

## ***ETHICS, BRIBERY & ANTI-CORRUPTION POLICY***

### **PREAMBLE**

NOVERA EXIM is committed to high ethical standards, doing open and fair business, follow best practices of corporate governance and support the business reputation at the appropriate level.

### **OBJECTIVES**

The aims and objectives of the Policy are to inter alia:

- encourage employees and directors to
  - act honorably and with integrity in all business dealings of the Company.
  - identify and address appropriately any potential conflicts of interest
  - recognize the duty of confidentiality to the Company's relationships and give it the highest importance
  - initiate steps to ensure that no financial or other inducements are offered or accepted by or on behalf of the Company.
- encourage employees and Directors to be vigilant and to act diligently in good faith.
- monitor and investigate instances of alleged corruption.
- take action against any individual(s) involved in corruption.
- minimize the risk of involvement of all employees and Directors in corruption related activities;
- form a common understanding for all stakeholders that the Company opposes bribery and corruption in any form;
- Provide advice, information and training on ethics to all our employees at all levels and locations

### **APPLICABILITY**

The Policy would be applicable to:

- All Directors and Employees of the Company,
- All Directors and Employees of the Company's subsidiaries, and
- Partners and Representatives or any other persons/individuals, who may be acting on behalf of the Company.

### **POLICY**

"Corrupt Practices" will be considered - giving or receiving financial or other inducements, intermediation in giving or receiving financial or other inducements, malpractice, misuse of official authority, facilitation payments, illegal use of the official position by a person to receive benefits in the form of money, property or other assets, services, and any rights to himself or to other persons or illegal provision of benefits or rights by other persons.

## VVD COMMUNICATION PRIVATE LIMITED

In view of the above, the Directors and the employees of the Company are strictly prohibited, whether directly or indirectly, personally or through the mediation of third parties, to be involved in corrupt activities, offer, give, promise, request and receive payments or make payments to simplify administrative, bureaucratic and other formalities in any form including cash, valuables, services or other benefits to any person or from any persons or organizations, including governments and local authorities, government officials, private companies and its representatives.

### RESTRICTIVE/PROHIBITIVE PRACTICES

Given below is an Illustrative List of acts /practices which are restricted / prohibited under the policy framework:

1. Dishonest misappropriation of property/money.
2. Criminal breach of trust.
3. Cheating.
4. Receiving or giving bribe.
5. Charity in order to obtain commercial advantages.
6. Participation/Contribution in/to Political Activities.
7. Payment of any costs for government officers and their relatives (or in their interests) in order to obtain commercial advantages,
5. Acceptance /giving of Gifts over and above the extent and the manner as allowed hereunder: -
  - A. Gifts and representative expenses including the hospitality business/entertainment expenses which the employee may provide on behalf of the Company to the individuals or organizations, or which the employees may receive in connection with their work in the Company from other persons and organizations, must meet the following criteria:
    - (a) to be directly related to the legitimate activity of the Company or with common holidays such as New Year/Diwali/Christmas/International Women's Day/Anniversaries/ Birthdays;
    - (b) to be reasonable, proportionate and not be a luxury;
    - (c) not to be a hidden fee for the service, act, omission, conniving, protection, provision of rights, making of certain decision on transaction, agreement, license, permit, etc. or attempt to influence the recipient to indulge in any illegal or unethical activity;
    - (d) not to create a reputational risk for the Company, employees, and other persons, in case of disclosure of information on gifts or representative expenses;
    - (e) not to be in conflict with the principles and requirements of the Policy, the Code of Conduct and other internal documents of the Company and the applicable laws.
  - B. Gifts on behalf of the Company, its employees and representatives to third parties shall be subject to the Gift Policy of the Company.
9. Any other unethical act or omission.

### REPORTING OF VIOLATIONS

All employees are encouraged to raise concerns about any actual or suspected cases of bribery and corruption at the earliest possible stage. Where anyone believes the Guidelines are not being complied with or they are being asked to carry out any act not in compliance with these Guidelines, these concerns must be raised immediately with the immediate superior. If the immediate superior is not the appropriate person, then the employee's concerns must be brought directly to the attention of the Head of Legal or the Head of Internal Audit.

Employees may also report a suspected violation of these guidelines through the Company's Vigil Mechanism/Whistleblowing procedures.

