

DHAMPUR SUGAR MILLS LIMITED

BUSINESS RESPONSIBILITY POLICY

1. INTRODUCTION:

Dhampur Sugar Mills Limited (**'the Company'**) is a Public Limited Company and the equity shares of the Company are listed on BSE Limited and National Stock Exchange of India Limited and as such the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) (**'the Listing Regulations'**) are applicable and binding on it.

The Securities and Exchange Board of India (SEBI) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") which are applicable to all listed entity with effect from 1st December, 2015.

SEBI has, vide circular dated August 13, 2012, mandated Business Responsibility Reporting (BRR) requirement for top 100 listed entities in their annual reports, which was extended to cover top 500 listed entities vide SEBI Circular # SEBI/LAD-NRO/GN/2015-16/27, dated 22nd December, 2015, which amended the Listing Regulations w.e.f. 1st April, 2016 and further the requirement has been extended to top 1000 listed entities vide SEBI Circular # SEBI/LAD-NRO/GN/2019/45, dated 26th December, 2019.

As per the Regulation 34(2)(f) of the Listing Regulations, Annual Report of listed entity (top 1000 listed entities based on market capitalization calculated as on March 31 of every year) shall contain, Business Responsibility Report (BRR).

2. SCOPE AND PURPOSE:

This Policy on Business Responsibility or Business Responsibility Policy (**'BR Policy'** or **'Policy'**) has been framed in line with the requirements of Regulation 34 of the Listing Regulations and is intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economic responsibilities.

This Policy endorses the Company's commitment to follow the principles and core elements, in conducting its business, as laid down in the National Guidelines on Responsible Business Conduct issued by the Hon'ble Ministry of Corporate Affairs. A yearly report on the status of the adoption / implementation of this Policy shall be included in the Annual Report of the Company.

3. APPLICABILITY:

The Business Responsibility Policy is an internal document of the Company and is applicable to all the directors and employees of the Company across all its functions, units, mills and distilleries, group companies and subsidiaries since August, 2017. However, consequent to amendment in Regulation 34(2) of Listing Regulations, which requires Business Responsibility Report by top 1000 listed entities based on market capitalization, the same has also been approved by the Board of Directors in its meeting held on 30th July, 2020 in line with the requirements.

4. IMPLEMENTATION:

The CSR committee of the Company shall have the authority to oversee the implementation of this Policy.

Mr. Akshat Kapoor, Chief Operating Officer and Mr. Vineet Kumar Gupta, Vice President, Finance shall jointly act the BR Head and shall be responsible for implementing the Business Responsibility initiatives and assisted by an internal and external team having multi-disciplinary background. They shall also be responsible for, providing clarifications on the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment, etc.

The CSR Committee of the Board 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.

5. KEY PRINCIPLES:

5.1 ETHICS, TRANSPARENCY AND ACCOUNTABILITY:

The Company maintains 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 conducts himself and leads on behalf of the Company with professionalism, honesty, and integrity, and confirm to high moral and ethical grounds.

The Company shall meet all its statutory obligations in line with the spirit of the law, enabling fair competition and ensuring it treats all its stakeholders in an equitable manner. The Company shall ensure that it contributes to public finances by making timely and complete payments of all applicable taxes in the letter and spirit of the laws and regulations governing such payments.

The Company shall ensure that the disclosures required to be made in business documents, statutory filings, 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 inform all relevant stakeholders of the operating risks and redress the issues raised.

The Company shall have zero tolerance for bribery and corruption in its business dealings. Every executive directors and employees of the Company shall take all care to ensure that there does not arise a conflict of interest between him and the Company. The executive directors and employees of the Company shall strictly adhere to the provisions of the Code in this regard.

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, either by itself or by any third party that are in violation of this Policy.

5.2 SAFETY AND SUSTAINABILITY:

The Company understands that the main product of the Company is sugar which is an edible product and therefore connected with the health of its consumers. The product being health-sensitive, the Company is aware that it cannot compromise with the standard of its products. The Company shall, at all times, ensure that its products are safe. To uphold the quality of the goods produced, the Company shall, *inter alia* maintain hygiene of the mills and also maintain necessary processes with respect to the personal hygiene of the workers at the mills. The Company should endeavor to educate the farmers/workers about the products manufactured by the Company.

The Company shall on a regular basis review and improve upon the process of new technology development, deployment and commercialization, incorporating various external and internal considerations.

