



# Sustainability Policy Manual

**Deepak Nitrite Limited**




Registered & Corporate Office: 2<sup>nd</sup> Floor, Fermenter House, Alembic City, Vadodara – 390 003

## DECLARATION

"At Deepak Nitrite Limited (DNL), we recognize the paramount importance of fostering a work environment that aligns with the values of environmental sustainability and social responsibility. Our purpose in creating this Policy Manual is to systematically document and communicate our commitment to environmental and social policies across all our operations, including our registered and corporate office in Vadodara, Gujarat, and our manufacturing facilities in Gujarat, Maharashtra, and Telangana, along with the R&D center in Vadodara.

This manual serves as a comprehensive repository, consolidating policies that address the intertwined dynamics of human resources, environmental impact, and social responsibility. Our objective is to align these policies with the evolving needs of our employees while maintaining synchronization with the strategic goals of the organization. Recognizing the dynamic nature of our industry and the evolving landscape of corporate responsibility, this Manual is designed to be adaptable.

DNL is committed to regularly reviewing and updating this living document. Changes, whether in the form of additions or deletions, will be made as deemed necessary by the management, ensuring the ongoing relevance and effectiveness of our policies. By fostering a culture of continual improvement, this Policy Manual stands as a testament to our dedication to the well-being of our employees, the communities we operate in, and our broader commitment to environmental stewardship and social accountability."

Recommended By		Approved By
 02/01/24	 02/01/2024	
<b>Dr. Madhur Saxena</b> General Manager- Health and Safety	<b>Narendra Raval</b> Head Manufacturing- HR and IR	<b>Sanjay Upadhyay</b> Group CFO & Director

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## Environmental Sustainability Policy

We at Deepak Nitrite Ltd (DNL) are conscious of fulfilling our duty towards environmental protection and to make tomorrow cleaner, greener, and more sustainable. We are continuously working on reducing the environmental impact of our business activities and developing methodologies that benefit the environment.

We support the United Nations in the implementation of the UN Sustainable Development Goals (SDGs), which create the framework for sustainable business practices at the economic, social, and environmental levels. To achieve this goal, we are proactively committed to:

- Comply with all applicable laws and legal regulations and where appropriate, improve performance beyond requirements.
- Minimize waste generation through reduction at source, recycling, reuse, and recovery.
- Reduce Green House Gas (GHG) emission and energy consumption through improvement programs.
- Focus on water conservation measures, waste-water treatment, preserve water resources, reduce the impact of effluent release, rainwater harvesting and continually reduce net water consumption.
- Eliminate or minimize emissions of dust, noise, odour, accidental pollution, and road congestion in and around company facilities.
- Consider environmental aspects in planning and decision-making and ensure adoption of resource efficient and cleaner production methods and techniques.
- Conserve natural resources and continuously enhance contribution from renewable energy sources.
- Evaluate the environmental impact of a product through its life cycle and initiate actions based on that to reduce the impact on environment.
- Ensure safe handling of chemicals and waste materials and implement emergency response plans to address any incidents involving pollution to the environment.
- Conduct operations in a manner that protects and conserves the environment and biodiversity.
- Sustainable consumption of materials and services that minimizes the impact on the environment.
- Enhance EHS performance by setting objectives and targets and periodically reviewing progress against short and long-term goals.
- Raise awareness of suppliers and other stakeholders on the importance of biodiversity conservation and sustainable use of natural resources.
- Enhance environmental awareness through participation and consultation with employees and contractors by training and effective channels of communication and encourage them to act in a more responsible manner towards the environment.
- Participate and work with community, industry organizations, Government and Non-Government organizations that are engaged in policy advocacy and promote Responsible chemistry.

This policy is communicated to all concerned in an appropriate and meaningful manner. DNL manufacturing units have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including processing of grievances for redressal.

## Health Safety Environment and Quality Policy

We, at Deepak Nitrite Ltd., are committed towards Health, Safety, Environment and Quality recognizes these as core business values. We are committed to maintain the highest standards of Health, Safety, Environment and Quality practices in all our operations and installations for safeguarding employees, stakeholders and community by taking all measures for prevention of injury, ill-health and environment. We shall strive to achieve excellence by making our growth safer, cleaner, greener and more sustainable along with delighted stakeholders.

We are committed to:

- Complying and going beyond all applicable State/ Country specific statutory, legal and other requirements in respect of Occupational health, Safety and Environment.
- Initiating efforts and building the HSEQ Culture where everyone is accountable to prevent or minimize the impact on Occupational health, Safety and Environment to all personal and community working directly and indirectly with us.
- Establishing adequate process and control in consultation and participation for assigning the responsibilities of employees, workers, contractors, sub-contractors, transporters and other agencies entering the premises towards Occupational Health and Safety systems.
- Establishing measuring and continually improving HSEQ performance by setting objectives and targets and key performance indicators at individual level and sharing performance in annual report.
- Ensuring regular hazard risk assessment and audits by Internal and External experts to continually enhance HSEQ performance.
- Integrating HSEQ requirements in all decisions dealing with purchase of equipment, machinery and material as well as selection and placement of personnel to promote HSEQ culture.
- Continual efforts shall be made to make a pro-active learning organization, training and retraining shall be given among employees and general public wherever required. HSEQ performance shall be an integral part of their career advancement.
- Conserve natural resources & reduce energy and wastages of material through reduce, reuse and recycle philosophy to minimize our environmental footprint and promote circular economy for sustainability and ESG.

The Company shall design, develop, manufacture, handle, store and distribute its product responsibly long with the global standard of Responsible Care and Process Safety Standards, so that risk reduction to the human being and environment go beyond it compliance.

The Policy shall be reviewed and suitably modified in case of any change in the process or business that may impact any of the HSEQ aspects. The policy shall be shared with all the key stakeholders and displayed at sites and offices.



## Product Stewardship Policy

We at Deepak Nitrite Ltd (DNL) focus on minimizing the health, safety, environmental, and social impacts of a product and its packaging throughout all lifecycle stages and maximizing economic benefits.

Product stewardship is an integral part at all stages of a chemical product from initial research, development, manufacture, distribution and ultimate disposal. We are working continuously to ensure that when used responsibly and appropriately our products do not present any risks for people and the environment. To achieve this goal, we are proactively committed to:

- Manufacture products using sustainably sourced inputs and raw materials.
- Continue to work towards optimal use of resources throughout life cycle of products and services.
- Build social and environmental capital through initiatives such as afforestation, water conservation, rainwater harvesting and promote use of renewable energy.
- Mitigate negative environmental, health and safety impacts of products and services and voluntarily adopt emerging safer and environment friendly processes and systems.
- Continue to incorporate relevant social and environmental considerations in product and service development processes.
- Provide appropriate mechanisms for customer feedback to drive continuous improvement in the value propositions of its products and services.
- Ensure safe and secure transportation of raw material and product and minimize impact on environment while product distribution.
- Ensure product security to prevent misuse or illegal use of the chemicals being handled.
- Comply with regulatory requirements pertaining to products and services, including marketing communication, promotion and sponsorship to enable customers to make informed purchase decisions.
- Encourage consumers to make sustainable choices by introducing innovative and sustainable products, packaging and services.

This policy is communicated to all concerned in an appropriate and meaningful manner. DNL has appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including processing of grievances for redressal.



## Policy on Stakeholder Engagement

Deepak Nitrite Limited (DNL) values the input and concern of all internal as well as external stakeholders associated with our business directly or indirectly. Those stakeholders can be persons or groups whom our operations have a significant impact on, those with a vested interest in our sustainability or environmental, social and governance (ESG) performance, and those in public positions who influence our activities. They include shareholders, financial institutions, governments, suppliers, customers, employees, NGOs, community interest groups, media, political and academic leaders, industry associations, sustainability collaborators etc.

Each stakeholder group has different viewpoints and expectations related to our business. We are sensitive to their aspirations and expectations, and we work in close collaboration with them by proactive and constructive engagement at regular intervals. Engagement with the relevant stakeholder is guided by the values of commitment, integrity and transparency with a balance of interests of diverse stakeholders. These meaningful engagements have helped us to improve our sustainability policies and strategies and achieve transformation in our value chain.

The approach and frequency of the engagement with the stakeholders vary depending on the stakeholders. There are events like annual general meetings for investors, customer meet, exhibitions for customers, meeting with suppliers etc. In addition, respective departments engage with their specific stakeholder groups on a need and regular basis.

Deepak Foundation carries out community engagement activities for DNL with a focus on the area of healthcare, education, skills building & livelihood, and disability & special needs. They interact with the community to understand their concern and orient their activities based on the need of the society.