**RESPONSIBILITY**

The members of the Board of Directors, and employees of all functions of the Company, regardless of position and designation, are personally responsible for compliance with the principles and requirements of the Policy, as well as the actions (inaction) of their subordinates, who violate these principles and requirements.

**TRAINING/FURTHER GUIDANCE**

Selected employees will be required to complete an online training programme supplementing the information in this Policy.

**COMMUNICATION**

The Company's approach of anti- bribery and corruption to be communicated to all suppliers, contractors, agents and business and other partners at the outset of the Company's relationship with them and as appropriate thereafter.

**AMENDMENTS**

The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***PRODUCT LIFE-CYCLE SUSTAINABILITY POLICY***

### **PREAMBLE**

NOVERA EXIM (the Company) is committed to provide products that are safe and contribute to sustainability throughout their life cycle.

### **OBJECTIVES**

The Objectives of this Policy are to :

- To ensure safe and optimal use over the life cycle of the products of the Company.
- To follow the principles of sustainability, as far as practicable from design of the products till the disposal by consumers.

### **POLICY**

The Company's Policy is to:

- endeavour to work continuously towards sustainability and safe and optimal resource utilisation over the life-cycle of its products from design to disposal and promote sustainable consumption including recycling of resources wherever possible
- continue to progressively factor in relevant social and environmental considerations during the development and manufacturing processes
- work towards sourcing significant raw materials, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts
- raise consumer awareness on the products including but not limited to details of contents, safe usage and disposal/recycling, if any, through product packaging/labelling and/or other appropriate communication.
- work towards systems such that all the value chain partners, third party manufacturers transporters and suppliers of significant raw materials, are aware of their responsibilities towards sustainability ;
- ensure that the Sustainability Policies of the Company including and not limited to human rights, ethics, health, safety and environment are adhered to when goods and services are procured, manufactured and delivered.
- continue to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.

### **RESPONSIBILITY**

- The heads of all function/divisions of the Company are responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Policy to be communicated to all employees, third party manufacturers suppliers, contractors, agents and business and other partners at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***Equality Policy Statement***

### **PREAMBLE**

NOVERA EXIM believes in promoting diversity at the workplace and providing equal opportunities for all of its employees.

### **OBJECTIVES**

The Objectives of this Policy are to:

- treat individuals justly, according to their abilities to meet the requirements and standards of their role, in all aspects of employment, recruitment, compensation and benefits, training, promotion, transfer and termination.
- not discriminate in any aspect of employment on the grounds of race, religion, colour, ethnic or national origin, age, disability, sexual orientation, political opinion, gender or marital status.

### **POLICY**

It is the Company's Policy to :

- To promote diversity and equal employment opportunities on the basis of merit and ability;
- To ensure that there is no discrimination whatsoever, in the provision of employment opportunities, benefits or privileges, to create discriminatory work conditions, or to use discriminatory evaluative standards in employment on the basis of in whole or in part, the person's race, colour, national origin, age, religion, disability status, gender, sexual orientation, or marital status;
- To provide a work environment that is free from discrimination in any form whatsoever including but not limited to sexual harassment.

### **REPORTING OF VIOLATIONS**

- All employees are encouraged to raise concerns about any actual or suspected cases of discrimination or sexual harassment at the earliest possible stage. Employees may also report a suspected violation of these guidelines through the Company's Sexual Harassment Policy procedures.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, regardless of position and designation, are personally responsible for compliance with the principles and requirements of the Policy, as well as the actions (inaction) of their subordinates, who violate these principles and requirements.

### **COMMUNICATION**

- The Company's Equality Policy is to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

***Policy on Prohibition of Child Labour and Prevention of Forced Labour at the Workplace***

**PREAMBLE**

NOVERA EXIM (the Company) believes in a Policy of prohibition of Child Labour and Prevention of Forced Labour.

**OBJECTIVES**

The Objectives of this Policy are to ensure that there is no Child Labour or Forced Labour employed in the workplace.

**POLICY**

The Company's Policy is to :

- Prohibit the employment of any person below the age of eighteen years in the workplace;
- Prohibit the use of forced or compulsory labour at all its Units ;
- Ensure that no employee is made to work against his / her will or to work as bonded/forced labour.
- Refrain from engaging with vendors and suppliers who resort to using child labour and forced labour in their operations.

**RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy.

**COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

**AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***Promotion of wellbeing of employees Policy***

### **PREAMBLE**

NOVERA EXIM(the Company) believes one of the key strengths of the Company is it's people and that all employees are important to the Company.

### **OBJECTIVES**

The Objectives of this Policy are to inter alia :

- Promote the wellbeing of all employees of the Company
- Promote diversity at the workplace and providing equal opportunities for all of its employees
- respect the right to freedom of employees to lawfully organize themselves into interest groups, independent of supervision by the management
- respect and uphold the dignity of all employees of the Company

### **POLICY**

The Company's Policy Statements to promote the wellbeing of its employees, are as below:

#### ***Freedom of Association Policy Statement***

The Company's Policy is to

- respect the right to freedom of employees to lawfully organise themselves into interest groups, independent of supervision by the management
- continue to build a culture of mutual trust and respect, interdependence and meaningful engagement.
- continue to building, strengthening and sustaining harmonious employee relations across the Company.
- to provide a work environment that upholds the dignity of the employees and to ensure that employees are not discriminated against for exercising this freedom in a lawful manner and consistent with the Company's core values.

#### ***Diversity & Equality Policy Statement***

It is the Company's Policy to :

- promote diversity at the workplace and to provide and maintain equal opportunities at the time of recruitment as well as during the course of employment on the basis of merit and ability.
- ensure that there is no discrimination whatsoever, in the provision of employment opportunities, benefits or privileges, learning opportunities, to create discriminatory work conditions, or to use discriminatory evaluative standards in employment on the basis of caste, creed, gender, race, religion, disability status, sexual orientation, or marital status;
- provide a work environment that this free from discrimination and harassment including but not limited to sexual harassment .

### ***Workplace Environment Policy Statement***

It is the Company's Policy to

- provide a work place environment that is safe, hygienic humane, and which upholds the dignity and security of the employees, with requisite facilities for the wellbeing of the employees, including those with special needs, if any
- train and instil a sense of duty in every employee including those of service providers at the Company's premises, towards the above personally as for their co-workers
- take cognizance of the work-life balances of the employees, especially that of women.
- Continue to create a system of Human Resource Management which rewards merit based performance and promotes employee morale and career development
- Play an active role in improving skills and competence upgrading of all employees

### **REPORTING OF VIOLATIONS**

- All employees are encouraged to raise concerns about any actual or suspected cases of discrimination or sexual harassment at the earliest possible stage. The Company's Sexual Harassment Policy procedures are also in place for the same.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, regardless of position and designation, are responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.



## **STAKEHOLDERS' ENGAGEMENT POLICY**

Eveready Industries India Ltd (the Company) believes good corporate governance consists of a combination of business practices which result in enhancement of the value of the Company to the shareholders and simultaneously enable the Company to fulfill its obligations to other stakeholders such as customers, vendors, employees and financiers and to the society in general. The Company further believes that such practices are founded upon the core values of transparency, empowerment, accountability, independent monitoring and environmental consciousness.

### **OBJECTIVES**

The Objectives of the Policy are to promote identification and engage stakeholders in an equitable and consistent manner.

### **POLICY**

The Company's Policy is to:

- identify and engage with all its stakeholders in a consistent and transparent manner
- understand the concerns of stakeholders including those who are disadvantaged, vulnerable and marginalised and prioritise their concerns;
- work towards addressing these concerns in a fair and equitable manner.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***HUMAN RIGHTS POLICY OF STAKEHOLDERS BEYOND THE WORKPLACE***

Eveready Industries India Ltd (the Company) recognizes and respects human rights of its relevant stakeholders and groups, both within and beyond the workplace and believes that its stakeholders beyond the workplace must also recognise and respect human rights and establish processes to assess and manage the respect and promotion of human rights of at their workplace.

### **OBJECTIVES**

The Objectives of the Policy are to promote human rights with stakeholders beyond the workplace.

### **POLICY**

The Company's Policy is to:

- Promote awareness and realisation of human rights for its key stakeholders
- Encourage respect for human rights by all relevant stakeholders within and beyond workplace including that of vulnerable and marginalised groups
- Discourage human rights abuses by such parties
- Encourage establishment of processes to assess and manage the respect and promotion of human rights of at their workplace.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## **ENVIRONMENTAL POLICY**

### **PREAMBLE**

Eveready Industries India Ltd (the Company) is committed to conducting all its operations with due regard for the environment, the environmental impact and sustainable performance and seeks to achieve sustaining and continuous improvement in meeting environmental standards, whether regulatory or otherwise.

