MAN INDUSTRIES (INDIA) LIMITED

Business Responsibility Policies Manual

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Introduction:

'Man Industries (India) Limited ('the Company') is a public limited company incorporated on May 19, 1988, under the Companies Act, 1956 (Corporate Identity Number L99999MH1988PLC047408). The Company's shares are listed and traded on National Stock Exchange of India Limited and BSE Limited.

We endeavour to foster a governance philosophy that is committed to maintaining accountability, transparency and responsibility, which are integral to the Company's day-to-day operations. We have established a strong internal framework that oversees various aspects of the organisation's administration. Through this robust framework we aim to promote strong ethics, a positive culture and long-term sustainability.

Scope and Purpose:

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been framed 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 fulfils its social, environmental and economical responsibilities.

This Policy endorses the Company's commitment to follow principles and core elements, in conducting its business, as laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business issued by Hon'ble Ministry of Corporate Affairs.

This Policy shall be in addition of and furtherance to the existing policies on Code of Conduct and Business Ethics ('the Code') of the Company. In view of the above, the Board of Directors of the Company (the Board) approved this Policy at its meeting held on 23rd June 2020.

Applicability:

- This Policy applies to all the directors, employees, group, joint venture, suppliers, customers, business partners, associates, and other stakeholders of the Company across all its offices and Manufacturing facilities.
- This Policy shall be effective from 23rd June 2020.

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

Objectives:

- The Company believes in conducting its affairs in a fair, transparent and professional manner and maintaining the good ethical standards, transparency and accountability in its dealings with all its employees and stakeholders.
- To maintain these standards, the Company encourages its employees and other stakeholders who have questions or concerns about ethics to come forward and express them without the fear of punishment or unfair treatment.
- Management shall constantly endeavour to inculcate this ethical behaviour across all levels in the
 organization so that it becomes essential part of the work culture among all the employees in the
 Company.

Key Principles of the Policy:

- a) The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of its principle across its value chain.
- b) The company will adhere to all the laws, rules and regulations in its true sense.
- c) The Company shall communicate transparently and assure access to information about its decisions that impact relevant stakeholders.
- d) The company shall protect privileged information and such information shall only be shared with authorised personnel.
- e) The Company shall not engage in practices that are abusive, corrupt, or anti-competition like acceptance or giving of bribery, money laundering, insider trading etc.
- f) The Company shall avoid collusion or connivance with the actions of any third party that violates any of the principles contained in this Policy.

Existing Policies to support above Principles: -

- Vigil Mechanism
- Code of conduct for employees on business ethics
- Code of practices and procedures for fair disclosure of unpublished price sensitive information
- Code on insider trading
- Code of conduct for board members and senior management

Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

Objectives:

- The company believes that their product is the key brand ambassador and it will be the sole criteria for its success. We believe in Excellent product delivery of highest quality.
- The company understands that sustainable development integrates economic progress, social responsibility and environmental concerns with the purpose of improving standard of living of community.

- a) The company ensures that its product comply with the highest standards of quality ensuring that while procuring, manufacturing and delivering goods and services they follow strict Quality standards.
- b) The Company tries to constantly bring Latest & improved technology, innovative ideas for the best product delivery and sustainable growth to continuously improve the balance between social, economic and environmental impacts.
- c) The company ensures a safe environment for all our customers, employees and business partners/ associates at all our premises.

Principle 3: Businesses should promote the wellbeing of all employees

Objective:

- The Company intends to create a safe environment for the well being of the employees at all times and spread the message of safety to one and all.
- The Company has incorporated this policy to respect the dignity and freedom of its employees without any discrimination.
- The company offers employment with a sense of certainty for successful long term career that would be driven by growth opportunities and exposure to immense learning opportunities.

- a) The Company understands that the human resource is the most important wealth for any organization. We ensure to provide an environment which generates sense of belongingness, loyalty and commitment amongst the employees.
- b) The Company shall provide equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion or disability. We comply with all the applicable local laws pertaining to human rights like child labour, adolescent labour, forced labour etc in any of its offices and units and provides an environment free of any type of harassment.
- c) 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. The Company shall at all time ensure safety of employees and follow all the provisions of Factories Act, and other applicable laws.
- d) It will ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- e) The Company shall ensure that there is a systematic chain or hierarchy amongst the employees and the senior management and a proper forum through which the grievances of the employees are taken up and addressed by the management
- f) The company is committed to provide a healthy environment to all its employees and has zero tolerance for sexual harassment at workplace. In order to prohibit, prevent and redress complaints of sexual harassment at workplace, it has constituted a Complaint Committee in line with the provisions of Section 4(1) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

Objective:

The company recognises the interest of all communities including those of disadvantaged, vulnerable, marginalized and weaker sections of the society and proactively engage with them through various mechanisms to identify their concerns and build effective communication.