Our dedicated team at the corporate and at manufacturing unit takes up the responsibility for interacting with the respective regulatory and government agencies for various statutory and regulatory compliances. We participate and work with industry organizations such as ICC, FICCI, CII, Industrial Associations, BIS etc. that are engaged in policy advocacy and promote Sustainable development and Responsible chemistry.

Our HR team indulges in to increase the satisfaction and enhance the commitment levels of our employees. Employees are appraised and recognized based on their performance through various awards and recognitions. Events like Town Hall meets, celebration of various festivals, Chairmen's award etc. are organized.

Understanding the expectations of all stakeholders is of high concern for us and we are committed to address those in our pursuit to ensure sustainability.



## Policy on Land Use & Biodiversity Conservation

Deepak Nitrite Ltd (DNL) endeavours to conduct its operations in a manner that protects, conserves and enriches biodiversity.

Free, Prior and Informed Consent (FPIC) is a specific right that pertains to indigenous peoples and is recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to a project that may affect them or their territories. DNL supports these processes and committed for the informed and meaningful involvement of all stakeholders, including indigenous peoples and other forest-dependent communities, whenever required.

The following shall be taken care of while purchasing land for extending business activities:

- Ensure that there is no land Grabbing. Complete all required formalities and statutory compliance before use of the land.
- FPIC shall be informed for land use change involving indigenous peoples with respecting their view to land use changes, Deforestation, Ownership of Land and impact assessment of it on local people. People impacted, if any, shall be given enough information and consulted while obtaining the consent.
- In case of any removal of Tree for the business requirement, new trees shall be planted in accordance with the prevailing laws to balance the ecosystem.
- Adopt High Carbon Stock (HCS) Approach for selection of land. Preference on degraded land with low carbon and low biodiversity values for the business activity. Not to carry out commercial activities on HCS Forests, High Conservation Value (HCV) Areas, Land having Natural resources of deep forest or habitat of tribal population or wildlife.

Following shall be ensured for Biodiversity Conservation:

- Conserve, enrich and promote efficient and sustainable use of natural resources and raw materials in its business activities,
- Minimize dependency on fossil energy through increased use of renewable sources of energy.
- Manage water consumption and waste in a sustainable manner with a view to protect and enhance biodiversity.
- Continue to raise awareness of suppliers and other stakeholders on the importance of biodiversity conservation and sustainable use of natural resources.
- Promote activities for biodiversity conservation in partnership with relevant stakeholders, local communities, other self-help groups and non-governmental organizations (NGOs);
- Increase carbon sequestration by plantations, and development of community-managed forests in forest fringe areas.
- Continue to recognize and respect the rights of local communities, in the context of biological diversity.



This policy is communicated to all concerned in an appropriate and meaningful manner. DNL has appropriate systems and processes in place to ensure compliance with this Policy and with statutory provisions, including processing of grievances for redressal. The responsibility of implementation of the policy rest with our HR & Admin team who will take necessary action to deal explicitly with land use change, including aspects of environmental management that include conservation and deforestation.



## Labour Relations Policy

The management of Deepak Nitrite Ltd. believes in dealing with the labour in a just, fair, and ethical manner and treats all employees as human beings in all its dealings arising out of the employment relationship.

The company has both on-roll and off-roll employees working at its manufacturing plants as well as the offices. While dealing with the on-roll employees the company management has a mechanism to deal with the employees directly for matters connected with employment or non-employment or the terms of employment or with conditions of labour of any person. Whereas, while dealing with the off-roll employees the company has a mechanism through which the company deals with the matters affecting the employment or non-employment or the terms of employment or with conditions of labour of any person.

As far as on-roll employees are concerned, there are 2 major categories of employees as stated below:

- a. The management staff employees
- b. Non-management staff employees (Bargainable Cadre Employees)

### **1. Disciplinary process:**

#### **a. On-roll employees**

##### **I. Management Staff employees**

The employee relations and matters of discipline in respect of the management staff employees are governed by a committee consisting of the Employee Relations Head, the Unit Head and respective Strategic Business Unit (SBU) Head. Any matter affecting the discipline is thoroughly investigated by giving a just, fair and proper opportunity to the person against whom such disciplinary process is initiated and the issue gets concluded following the process of natural justice and only thereafter if any action is required to be taken is initiated.

##### **II. Non-management staff employees (Bargainable Cadre Employees)**

The employee relations and matters of discipline in respect of the non-management staff (Bargainable Cadre Employees) are governed by a statute, namely, the Industrial Employment (Standing Orders) Act 1946. Whenever employee from this category is involved in any misconduct or indiscipline stated in rule 24, the workmen guilty of such misconduct or indiscipline may be punished as per the rule 25 stated in the applicable rules.

The company always follows the procedure stated by the Industrial Employment (Standing Orders) Act 1946 and accordingly informs in writing to the workmen concerned of the alleged misconduct and giving an opportunity to explain the circumstances alleged against the workman and no dismissal order shall be made except after holding an inquiry against the workman concerned in respect of the alleged misconduct.



**b. Off-roll employees**

Whenever any off-roll employee is involved in any misconduct or indiscipline the company management ensures a just & fair opportunity is given to such an employee. However, since the off-roll employee is employed by a contractor, the company management ensures that the process laid down as above is followed by the contractor.

**2. Compensation**

**a. On-roll employees**

**I. Management Staff employees**

For the management staff employees annual performance management system is in operation and depending upon the individual and company's performance the salaries of employees get revised annually. While conducting the annual PMS exercise various factors such as qualification, experience, performance etc. are looked into and the employees are rewarded accordingly. It is ensured that the element of subjectivity and bias is eliminated in the whole process.

**II. Non-management staff employees (Bargainable Cadre Employees)**

Usually, the Non-management staff employees (Bargainable Cadre Employees) are represented by their unions. Accordingly, wage negotiations are carried out upon the completion of wage settlement. While striking the agreement, various factors such as the company's performance, industry-cum-region salary structures prevailing in the nearby industries are considered.

At each factory represented by the union, separate negotiated settlements are signed following a process of collective bargaining. The company management follows a fair and transparent process while entering into the settlement.

Usually, the collective bargaining process happens in a peaceful & amicable manner. However, if the union tries to be unreasonable and shows adamancy the company management makes all the efforts to educate and create awareness amongst the Non-management staff employees (Bargainable Cadre Employees) and finally a fair wage agreement is signed.

During the process of collective bargaining both the union and the management resort to an open dialogue and usually do not try to use intermediary tactics like strike (by union) and adoption of unfair labour practices (by the company) and usually any areas of disagreement are resolved with a fair & just dialogue between the union & the management.

**b. Off-roll employees**

As far as off-roll employees are concerned their wage structure depends upon the experience, qualification & their skill levels. As far as blue collar off-roll employees are concerned, the company believes in being



compliant with the applicable labour laws & hence ensures that contractors pay minimum wages, provide social security benefits under applicable labour laws like the Employees Provident Funds & Miscellaneous Provisions Act, Employees State Insurance Act, Payment of Bonus Act, Payment of Gratuity Act and Other applicable acts.

As far as qualified white collar employees are concerned, the company ensures that the contractor pays living wage commensurate with the experience, qualifications of such employees so as to ensure that there is no discrimination between the salary structures of on-roll & off-roll employees.

Depending upon the changes in the industry and circumstances this policy may be amended from time to time but the policy will continue to be governed by the principles of fairness, equality, equity & ethics.



## Customer Health & Safety Policy

At Deepak Nitrite Limited (DNL), we prioritize the health and safety of our customers as a fundamental aspect of our commitment to responsible and sustainable business practices. This policy outlines our approach to ensuring a secure environment for our customers.

### **1. Compliance with Regulatory Standards:**

We commit to complying with all relevant health and safety laws, regulations, and standards applicable in India. Our products will adhere to the prescribed safety guidelines to ensure the well-being of our customers.

### **2. Commitment to Customer Health & Safety:**

DNL provides chemicals that meet the highest standards of customer health and safety. We recognize the importance of preventing accidents, injuries, and health hazards related to our products and operations.

### **3. Product Safety Information:**

DNL will provide clear and accessible safety information for all our products including proper handling, storage guidelines, and necessary precautions to minimize any potential risks associated with the use of our chemicals.

### **4. Continuous Improvement:**

We are committed to continuous improvement in our processes and products to enhance customer safety.

### **5. Customer Education and Awareness:**

DNL will actively engage in educating our customers about the safe usage of our products. We will provide accessible resources, including online materials and customer support, to enhance safety awareness.

### **6. Emergency Response and Support:**

In the event of any emergencies related to our products or services, DNL will establish effective communication channels and provide prompt support to our customers.

### **7. Collaboration with Customers:**

We value feedback from customers and will actively seek their input on matters related to health and safety.

