



Business Responsibility Policy

1. Preface

Triveni Engineering & Industries Limited ('the Company') is a public limited company incorporated under the Companies Act, 1913. The equity shares of the Company are listed on BSE Limited and National Stock Exchange of India Limited and as such the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') are applicable and binding on it.

Regulation 34 of the Listing Regulations mandates reporting of Business Responsibility Report in the Annual Report for the top 500 listed entities based on market capitalization (calculated as on March 31 of every financial year). The Company falls within the top 500 entities based on the market capitalization as on March 31, 2017.

2. Scope and purpose

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been framed in line with the requirements of the Listing Regulations and is based on the 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.

The key objective of this Policy is to ensure a unified and common approach to the dimensions of Business Responsibility across the Company and act as a strategic driver that will help the Company respond to the complexities and challenges that keep emerging and be abreast with changes in regulations.

In view of the above, the Board of Directors of the Company have approved and adopted this Policy at its meeting held on February 12, 2018.

3. Applicability and Effective Date

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

This Policy shall be effective from February 12, 2018.

4. Implementation

The Vice Chairman and Managing Director (VCMD) of the Company shall have the authority to oversee the implementation of this Policy.

The Business Head/President (Sugar Business), CEO (Gears Business) and CEO (Water Business) shall jointly and severally act as the BR Head and shall be responsible for implementing the Business Responsibility initiatives and assisted by an internal and external team having multi-disciplinary background. They shall also be responsible for providing clarifications on the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment etc.

The Executive Sub-Committee of the Board shall be the reviewing authority of this Policy, subject to the approval of the Board and may make suitable changes in this Policy from time to time. However, such alterations shall not be inconsistent with the provisions of any law for the time being in force.

5. POLICY/KEY PRINCIPLES

The Company believes in the highest standards of good and ethical business practices. It believes that good business practices stem from the culture and mindset of the organization. It is therefore not merely about enacting regulations and procedures, but also about establishing an environment of trust and confidence among various stakeholders. The Company's business practices would therefore be governed by the following guiding principles.

5.1 Principle 1 - Ethics, Transparency and Accountability

- The company shall develop necessary governance structures, procedures and practices that ensure ethical conduct at all levels and shall assure access to information about its decisions that impact relevant stakeholders.
- The company shall not engage in practices that are abusive, corrupt, or anti-competition.
- The company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely in accordance with the applicable policies and statutory requirements.
- 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.
- The company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

5.2 Principle 2 - Safety and Sustainability of Goods and Services

- The Company shall strive to ensure safety and optimal resource use over the life-cycle of the products - from design & manufacturing to disposal - and ensure that everyone connected with it are aware of their responsibilities.

- The Company shall make sure that the waste products generated during the process of manufacturing are re-cycled or the by-products generated are put to best possible use to safeguard the environment and minimize the hazards.
- The Company shall ensure that the manufacturing processes and technologies required to produce its products are resource efficient and sustainable.
- The Company shall regularly review to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- The Company shall raise the consumer's awareness with regard to their rights, through education, product labelling, appropriate and helpful marketing communication, full details of the contents and composition and promotion of safe usage and disposal of products and services.
- The Company shall recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
- The Company shall strive to treat all its stakeholders and customers with dignity, respect and due understanding.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

5.3 Principle 3 - Employees' Wellbeing

- The Company shall ensure an environment which generates sense of belongingness, loyalty and commitment amongst the employees.
- The company shall strive to respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
- The company shall provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment. 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.
- The company shall take cognizance of the work-life balance of its employees, especially that of women.
- The company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
- The Company shall provide facilities for the wellbeing of its employees including those with special needs, ensuring timely payment of fair living wages to meet basic needs and economic security of the employees.
- The company shall attract and retain talent involves many facets including employee engagement, mentoring, training and career development, empowerment and providing various perquisites as per the rules 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 strive to communicate to its employees all the policies related to them so as to keep them aware of the same and allow them to take optimum advantage of the same.

5.4 Principle 4 - Protection of Stakeholders' Interest

- The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of not only its shareholders and employees, but all the stakeholders.
- The company shall systematically identify its stakeholders (both internal and external), understand their concerns, define purpose and scope of engagement, and commit to engaging with them.
- The company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- The company shall strive to give special attention to stakeholders in areas that are underdeveloped.
- The company shall resolve differences with stakeholders in a just, fair and equitable manner.

5.5 Principle 5 - Respecting and Promoting Human Rights

- The Company shall understand the human rights content of the Constitution of India, national laws and policies and also the guidelines of the International bill of Human Rights, as well as acknowledging that human rights are inherent, universal, indivisible and interdependent in nature.
- 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, wherever applicable.
- The company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, customers and vulnerable and marginalized groups.
- The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

5.6 Principle 6 - Respecting, Protecting and Restoring the Environment

- 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.
- The company shall continuously seek to improve its environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- The company shall continue to implement the Environment, Health and Safety Policy effectively and shall develop the Environment Management System and contingency plans & processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.

- The company shall take measures to check and prevent pollution and shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest, wherever possible.
- 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.
- The Company shall strive to procure products or services from locally-based suppliers who comply with the local and national regulations pertaining to their business.
- The Company shall promote ecological sustainability and green initiatives by adopting energy saving mechanisms, sensitising employees to reduce carbon footprint of the Company.
- As a part of Green initiative-
 - The Company shall continue to organize tree plantation campaigns regularly and ensure participation of local communities into it.
 - The Company will encourage using electronic methods of communication within and outside its offices and discourage use of paper.
 - The Company will continue to encourage investors/shareholders to hold shares in dematerialized mode and provide their email addresses for dispatch of notices, annual reports etc. for communication purpose.
 - The Company will continue to encourage shareholders to provide bank mandate for remittance of dividend through electronic mode.
- 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.

5.7 Principle 7 - Responsibility towards Public and Regulatory Policy

- The Company shall operate within the democratic setup and constitutional framework.
- The Company shall operate within the specified legislative and policy frameworks prescribed by the Government, which guide its growth and also provide for certain desirable restrictions and boundaries.
- The Company shall strive to engage with the Government and be a part of various chambers and associations to make recommendations/representations before regulators and associations for advancement and improvement of the industry it does business. The executives of the Company shall participate and play an active role in committees, associations etc. constituted for industry reforms and advancement.
- The Company shall ensure that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.
- The Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake policy advocacy in a transparent and responsible manner.

5.8 Principle 8 - Inclusive Growth and Equitable Development

- The Company shall understand the impact of inclusive growth and equitable development on the social and economic development and respond through appropriate action to minimize the negative impacts, if any being created by the Company in the course of its business.
- The company shall innovate and invest in products, technologies and processes that promote the wellbeing of society, putting the local and the underdeveloped regions in priority. The Company shall strive to increase its presence in rural areas for initiating various cane development activities for the benefits of farmers through its sugar mills.
- The company shall undertake, as and when applicable, 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. Besides, the Company shall, through its societal and other community activities, continue to focus on community development initiatives in five key areas i.e. education, healthcare, environment, community enhancement and sports & recreation.

5.9 Principle 9 - Engaging and Enriching Customer / Consumer Value

- The company shall take into account the overall well-being of the customers and that of society.
- 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.
- The company shall disclose all information truthfully and factually as per applicable laws, through labelling and other means to the customers/consumers, so that they can exercise their freedom to consume in a responsible manner.
- The company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
- The company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources.
- The company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.
