

BUSINESS RESPONSIBILITY POLICY

A. Preamble:

- a. The Company has in place several policies - Corporate Governance (including Ethics and Accountability), Code of Conduct, Environment Protection, Sustainability, Customer Centric Innovation & Product Development, Safe Working Environment, Fair Human Resource Practices etc.,
- b. Securities and Exchange Board of India (SEBI), vide Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) 2015, has mandated that top 500 Listed Companies shall furnish a Business Responsibility Report as part of the Annual Report from an environmental, social and governance perspective.
- c. Annexure II to the above referred Regulation has laid down 9 Principles to assess compliance with Environmental, Social and Governance Norms.
- d. This document is an **umbrella policy document** named as **Business Responsibility Policy**, formally capturing the 9 principles which form the foundation for all the other Policies of the Company.

B. Objective of this Policy:

The purpose of this policy is to

- Bring about a common approach to the several Policies of the Company – present and future – as all other Policies are sub-policies to the Business Responsibility Policy.
- Periodically review the sub-policies to keep them contemporary and in synchronization with the principles enshrined in the Business Responsibility Policy.
- Act as a holistic driver of the business of the Company.

C. Scope of the Policy:

This Policy applies to the Company and its employees

D. Authority:

This updated Policy Document has been placed before the Board of Directors and approved at the meeting held on April 12, 2018. Any modification/amendments to this Policy will be placed before the Board of Directors.

E. Publication:

This Policy will be posted on the web-site of the Company and on the intra-net of the Company.

F. Policy Statements:

As one of the most trusted corporate and product brands in India, we believe that we can sustain and build on this image only by continuing to observe high standards of governance and being wedded to environment and social responsibilities. Our business practices will be guided by the following principles.

1. Ethics, Transparency and Accountability:

TTK Prestige lays a strong emphasis on ethical corporate citizenship and establishment of good corporate culture. It has always believed in adhering to the best governance practices to ensure protection of interests of all stakeholders of the Company in tandem with healthy growth of the Company.

Policy:

1. The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels across its value chain.
2. The Company shall assure access to information about its decisions that impact relevant stakeholders.
3. The Company shall not engage in practices that are abusive, corrupt, or anti competition.
4. The Company shall truthfully discharge its responsibility on making financial and other mandatory disclosures in time including Business Responsibility Report under the applicable SEBI Regulations.
5. Every employee of the Company shall abide by the values and the commitment to ethical business practices reflected in the Company's Code of Conduct.
6. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
7. The Company shall encourage its business partners and third parties with whom it conducts business to follow this principle and avoid complicity with the actions of any third-party that violate any of the principles stated herein.

2. Product Lifecycle Sustainability:

TTK Prestige endeavours to embed the principles of sustainability, as far as practicable, into the various stages of product or service lifecycle including procurement of raw material/ service, manufacturing of product or delivery of service, transportation of raw materials and finished goods, and disposal by consumers to improve the quality of life and people.

Policy:

1. The Company shall ensure that its products and services comply with all applicable standards, statutes and regulations;
2. The Company shall work towards sourcing significant raw materials, products and services in a manner to continuously improve the balance between social, economic and environmental impacts ;
3. The Company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services;
4. The Company shall continue to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
5. In designing the products, the Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
6. The Company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling of resources wherever possible ; endeavour to embed the principles of sustainability, as far as practicable, into the various stages of product or service lifecycle including procurement of raw material/ service, manufacturing of product or delivery of service, transportation of raw materials and finished goods, and disposal by consumers to improve the quality of life and people.
7. The Company shall encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming more sustainable.
8. The Company shall work towards building capacity such that all the value chain partners, namely the third-party manufacturers, service providers including transporters and suppliers of significant raw materials, are sensitised and empowered to fulfil their roles and responsibilities towards sustainability ;
9. The Company shall raise the consumer's awareness of their rights through education, product labelling, appropriate and helpful marketing communication, full details of contents and composition as per the applicable laws and promotion of safe usage and disposal of their products and services.
10. The Company shall encourage its business partners and third parties with whom it conducts business to follow this policy.

3. Employee Well Being:

TTK Prestige focuses on ensuring the well-being of all its employees. The safety and health of employees is extremely important to the Company. The Company believes in giving its employees ample opportunities to perform as employee well-being is imperative to achieve a profitable growth. Ensuring diversity, preventing discrimination, safety and health are part of Company's Code of Conduct

Policy:**Diversity, Equal Opportunity, Freedom of Association**

1. The Company shall provide and maintain equal opportunities at the time of recruitment as well as during employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
2. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.

Prevention of Child Labour/ Forced Labour and Harassment

1. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
2. The Company shall ensure that no person below the age of eighteen years or other statutorily prescribed age limit is employed in the workplace ;
3. The Company shall ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work ;
4. The Company shall provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment ;
5. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Well Being:

6. The Company shall strive to instil a sense of duty in every employee including those of service providers at the Company's premises, towards their personal safety, as well as that of their co-workers.
7. The Company shall take cognizance of the work-life balance of its employees, especially that of women.
8. The Company shall provide facilities for the wellbeing of its employees including those with special needs.
9. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
10. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
11. The Company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. The Company shall promote employee morale and career development through enlightened human resource interventions.