### **8. Transparency:**

DNL is committed to transparency regarding the composition of our products. Customers will have access to comprehensive information about the ingredients and potential risks associated with our chemicals.

### **9. Review and Compliance Audits:**

Regular reviews and compliance audits of our health and safety policies will be conducted to ensure that our practices align with the latest industry standards and regulatory requirements.

### **10. Communication Channels:**

DNL will establish effective communication channels to disseminate health and safety information to our customers. This includes regular updates through our website, product labels, and other relevant channels.

By adhering to this Customer Health & Safety Policy, Deepak Nitrite Limited reaffirms its commitment to fostering a secure environment for our valued customers.



## Anti- Bribery and Anti- Corruption (ABAC) Policy

### 1. Introduction:

- Deepak Nitrite Limited ('DNL', 'Company'), Deepak Phenolics Limited ('DPL', 'Company') and all subsidiaries Deepak Group are committed to conduct business transparently, honestly with integrity and to the highest ethical standards. This commitment is embodied in the Company's Code of Conduct, Gifts and Entertainment Policy, Whistle Blower Policy and this Policy.
- Bribery and corruption entails ethical, legal, safety and quality, financial and reputational risks.
- DNL thus, reiterates through this Anti-Bribery and Anti-Corruption (ABAC) policy, it's 'zero tolerance' towards bribery and corruption and the responsibilities of its directors, employees (both permanent and contractual) and agents to conduct business in accordance to the applicable anti-bribery and anti-corruption laws.

### 2. Purpose :

The purpose of this policy is :

- To spell out the responsibilities of those working for or with the Company in observing and upholding the DNL's position on bribery and corruption.
- To ensure that the DNL has adequate procedures in place to prevent and detect bribery and corruption.
- To build an anti-bribery and anti-corruption culture in DNL
- To provide information and guidance to those working for or with the DNL as to how to recognize and deal with potential bribery and corruption issues.
- To protect the Company against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behavior.

### 3. Scope :

- This policy is applicable to all directors and employees of DNL, DPL and all subsidiaries of Deepak Group.
- This policy also reflects Deepak Group's expectations of the standard, of its business partners, agents, and contractors, technical and other consultants (third party-service providers).
- This policy should be read in conjunction with Deepak Group's Code of Conduct, Gifts and Entertainment Policy and Whistle Blow Policy.

### 4. Applicable Laws :

Following Indian laws are applicable:

- (a) Indian Penal Code 1860 (IPC)
- (b) Indian Prevention of Corruption Act 1988 and amendments



- (c) Indian Prevention of Money Laundering Act 2002 and amendments
- (d) Central Vigilance Act 2003
- (e) Lok Ayukta Acts of various states

## 5. Definitions :

### a. Bribery

- (a) Bribery is the most common form of corruption and can be broadly defined as the offering, promising, giving, accepting or soliciting of an inducement or reward, loan, advantage or benefit of any kind to a person in a position of trust or power (including a “public official”) to influence that person’s views or conduct or to obtain an improper advantage.
- (b) Amendment to Prevention of Corruption Act 1988 passed in 2018, has now made giving of bribe also as a punishable offence.
- (c) Bribery can not only be giving cash to someone but also it can take many other forms as under:
  - Non-cash gifts
  - Lavish entertainment or hospitality
  - Employment or ‘consulting’ relationships of a Third Party to a relative
  - Loans
  - Kickbacks
  - Political contributions
  - Charitable contributions
  - Social benefits
  - Gifts, travel, hospitality, and reimbursement of expenses; or
  - Other rewards or benefits.
- (d) It is important to know that it is irrelevant whether the bribe was accepted or not, merely offering the bribe is usually sufficient for an offence to be committed.
- (e) Bribery can be direct (e.g. you give a bribe to someone) or indirect (e.g. you get someone else to give a bribe to another person). Indirect bribery may be deemed to occur even if you have entered into a contract or understanding with a Third Party that does not explicitly or implicitly contemplate the commission of bribery.

### b. Corruption.

- a) Corruption means wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards
- b) Corruption is usually designed to obtain financial benefits or other personal gain.

**c. Third Party.** It means any individual or organization you come into contact with during the course of your work for/with Deepak Group. It includes actual and potential, customers, suppliers, distributors, business contacts, joint venture partners, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

**d. Public official.** It includes a person who holds a legislative, administrative or judicial position of any state. And/or a person who performs public duties or functions for any state, including a person employed by a board, commission, corporation or other body or authority that is established to perform a duty or function on behalf of the Indian Government or a foreign state or is performing such a duty or function.

**e. Facilitation payment.** Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official (such as the issuance of permits, licenses, processing sanctions or work permits).

**f. Kickback.** These are payments made in return for a business favor or advantage and can include discounts or other types of cash incentives.

## 6. What is acceptable and what is not acceptable?

Deepak Group will not accept, you or a third Party acting on your behalf or with whom you have a contract or works on behalf of Deepak Group to:

- (a) Give, promise to give, or offer, a payment, loan, reward, gift or hospitality, to a public official with the expectation or hope that an improper business advantage will be received, or to reward an improper business advantage already given
- (b) Give, promise to give, or offer, a payment, loan, reward, gift or hospitality to a public official to 'facilitate' or expedite a routine procedure performed by a government body or NGO (non-governmental organization)
- (c) Make or authorize cash or cash equivalent (e.g. cheque) reimbursements or payments of any kind to individual public officials without prior written authorization from the Company Secretary.
- (d) Threaten or retaliate against any person who has refused to commit a bribery offence or who has raised concerns under this policy
- (e) Write a cheque to 'cash' or 'bearer'.
- (f) Receive or be promised or offered a payment, loan, reward, gift or lavish hospitality from a Third Party seeking to obtain business improper business advantage or to reward an improper business advantage previously given
- (g) Engage in any activity that might lead to a breach of this policy

**7. Gifts and Entertainment.** As a general principle, Deepak Group does not give or receive gifts and entertainment. However, gifts and entertainment are not prohibited as long as they are appropriate, legitimate, reasonable and modest and are given or received with a purpose to build goodwill and strengthen working relationships. Such gifts and entertainment:





- (a) Must be duly approved
- (b) Must not be intended to improperly influence
- (c) Must not appear to improperly influence
- (d) Are company branded items
- (e) Does not involve cash or cash equivalent, gold or precious stones
- (f) Has not been paid from personnel account of an employee

**(Also read Gifts and Entertainment Policy)**

**8. Facilitation payments and Kickbacks.** Deepak Group prohibits giving and accepting facilitation payments and kickbacks. Any request for facilitation payment should be refused. Payment may be made if there is risk of injury or threat to your life on refusal to pay by you. A receipt for the payment should be taken and the Company Secretary should be informed at the earliest.

**9. Donations.** Making any kind of donations from funds of Deepak Group is prohibited. However, Company may make donations if they are ethical and comply with the local laws.

**10. Third Party.** Unethical business practices followed by some third parties can put DNL at risk. Thus, it is the responsibility of every employee to ensure that due diligence has been conducted on every third party we associate with.

**11. Maintaining Records.**

- (a) DNL will keep financial records and have appropriate internal controls in place which will record the business reason for any payments made to Third Parties.
- (b) All employees must ensure that all expense claims relating to hospitality, gifts, or expenses incurred are submitted in accordance with the Company's expense policy and specifically recording the reason for the expenditure.

**12. Training and Dissemination.**

- (a) This policy should be shared with all existing employees. This policy should also be disseminated during the induction training.
- (b) Deepak Group's zero tolerance towards bribery and corruption should also be communicated to all third parties including suppliers, vendors, contractors, agents and business partners.

**13. Raising concerns and complaints.** Any employee becoming aware of an event or suspicion of violation of this policy is duty bound to report the same through the whistle blow mechanism. Following are some examples of 'Red Flags' which indicate risk to Deepak Group and should be reported immediately through the whistle blow mechanism:

- (a) Third party requests for additional fee or commission to facilitate a service



- (b) Third party requests for payment to be made at an address other than his own address
- (c) Third party requests for payment in cash or refuses to give invoice/ receipt for the a payment made to him
- (d) Third party has the reputation of paying bribes or having close relationship with government officials
- (e) There are legal cases relating to bribery and corruption against the third party
- (f) Third party is known to have engaged in improper payments and improper business practices.
- (g) Third party insists on payment of fees or commission before the service has been provided
- (h) Third party demands lavish gifts or entertainment
- (i) Third party demonstrates willingness to violate laws and policies.
- (j) Third party asks for employment for a relative or friend.
- (k) You are offered lavish gifts or entertainment by the third party
- (l) Third party asks for commission which is very high as per industry standards
- (m) Third party is recommended by a public official, his/her family member, or his/her close associate
- (n) A public official requests, urges, insists, or demands that a particular party, company, or individual (agents, vendors, service providers, etc.) be selected or engaged, particularly if the official has discretionary authority over the business at issue
- (o) Third party is a company with an owner, major shareholder or executive manager who is a public official
- (p) Third party has financial or business ties, relationship, or association with public officials.

