### TEGA INDUSTRIES LIMITED (Tega) BUSINESS RESPONSIBILITY & SUSTAINABILITY POLICY

#### Principle 1: Business ethics, transparency, and accountability

#### <u>Company Philosophy –</u>

The Company is committed to maintaining the highest standards of ethics in all spheres of its business activities. The Board of Directors, the Executive Committee and Senior Management strive and endeavour to set examples of utmost ethical behaviour.

Executive Management aims to inculcate ethical behaviour at all levels across the Company making it an essential part of the work culture. Every employee of the Company shall conduct himself and lead on behalf of the Company with professionalism, honesty, and integrity while conforming to high moral and ethical grounds.

At Tega we conduct operations by upholding values of ethics and integrity within and across our value chain and have established/are in process of establishing robust governance systems and policies in place that enables us to guide our economic, social, and environmental ambitions, in a fair and responsible manner.

- 1. The Senior Management and Directors of the Company shall also ensure abiding by the Code of Conduct (the "Code") framed by the Company from time to time. Any violation of the Code shall be viewed strictly and lead to disciplinary action. The Senior Management and Directors of the Company are required to strictly adhere to the Code. Any violation of the Code shall be viewed strictly and lead to disciplinary action.
- 2. All business decisions and transactions shall be fair, transparent, and amenable to disclosure and be visible to the concerned stakeholder. The Company shall ensure maximum appropriate disclosure to its various stakeholders without impacting its strategic intent.
- 3. The Company shall ensure that the disclosures required to be made in business documents, statutory filings, declarations, and advertisements are correct and complete in all sense.
- 4. Disclosures shall be governed by the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, Policy, and Procedure for Inquiry in Case of Leak of Unpublished Price Sensitive Information or Suspected Leak of Unpublished Price Sensitive Information, Determination of Materiality Policy and such other applicable policy as may be framed by the Company, from time to time.
- 5. The Company shall have zero tolerance for bribery and corruption in its business dealings. All Employees of the Company shall not, directly or indirectly, solicit or accept any personal fee, commission or any form of remuneration arising out of a transaction involving the Company. This includes gifts or other benefits, which might be extended at times, to influence business decisions. Any offer, promise or grant of gift may be made only if it is customary and/or are of a commemorative nature.
- 6. The Company believes in free and open competition and shall not indulge in any anticompetitive or unfair practice or abuse its dominant position in the market.

- 7. The Company shall meet all its statutory obligations in line with the spirit of the law, enabling fair competition and ensuring it treats all its stakeholders in an equitable manner.
- 8. The Company shall avoid, to the extent possible involvement in practices, either by itself or by any third party that are in violation of this Policy.
- 9. The Company aspires to act as a catalyst to cascade responsible practices across its value chain members. Any member of the value chain found to be indulging in irresponsible, unfair and unethical business practices shall be condemned and appropriate action shall be taken, to the extent permissible.
- 10. By timely and fully paying all due taxes in accordance with the text and spirit of the laws and regulations governing such payments, the company through the development of the necessary procedures to ensure that the business contributes to public finances.
- 11. The company shall establish governance structures to ensure that the guiding principles and policies of the organization are understood, adopted, and implemented throughout the operations of our business.
- 12. The Company shall at all times have a whistle-blower/vigil mechanism policy in place wherein detailed procedure would be mentioned for the employees to make a disclosure regarding any unfair, unethical practice or improper activity observed within the organisation in an undisclosed manner, which will then be investigated by such person/group of person/committee as may be mentioned in the said policy and such disciplinary actions may be taken against the person who has done such wrongful/unethical activity.

# Principle 2: Safety, Sustainability and Product Responsibility

### <u>Company Philosophy –</u>

As Tega Industries Limited, is a manufacturer and distributor of specialized 'critical to operate' and recurring consumable products for the global mineral beneficiation, mining and bulk solids handling industry, we endeavour to align our business operations to the highest standards of safety, quality, and sustainability. Since manufacturing activities by nature may be hazardous, the Company shall ensure compliance with requisite safety requirements and standards in all operations.

- 1. The Company shall, always, ensure that the goods/products it produces are safe and sustainable.
- 2. The Company shall strive to minutely evaluate and recognise the risks and concerns related to its products and services and communicate the same to its customers through proper product orientation and detailing.
- 3. The Company shall, at all times, ensure that its products are safe. To uphold the quality of the goods produced, the Company shall, inter alia maintain hygiene of the manufacturing units and plants and also maintain necessary processes with respect to the personal hygiene of the workers at the plants. The Company should endeavour to educate the workers about the products manufactured by the Company.