The Company shall ensure that the social, environmental and economic factors are considered in the business it conducts. The Company shall endeavor that its business goals are pursued without compromising any of the three elements. Such balance should be ensured throughout the life cycle of the goods. The Company shall parallelly ensure quality of its products by various level of quality checks. 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 optimization at all stages and also recycle the same to the extent possible. The Company shall regularly advice and train wherever practical its employees, workers, engineers, value chain members, customers and recyclers, on optimum utilization of resources. The Company should strive to continuously review and improve its manufacturing process and technology (including improving the quality of the raw materials) 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 non-renewable resources and minimize the hazards.

The Company shall strive to keep its own environmental footprints within the permitted limits, encourage the stakeholders and employees in order to encourage them to reduce their footprints.

The Company shall respect the rights of people who may be the owners of traditional knowledge and other forms of intellectual property. The employees of the Company shall acknowledge the efforts made by others *inter alia* fellow employee and ensure that the ideas are not hacked and due credit is given to the deserving colleague from whom the idea has been borrowed. None should attempt to project others' ideas or efforts as his own.

The Company shall always strive to treat all its stakeholders and customers with dignity, respect and due understanding.

5.3 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 by the senior management.

The Company shall not employ child labor, adolescent labor, forced labor or any form of involuntary labor, paid or unpaid in any of its offices and mills. The Company has a Policy on Selection & Remuneration of Directors, KMP and other employees, which deals extensively with the employment and remuneration practices (including awards, recognitions, appraisals, stock options, minimum wages, etc.) to be followed by the Company. The Company shall ensure fair, timely and transparent payment of statutory wages to all its employees without discrimination.

The Company shall ensure that all its employees, including contract and casual labors, are fairly treated. The Company shall promote work-life balance among all its employees specially its women employees. The Company has a Policy on Prevention of Sexual Harassment, which deals extensively on providing a safe working environment and protection from sexual harassment.

The Company shall provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. It shall provide facilities for the wellbeing of its employees including those with special needs. The Company shall comply with the statutory provisions pertaining to its employees and in particular with regard to health, safety and wellbeing of its employees. The Company shall at all-time have a safety and environment policy as per the provisions of Factories Act, FSSAI Norms and other applicable laws.

The Company shall conduct programs for enhancing the skills of its employees, improve their morale and for their overall career development. This could be through various sensitization programs, on-the-job training, job rotation or training through various programs – internal or external to upgrade their skills and competencies which shall include training to handle machines, chemicals and other products used during manufacturing of the products. Such training shall be imparted on non-discriminatory basis based on the need of the employees / business.

The Company shall at all times have 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 organization in an undisclosed manner, which will then be investigated by such person / group of person / committee as may be mentioned in the said policy and such disciplinary actions may be taken against the person who has done such wrongful / unethical activity.

The executive directors and employees of the Company shall strictly adhere to the provisions of the Code with regard to their association with any professional, trade, legislative, political or public body.

The Company promotes collective bargaining to allow healthy negotiation between the employee/ employee association and the Company's management in good faith with a view to agree on terms and conditions of work and/ or settlement of disputes and grievances of employees represented by a representative body of employees. The Company shall ensure that the agreed terms of engagement of all its employees, including contract and casual labors are fair.

The Company should strive to regularly 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.

5.4 PROTECTION OF STAKEHOLDERS' INTEREST:

The Company values the support of its stakeholders and endeavors to maintain a cordial relationship and safeguard the interests of all the stakeholders. The Company shall regularly and systematically identify its internal stakeholders like employees and workers and external stakeholders like shareholders, investors, suppliers, consumers, government bodies including regulators, banks and financial institutions. The management of the Company shall remain accessible to all stakeholders in order to understand their concerns and respond accordingly. The Company shall endeavor to maintain healthy stakeholders' engagement, allow stakeholders' participation and shall promote collective decision making process as far as practically possible.

The Company appreciates that all some of its stakeholders are not equally influential or are disadvantaged, vulnerable, underdeveloped and marginalized and therefore it shall give priority to safeguard their interest. The Corporate Social Responsibility (CSR) initiatives of the Company shall be also prioritized towards their upliftment.

Apart from statutory disclosures and subject to business confidentiality, the Company shall ensure to disclose all the relevant information with respect to the Company, to the relevant stakeholders so as to enable them to take reasoned decisions. The Company believes that it is the responsibility of the Company to remain transparent about the impact of its products, 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 to keep the stakeholders aware about position of the Company. The website of the Company shall provide for feedback mechanism for stakeholders to communicate regarding impact of the Company's policies, decisions and products.

The Company Secretary of the Company shall receive the queries/grievances/ feedback of various stakeholders and shall be responsible to respond to the same within reasonable time and his name and contact details shall be displayed on the website of the Company. Differences, if any, with any stakeholder shall be resolved in a just, fair and equitable manner.