**14. Non Retaliation.** Any employee who refuses to offer or accept any bribe and raises a concern regarding violation of this policy will be protected against retaliation. Deepak Group will provide complete confidentiality and protection to the employee who raises concerns in good faith.

**15. Non Compliance to this Policy.** Any unintentional or intentional non-compliance of this policy could result in serious repercussions for the individual employee or Deepak Group as a whole. Thus, all employees are advised to read, understand and follow the guidelines in this policy. Appropriate disciplinary and legal action will be taken in event of any non-compliance of this policy.

**Policy governance:**

- a) These guidelines shall come into effect from 15<sup>th</sup> January 2020.
- b) Internal employees for entry and exit purposes in Office shall use Security Gate where the bio-metric machine is installed.
- c) New joinees during their period of induction for settling assistance shall be exempted from the provisions of Late-coming & Early-going as mentioned in the policy.
- d) The management reserves the right to exclude any employee from the scope of applicability of above policy guidelines for Corporate Office.
- e) The policy deployment shall be reviewed once in a year from effective date

*Note: - Any clarification/ justification regarding the interpretation of this policy shall be done with Corporate HR only.*

*Any deviation from this policy shall not be entertained by the Organization.*

## Discrimination and Harassment Policy

### **OBJECTIVE :**

Provide and maintain an equitable, fair, healthy and fear-free business environment, free of discrimination, for all employees, in which all individuals are treated with mutual respect and dignity

### **COVERAGE & APPLICABILITY:**

The scope extends to all employees in DNL employed across all locations in all disciplines and departments:

- All work locations and in any work-related setting outside the workplace, such as business trips and business-related social events.

### **Guidelines for all Employees on Equal Employment Opportunity and Work Place Harassment**

DNL strives to provide and maintain an environment free of discrimination of any kind, based on caste, religion, gender, ancestry, age, disability, marital status, sex, or any other characteristics. In keeping with this commitment, harassment and inappropriate conduct of any form will not be tolerated.

Any employee, found to have violated this policy will be disciplined, up to and including termination of services. Any employee filing a complaint or assisting in the investigation of a complaint is protected from retaliation, coercion, intimidation, interference, and discrimination.

Each employee is required to contribute to a professional atmosphere that promotes equal opportunity and nondiscriminatory practices. Examples of such inappropriate practices include, but are not limited to -

- Sexual Harassment;
- Any other harassment, bias or prejudice on the basis of any characteristic
- Inappropriate conduct that disrupts or interferes with another's work performance or creates an intimidating, offensive, or hostile environment.

On all occasions, employees are required to exhibit, in their conduct and communications, sound judgment and respect for every other employee and all other persons (e.g., vendors, consultants, and clients) with whom the Company has any business transaction.

Employees should refrain from any act that may be construed as insulting, degrading, exploitative or discriminatory treatment; whether use of abusive language or physical, blatant and obvious or even ambiguous.

Similarly, inappropriate conduct directed towards DNL employees by outside vendors, consultants or clients is also unacceptable.

An employee with any questions or concerns regarding this policy should discuss them with the Human Resource Team.



## Sexual Harassment

DNL does not tolerate workplace sexual harassment and considers it to be a serious offense. Employees are prohibited from harassing other employees, vendors or consultants irrespective of the occurrence of the harassment taking place on company premises or outside; during working hours or after official work hours.

Sexual harassment is defined as —

- Unwanted sexual attention of a persistent or offensive nature made by a person who knows, or reasonably should know, that such attention is unwanted.
- It also includes sexually oriented conduct that is sufficiently pervasive or severe to unreasonably interfere with an employee's job performance or create an intimidating, hostile, or offensive work environment. While sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include (but not limited to):
  - Promising, directly or indirectly, an employee reward, for complying with a sexually oriented request;
  - Threatening, directly or indirectly to retaliate against an employee, if the employee refuses to comply with a sexually oriented request;
  - Denying, directly or indirectly, an employee an employment-related opportunity if the employee refuses to comply with a sexually oriented request;
  - Engaging in sexually suggestive physical contact or touching another employee in a way that is unwelcome;
  - Displaying, storing, or transmitting pornographic or sexually oriented materials using company equipment or facilities;
  - Indecent exposure; or
  - Making sexual or romantic advances toward an employee and persisting despite the employee's rejection of the advances.
  - Comments on the speaker's own sexual abilities or those of co-workers;
  - Obscene teasing, jokes and remarks of a sexual nature;
  - Comments of a sexual nature on, or staring at, an individual's physical attributes;
  - Other harassment of a non-sexual nature that is engaged in due to the gender of the individual.
- Sexual harassment may involve individuals of the same or different gender and is prohibited whether directed toward men or women and regardless of whether the targeted individual accepts or rejects the advances or other offensive behavior.
- Sexual harassment can be physical and/or psychological in nature. A pattern of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.

## Reporting Harassment, Discrimination Or Retaliation

Any employee who believes that he/she is being harassed should immediately and directly, notify the offender, that such behavior (verbal or an action) is inappropriate and request that the behavior be stopped, forthwith.

It is also the right and responsibility of each and every employee to bring any inappropriate behavior in the



form of unlawful discrimination or harassment of any kind, including Sexual Harassment, to the immediate notice of the Human Resource Representative and/or his reporting Manager/other superiors to help build a strong and positive environment.

Any employee, who believes that he/she may have been the subject of unlawful discrimination or harassment of any kind, is required to promptly report the matter to the Human Resource Team Member, who will help him/her subsequently file a complaint with the Management.

Once the complaint is filed with the Management, it is the responsibility of the Human Resource Team Member along with two other members of the Senior Management Cadre (the three member team, should preferably represent both genders. In the event that this is not feasible, it is essential that the Team co-opts another member from the opposite gender) to meet with the complainant and have a detailed discussion to better understand the nature of the issue and completeness.

It is equally important for the team to be thorough to ensure fairness for all concerned. It is critical for the Team to recognize the sensitivity of the issue and maintain a high level of confidentiality while collating the facts of the situation.

Upon completion of this initial discussion with the complainant, the Team should discuss the complaint with both the complainant as well as the “offender”. In the event that the complainant is uncomfortable, he/she may be excluded from the meeting and the meeting with the “offender” may be held separately.

A fair chance should be given to both the Parties (The Harassed and the Offender) to put forward their word. After listening to either of the sides and studying the facts, if the decision goes in favour of the harassed employee, an unbiased and fair action should be taken against the Offender.

Consider the severity, frequency and pervasiveness of the conduct when imposing discipline on the harasser. There are several disciplinary options available, including:

- ◆ Oral and written warning
- ◆ Reprimand
- ◆ Suspension
- ◆ Probation
- ◆ Transfer
- ◆ Demotion
- ◆ Discharge

In the event that an employee believes he/she has witnessed any form of harassment or any inappropriate behavior, he/she must also notify Human Resource Team Member, who will discuss the same with VP - HR and they will work with the concerned Senior Official towards understanding and resolving the issue.

Similarly, any employee who belongs to the Leadership team or plays a senior role in the Company receives



information regarding any form of harassment or discrimination, irrespective of the Company/unit, then, he/she has the responsibility and obligation to report it immediately to Human Resource Representative and a similar process as above is to be followed once the harassment issue is reported within the Organization.

### General

- The Company may, notwithstanding the eligibility and terms mentioned above, at its discretion amend, modify or withdraw this policy.
- Any deviation from the provisions made in the clauses mentioned in the policy will require prior approval of the VP – HR, Chief Financial Officer, Executive Director and the concerned Managing Director of the Company.
- DNL Group employees should contact Corporate HR, in case of any clarifications



## Annexure - A

### Harassment Investigation Guide

#### **1. Getting the employee to describe the Claim:**

- Listen to the Charge. Don't make comments like, 'you're overreacting.'
- Acknowledge that bringing harassment complaint is a difficult thing to do.
- Maintain a professional attitude.
- Gather the facts; don't be judgmental
- Ask who, what, when, where why and how. Find out if the employee is afraid of retaliation. How does the employee want the problem resolved?

