

**EVEREST INDUSTRIES LIMITED**  
**BUSINESS RESPONSIBILITY POLICY**

# **BUSINESS RESPONSIBILITY POLICY ON ETHICS, TRANSPARENCY & ACCOUNTABILITY**

## **INTRODUCTION**

Everest Industries Limited ("the Company") is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") are applicable and binding on the Company. Securities and Exchange Board of India ("SEBI") has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report ("BRR") as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI's Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## **SCOPE & PURPOSE**

This Policy endorses Company's commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## **PHILOSOPHY**

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles of sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, including statutory modifications or re-enactments thereto from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Ethics, Transparency & Accountability.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business of the Company. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company is committed to the highest standards of openness, probity, accountability and ethical and transparent conduct in its business activities. The Company strives to comply with applicable laws in true letter and spirit and make adequate & timely disclosures. The Company endeavors to set examples of 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 conform to high

moral and ethical grounds.

The following measures govern the Ethics, Transparency and Accountability of the Company:

- The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels across its value chain.
- Every employee of the Company shall abide by the values and the commitment to ethical business practices reflected in the company's Code of Business Conduct and Ethics. Any violation of the same shall be viewed strictly and lead to disciplinary action.
- The Company shall encourage its Stakeholders to report genuine concerns of serious malpractice, impropriety, abuse or wrongdoing, misconduct or unlawful conduct in a responsible and confidential manner and without fear of reprisal under Vigil Mechanism Policy.
- The Company shall ensure that disclosures required to be made in statutory forms, declarations, advertisements etc. are correct and complete in all sense. Disclosures shall be governed by the Code of Conduct to Regulate, Monitor and Reporting Trading by Insiders and Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information and such other Policies as may be framed by the Company, from time to time.
- The Company believes in free and open competition and shall not indulge in any anti- competitive or unfair practice or abuse its position in the market.
- The Company shall not participate with unethical, immoral or violent practices by any third party

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.

# **BUSINESS RESPONSIBILITY POLICY ON PRODUCT LIFE CYCLE SUSTAINABILITY**

## **INTRODUCTION**

Everest Industries Limited (“the Company”) is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) are applicable and binding on the Company. Securities and Exchange Board of India (“SEBI”) has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report (“BRR”) as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI’s Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## **SCOPE & PURPOSE**

This Policy endorses Company’s commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## **PHILOSOPHY**

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its Stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, including statutory modifications or re-enactments thereto from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Product Life Cycle Sustainability

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business of the Company. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company endeavours to embed the principles of sustainability, as far as practical, into the various stages of the product lifecycle including the selection and procurement of raw materials, design and manufacturing of product, transportation and storage of raw materials and finished goods, and use by channel partners and consumers, to improve the quality of life and people.

The following measures shall govern the Product Life Cycle Sustainability of the Company:

- The Company shall ensure that its products and its process comply with all applicable statutes and regulations.
- The Company shall strive to consistently enhance its value proposition to the customers and adhere to its promised standards.
- The Company shall work towards sourcing significant raw materials and products in a manner so as to continuously improve the balance between social, economic and environmental aspects.
- The Company shall work towards ensuring that its products are manufactured and delivered as per the principles of labour practices, human rights, ethics, occupational health, safety and environment as defined in the various policies adopted by the Company.
- The Company shall continue to progressively factor relevant social and environmental considerations during the process of design and development of its products.
- The Company shall continue to work to ensure that the manufacturing processes and technologies required are resource efficient and sustainable.
- 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 encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming more sustainable.
- The Company shall conduct regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard

will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.



# **BUSINESS RESPONSIBILITY POLICY ON EMPLOYEE WELLBING**

## **INTRODUCTION**

Everest Industries Limited (“the Company”) is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) are applicable and binding on the Company. Securities and Exchange Board of India (“SEBI”) has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report (“BRR”) as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI’s Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## **SCOPE & PURPOSE**

This Policy endorses Company’s commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## **PHILOSOPHY**

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles of sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means Business Responsibility Policy on Product Lifecycle Sustainability.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company understands the worth of a healthy and sound human resource. The Company focuses on ensuring the well-being of all its employees. The safety and health of employees is extremely important to the Company. Code of Conduct of the Company depicts the values of Safety of people, Innovation and Information, Love for community and Ethics above all. 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 management and there is in place a proper channel through which the grievances of the employees are taken up and addressed by the management. The company believes in giving its employees ample opportunities to perform as employee well-being is imperative to achieve a profitable growth.

