

POLO QUEEN INDUSTRIAL AND FINTECH LIMITED

BUSINESS RESPONSIBILITY POLICY

CONTENTS

1. Scope & Purpose
2. Principles

Policy 1: Ethics Transparency & Accountability

Policy 2: Business Lifecycle Sustainability

Policy 3: Wellbeing of all Employees

Policy 4: Stakeholder Engagement

Policy 5: Human Rights

Policy 6: Protection of Environment

Policy 7: Responsible advocacy

Policy 8: Inclusive growth and equitable development

Policy 9: Customer Value

1. SCOPE AND PURPOSE:

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

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

In view of the above, the Board of Directors of the Company (Board) approved this Policy at its meeting held on 08th August, 2022.

Policy 1 : Ethics Transparency & Accountability

- (i). The company shall develop necessary governance structures, procedures and practices to ensure ethical conduct at all levels; and to promote the adoption of this principle across the value chain.
- (ii). The company shall assure access to information about its decisions that impact relevant stakeholders.
- (iii). The company shall not engage in practices that are abusive, corrupt, or anti-competition.
- (iv). The company shall truthfully discharge its responsibility on financial and other mandatory disclosures timely.
- (v). The company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- (vi). The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
- (vii). The Company shall report on the status of adoption of these Guidelines, as necessary.

Policy 2: Business Lifecycle Sustainability

- (i). The company shall assure safety and optimal use of resources over the business lifecycle and ensure that everyone connected with it are aware of their responsibilities;
- (ii). The company shall work towards ensuring that all goods and services are procured, manufactured and delivered embedding the principles of labour practices, human rights, ethics, occupational health, safety and environment.

- (iii). The company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services;
- (iv). The company shall continue to recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
- (v). In designing the products, the company shall ensure that the processes and technologies required to produce it are resource efficient and sustainable.
- (vi). The company shall work with supply chain members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment ;
- (vii). The Company shall encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming more sustainable.
- (viii). 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 sensitized and empowered to fulfil their roles and responsibilities towards sustainability ;
- (ix). 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.
- (x). The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
- (xi). The Company shall regularly review and improve upon the technological advancement & commercialization of, incorporating Social, Ethical & Environmental consideration.

Policy 3: Wellbeing of all Employees

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

- (iii). The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- (iv). The Company shall take cognizance of the work-life balance of its employees, especially that of women.
- (v). The Company shall provide facilities for the wellbeing of the employees including those with special needs and Ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- (vi). The company would provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. The Company shall create awareness of these provisions to the employees and training them on a regular basis.
- (vii). The Company would ensure continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and nondiscriminatory basis and promote employee morale and career development through enlightened human resource interventions.
- (viii). The company shall implement necessary systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Policy 4 : Stakeholder Engagement

- (i). The Company would systematically identify stakeholders, understand their concerns, define the purpose and scope of engagement, and commitment to engage with them.
- (ii). The company would acknowledge responsibility and be transparent about the impact of the policies, decisions, product & services and associated operations on the stakeholders.
- (iii). The Company would give special attention to stakeholders in areas that are underdeveloped.
- (iv). The Company would resolve differences with stakeholders in a just, fair and equitable manner.

Policy 5: Human Rights

- (i). The company shall 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 mechanisms.
- (ii). 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.
- (iii). The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- (iv). The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Policy 6 : Protection of Environment

- (i). 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.
- (ii). The Company shall take measures to check and prevent pollution and assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- (iii). The company shall continuously seek to improve environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- (iv). 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.

Policy 7: Responsible advocacy

- (i). The Company, while pursuing policy advocacy, ensure that our advocacy positions are consistent with these Policies and Sub policies.
- (ii). To the extent possible, the company shall, Utilize, to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.

Policy 8: Inclusive growth and equitable development
Not Applicable

Policy 9: Customer Value

- (i). The company shall take into account the overall well-being of the customers and that of society.
- (ii). Ensure that we do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling our products.
- (iii). The company shall Make full disclosures of all information truthfully and factually, through labelling and other means, including the risks to the individual to society and
 - a. to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, education
 - b. of customers on the safe and responsible usage of our products and services will be undertaken.
- (iv). The Company shall ensure that promotion and advertisements of our products do not mislead or confuse the consumers or violate any of the principles in these policies.
- (v). 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.
- (vi). Providing adequate grievance handling mechanisms to address customer concerns and feedback.

Implementation

- The policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company’s website.
- The Company Secretary through the functional heads of the Departments of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis.
- Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.

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