#### **2. Conducting an investigation of the claim – general rules to follow:**

- Investigate immediately. Delaying or extending an investigation can make witness testimony increasingly unreliable.
- Remember that the manner in which the investigation is handled can itself furnish grounds for a hostile environment claim, so carefully document every step.
- Treat all claims seriously – even those that seem frivolous – until you have reason to do otherwise.
- Keep the investigation confidential. Emphasize to those involved that your discussions are not to be shared with uninvolved parties. Warn of possible disciplinary action, if necessary.
- Limit the number of persons who have access to the information. Communicate strictly on a 'need to know' basis.
- Ask questions so that information is not unnecessarily disclosed. For example instead of asking, 'Did you see X touch Y?' ask "Have you seen anyone touch Y at work in a way that made her uncomfortable?" Remember – the purpose of the investigation is to gather facts, not disseminate allegations.
  - If there is more than one allegation, treat each separately
  - To avoid defamation liability, never broadcast the facts of a given situation or the results as an example to others or as a training tool.

#### **3. Interviewing the complainant (can be done when employee first reports charge):**

- Get specific details
- Find out whether there was a pattern of previous episodes or similar behaviour toward another employee.
- Get the specific context in which the conduct occurred. Where? What time?
- Determine the effect of the conduct on the complainant. Was it economic, non-economic, and/or psychological?
- Determine the time relationship between the occurrence of the conduct, its effect on the complainant, and the time when the complainant made the report.
- Prepare a detailed chronology.
- Analyze whether there might have been certain events that triggered the complaint, i.e., promotion, pay or transfer denial.
- Determine whether there were any possible motives on the part of the complainant.
- Find out what the complainant wants.

- Explain to the complainant that the charges are serious, that you will conduct a thorough investigation before reaching any conclusion, and that he or she will not be retaliated against for making the complaint.
- Don't make any statements about the accused employee's character, job performance, or family life.

#### **4. Interviewing the accused:**

- Obtain a statement from the accused.
- Identify the relationship of the accused to the complainant.
- If the individual was a supervisor, indicate the individual's job title, and determine the individual's specific duties at the time of the alleged harassment.
- Determine whether the accused directed, or had responsibility for the work of the complainant, had authority to recommend employment decisions affecting the complainant.
- You can expect the accused to deny the charges. Observe the reaction. Note whether there is surprise, anger, or disbelief. Describe the details of the allegation and note the areas of disagreement between the testimony of both parties. If the accused denies the allegations, probe further to determine with the accused the background, reasons, and motivation that could possibly trigger the complaint.

#### **5. Interviewing witnesses:**

- Obtain statements from any witnesses who support or deny any of the complainant's allegations. Be aware that witnesses are often reluctant to come forward out of fear of reprisal.
- Assure all witnesses that their cooperation is important, that their testimony is confidential and that they will not be retaliated against for testifying.

#### **6. Resolving the complaint:**

- Apologize for the incident occurring, if that is appropriate.
- When attempting to remedy the conduct, avoid requiring the claimant to work less desirable hours or in a less desirable location. If you offer to transfer the complainant, try to get the complainant's consent and make sure the transfer position is substantially similar to the complainant's prior position. This helps ensure that the complainant is not being illegally punished for reporting discrimination or harassment.
- When imposing discipline on the accused, any forms of discipline short of discharge should be accompanied by a warning that similar misconduct in the future may result in immediate discharge. If no discipline is imposed, document the reasons why.
- Carefully and fully document the investigation, the discipline imposed, and any remedial steps taken.
- Conduct follow-up interviews with the parties to inform them of the company's actions.



## Annexure - B

### Sexual Harassment Complaint and Resolution Procedure

#### COMPLAINT REDRESSAL COMMITTEE

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

A Complaints Redressal Committee has been formed consisting of the following:

1. A senior woman employee, as Presiding Officer
2. A senior employee from HR Department
3. An employee from Legal Department
4. An outside women, preferably from a Non-Government Organization.

All members are required to be present for the proceedings to take place. The quorum shall include the Chairperson, two members, one of whom shall be a lady.

#### REDRESSAL PROCESS

Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.

The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.

At the first meeting, the Committee members shall hear the Complainant and record his/her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/ her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.

In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

### **ENQUIRY PROCESS**

The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.

If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he /she shall supply original copies of such documents. Both shall affix his /her signature on the respective documents to certify these to be original copies.

The Committee shall call upon all witnesses mentioned by both the parties.

The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

The Committee shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Vice President – Human Resources. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

The Vice President – Human Resources will direct appropriate action in accordance with the recommendation proposed by the Committee.

The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

### **OTHER POINTS TO BE CONSIDERED**

The Committee may recommend to the Vice President – Human Resources action which may include transfer or any of the other appropriate disciplinary action.

The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, DNL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Head- HR.

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and the Management, for making a Police Complaint, shall initiate appropriate action.

### **Complaints made with a malicious intent**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

## Gifts and Entertainment Policy

### 1 Introduction :

As a general principle, giving, offering or receiving of gifts and entertainment at Deepak Group, are not allowed. However, there may be occasions where to build goodwill and strengthen working relationships with our business associates, giving or receiving gifts and entertainment may be appropriate. Gifts and entertainment can be a legitimate way of showing appreciation for business relationships, but gifts and entertainment should never be given as a means of influencing another person's decision-making. Neither should DEEPAK GROUP's employees allow the gifts or entertainment offered by others to influence their business decisions. In cases where, gifts, entertainment and travel are frequent or of substantial value, they may create the appearance of, or an actual, conflict of interest or illicit payment, or otherwise affect DEEPAK GROUP's reputation.

### 2 Purpose :

This policy intends to help employees take the right decision when giving or accepting gifts, entertainment or travel, while conducting business on behalf of DEEPAK GROUP.

### 3 Scope :

- This policy is applicable to all Directors and Employees (both permanent and contractual) of Deepak Group and its subsidiaries.
- This policy should be read in conjunction with DEEPAK GROUP's Code of Conduct and Anti-Bribery and Anti-Corruption Policy.

### 4 Definitions :

#### a) Gifts.

A gift can be anything of value either received by a DEEPAK GROUP employee or a member of his or her family from an external party or offered or given by a DEEPAK GROUP employee to an external individual or a member of their family. The examples of gifts are given at Appendix.

#### b) Entertainment.

It is an event to which you accompany a third party. Event such as a meal, sports match or cultural event (e.g. a show or exhibition), and includes any travelling, accommodation and refreshments. When the host does not attend the event with you or when DEEPAK GROUP is paying for the event and a DEEPAK GROUP employee does not attend with the third party, the event is a gift and shall consequently follow the rules for gifts.



## 5 Policy

**a. Yardstick for Gifts and Entertainment.** Answer the following questions before taking a decision on giving or receiving any gifts and entertainment. Proceed further only if the answers to all questions are 'YES' :

- Is it for any proper purpose
- Is not intended to secure an improper advantage or inappropriately influence the recipient.
- Is it permitted by law
- Do our policies permit this
- Do the policies of the recipient allow this
- Is it of reasonable in value
- Is not meant for the family of the recipient
- Cost is equal to or less than Rs 2500/- when in India and equal to or less than \$ 100 outside India
- It will not embarrass you or the company if other people in the company come to know of this

**b. Gifts and Entertainment to Government officials.**

- All Directors and Employees are required to exercise great care while interacting with Government officials. All are expected to act with highest level of integrity.
- Prior approval of the Chief Executive Officer should be obtained before giving any gift or provision of Entertainment to any Government official.
- Gifts and entertainment of insignificant value such as branded giveaways (pens, notepads, diaries and calendars) or refreshments offered during meetings are not covered by this rule

**c. Permissible Gifts.**

- Company branded giveaways
- Gifts costing equal to or less than Rs 2500/- in India and \$100 abroad
- Gifts for which proper approval has been taken and record kept
- Would not embarrass DEEPAK GROUP or the gift giver if disclosed publicly
- Would not influence, or appear to influence, the employee's ability to act in the best interest of DEEPAK GROUP

**d. Prohibited Gifts.** The following gifts are never appropriate and should never be accepted or given:

- Gifts of cash or gold or other precious metals, gems or stones
- Gifts that are prohibited under applicable law
- Gifts given as a bribe, payoff, kickback or as a 'facilitation' payment
- Gifts the recipient knows are prohibited by the gift giver's or recipient's organization
- Gifts given in the form of services or other non-cash benefits (e.g. a promise of employment)

**e. Permissible Entertainment.**

- When it is infrequent
- It reasonably related to a legitimate business purpose (e.g., accompanying a customer or supplier to a local theatre/sporting event or attending a business meal)
- It is not given as a bribe, payoff, kickback or facilitation payment (e.g., in order to obtain or retain business or to secure an improper advantage)



- d) It does not create the appearance (or an implied obligation) that the entertainment is entitled to preferential treatment, an award of business, better prices or improved terms of sale or service
- e) It is in good taste and occurs at a business appropriate venue
- f) It is reasonable and appropriate in the context of the business occasion;
- g) It would not influence, or appear to influence, the employee's ability to act in the best interest of DEEPAK GROUP;
- h) It is disclosed, if applicable, in the Gift Register
- i) It is duly approved, if applicable, by the Departmental Head.