5.5 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 and other applicable laws and policies and shall strive to make its employees aware about the same. The Company shall ensure to inculcate and integrate values of human rights in the management systems and throughout the organization.

The Company shall respect the human rights of all stakeholders associated with it and public at large within and beyond the workplace including that of communities and vulnerable and marginalized groups and ensure that all stakeholders impacted by the business of the Company shall have access to the top management / grievance redressal mechanisms / vigil mechanism (wherever applicable). The Company shall carry out periodic due diligence to identify, prevent, mitigate and account for the

adverse human rights impacts, if any, and shall carry out necessary corrective actions to address the same.

The Company shall endeavor to promote the awareness and realization of human rights across its value chain.

The Company shall strive to abide with the aforesaid principle and discourage violating practices by any third party to the extent possible. The Company shall also not be complicit with human rights abuses by a third party.

5.6 RESPECTING, PROTECTING AND RESTORING THE ENVIRONMENT:

The Company understands its responsibility towards the environment.

The Company commits to be responsible in the utilization and to continuously take all necessary initiatives towards optimum utilization and further reduction in the utilization of non-renewable resources. The Company understands the importance of the resources and believes in sweating of the existing assets instead of aggressive usage of new capacities. The Company shall also remain committed towards equal and fair utilization of benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge.

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, and such other places where the Company operates. The Company shall continue to provide personal protective equipment to employees. 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 endeavors to assess the environmental damage and strives to bear the cost of pollution abatement with due regard to public interest.

The Company shall continuously endeavor to use the latest energy efficient technologies to ensure optimal utilization of the resources without having to compromise with the quality of its products.

The Company endeavors to conduct environmental audit periodically/annually to assess existing practices and procedures adopted by the Company and the extent to which 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 continue to effectively implement the Environment, Health and Safety Policy and the Environmental Safety System, Contingency Plans and processes, that have been developed to prevent, mitigate and control environmental damages, disasters and contingencies.

The Company shall also persuade and encourage its external stakeholders to move towards environmentally friendly practices.

The Company shall report to the stakeholders in a fair and transparent manner, the environmental risks associated with the products and process of manufacturing of the products and the steps undertaken by the Company to minimize the same.

5.7 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 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 business of the Company. The executives of the Company shall participate, without any political affiliation / biasness and play an active role in committees, associations, etc., constituted for industry reforms and advancement.

Any policy advocacy shall be undertaken in a transparent and responsible manner, without any political affiliation / biasness, while engaging with all the authorities and shall take into account the Company's as well as the larger national / industry interest and to promote fair competition and respect for human rights.

5.8 INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT:

The Company considers the society as an integral part of its business and believes that it cannot work in vacuum and therefore, as it grows, 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.

As a responsible citizen, the Company through its societal, CSR and other community activities, shall continue to participate in activities related to healthcare, education, development of sports, eradicating hunger and malnutrition, rural development and poverty alleviation, promoting the overall well-being of society, etc. The Company shall also ensure that it plans the expansion / acquisitions in such a manner that there are no cases of displacements.

The Company shall make efforts to innovate and invest in the processes and technologies to promote the wellbeing of society, putting the local (especially farmers) and the underdeveloped regions in priority. The Company shall continue to engage with local farmers in its command area to promote - greater cane planting, superior cane varieties and best practices in farming to increase farm productivity.

5.9 ENGAGING AND ENRICHING CUSTOMER / CONSUMER VALUE:

The Company acknowledges that no business can survive in absence of customers. The Company shall continuously strive to provide such goods to its consumers in a manner that creates value for both. The Company shall make every effort to make available such goods that are safe, competitively priced and easy to consume for the benefit of its consumers. The Company shall not indulge in any unfair or disruptive trade practice that can in any way and at any stage while selling its products 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 wherever applicable all the information that is statutorily required to be disclosed or otherwise advertised in relation to its products are disclosed truthfully and factually to the consumers through labeling or advertisement(s) so that the consumers can exercise their freedom to consume in a responsible manner.

The Company commits to exercise due care and caution while providing goods that result in over exploitation of natural resources.

The Company shall ensure that the customers' data collected by it does not infringe upon the right of privacy of its customers.

The Company shall establish adequate grievance redressal mechanisms for the consumers and also address customer concern and feedbacks. The Company shall maintain a specific section in its website where the customers can post their queries, grievances, suggestions, feedback for the products of the Company. Wherever required, the same shall be escalated to the level of business heads, regional heads/ functional heads and the Managing Director, as appropriate.