- 4. The Company shall on a regular basis review and improve upon the process of new technology development, deployment and commercialization, incorporating various external and internal considerations.
- 5. The Company shall ensure that the social, environmental and economic factors are considered in the business it conducts. The Company shall endeavour that its business goals are pursued without compromising any of the three elements. Such balance should be ensured throughout the life cycle of the goods.
- 6. The Company shall in parallel ensure quality of its products by various level of quality checks. The Company shall remain committed to provide full satisfaction to its customers with respect to quality, reliability and delivery and attain quality leadership for all products that are offered by it.
- 7. The Company should strive to use all the resources viz. raw materials, natural resources, and other resources like electricity, air, power, etc sustainably with maximum optimisation at all stages and also recycle the same to the extent possible.
- 8. The Company shall regularly advice and train wherever practical its employees, workers, engineers, value chain members, customers and recyclers, on optimum uTegaisation of resources.
- 9. The Company should strive to continuously review and improve its manufacturing process and technology (including improving the quality of the raw materials) used so as to increase the productivity with reduced usage of resources without any compromise on the quality of the goods.
- 10. The Company shall make sure that the waste products generated during the process of manufacturing are recycled or the by-products generated are put to best possible use to safeguard the environment from over uTegaisation of non-renewable resources and minimize the hazards.
- 11. The Company shall strive to keep its own environmental footprints within the permitted limits, encourage the stakeholders and employees in order to encourage them to reduce their footprints.
- 12. The Company always strive to treat all its stakeholders and customers with dignity, respect, and due understanding. Further the company strives to upgrade the work culture and take such initiatives that work towards the conservation of the surrounding environment and enhances the inclusiveness of value chain members towards creating a sustainable future of co-existence.
- 13. The company shall establish appropriate processes and procedures to identify material sustainability across the organizational footprint, inclusive of its value chain and the life cycle of the product. Furthermore, the company shall adopt appropriate measures to address concerns arising from the concerns raised by the stakeholders during the process of identification of material issues.
- 14. The Company shall undertake impact assessments and implementation of best industry practices with regard to water management, waste management, climate change mitigation, and protection of biodiversity and ecosystem across the value chain. Furthermore, the Company shall communicate openly with all its stakeholders including suppliers for improving environment, health and safety performances and introduce training and awareness campaign to address environmental, health and safety issues arising across the value chain.

### Company Philosophy -

At Tega Industries Ltd., we recognize all our employees and business partners as an integral part of our business model. The three pillars of inclusivity, fairness, and diversity serve as the foundation for all our employee wellbeing policies developed. We are dedicated to creating a positive work environment that will further foster employee satisfaction and trust. The Company complies with all relevant labour laws and regulations as per the national and international guidelines and standards.

## <u>Our Policy –</u>

- 1. The Company shall ensure fair, timely, and transparent payment of statutory wages to all its employees without discrimination.
- 2. The Company shall strictly abide with the rules and regulations stipulated by local governments on minimum wages to be paid to employees and shall ensure compliance with all regulatory requirements pertaining to its employees and establish appropriate systems and processes in place to enable this to be done by value chain partners.
- 3. The Company shall not employ child labour, adolescent labour, forced labour or any form of involuntary labour, paid or unpaid in any of its offices and mills.
- 4. The company shall ensure equal opportunities at the time of recruitment, during the course of employment, and at the time of separation without any discrimination. Furthermore, the company has Policy on the Selection & Remuneration of Directors, KMP, and other employees, which deals extensively with the employment and remuneration practices (including awards, recognitions, appraisals, stock options, minimum wages, etc.) to be followed by the Company.
- 5. The Company shall ensure that all its employees, including contract and casual labours, are fairly treated and paid fair living wages to meet basic needs and economic security. Furthermore, it shall ensure that the agreed terms of engagement of all its employees, including contract and casual labours are fair.
- 6. The Company shall promote work-life balance among all its employees specially its women employees.
- 7. The Company has a Policy on the Prevention of Sexual Harassment, which deals extensively on providing a safe working environment and protection from sexual harassment. Any such instance shall be dealt promptly, sensitively and confidentially in the most judicious and unbiased manner.
- 8. The Company shall provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. It shall provide facilities for the wellbeing of its employees including those with special needs. The Company shall comply with the statutory provisions pertaining to its employees and in particular about health, safety and wellbeing of its employees. Specific provisions contained in the labour laws ensuring health, safety, hygiene, comforts and wellbeing of employees shall be complied in letter and spirit. (*CE 8*)
- 9. The Company shall conduct programs for enhancing the skills of its employees, improve their morale and for their overall career development. This could be through various sensitization programs, on-the-job training, job rotation or training through various programmes internal or external to upgrade their skills and competencies

which shall include training to handle machines, chemicals, and other products used during manufacturing of the products. Such training shall be imparted on a nondiscriminatory basis based on the need of the employees/business.