**f. Not permissible Business Entertainment.**

- a) Entertainment that can be viewed as excessive in the context of the business occasion
- b) 'Adult' entertainment, or any event involving nudity or lewd behavior
- c) Entertainment that can be viewed as creating any affiliation of DEEPAK GROUP brand with any particular political party
- d) Entertainment that the recipient knows that the gift-giver is not permitted to give
- e) Entertainment that would involve a breach of any applicable law
- f) Boarding and travel expenses for any kind of entertainment will not be given or received

**6 Procedure for Gifts and Entertainment.**

**a) Approvals :**

- No Gifts (other than branded giveaways) and entertainment will be given by a DEEPAK GROUP employee without proper approval
- Employees will take approval on mail from the 'Department Head' for giving Gifts and Entertainment, cost of which is within the stipulated in this policy. Mail will specify recipient, occasion and approximate cost. Copy of this mail along with the approval mail will be submitted to finance department as supporting documents for the reimbursement claim
- Any gift or entertainment planned to be given by the DEEPAK GROUP employee for an amount above the stipulated limits, the Head of the Department will obtain approval on mail of the Chief Executive Officer giving reasons for this exception

**b) Gift Register.**

1. A central gift register will be maintained at all locations for record of gifts and entertainment given or received beyond the stipulated value.
2. Gift register will record following details:
  - a. Employee name
  - b. Description of gift, relevant date
  - c. Identity of the gift giver
  - d. Approximate value of the gift
  - e. Context / business purpose of the gift
  - f. Authority which has given approval
  - g. Whether accepted or declined
  - h. If accepted, reason/s for the same
  - i. If declined, reason/s for the same



3. Going forward we will develop an interactive gifts and entertainment register on the intranet. Each employee giving or receiving gifts and entertainment, will be required to update the same. Giving and receiving gifts and entertainment will, thus, become transparent.

**c) Procurement of DEEPAK GROUP Branded Giveaways.**

1. At the beginning of every financial year, Head Corporate Communication will procure samples of branded gifts and get them approved from the CEO. Approved gifts will be circulated to each location.
2. Each location head will place firm requirement of respective branded gifts with the Head of Corporate Communication. Same will be bought in bulk and distributed to each location by Head Corporate Communication.
3. Each department will maintain proper record of the branded giveaways. It will be subject to internal audit.

**7 Reporting Violation:**

Anyone who becomes aware of violation of this policy is encouraged to report the same through Whistle Blow mechanism.

**8 Policy governance:**

- a) These guidelines shall come into effect from 15<sup>th</sup> January 2020.
- b) Internal employees for entry and exit purposes in Office shall use Security Gate where the bio-metric machine is installed.
- c) New joinees during their period of induction for settling assistance shall be exempted from the provisions of Late-coming & Early-going as mentioned in the policy.
- d) The management reserves the right to exclude any employee from the scope of applicability of above policy guidelines for Corporate Office.
- e) The policy deployment shall be reviewed once in a year from effective date.

*Note: - Any clarification/ justification regarding the interpretation of this policy shall be done with Corporate HR only.*

*Any deviation from this policy shall not be entertained by the Organization.*

## Appendix

### Examples of Gifts

Some examples are as under:

- Cash or cash equivalent (such as gift, prepaid or stored-value cards or vouchers)
- Shares, stocks or securities
- Participation in share offerings
- Tickets and gift certificates
- Artwork
- Jewelry
- Equipment
- Electronics (e.g. mobiles, laptops, cameras)
- Delicatessen products (e.g. food, tea, alcohol, cigarettes)
- Loans
- Prizes
- Transportation
- Use of vehicles
- Donations to charity
- Discounts
- Favorable terms for a product or service
- Use of vacation facilities or hotels
- Home improvements



## Prevention Of Sexual Harassment (POSH) Policy

### INTRODUCTION :

1. Deepak Nitrite Limited ('DNL' or 'Company') and its subsidiaries provide a safe and secure work environment for women which is free from any form of sexual harassment and where all women employees are treated with dignity and respect.
2. This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder ('the Act'). The policy covers all the key aspects of the Act.

### PURPOSE :

1. To clearly /define DNL's position on the issue of sexual harassment of women at workplace.
2. To prohibit and prevent any kind of sexual harassment of women at all workplaces of DNL and its subsidiaries.
3. To lay down policy for addressing issues related to sexual harassment promptly, confidentially and with sensitivity.
4. To ensure compliance with the Act and DNL's Code of Conduct.

### SCOPE :

1. This policy extends to all employees (both on roll and contractual) of DNL and all its subsidiaries and all the visiting women.
2. In case, sexual harassment occurs to a DNL employee as a result of an act by a third party or outsider, while on official duty, DNL will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

### DEFINITIONS :

**Sexual Harassment** : According to Section 2(n) sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), namely:

- i. Physical contact or advances, or
- ii. A demand or request for sexual favors, or
- iii. Making sexually colored remarks, or
- iv. Showing pornography, or
- v. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature,

### PREVENTION OF SEXUAL HARASSMENT :

According to Section 3

1. No woman shall be subjected to sexual harassment at any workplace.
2. The following circumstances, among other circumstances, if it occurs or is present in relation to or



connected with any act or behavior of sexual harassment may amount to sexual harassment

- i. implied or explicit promise of preferential treatment in her employment,
- ii. implied or explicit threat of detrimental treatment in her employment,
- iii. implied or explicit threat about her present or future employment status;
- iv. interference with her work or creating an intimidating or offensive or hostile work environment for her, or
- v. humiliating treatment likely to affect her health or safety,

**Note:** In determining 'Unwelcome Acts' whether the behavior or act complained of, is an unwelcome act / or is sexual harassment, one of the factors to be given due weight shall be the subjective perception of the complainant.

#### WORKPLACE :

1. Any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the
2. Appropriate Government or the local authority or a Government company or a corporation or a co-operative society;
3. Any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service; hospitals or nursing homes;
4. Any sports institute, stadium, sports complex or competition or games venue. whether residential or not used for training, sports or other activities relating thereto
5. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey
6. A dwelling place or a house;

#### AGGRIEVED WOMAN :

1. In relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent
2. All women working or visiting any workplace whether in the capacity of regular, temporary, adhoc, or daily wages basis is protected under the Act.
3. It includes all women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or otherwise. Their terms of employment can be express or implied.
4. Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name. The Act also covers a woman, who is working in a dwelling place or house.

## COMPLAINTS COMMITTEE/S :

The Act provides for two kinds of complaints mechanisms, Internal Committee (IC) and Local Committee (LC). All Complaints Committees will have 50 per cent representation of women.

**1. Internal Complaints Committee (ICC) : According to Section 4 :** DNL is obliged under the act to constitute an ICC through a written order at each location which will manage the process of enquiry and redressal of sexual harassment complaints. The ICC will be composed of the following members :

- a) **Presiding Officer (Chairperson) :** A Woman working at a senior level from amongst the employees, if not available then nominated from other office, plant, department, location of the DNL
- b) **Members (Minimum Two) :** From amongst employees committed to the cause of women, having legal knowledge, experience in social work
- c) **External Member :** From amongst NGO/associations committed to the cause of women or a person familiar with the issue of Sexual Harassment
- d) Quorum of minimum three members is required to be present for any proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a woman.

The presiding officer and every other member of Internal Complaint Committee shall hold office for such period not exceeding 3 years

**2. Local Committee (LC) : According to Section 5 :** The District Officer will constitute an LCC in every district so as to enable women in the unorganized sector or small establishments to work in an environment free of sexual harassment. Local complaints of sexual harassment from establishments where ICC has not been constituted due to having less than 10 workers or

## HOW TO LODGE A COMPLAINT :

1. An Aggrieved woman may make, in writing, a Complaint of Sexual Harassment at Workplace to the Internal Committee if so constituted, or the Local Committee, in case it is not so constituted within a period of 3 Months from the date of incident and in case of series of incidents, within a period of 3 Months from the date of last incident.
2. Complainant can also raise the complaint through whistle blow mechanism. Complainant can also raise a complaint directly with IC via email or in writing to the Presiding officer or any member of the IC.
3. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint.
4. The complaint must include:
  - a) Description of the incident,
  - b) date(s),
  - c) timings,
  - d) Respondents name
  - e) Parties working relationship
5. Complaint should be raised within 3 months from date of incident or within 3 months from the date of last incident, in case of a series of incidents.

6. The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.
7. The Committee shall ensure that a fair and just investigation is undertaken immediately. Both the complainant and the respondent shall be initially questioned separately with a view to ascertain the veracity of their contentions.
8. The complainant and the respondent shall be informed of the outcome of the investigation. The investigation shall be completed in not more than 90 days from receipt of the complaint.