The following measures shall govern the Employee Wellbeing of the Company:

- The Company shall ensure better flow of information and understanding among its employees and provide all relevant employee benefits.
- The Company shall adopt a culture that facilitates a sense of belonging, loyalty, responsibility and commitment amongst the employees and facilitates free access to the members for sharing ideas, suggestions and grievances.
- The Company shall refrain from employing child labour, forced labour or any form of involuntary labour, paid or unpaid.
- The Company shall advocate a business environment that favours the concept of equal employment opportunities for all without any discrimination with respect to caste, creed, gender, race, religion, disability or sexual orientation.
- The Company shall strictly abide with the applicable rules and regulations on minimum wages to be paid to employees.
- The Company shall promote work-life balance among all its employees.
- The Company shall provide a safe working environment to all employees and protect them from sexual harassment by all means. Any such instance shall be dealt promptly, sensitively and confidentially in the most judicious and unbiased manner in accordance with the Company's Policy on Prevention of Sexual Harassment at Workplace.
- Attracting and retaining talent involves many facets including employee engagement, mentoring, training and career development, empowerment and providing various perquisites as per the policies 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 respect the right to freedom of association, participation and collective bargaining.
- The Company shall provide a workplace environment that is safe, hygienic, humane and comfortable which upholds the dignity of the employees. It shall provide facilities for the well-being of its employees including those with special needs.

## MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

## AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.

# **BUSINESS RESPONSIBILITY POLICY ON STAKEHOLDERS ENGAGEMENT**

## **INTRODUCTION**

Everest Industries Limited (“the Company”) is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) are applicable and binding on the Company. Securities and Exchange Board of India (“SEBI”) has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report (“BRR”) as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI’s Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## **SCOPE & PURPOSE**

This Policy endorses Company’s commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## **PHILOSOPHY**

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Stakeholders Engagement.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of all the stakeholders. The Company recognizes its employees, business associates, customers, creditors, directors, shareholders/ investors and communities surrounding our operations and regulatory authorities as key Stakeholders. The company continues its engagement with them

through various mechanisms such as consultations with local communities, suppliers/ vendors/ dealers meets, customers/ employees satisfaction, investor forums, etc.

The following measures shall govern the Stakeholders Engagement of the Company:

- The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, products and associated operations on the Stakeholders.
- The Company shall proactively engage with and respond to those sections in the society that are disadvantaged, vulnerable and marginalized. The Corporate Social Responsibility (CSR) initiatives undertaken by the Company in accordance with the Corporate Social Responsibility Policy shall be driven towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders.
- The Company shall engage with its various stakeholders in a consistent and systematic manner to understand their concerns.
- The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product and services and associated operations on the stakeholders.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.

# **BUSINESS RESPONSIBILITY POLICY ON HUMAN RIGHTS**

## **INTRODUCTION**

Everest Industries Limited (“the Company”) is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) are applicable and binding on the Company. Securities and Exchange Board of India (“SEBI”) has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report (“BRR”) as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI’s Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## **SCOPE & PURPOSE**

This Policy endorses Company’s commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## **PHILOSOPHY**

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.



## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Human Rights.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company appreciates and believes that human rights are inherent, universal, indivisible and interdependent in nature. The Company respects and promotes human rights for all individuals. The company’s commitment to human rights and fair treatment is set in its Code of Conduct. The Code provides to conduct the operations with safety, responsibility, integrity, respect and ethics for human rights and interests of employees.

The following measures shall govern the Respect towards Human Rights of the Company:

- The Company shall integrate respect for human rights in management systems and ensuring all individuals impacted by the business have access to grievance mechanisms.
- The Company shall encourage respect for human rights of local communities with specific focus on vulnerable and marginalised groups.
- The Company shall play a positive role in building awareness on human rights for its key stakeholders.
- The Company shall strive to discourage human rights abuses by a third party.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.

# BUSINESS RESPONSIBLE POLICY ON PROTECTION OF ENVIRONMENT

## INTRODUCTION

Everest Industries Limited ("the Company") is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") are applicable and binding on the Company. Securities and Exchange Board of India ("SEBI") has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report ("BRR") as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI's Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## SCOPE & PURPOSE

This Policy endorses Company's commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## PHILOSOPHY

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In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Protection of Environment.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

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## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company sets high standards in the area of environmental responsibility – striving for performance that comply with regulations but reduces environmental impacts. 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 commits to be responsible in the utilization and to continuously take all necessary initiatives by way of the following:

- The Company shall comply with all applicable regulations and take measures to protect environment.
- The Company shall promote ecological sustainability and green initiatives by

adopting energy saving mechanisms.

- The Company commits itself to take all necessary initiatives towards optimum utilization of natural resources as well as manmade resources. The Company shall proactively promote the same across the value chain also.
- The Company shall manage all of its processes to prevent pollution, ensure reduction in the use of natural resources and minimise waste in order to protect the environment and support sustainable development.
- 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 to the extent possible.
- The Company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.

