stakeholders in a just, fair and equitable manner.
- Feedback form shall be provided to every customer for their suggestions and if found appropriate, the Company, implements the suggestion
- The Company would employ fair and non-discriminatory tendering processes so that all capable and technically compliant vendors get an equal opportunity to work with us.

Policy 5: Human Rights

- The Company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers 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 respects human rights and ensures equal employment opportunity, benefits, freedom of expression, robust grievance mechanisms.
- Recruitment of an individual is totally based on ability and capability of the person without any discrimination on the bases of race, gender, creed, religion, color, disability or national origin.
- The Company is strictly against any child labour, forced labour and or human trafficking. The Company can cancel the contract with third party vendors, contractors or sub – contractors if found noncompliant.



Policy 6: Protection of Environment

- 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.
- The Company shall take measures to check and prevent pollution and assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- The Company shall lay emphasis on protecting biodiversity and takes additional steps to avoid cutting of trees during the design and construction phase. The Company shall relocate the trees, wherever possible, even at an extra cost.
- Through our projects and techniques, the Company shall strive to minimize waste, energy consumption and water usage
- The Company shall work on prevention of soil, water, air and noise pollution from construction activities by continuously monitoring different parameters and taking required measures.
- Through continuous innovations, we shall strive to use alternate materials wherever possible in our operations which would reduce the environmental footprint and at the same time without compromising on the safety of our customers.

Policy 7: Responsible advocacy

- The Company, while pursuing policy advocacy, ensure that our advocacy positions are consistent with these Policies.
- The Company shall, utilize, to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.
- Ensuring that our policy advocacy and liaison reflect our commitment to integrity, transparency and high ethical standards, and are conducted in strict compliance with all applicable central, state and local laws, regulations, and rules and good corporate governance practices.

Policy 8: Inclusive growth and equitable development

- The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- 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.
- The Company shall be sensitive to local concerns while operating in regions that are underdeveloped.

- 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.

Policy 9: Customer Value

- Customers are provided with brochures which includes every detail and disclosure regarding the project. These brochures are prepared and thoroughly checked by the legal department to ensure that the correct and the most accurate information is released to our customers.
- The Company takes into account the overall well-being of the customers and that of society.
- The Company ensures that promotion and advertisements of our projects do not mislead or confuse the consumers or violate any of the principles in these policies.
- Providing adequate grievance handling mechanisms to address customer concerns and feedback.
- The customers are provided with safety guidelines and we educate them on the safety features of their property at the time of possession.
- The Company will regularly communicate with all the key stakeholders of the Company and ensure to understand their concerns and feedback on the areas of operations concerning them.

Implementation

These policies shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.

Mr. Shahid Balwa, Vice Chairman and Managing Director is responsible for implementation of the policies. Mr. Asif Balwa, Chief Financial Officer is head of the Business Responsibility who shall ensure that the policies are implemented throughout the Company through the functional heads of the Departments of the Company

Compliance with the Policies shall be monitored and evaluated by the Company Secretary on a regular basis.

Any grievances/ complaints with respect to violation of the policies shall be reported to the head of the Business Responsibility.