#### **POWERS OF INTERNAL COMPLAINTS COMMITTEE (ICC) :**

1. Initiate enquiry procedure :
  - i. ICC is required to take cognizance of complaint, if the complaint is made within the period of 3 months from date of incidence or from date of last incidence.
  - ii. ICC should initiate steps before commencing inquiry to settle the matter between the complainant and respondent through conciliation. However, conciliation on the basis of monetary settlement should not be made.
  - iii. Provide copies of the settlement recorded to Ethics Committee (defined by Deepak Nitrite Limited), aggrieved woman/complainant and the respondent to take actions as specified in recommendations.
  - iv. ICC will make inquiry into the complaint in accordance with the service rules applicable to the respondent and where no such rule exist, in the manner prescribed under Rule 7 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.
  - v. Ensure inquiry is completed within a period of 90 days.
  - vi. Provide report on findings within 10 days after the completion of an inquiry to the Ethics Committee.
2. ICC has the power to summon witnesses and call for documents or any information from any employee.
3. If the ICC has reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such documents or information by serving a notice in writing on that person, summoning the person, or calling for such documents or information at such place and within such time as may be specified in the written notice.
4. Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the Committee shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.
5. Upon production of documents / information called for by it, the Committee shall have the power to:
  - i. Make copies of such documents and information or extracts there from,
  - ii. Retain such documents and information for such period as may be deemed necessary for purposes of the proceedings before it.
6. IC will support the aggrieved woman in lodging an FIR if she wishes to do so.

#### **PENAL CONSEQUENCES OF SEXUAL HARASSMENT :**

1. ICC shall not recommend any action if the allegations are not proved.
2. The employee, against whom the allegation of sexual harassment has been proven, becomes liable to



penal actions. ICC may recommend the following:

- i. Demand for a written letter of apology,
  - ii. Warning letter / memo, reprimand or censure,
  - iii. Withdrawal / withholding of promotion,
  - iv. Withdrawing the pay rise or increment,
  - v. Termination from Company's services;
  - vi. Undergoing counseling session(s),
  - vii. Carrying out Community Service,
  - viii. Any other action as per the Company's Service Rules or as the Management may deem appropriate.
3. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

### TIMELINES AS PER ACT :

Following timelines have been laid down by the Act:

- a) Submission of Complaint: Within 3 months of the last incident
- b) Notice to the Respondent: Within 7 days of receiving copy of the complaint
- c) Completion of Inquiry: Within 90 days
- d) Submission of Report by IC: Within 10 days of completion of the inquiry
- e) Implementation of Recommendations: Within 60 days
- f) Appeal: Within 90 days of the recommendations

### CONFIDENTIALITY :

1. The Act prohibits the publication or making known the contents of a complaint and the inquiry proceedings. Any breach of confidentiality will result in specific legal consequences.
2. The Act prohibits the disclosure of:
  - a) Contents of the complaint,
  - b) Identity and address of complainant, respondent and witnesses; Information pertaining to
  - c) conciliatory/inquiry proceedings or recommendations of the IC,
  - d) Action taken by the Company.

### PROTECTION AGAINST RETALIATION :

1. Irrespective of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation.
2. While dealing with complaints of sexual harassment, the IC shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused.
3. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the respondent against the complainant while the investigation is in progress should be reported by the complainant to the Committee as soon as possible.
4. Disciplinary action will be taken by the Committee against any such complaints which are found genuine.

## DUTIES OF EMPLOYER'S ACCORDING TO SECTION 19

Head of HR shall be responsible for :

- Ensure that following are prominently displayed at each location.
- The names and contact details of ICC members.
- Penal consequences of Sexual Harassment.
- Conduct awareness programs and workshops about this policy and also ensure that awareness is imparted during induction training.
- Maintain records of Sexual Harassment cases and findings of IC.

*Note: - Any clarification/ justification regarding the interpretation of this policy shall be done with Corporate HR Head only. Any deviation from this policy shall not be entertained by the Organization.*

### INTERNAL COMPLAINTS COMMITTEE

Deepak Nitrite Limited ("Company") is committed in creating a healthy working environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity and protection of women against sexual harassment at workplace is given utmost importance.

Pursuant to provisions of Sub-Section (1) of Section 4 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and Company's Policy on Discrimination and Harassment ("Policy"), an Internal Committee comprising of following members is hereby constituted to deal with the complaints of sexual harassment at workplace in accordance with the Act and Policy:

#### FOR CORPORATE OFFICE - VADODRA

SR. NO.	NAME	CONTACT DETAIL		EMAIL ID
		LANDLINE NO.	MOBILE NO.	
1	MS. SITA MURALIDHARAN (Presiding Officer)	0265-2765403	9904709874	<a href="mailto:smuralid@godeepak.com">smuralid@godeepak.com</a>
2	MR. NARENDRA RAVAL	0265-2765241	9909522555	<a href="mailto:nlraval@godeepak.com">nlraval@godeepak.com</a>
3	MR. ARVIND BAJPAI	0265-2765302	9904709815	<a href="mailto:abajpai@godeepak.com">abajpai@godeepak.com</a>
4	MS. DIPTI AGRAWAL	0265-2765500	7738485450	<a href="mailto:dcagrawal@godeepak.com">dcagrawal@godeepak.com</a>
5	MS. SURABHI BHESANIA	0265-2765260	6358882264	<a href="mailto:skbhesania@godeepak.com">skbhesania@godeepak.com</a>
6	DR. JAI PAWAR	--	9909984911	<a href="mailto:jai.pawar@deepakfoundation.org">jai.pawar@deepakfoundation.org</a>

It is brought to the notice of all concerned that sexual harassment at the work place is considered by the Company a grave offence and is liable to be punishable. Where the allegations against the respondent in a complaint is proved, the Company shall, on the recommendations of the Internal Committee :

- a) Take action for sexual harassment as a misconduct in such manner as may be prescribed under the Act.
- b) Deduct, from the salary or wages of the respondent such sum as may considered appropriate to be paid to the aggrieved woman or to her legal heirs, as the Internal Committee may determine in accordance with the provisions of the Act.
- c) Take such other action as the Company deems necessary.

## Policy on Office Working Hours

### **Objective :**

To provide guidelines to all the employees regarding office working hours:

- 1) Office timing
- 2) Late-coming and Early-going
- 3) Late-coming & Early-going in a half-day framework
- 4) Attendance while on outdoor office duty during working hours
- 5) Lunch break

### **Applicability :**

The policy applies to following :

- a. On-roll employees
- b. Trainees
- c. Retainers and Consultants
- d. Temporary employees

All above working in Corporate Office i.e. – Aaditya – 1 & 2, Ahmedabad Office and Delhi Office.

### **Policy Guidelines:**

#### **1) Office Timing:**

- i. The office timing shall be from 09:30 a.m. to 06:30 p.m. (i.e. 9 hours/day).
- ii. Half day definition :
  - First Half – 9:30 am to 2:00 pm
  - Second Half – 2: 00 pm to 6: 30 pm
- iii. Time flexibility is provisioned to employees wherein they may reach office anywhere between 09:30 a.m. to 09.45 a.m.
- iv. Time flexibility is provisioned to employees wherein they may reach office anywhere between 09:30 a.m. to 09.45 a.m for full day and
  - For half day in First Half – 9:30 am to 9:45 pm till 2:00 pm to 2:15 pm
  - For half day in Second Half – 2:00 pm to 6:30 pm till 2:15 to 6:45 pm
- v. Employees reaching office later than 09:30 am shall be required to work beyond 06:30 p.m. to adjust such Late-coming as well as to ensure completion of 9 hours/day mandate.
- vi. All employees are required to record their attendance in the biometric attendance system by swiping in and out two times mandatorily, adhering to office timing.
- vii. In an event employee is required to leave during office hours for attending outdoor duty, the employee is required to swipe out in the biometric attendance system and record in the register kept with the Security.



- viii.** In an event employee reaches office later than the office timing after attending outdoor duty, the employee is required to swipe in biometric attendance system and record in the register kept with the Security

## 2) Late-coming and Early-going :

### a) Late-coming:

- i.** The employees shall ensure not to report office later than 09:45 a.m. on any working day.
- ii.** Wherein any employee reports later than 09:45 a.m. on any working day (in case of full day) or reports later than 02:15 p.m. on any working day (in case of half day), such accumulated Late-coming and Early-going combined as stated in scenario of Early-going stated below shall not exceed 1 hour during any month subject to a maximum of 3 such instances (combining full day and half day instances) in a calendar month. No deductions/ recovery shall be made from leave balance/ salary for such Late-coming provided the total Late-coming is within 1 hour in a calendar month.
- iii.** Wherein, if an employee exceeds Late-coming beyond 1 hour, subject to maximum of 3 instances, for every instance, the employee shall be required to apply for half day leave against intimation given by time office department.