### **OBJECTIVES**

The Objectives of the Policy are to respect, protect and make efforts to restore the environment.

### **POLICY**

The Company believes that the environment is everybody's responsibility and all employees are accountable for the Company's environmental performance and are accordingly expected to inter alia :

- Conduct operations in compliance with all relevant laws and regulations and contribute to sustainable development through the establishment and implementation of high environment standards.
- Implement and certify internationally recognised environmental management systems.
- Continuously seek to improve the Company's environmental performance.
- Identify and implement ways reduce waste, conserve energy, and promote recycling of waste wherever possible.
- Save water and treat waste water.
- Take account of environment, and provide appropriate training and disseminate information to enable all employees to accept individual responsibility for environment, implement best practices, and work together for continuous improvement.
- Ensure safe handling, storage, use and disposal of all substances and materials that are classified as hazardous to environment.
- Monitor results and audit processes in order to assure compliance with policy, standards, and requirements of laws and regulations.
- Communicate the Company's environmental requirements and performance to its business partners and stakeholders.

### **RESPONSIBILITY**

The employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy. The Manufacturing Head is responsible for reviewing and updating the environmental standards and for providing guidance and support to all concerned.

### **COMMUNICATION**

All employees of the Company are expected to adhere to and comply with the Environmental Policy of the Company. This Policy is extended to all the units of the Company.

The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***RESPONSIBLE ADVOCACY POLICY***

### **PREAMBLE**

Eveready Industries India Ltd (the Company) believes that as and when required, it may be essential to represent and communicate with authorities on matters concerning its business.

### **OBJECTIVES**

The Objectives of the Policy are to promote that the advocacy of the Company in a responsible manner.

### **POLICY**

The Company's Policy is to:

- ensure that its advocacy if any, is consistent with its values and philosophy
- utilise the industry chambers/associations/organisations/associations and other such collective platforms to undertake such advocacy, to the extent possible
- ensure that policy advocacy is conducted ethically and guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***EQUITABLE DEVELOPMENT POLICY***

### **PREAMBLE**

Eveready Industries India Ltd (the Company) believes in support for the inclusive growth and equitable development of the relevant communities and groups related to its.

### **OBJECTIVES**

The Objectives of the Policy are to support inclusive growth and equitable development.

### **POLICY**

The Company's Policy is to:

- Innovate and invest in products, technologies and processes to promote the wellbeing of the customers
- Make efforts to complement and support the development priorities and ensure appropriate resettlement and rehabilitation of communities displaced by business operations, if any.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## ***POLICY ON PRODUCT RESPONSIBILITY***

### **PREAMBLE**

Eveready Industries India Ltd (the Company) is committed to providing value to their customers and consumers in a responsible manner.

### **OBJECTIVES**

The Objectives of the Policy are to promote that the products of the Company serve the needs of the Company's customers and consumers and provide value to them.

### **POLICY**

The Company's Policy is to:

- comply with all regulatory requirements pertaining to the health and safety impacts of its products and take into account the overall wellbeing of the customers and society as relevant
- endeavour to use sustainably sourced ingredients in products and accepted standards of manufacturing in relevant businesses
- raise consumer awareness on the products including but not limited to details of contents, safe usage and disposal/recycling, if any, through product packaging/labelling and/or other appropriate communication.
- enable customers in making informed purchase decisions through factual and truthful disclosure of relevant information
- comply with relevant regulations concerning marketing communications, including advertising, promotion and sponsorship
- promote freedom of choice in a competitive environment while designing, promoting and selling its products.
- work towards sustainable consumption of natural resources while producing goods
- provide adequate grievance handling systems for customer / consumer feedback so as to be able to continuously improve upon its products.

### **RESPONSIBILITY**

- The members of the Board of Directors, and employees of all functions of the Company, are personally responsible for compliance with the principles and requirements of the Policy.

### **COMMUNICATION**

- The Company's Policy to be communicated to all concerned at the outset of the Company's relationship with them and as appropriate thereafter.

### **AMENDMENTS**

- The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.