# BUSINESS RESPONSIBILITY POLICY ON RESPONSIBLE ADVOCACY

## INTRODUCTION

Everest Industries Limited (“the Company”) is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) are applicable and binding on the Company. Securities and Exchange Board of India (“SEBI”) has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report (“BRR”) as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI’s Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## SCOPE & PURPOSE

This Policy endorses Company’s commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## PHILOSOPHY

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Responsible Advocacy.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

The Company believes that a lot can be achieved the company it works together with the Government, policy makers 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 recognizes that it operates within the

specified policy frameworks prescribed by the Government, which guide its growth and also provide for certain desirable restrictions and boundaries by way of the following:

- The Company shall ensure that its advocacy position is consistent with its values and philosophy.
- The Company shall work with industry organizations/ chambers/ associations/ other such collective platforms that are engaged in policy advocacy in a responsible manner.
- The Company shall ensure that policy advocacy is conducted ethically.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.



# POLICY ON INCLUSIVE GROWTH & EQUITABLE DEVELOPMENT

## INTRODUCTION

Everest Industries Limited (“the Company”) is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) are applicable and binding on the Company. Securities and Exchange Board of India (“SEBI”) has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report (“BRR”) as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI’s Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## SCOPE & PURPOSE

This Policy endorses Company’s commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## PHILOSOPHY

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Inclusive Growth & Equitable Development.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

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.

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.

The Inclusive Growth of the Company shall be governed by the following measures:

- The Company shall understand the impact of inclusive growth and equitable development on social and economic development and respond through appropriate action to create positive impacts.
- The Company shall engage organizational resources and knowledge to enhance livelihood and living conditions of communities through sustainable development oriented interventions, capacity building, and projects in the areas of health, sanitation, education, culture and sports.
- 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.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.

# **BUSINESS RESPONSIBILITY POLICY ON CUSTOMER VALUE**

## **INTRODUCTION**

Everest Industries Limited ("the Company") is a public limited company incorporated on April 3, 1934 under the Indian Companies Act, 1913. Equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited. The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") are applicable and binding on the Company. Securities and Exchange Board of India ("SEBI") has amended Regulation 34 of the Listing Regulations which requires top 1000 listed companies (based on market capitalization calculated as on March 31 of every financial year) to have Business Responsibility Report ("BRR") as part of their Annual Report, in the prescribed format describing the initiatives taken by them from an environmental, social and governance perspective.

As per the provisions of Regulation 34(2)(f) of the Listing Regulations (*as amended*) read with the SEBI's Circular dated November 4, 2015, Business Responsibility Policy is required to be formulated and adopted as a part of business practice as per principles enumerated under National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by Ministry of Corporate Affairs.

## **SCOPE & PURPOSE**

This Policy endorses Company's commitment to follow principles and core elements in conducting its business laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Code of Business Conduct and Ethics of the Company.

In view of the above, the Board of Directors of the Company approved this Policy at its meeting held on March 24, 2020.

## **PHILOSOPHY**

The Company firmly believes that the social, environmental and economic values are interlinked and determine the significance of its commitment to ensure a positive impact of the existence of the Company on all its stakeholders.

In order to make a difference, the Company has to work with a unified and common approach in all dimensions of its business responsibility, to create a sustainable & inclusive growth for all. The Company aims to integrate the principles Sustainability throughout its value chain and stakeholders.

## INTERPRETATION

“Board” shall mean Board of Directors of the Company.

“Companies Act” shall mean the Companies Act, 2013 and the rules made thereunder, notified by the Ministry of Corporate Affairs, Government of India, including the statutory modifications or re-enactments from time to time.

“Listing Regulations” 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.

“Policy” means the Business Responsibility Policy on Customer Value.

“Stakeholders” can be any person, organization, social group, or society at large that has a stake in the business. The coverage of stakeholders can include ownership and property interests, legal interests and obligations. Examples of stakeholders are customers, suppliers, creditors, employees and directors.

The words and expressions used which are not defined in this Policy, but defined in the SEBI Act, 1992, Companies Act, 2013, the Income Tax Act, 1961 and other applicable Laws, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

## APPLICABILITY

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

## IMPLEMENTATION

Corporate Social Responsibility (CSR) Committee members of the Company shall be responsible for implementing the Policy assisted by BR Head. CSR Committee may delegate such authority as and when it may deem fit in favour of the any official(s) of the Company for the purpose of implementation of the Policy.

## POLICY STATEMENT

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 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 Consumer Value of the Company shall be governed by the following:

- The Company shall take into account the overall well-being of the customers and that of society.
- The Company shall enable the customers to make informed purchase decisions through factual and truthful disclosure of relevant information.
- The Company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
- The Company shall allow freedom of choice in a competitive environment while designing, promoting and selling its products.
- The Company shall exercise due care and caution while providing goods that result in over exploitation of natural resources or lead to excessive conspicuous consumption.

#### MONITORING & REVIEW FRAMEWORK

The CSR Committee will review and oversee the implementation of this Policy on annual basis.

#### AMENDMENTS

The Policy can be modified by the Board of Directors of the Company.

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time this Policy is amended to conform to the applicable law, rule, regulation or standard.

This Policy shall come into force with effect March 24, 2020.