4. Stakeholder Engagement:

TTK Prestige recognises employees, business associates (network of suppliers, stockists and dealers), customers, shareholders/investors and communities surrounding its operations and regulatory authorities as key stakeholders. The Company continues its engagement with them

through various mechanisms such as consultations with local communities, supplier/vendor meets, customer/employee satisfaction surveys, investor forums, etc.

Policy:

1. The Company shall understand the concerns of its stakeholders, define its purpose and scope of engagement and commit to engaging with them.
2. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
3. The Company shall strive to give special attention to stakeholders in areas that are underdeveloped.
4. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

5. Human Rights:

TTK Prestige 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 honesty, integrity and openness with respect for human rights and interests of employees.

Policy:

1. The Company shall integrate respect for human rights in management systems, through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
2. The Company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
3. The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
4. The Company shall encourage its business partners and third parties with whom it conducts business to follow this policy.

6. Preservation of Environment:

TTK Prestige places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. TTK Prestige sets high standards in environmental responsibility — striving for performance that does not merely comply with regulations but reduces environmental impacts. TTK Prestige believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for future generations.

Policy:

1. The Company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
2. The Company shall take measures to check and prevent pollution. The Company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
3. The Company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
4. 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.
5. The Company shall develop Environment Management Systems and contingency plans and processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.
6. The Company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
7. The Company shall proactively persuade and support its value chain to adopt these principles.

7. Responsible Advocacy:

TTK Prestige believes that a lot can be achieved if it works together with the Government, legislators, trade bodies and regulators to create positive social and environmental outcomes. TTK Prestige 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 itself or its industry, but for advocating certain best practices for the benefit of society at large. TTK Prestige engages with industry bodies and associations to influence public and regulatory policy in a responsible manner.

Policy:

1. The Company shall work with industry organisations that are engaged in policy advocacy in a responsible manner;
2. The Company shall ensure that policy advocacy is conducted ethically.

8. Inclusive Growth and Equitable Development:

TTK Prestige has always believed to ensure protection of interests of all stakeholders of the Company in tandem with healthy growth of the Company. The Company has a robust Corporate Social Responsibility Policy and contributes to various projects in public interest.

Policy:

1. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
2. The Company shall make efforts to complement and support the development priorities at local and national levels and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
3. The Company shall be sensitive to local concerns while operating in regions that are underdeveloped.
4. The Company shall undertake/contribute to CSR activities in accordance with the applicable rules and the CSR policy of the Company.

9. Customer Value:

TTK Prestige is a consumer centric Company and the foundation of the Company is based on the trust, satisfaction and loyalty of its consumers both in India and global markets. TTK Prestige is dedicated to delivering products that delight customers and meet their need gaps. Our products are the result of understanding consumers' pain points, unmet needs through path breaking/appropriate technology by combining years of practical experience with a continuous flow of new knowledge.

Policy:

1. The Company shall consider the overall well-being of the customers and that of society.
2. The Company shall ensure that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its products.
3. The Company shall disclose all information truthfully and factually as per applicable laws, through labelling and other means, including the risks to the individual and to the society from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner.
4. The Company shall educate its customers on the safe and responsible usage of its Products.
5. The Company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
6. The Company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.

7. The Company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.

G. Implementation of Business Responsibility Policy:

1. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's intranet.
2. All other Policies and micro-level business processes shall adhere to the Principles enunciated under this Policy and the micro-level policies will be communicated to the relevant stakeholders so that each of the employee is made aware of these principles and educated/motivated to adhere to the same.
3. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
4. Compliance with the Policy shall be monitored and evaluated by the Head of Governance/ Company Secretary and Head of HR on a regular basis.
5. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary/ Head of Internal Audit.

Annexure to Business Responsibility Policy:

Key Policies of the Company which flow from the principles stated in the Business Responsibility Policy and their publication:

Policies published on Website of the Company

1. Business Responsibility Policy
2. Corporate Governance and Code of Conduct
3. Whistle Blower Policy
4. CSR Policy
5. Policy on Related Party Transactions

Policies published on the Intranet of the Company/Internal Control Manuals/ Business Process Manuals/ Posters in Work Places:

1. Business Responsibility Policy
2. Corporate Governance and Code of Conduct
3. Whistle Blower Policy
4. CSR Policy
5. Policy on Related Party Transactions
6. Policy on anti-bribery and corruption
7. Policy on Prevention of Sexual Harassment in Workplace
8. TPM Quality Policy
9. Social Accountability Policy
10. Policy for control of Health and Safety
11. Environmental, Health and Safety Policy
12. Drug, Alcohol & Tobacco Policy

13. Policy for Freedom of Association & Right to Collective Bargaining
14. Policy against Discrimination
15. Policy on Disciplinary practices
16. Policy on working hours and Over Time
17. Leave Policy
18. Policy on Fair Remuneration
19. Grievance Redressal Policy
20. Policy against Child Labour/Young Worker and Remediation Procedure
21. Policy against Bonded and Compulsory Labour
22. Recruitment Policy