

McLeod Russel India Limited

BUSINESS RESPONSIBILITY POLICY

Preamble

McLeod Russel India Limited (MRIL) endeavours to fulfil its social duties and undertakes to consolidate social, environmental, ethical and human rights considerations into the fundamental strategy and business operations of the Company. MRIL strives to improve a long term and sustainable business which delivers value for every stakeholder associated with the Company and also to the society at large. The Company is committed towards its responsibilities towards the society, environment, human resources and ethics and hence, it is desirous of implementing the business responsibility measures as outlined in this Business Responsibility Policy. The Company is confident that the measures and practices outlined in the Business Responsibility Policy would attribute advantages to all concerned stakeholders.

Scope

In terms of the applicability of clause 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 to the Company and pursuant to SEBI circular CIR/CFD/CMD/10/2015 dated November 04, 2015, the Company has developed this Business Responsibility Policy which outlines the directives to be followed by the Company under nine principles as enumerated herein.

This policy is imperative to maintain equilibrium between economic, social, environmental performance and delivering value to various stakeholders. This policy would act as a guideline for the company to uphold and maintain ethical standards, human rights, environmental and social considerations.

Principles

The Company has adopted the following nine key principles of Business Responsibility as prescribed in the SEBI guidelines:

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.

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

Principle 3: Businesses should promote the wellbeing of all employees.

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

Principle 5: Businesses should respect and promote human rights

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

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

Principle 8: Businesses should support inclusive growth and equitable development.

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

Policy

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

- The directors, management and employees at all levels will ensure good governance, ethical practices, transparency and accountability in conducting affairs of the Company and dealing with stakeholders of the Company.
- The directors, management and employees will report their compliance to the Company's' policy.
- The Company will promptly update its website with all relevant information regarding quarterly, semi-annual and annual financial results/statements of the Company as mandated under the Listing Regulations.

- The Company will not engage in practices that are abusive, corrupt, or anti competition
- The Company will avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines

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

The Company is engaged in cultivation, manufacture and sale of tea. The Company is committed to continuously improve its Safety Standards, Sustainability and Environmental Management System through processes defined below:

- Minimizing the consumption of electrical energy, chemicals and natural resources.
- Encouraging use of renewable / replenishable / sustainable resources.
- Compliance to applicable legal requirements and other requirements related to environmental aspects.
- Prevention of pollution to air, water and land by using environment friendly chemicals and continuous reduction of hazardous material in the processes.
- Reduction in generation of identified wastes.
- Promotion & adoption of environmental friendly and non-hazardous materials, components and processes.
- Providing detailed information to customers regarding the products as mandated under applicable laws.
- Setting, Maintaining and Monitoring the Environmental Objectives & Targets
- Promoting Environmental and Safety Awareness among all the employees, vendors and contractors.

Principle 3: Businesses should promote the wellbeing of all employees

- The Company will provide equal opportunity to all employees starting from their recruitment irrespective of their caste, creed, gender, race, religion, language and disability or sexual orientation. The employees of the Company can belong to all parts of the country and will be selected based on individual merit without any discrimination or preference
- The Company has formulated schemes and policies to address health, superannuation issues and welfare needs of its employees and their families and the same should be adhered.
- The Company will provide workplace environment that is safe, hygienic and which upholds the dignity of the employee.
- The Company will ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities on equal and non-discriminatory basis.
- The Company will promote employee morale and career development through various HR policies.
- The Company will ensure adhere to anti sexual harassment policies and practices to ensure that the employees especially female employees do not suffer harassment and create the environment where they feel safe and secure in discharging their responsibilities.
- The Company will not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- The Company will take cognizance of the work-life balance of its employees, especially that of women

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

- The Company values the support of its stakeholders and respects the interests and concerns they have towards it. The Company and its employees shall provide value-based services to the stakeholders.
- The Company shall have continuous engagement with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.
- The Company is conscious of the impact of its policies, decisions, products and services and associated operations on the stakeholders and shall avoid such actions which adversely affect the health, safety and welfare of the stakeholders.
- The Company shall proactively engage with and respond to those sections in the society that are disadvantaged, vulnerable and marginalized. It shall also give special attention to stakeholders in areas that are underdeveloped.
- The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

Principle 5: Businesses should respect and promote human rights

- As a good corporate citizen the Company will respect the human rights of those who come into its direct as well as indirect contact.
- The Company will pay fair wages to our employees and will not discriminate between male and female employees. They are treated equally with dignity and are given equal opportunities, rights and benefits.

- The Company will integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanism.
- The Company will recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- The Company will within their sphere of influence, promote the awareness and realization of human rights across our value chain.
- The management will ensure compliance and adherence to all the human rights laws and national laws. The Company's policies will strive to disseminate these values at all levels in the organization.
- The Company will not be complicit with human rights abuses by a third party.

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

- The Company is committed to achieve the economic, ecological and social responsibility objectives of sustainable development through its varied business operations and activities.
- The Company shall comply with all legal / regulatory requirements related to environment protection, management and sustainable development. Company shall have regular monitoring programme to assess its performance of environment management and sustainable development.
- The Company shall consider protection of bio-diversity and wildlife in its various tea estates by educating the employees and spreading awareness regarding the same. The Company would engage initiatives to protect natural habitats of wildlife and cooperate with forest officials and other authorities in prevention of any incident leading to any harm to wild life and bio diversity.

- The Company shall persuade and encourage its business partners to move towards environmentally friendly processes right from design to disposal.

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

- The Company while pursuing advocacy policy, will ensure that their advocacy positions are consistent with the principles and core elements contained in this policy.
- To the extent possible, the Company will utilize the trade and industry chambers and associations and other such collective platforms to undertake such advocacy policy.

Principle 8: Businesses should support inclusive growth and equitable development

- The Company will understand their impact on social and economic development, and respond through appropriate action to minimize the negative impacts.
- The Company will make efforts to complement and support the development priorities at local and national levels.
- The Company will aim at operating its business in the regions that are underdeveloped should be especially sensitive to local concerns.

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

- The customer satisfaction is essential for growth and success in the present business operations. The Company strives hard to provide better products to customers at large.
- The Company will serve the needs of its customers taking into account the overall well-being of the customers and that of society.
- The Company will promote and advertise its services in ways that do not mislead or confuse the consumers or violate any of the principles in this policy.

- The Company will provide adequate grievance handling mechanisms to address customer concerns and feedback.

IMPLEMENTATION AND MONITORING

In order to monitor the activities and principles under the Business Responsibility Policy, a Business Responsibility Committee is constituted whose members would include the key functional heads of the Company. The Committee shall meet at least once a year and shall monitor the implementation of the Business Responsibility Policy and related activities. The Committee shall have the power to take decisions of matters regarding applicability, comprehension, interpretation, scope, role and adoption of the Policy. The Committee would advise and recommend the activities and performance undertaken pursuant to the Policy for reporting in the Annual Report of the Company.

The Business Responsibility (BR) Committee shall comprise of the Whole-time Director and the departmental head of the respective functions of the Company would be the other members of the Committee. The Company Secretary shall also be the member of the Committee who would advise on various legal mandates and would also act as the Secretary of the Committee. The quorum of the committee shall be one third or two persons present in person.

AMENDMENT

BR Committee will consider amendment of the policy based on the suggestions received from the Member(s) of the BR Committee.