

Ddev Plastiks Industries Limited

CIN: L24290WB2020PLC241791 Registered Office: 2B, Pretoria Street, Kolkata- 700 071

Environmental, Social and Governance (ESG) Policy

1. Introduction:

Ddev Plastiks Industries Limited ('DPIL' or 'the Company') is committed to sustainable and ethical practices and aligns its operations with the 9 principles of the National Guidelines for Responsible Business Conduct (NGRBC).

We understand that Environmental, Social & Governance (ESG) performance and management of ESG risks is a key consideration for all our stakeholders.

The Securities and Exchange Board of India (SEBI) mandates that the top 1,000 listed companies include a Business Responsibility and Sustainability Report (BRSR) in their annual reports, effective from the financial year 2022-2023. This policy aligns Ddev Plastiks Industries Limited (DPIL)'s practices with the sustainability principles set by SEBI and India's National Guidelines on Responsible Business Conduct.

2. Purpose:

Environmental, Social, and Governance (ESG) policy:

- Defines the company's commitment to Environmental, Social and Governance principle and to sustainable and responsible practices
- Aligns business operations with sustainability and ethical standards.
- Outlines the principles and guidelines for incorporating ESG into company's decisionmaking processes, operations and corporate culture.
- Fosters transparency and accountability, helps mitigate reputational risks, enhances stakeholder engagement, and drives continual improvement in sustainability and governance practices.

3. Definitions:

- Company: It represents Ddev Plastiks Industries Limited
- Value chain partner: Value chain partner refers to company's upstream or downstream
 activities that plays a significant role in the creation, delivery, or enhancement of a product
 or service. These partners are integral to a company's operations and ESG impact. It
 includes entities with which the organization has a direct or indirect business relationship.

Upstream Partners are entities that supply products or services that contribute to the organization's own products or services for eg suppliers, service providers who contribute to inputs or production

Downstream Partners are entities that receive products or services from the organization for eg distributors, retailers, cutomers etc who deliver or consume the company's final products.

• NGRBC: The NGRBC has been designed by the Ministry of Corporate Affairs (MCA) to assist businesses to perform above and beyond the requirements of regulatory framework.

4. Scope of the Policy:

- This policy document extends these principles to DPIL'S top cumulative 75% upstream and downstream value chain partners and entities that individually account for 2% or more of company's sales or purchases by value.
- It applies to all employees, directors, business units, and stakeholders of DPIL.
- Value Chain Partners are expected to implement the expectations listed herewith in their business practices wherever applicable and as feasible.

5. Objectives

- 1. **Transparency:** Share sustainability initiatives openly to build trust with stakeholders, including investors, customers, and employees.
- 2. **Compliance:** Adhere to legal and sustainability reporting requirements to reduce risks
- 3. **Stakeholder Engagement:** Promote meaningful engagement to understand and address stakeholder needs.
- 4. **Continuous Improvement:** Encourage progress through goal-setting and performance measurement.

6. Core Policies

Policy 1: Ethics, Transparency, and Accountability

DPIL upholds ethical conduct and good governance at all levels. It follows a Code of Conduct that prioritises integrity, fair practices, and transparent communication with stakeholders. An Anti-Bribery Policy ensures zero tolerance for fraud and corruption.

Policy 2: Sustainable and Safe Products and Services

DPIL integrates sustainability principles across all operations, from procurement to product design, focusing on optimal resource use, safety, and environmental protection. Initiatives include implementing the Reduce, Reuse, Recycle Principle, sustainable procurement practices, and safe waste disposal.

Policy 3: Employee Well-Being

DPIL values its workforce and promotes a safe, inclusive, and supportive workplace. Equal opportunities, skill development, and a harassment-free environment are cornerstones of its employee policies.

Policy 4: Stakeholder Engagement

DPIL actively engages with stakeholders, including customers, suppliers, and local communities, to address their needs and ensure fair and transparent interactions.

Policy 5: Human Rights

Respect for human rights is embedded in DPIL's operations, ensuring fair treatment, grievance mechanisms, and promoting awareness across the value chain.

Policy 6: Environmental Preservation

DPIL is committed to reducing its environmental impact through energy-efficient practices, waste management, and the use of renewable resources. It regularly monitors and reports its environmental performance.

Policy 7: Responsible Advocacy

DPIL collaborates with industry bodies and policymakers to support sustainable and ethical business practices.

Policy 8: Inclusive Growth and Development

DPIL contributes to community development through educational initiatives and other corporate social responsibility (CSR) projects aligned with local and national priorities.

Policy 9: Customer Value

DPIL prioritises customer satisfaction by delivering high-quality products, ensuring transparency in communication, and promoting responsible consumption.