- 10. The executive directors and employees of the Company shall strictly adhere to the provisions of the Code about their association with any professional, trade, legislative, political or public body.
- 11. The Company shall ensure that the agreed terms of engagement of all its employees, including contract and casual labours are fair.

## Principle 4: Stakeholder Engagement and inclusiveness

### <u>Company Philosophy –</u>

The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of all the stakeholders. The company periodically and systematically identifies and engages with its internal stakeholders like employees and workers and external stakeholders like shareholders, investors, suppliers, customers, and government bodies including regulators, banks, and financial institutions. Furthermore, the management of the Company always remain accessible to all stakeholders in order to understand their concerns and respond accordingly.

The Company endeavours to maintain healthy stakeholders' engagement, allow stakeholders participation and promote collective decision making process as far as practically possible.

- 1. The Company recognizes that some of its stakeholders are not equally influential or are disadvantaged, vulnerable, underdeveloped, and marginalized, and therefore it shall give priority to safeguard their interest. The Corporate Social Responsibility (CSR) initiatives of the Company shall be also prioritized towards their upliftment.
- 2. Apart from statutory disclosures and subject to business confidentiality, the Company shall ensure to disclose all the relevant information with respect to the Company, to the relevant stakeholders so as to enable them to take reasoned decisions. The Company believes that it is its responsibility to remain transparent about the impact of its products, its policies, and decisions on its stakeholders. The Company shall ensure while formulating any policy, that the interests of the stakeholders are not compromised.
- 3. The website of the Company shall display all such policies and other relevant information from time to time to keep the stakeholders aware about the position of the Company. Furthermore, the website of the Company shall provide appropriate feedback mechanism for stakeholders to communicate regarding impact of the Company's policies, decisions and products.
- 4. The Company Secretary of the Company shall receive the queries/grievances/ feedback of various stakeholders and shall respond to the same within reasonable time and the concerned person's name and contact details shall be displayed on the website of the Company.
- 5. Differences, if any, with any stakeholder shall be resolved in a just, fair and equitable manner.

- 6. The Company endeavors to make prompt public disclosure of all unpublished price sensitive information(s) that may impact price discovery, as soon as credible and concrete information comes into being. Further the Company is committed to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 7. The Company's Risk Management Policy enables proactive identification, assessment, management, monitoring and reporting of identified and prioritized risks. This policy underpins the Company's efforts to remain a competitive and sustainable Company, enhancing operational effectiveness and creating wealth for employees, shareholders and stakeholders.

# Principle 5: Respecting and Promoting Human Rights

### <u>Company Philosophy –</u>

We integrate the principles and norms of Human Rights across our business to protect the interests of our employees, workers, and value chain partners. As a responsible Company, we strive to ensure compliance with all relevant policies and regulations pertaining to Human Rights in line with national and international guidelines such as United Nations Guiding Principles for Business and Human Rights, International bill of rights and Declaration of Fundamental Rights at work as per the International Labor Organization.

- 1. Human rights being inherent, universal, indivisible and interdependent in nature, the Company shall comply and adhere to all the human rights related laws and guidelines as prevailing in its area of operation.
- 2. The Company shall further ensure to inculcate and integrate values of human rights in the management systems and throughout the organisation. The Company shall endeavour to promote the awareness and realization of human rights across its value chain.
- 3. The Company shall respect the human rights of all stakeholders including that of its customers, depositors, shareholders, investors and public at large within and beyond the workplace including that of communities and vulnerable and marginalized groups and ensure that all stakeholders impacted by the business of the Company shall have access to the top management / grievance redressal mechanisms / vigil mechanism (wherever applicable).
- 4. The Company shall strive to abide with the aforesaid principle and discourage violating practices by any third party to the extent possible. The Company shall also not be complicit with human rights abuses by a third party.
- 5. The Company strives to regularly 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.
- 6. For further insights into our human rights policy and practices, Principle 5 can be read with Principle 3.