Key Principles of the Policy:

- a) The company ensures to treat all its stakeholders equally and promote engagement platforms to resolve their concerns in a transparent, just, fair and equitable manner.
- b) The Company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.
- c) 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 shall endeavour to maintain healthy stakeholder's engagement, allow stakeholders participation and shall promote collective decision-making process as far as practically possible.
- d) The company ensures that the management remains accessible to all stakeholders in order to understand their concerns and respond accordingly.
- e) The Company's CSR policy drives initiatives towards the benefit of the disadvantaged, vulnerable and marginalized section of community at large.

Existing Policies to support above Principles: -

• Corporate Social Responsibility Policy

Principle 5: Businesses should respect and promote human rights

Objectives:

The Company seeks to conduct business in a manner that respects each and every individual associated with the Company and encourages a work place environment which is free from any kind of human rights violations treating others with dignity and respect.

- a) The Company shall understand the human rights content of the Constitution of India, national laws and policies. It shall appreciate that human rights are inherent, universal, indivisible and interdependent in nature.
- b) 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.
- c) The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, customers and vulnerable and marginalized groups.

Existing Policies to support above Principles: -

- Vigil mechanism / Whistle Blower policy
- Prevention of Sexual Harassment at work place

Principle 6: Business should respect, protect, and make efforts to restore the environment

Objective:

The company is committed to adopt environmental practices and processes that minimizes or eliminates the adverse impact of its operations and across the value chain. Focus to use renewable sources of energy, recycling, waste management and conservation to mitigate the environmental impact.

Key Principles of the Policy:

The Company strives to

- a) Abide by all environmental rules, legislations, regulations and other requirements in letter and spirit.
- b) Ensure continuous improvement in environmental performance by
 - i. Taking proactive steps to limit impact of our operations on environment.
 - ii. Conserve natural resources by maximizing use of renewable sources of energy.
 - iii. Encourage reduction in pollution by recycle/reuse.
 - iv. Continuous improvement by setting goals and targets.
- c) Inculcate habit and culture of environmental protection as a core value and involve all employees in achieving the above.
- d) Review environmental performance periodically for adequacy and suitability.

Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

Objective:

The Company endeavours to work with Government bodies for the betterment of public polices and support issues such as fair and transparent business practices, inclusive growth, social responsibility and environmental stewardship.

- a) The Company recognizes the importance of working within the specified legislative and policy frameworks prescribed by the Government and its value for the growth of company and society at large.
- b) The company is committed to co-operate with all Government bodies and policy makers towards implementation of laws and regulations and is always ahead in providing constructive feedback.

- c) The Company is the member of following associations and represent through them for improvement in various matters and legitimate trade practices:
 - o Confederation of Indian Industry
 - o Federation of Kutch Industrial Association
 - o Bombay Chamber of Commerce and Industry
 - o All India Association of Industry
 - o Engineering Export Promotion Council of India

Principle 8: Businesses should support inclusive growth and equitable development

Objective:

The company participates actively for the betterment of society specially for the upliftment of needy and weaker section of society through various CSR Initiatives. Company undertakes various projects in the areas of healthcare, education, rural development and sanitation etc.

Key Principles of the Policy:

- a. The Company undertakes 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.
- b. The details of companies CSR Initiatives are given in the Annexure B to the directors report in the annual report of the company.

Existing Policies to support above Principles: -

• Corporate Social Responsibility Policy

Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner

Objective:

The company enjoys long and fruitful relationship with all its domestic and International Clients. We have worked with almost all the big players in oil & gas and water sector across geographies and have built an impeachable track record of superior quality and customer satisfaction.

- a) The Company preaches the concept that "customer is king" and works towards building a long and strong relationship with them.
- b) 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.
- c) The Company thrives to work in the most transparent and truthful manner with all its customers
- d) The Company senior management remain in personal touch with all its customers and review customer feedback and address their concerns from time to time.

Implementation:

- 1. The policy shall be appropriately communicated within the Company across all levels and shall be displayed on the website of the Company for all internal and external stakeholders.
- 2. The Chairman, shall be responsible for the implementation of the Business Responsibility initiatives assisted by the department heads of the Company who shall be the reviewing authority of this policy, shall oversee the implementation of the Policy.
- 3. Compliance with the Policy shall be monitored and evaluated by the Company through Business Responsibility Head on a periodic basis.
- 4. Any grievances/ complaints with respect to violation of the policy shall be reported to the BR Head.

STRIES (10)