7. Principles of the Policy:

1. Ethics, Integrity and Transparency

Ensure high standards of ethics, Integrity and Transparency within the organisation and in its functioning and operations

Expectations:

- I. Ethical Behaviour: Promote ethical behavior throughout the organization
- II. **Anti-Corruption:** Promote anti-corruption practices to prevent bribery and unethical conduct
- III. **Reporting Mechanisms:** Establish secure and confidential channels for employees/ stakeholders to report unethical behaviour without fear of retaliation
- IV. **Financial Transparency:** Maintain accurate and transparent financial records, ensuring all transactions are properly documented and reported
- V. **Open Communication:** Communicate openly and honestly with all the stakeholders, including employees, customers, suppliers, and regulators
- VI. **Disclosure of Information:** Disclose relevant information in a timely and accurate manner, including financial performance, business practices, and any potential conflict of interest
- VII. **Responsibility:** Accept responsibility for the impact of business decisions and activities on stakeholders, society, and the environment
- VIII. **Compliance:** Adhere to applicable laws, regulations, and standards governing business operations
- IX. **Corrective Actions:** Implement effective mechanisms to address and remediate any violations of ethical, transparency or accountability standards

2. Sustainable and High Quality Provision of Goods and Services

Aim to provide goods and services that are sustainable, ensuring they meet high standards of quality and specifications.

- Resource Efficiency: Utilize resources efficiently to minimize waste and environmental impact. This includes adopting practices that reduce energy, water consumption, and material use
- II. **Sustainable Sourcing:** Source materials responsibly from suppliers that adhere to sustainable practices
- III. **Environmental Impact:** Continuously assess and mitigate or reduce the environmental impact of products and services
- IV. **Innovation:** Invest in and adopt innovative technologies and practices that enhance sustainability

- V. **Product Safety:** Ensure all products meet or exceed safety standards and regulations by conducting thorough testing and quality control processes
- VI. **Risk Management:** Implement robust risk management processes to identify, assess, and mitigate potential safety hazards associated with goods and services
- VII. **Compliance:** Adhere to relevant safety regulations and standards, ensuring products and services are compliant with legal/ statutory or regulatory requirements

3. Respecting and Promoting Employee Well-Being

Respect and promote the well-being of employees, ensuring a safe, healthy, and inclusive working environment.

- Health and Safety Standards: Comply with applicable health and safety regulations and strive to exceed these standards where possible
- II. **Regular Audits:** Conduct periodical health and safety assessments if necessary to identify and mitigate potential hazards
- III. **Emergency Preparedness:** Develop and maintain emergency preparedness and response plans.
- IV. **Training:** Provide regular health and safety training for employees to ensure they understand and adhere to safety protocols
- V. **Non-Discrimination:** Implement practices that prevent discrimination based on race, gender, age, religion, disability, or other protected characteristics
- VI. **Equal Opportunity:** Ensure equal opportunity in hiring, promotion, and professional development
- VII. **Diversity and Inclusion:** Promote diversity and inclusion at all levels of the organization
- VIII. **Harassment-Free Workplace:** Enforce a zero-tolerance practice towards harassment, sexual harassment and bullying, providing a safe and respectful environment for employees
- IX. **Fair Wages:** Ensure employees receive fair wages that meet or exceed the local labour laws
- X. **Benefits:** Try and provide comprehensive benefits that support the well-being of employees and their families, including health insurance, paid leave, and retirement plans
- XI. **Feedback Mechanism:** Establish regular feedback mechanisms to understand employee needs and concerns, and take appropriate action to address them

4. Respect for Stakeholders

Respect the interests of all stakeholders and be responsive to their needs and concerns, ensuring open communication and active engagement

- I. **Stakeholder Mapping:** Identify relevant stakeholders, including employees, customers, suppliers, communities, investors, and regulatory bodies
- II. **Regular Engagement:** Engage with stakeholders regularly to understand their interests, needs, and concerns
- III. **Inclusive Dialogue:** Ensure that engagement processes are inclusive, allowing stakeholders to participate and voice their opinions
- IV. **Clear Communication:** Provide clear, accurate, and timely information to stakeholders about business practices, performance and impacts
- V. **Accessibility:** Ensure communication channels are accessible to stakeholders, allowing them to reach out with their inquiries and feedback
- VI. **Regular Updates:** Keep stakeholders informed about important developments, changes and decisions that may affect them
- VII. **Respect and Fairness:** Treat stakeholders with respect and fairness, acknowledging their rights and interests

VIII. **Sustainability:** Consider the long-term impacts of business decisions on stakeholders and prioritize sustainable practices

5. Promoting and Respecting Human Rights

Respect and promote human rights, ensuring that all business practices are conducted in a manner that protects and upholds the dignity and rights of individuals

Expectations:

- I. Adherence to Standards: Comply with human rights standards as per local labour laws
- II. **Non-Discrimination:** Implement practices that prevent discrimination based on race, gender, age, religion, disability etc.
- III. **Equal Opportunity:** Ensure equal opportunity in hiring, promotion, and professional development
- IV. **Diversity and Inclusion:** Foster a diverse and inclusive work environment that respects and values individual differences
- V. **Prohibition of Forced Labour:** Ensure that no forced, bonded, or involuntary labour is used in business activities
- VI. **Prohibition of Child Labour:** Adhere to local labour laws on child labour, ensuring that no child labour is used in business activities
- VII. **Workplace Safety:** Provide a safe and healthy working environment for employees, ensuring compliance with relevant health and safety regulations
- VIII. **Health and Safety Training:** Offer periodic health and safety training to employees wherever applicable
- IX. **Risk Mitigation:** Identify and mitigate potential health and safety risks in the workplace
- X. **Prevention of Sexual Harassment (POSH):** Implement and adhere to the POSH regulations ensuring a safe, respectful and inclusive workplace.