#### <u>Company Philosophy –</u>

We at Tega Industries Ltd. are cognizant of the responsibility etched to our business activities and their consequent impact on the environment and society at large. We shall conduct periodic risk and opportunity assessments to identify any adverse impact of our products and services on the environment and society at large. This assessment shall enable us to strategically implement targeted initiatives that help us reduce our environmental footprint and augment resource conservation, propelling our efforts to achieve sustained progress across the triple bottom line.

### Our Policy -

- 1. The Company shall uTegaize 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 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.
- 4. 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.
- 5. 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.
- 6. The Company shall proactively persuade and support its value chain to adopt these principles and shall also persuade and encourage its external stakeholders to move towards environmentally friendly practices.
- 7. The Company shall report to the stakeholders in a fair and transparent manner, the environmental risks associated with the products and process of manufacturing of the products and the steps undertaken by the Company to minimise the same.

### Principle 7: Responsible Advocacy with public and regulatory body

#### <u>Company Philosophy –</u>

As a corporate citizen, the Company understands its responsibility to operate within the democratic setup and constitutional framework.

As a responsible organization, we are cognizant of the guidelines provided by regulators and legislative bodies across the social, environment and economic parameters. At Tega Industries Ltd., we work hard to uphold an ethical standard by honouring the principles of equality, integrity, and transparency in all of our policy advocacy stances.

# Our Policy -

- *1.* The Company shall in case of any grievance with any legislative/regulatory authority or framework, seek redressal of the same and resort to policy advocacy consistent with the principles and policies contained in the policy through the trade and industry chambers and other such collective platforms related to the business of the Company.
- 2. The executives of the Company shall participate, without any political affiliation / biasness and play an active role in committees, associations, etc., constituted for industry reforms and advancement.
- 3. The Company believes that policy advocacy must preserve and expand public good and thus shall never advocate any policy change to benefit itself alone or a select few in a partisan manner.)
- 4. The Company shall work with policy makers as knowledge partners to share insights, scientific knowledge and technical expertise through authorized personnel.
- 5. The Company shall remain ethical, unbiased and transparent, ensuring that it does not undertake any adverse activities in line with the nation's interest or those that will have any negative social impact and shall ensure its policy advocacy positions promote fair competition and respect for human rights.

## **Principle 8: Inclusive Growth and Equitable development**

### Company Philosophy –

At Tega Industries Ltd, the upliftment of communities has always been an integral part of our business strategy. The company aspires to create long-term value across all its business activities is supported by its commitment to co-creating a comprehensive, just, and inclusive society. We continuously work towards improving the quality of life for all our stakeholders, paying particular attention to the important needs of disadvantaged and marginalised groups in society.

- 1. The Company shall undertake CSR initiatives in the areas of education, healthcare, sanitation, community development etc. that promote the well-being of the society. The Company shall strive to increase its presence in the rural parts of the country.
- 2. The Company strives to minimize any adverse impact on social, cultural and economic aspects which arise from any of our business operations.
- 3. The Company strives to invest in R&D and technology to bring advancement in product development, enabling positive and equitable impact on the environment and society.
- 4. The Company shall respect the rights of people who may be the owners of traditional knowledge and other forms of intellectual property. The employees of the Company shall acknowledge the efforts made by others inter alia fellow employee and ensure that the ideas are not hacked, and due credit is given to the deserving colleague from whom the idea has been borrowed. None should attempt to project another ideas or efforts as his/her own.
- 5. 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.

## <u>Company Philosophy –</u>

At Tega Industries Ltd., we are committed to responsible growth and delivering superior products and services to our consumers. We appreciate and prioritize our relationships with all our customers as they are pivotal in our value-creation journey. In this regard, we continuously work towards establishing ethical and transparent communication with all our customers, considering parameters of product pricing, quality, and accessibility.

The Company, while serving the needs of their customers, considers the overall well-being of the customers and that of society.

- 1. The Company will ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
- 2. The Company will disclose all information truthfully and factually, through labelling and other means, including the risks to the individual, to society and 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, the Company shall also educate their customers on the safe and responsible usage of their products and services.
- 3. The Company will promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- 4. The Company will exercise due care and caution while providing goods and services and ensure that the business minimizes and mitigates any adverse impact of its goods and services on consumers, the natural environment and society at large.
- 5. The Company will provide adequate grievance handling mechanisms to address customer concerns and feedback.