### b) Early-going:

- i.** Wherein an employee leaves office before putting in minimum 9 hours (in case of full day) or 4.5 hours (in case of half day), such Early-going shall not exceed 1 hour subject to a maximum of 3 such instances in a calendar month. While considering 1 Hour and the instances, time of Late-Coming shall also be considered. Total instances and Time of Late-coming and Early-going combined shall not exceed 3 Instances and 1 Hour duration and the time. No deductions shall be made from leave balance for such Early-going and Late-coming combined provided it is within 1 hour in a calendar month.
- ii.** Wherein, if an employee exceeds 1 hour subject to maximum of 3 instances of Late-coming and Early-going combined, the employee shall be required to apply for half day leave for each such instance exceeding 3 Instances and 1 Hour against intimation given by time office department.

## 2) Late-coming & Early-going in a half-day framework :

- i.** In event of employee reporting later than 09:30 a.m. and leaving office earlier than 02:00 p.m. without putting-in minimum 4.5 hours of duty on any working day, in such instances, employee will be required to apply for half-day leave

## 3) Attendance while on outdoor office duty during working hours :

- i.** Wherein any employee visits to clients place / vendors / customers, etc. directly from his/ her residence for official purpose and reports late to office, such employees shall be governed as per guideline mentioned in point no. **1).vi.**



- ii. Similarly, any employee who leaves office early to meet clients / vendors / customers, etc., such employees shall be governed as per guideline mentioned in point no. **1).v.**
- iii. Employees reporting late to office / going early from office owing to official tour during official hours and as per **1).vi. / 1).v.** have to mandatorily apply for regularizing their attendance/ outdoor duty in system, mentioning the details of such outdoor duty.

#### 4) Lunch break:

- i. The lunch break shall be for half an hour (i.e. any time between 01:00 p.m. to 02:30 p.m.).
- ii. Employees going for lunch at designated canteen facility/ going out of office during lunch break are required to adhere to this duration and are required to swipe in and swipe out in the biometric attendance system.
- iii. Employees going out of office premises other than during lunch time, would be required to record their exit and entry time in the register kept with the Security.

#### Policy governance:

- a) These guidelines shall come into effect from 15<sup>th</sup> January 2019.
- b) Internal employees for entry and exit purposes in Office shall use Security Gate where the bio-metric machine is installed.
- c) New joinees during their period of induction for settling assistance shall be exempted from the provisions of Late-coming & Early-going as mentioned in the policy.
- d) The management reserves the right to exclude any employee from the scope of applicability of above policy guidelines for Corporate Office.
- e) The policy deployment shall be reviewed once in a year from effective date

*Note: - Any clarification/ justification regarding the interpretation of this policy shall be done with Corporate HR only.*

*Any deviation from this policy shall not be entertained by the Organization.*

## Ethics, Human Rights & Labour Policy

It's our culture at Deepak Nitrite Ltd. to respect human rights, foster freedom, dignity equality and integrity.

We strive to incorporate Global Compact Principles and International Standards into our strategies to lead in good governance & ethical practices.

We are committed to:

- Forbid any kind of child, forced, bonded or involuntary labour.
- Avoid corruption, extortion, embezzlement and other unlawful incentives.
- Safeguard and make only appropriate use of confidential information.
- Protect stake holders' privacy and valid intellectual property rights.
- Take decisions based on merit and promote fair competition.
- Ensure no discrimination based on gender, age, social origin, disability and religion.
- Provide working environment free of harsh and inhumane treatment, devoid of sexual harassment or sexual abuse.
- Observe working hours and pay compensation, as per applicable laws.
- Proactive compliance with all applicable statutory, regulatory and other requirements.

We communicate our policy to all concerned and encourage our subcontractors and suppliers to adopt similar policies and practices.



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

Deepak Nitrite Ltd (DNL) endeavors to provide a conducive working environment that is characterized by equality and mutual respect. DNL has adopted “No child or forced labor” policy and will not tolerate the use of child or forced labour, nor exploitation of children in any of its operations and facilities. To achieve this goal, we are proactively committed to:

Ensure that no person below the age of eighteen years is employed in the workplace and prohibit the use of forced or compulsory labour at all our locations.

- Comply with all applicable child labour laws, including those related to wages, hours worked, overtime and working conditions.
- Ensure that no employee is made to work against the will or to work as bonded or forced labour or subjected to corporal punishment or coercion of any kind, related to work.
- Refrain from engaging with contractors, vendors, suppliers and associates who resort to using child labour and forced labour in their operations.

This policy is communicated to all concerned in an appropriate and meaningful manner.

DNL has appropriate systems and processes in place to ensure compliance with this Policy and with statutory provisions, including processing of grievances for redressal. The responsibility of implementation of the policy rest with HR team and the Security staff who do not permit under-age person to enter the factory as worker.

The employment contract and other records documenting all relevant details of the employees including age are maintained at all units and are open to verification by any authorized person. Surprise sample check of records is undertaken and internal audit is carried out by the independent internal audit team.



## Policy on Diversity, Equal Opportunity and Freedom of Association

Deepak Nitrite Ltd (DNL) believes that all employees are important stakeholders in the organization, and it is imperative to build a culture of mutual trust and respect, interdependence, and meaningful engagement. Diversity, equal opportunity, and freedom of association at the workplace helps in building, strengthening, and sustaining harmonious employee relations across the organization and creates an environment conducive to engagement, alignment, innovation, and high performance.

To achieve this goal, we are proactively committed to:

- Provide a work environment that is free from any form of discrimination.
- Promote diversity and offer equal opportunity to all employees based on merit and ability.
- Engage and promote employees based on their qualifications, competency, and performance.
- Ensure that there is no discrimination amongst employees in compensation, training, and employee benefits, based on caste, religion, disability, gender, sexual orientation, race, colour, ancestry, marital status, or affiliation with a political, religious or union organization or majority or minority group.
- Respect the dignity of the individual and the freedom of employees to lawfully organize themselves into interest groups, independent of supervision by the management and ensure that employees are not discriminated against for exercising this freedom in a lawful manner and consistent with DNL's core values.

This policy is communicated to all concerned in an appropriate and meaningful manner. DNL has appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including processing of grievances for redressal.



## Diversity, Equity And Inclusion Policy

### DIVERSITY, EQUITY AND INCLUSION AT DEEPAK GROUP CO.

"**Diversity**" describes a wide variety of differences that may exist amongst people in any community, including race, ethnicity, nationality, gender and sexual identity, disability, neurodiversity, and others.

"**Equity**" is the practice of providing fair opportunities via personalized approaches based on individual needs, thus aiming to "level the playing field" by considering the different starting points of different individuals. Equity should not be confused with the notion of "equality" which aims to treat everyone the same.

"**Inclusion**" specifies the desired outcome, namely, ensuring that individuals find opportunities and spaces to participate, regardless of their differences. Inclusion is a step towards integration, where diverse individuals blend into the environment safely and harmoniously.

#### Our Vision:

As a responsible corporate citizen, we envision an organization that embraces diversity, equity and inclusion to be an equal opportunity institution, empowered to meet the varied and changing needs of our internal and external stakeholders. Our core philosophy of "Responsible Chemistry" is the foundation of our operations and our relationships with our employees and society. We believe in "culture add" in the journey of Deepak group as a robust approach towards building a world where everyone Depends on Deepak.

#### Our Objective:

To address and eliminate any conscious or unconscious gender and diversity disparities, including persons with disability, to be an inclusive and an Equal Opportunity Organization with zero tolerance for any discrimination.

#### Our commitments:

Deepak Group is committed towards celebration of the common values and focuses on bridging differences among the diverse work pool. We also commit ourselves towards:

- An inclusive work environment where members from diverse backgrounds can grow together and thrive.
- Encouraging and investing in sustaining workforce diversity in terms of all genders, social origin, abilities, age, experiences, demographics, sexual orientation, etc.
- Designing and reviewing effectiveness of policies, systems and processes, to nurture Diversity, Equity and Inclusion across all our entities.
- Respecting the privacy of every individual's information w.r.t disability/ sexuality/ gender identity or any other personal information shared by our employees (or potential candidates).
- Diversity initiatives which are applicable- but not limited- to our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions and other



aspect of our employee's life cycle.

- Encouraging all our stakeholders both internal and external, performing services for the Group to also adopt a robust DEI policy.

The guidelines of this policy are non-negotiable, and DEI is at the core of our work culture.

**For any violations, please approach Deepak Group DEI Council.**

This is a group policy and applies to all employees of Deepak, also providing the guiding principles as an equal opportunity employer.