6. Protecting the Environment

Respect the environment and make efforts to protect and restore it, ensuring that all business practices contribute to environmental sustainability.

- I. **Compliance:** Adhere to relevant environmental laws, regulations, and standards
- II. **Environmental Impact Assessment:** Conduct environmental impact assessments to identify and mitigate potential environmental risks wherever applicable.
- III. **Resource Efficiency:** Use resources efficiently, aiming to reduce energy, water, and material consumption.
- IV. **Waste Reduction:** Implement practices to minimize waste generation and promote recycling and reuse.
- V. **Hazardous Waste Management:** Ensure proper handling, storage, and disposal of hazardous waste to prevent environmental contamination
- VI. **Green House Gas (GHG) Reduction:** Monitor and reduce greenhouse gas emissions across all operations where feasible
- VII. **Energy Efficiency:** Invest in energy-efficient technologies and practices where feasible
- VIII. Renewable Energy: Increase the use of renewable energy sources where feasible
- IX. **Biodiversity Conservation:** Protect and conserve biodiversity in areas impacted by business operations
- X. **Habitat Restoration:** Engage in activities that restore and rehabilitate natural habitats
- XI. **Sustainable Land Use:** Adopt sustainable land use practices to prevent habitat destruction and degradation.

- XII. **Air and Water Quality:** Implement measures to prevent/reduce air and water pollution, ensuring emissions and effluents meet regulatory standards
- XIII. **Soil Protection:** Prevent/Reduce soil contamination through responsible waste disposal and chemical management
- XIV. **Noise and Light Pollution:** Minimize noise and light pollution to reduce the impact on local communities and wildlife
- XV. **Employee Training:** Provide training to employees on environmental practices and sustainability.
- XVI. **Stakeholder Engagement:** Engage with stakeholders to raise awareness and promote environmental initiatives.
- XVII. **Community Involvement:** Support and participate in community-based environmental projects and initiatives.

7. Responsible and Transparent Engagement in Public and Regulatory Policy

Engage in influencing public and regulatory policy in a manner that is responsible, transparent, and aligned with ethical standards

Expectations:

- I. Integrity: Conduct policy engagement activities with integrity and honesty.
- II. **Ethical Conduct:** Avoid any practices that could be perceived as corrupt or unethical, such as bribery or undue influence.
- III. **Compliance:** Adhere to laws and regulations governing lobbying and political engagement
- IV. **Reporting:** Regularly report on policy engagement activities, including the objectives, stakeholders involved, and outcomes
- V. Alignment with Values: Ensure that policy positions and advocacy efforts align with the company's values and commitment to sustainability, human rights and ethical conduct
- VI. **Responsibility:** Accept responsibility for the impact of policy engagement activities on society, environment, and the economy.
- VII. **Feedback Mechanism:** Implement mechanisms for stakeholders to provide feedback on policy positions and engagement activities
- VIII. **Continuous Improvement:** Regularly review and improve policy engagement practices based on stakeholder feedback and changing regulatory landscapes

8. Promoting Inclusive Growth and Equitable Development

Promote inclusive growth and equitable development, ensuring that business practices contribute to creating opportunities for all stakeholders and reducing disparities.

- I. **Diversity and Inclusion:** Foster a diverse and inclusive work environment that values and respects the contributions of all employees
- II. **Equal Hiring Practices:** Implement fair and non-discriminatory hiring practices to ensure equal opportunity for employment.
- III. **Professional Development:** Provide opportunities for professional development and advancement for all employees, regardless of background or identity
- IV. **Community Investment:** Invest in community development projects and initiatives that promote economic empowerment, education, healthcare, and environmental sustainability.
- VI. **Partnerships:** Collaborate with local organizations, governments, and other stakeholders to address community challenges and foster inclusive growth
- VII. **Education Programs:** Provide access to education and training programs that equip individuals with the skills and knowledge needed to succeed in the workforce
- VIII. **Skill Development:** Offer opportunities for skills development and vocational training, particularly for disadvantaged groups

9. Responsible Engagement and Value Creation for Customers

Engage with consumers in a responsible manner, prioritizing well-being, safety, and satisfaction, while delivering products and services that provide tangible value.

Expectations:

- I. **Product Safety:** Ensure that all products meet safety standards and regulations to protect consumers from harm
- II. **Quality Assurance:** Maintain high standards of quality and integrity in product manufacturing and distribution
- III. **Transparency:** Provide clear and accurate information about products, including ingredients, manufacturing processes, and potential risks
- IV. **Fair Pricing:** Set prices that are fair and reasonable, reflecting the value provided by the product or service
- V. **Consumer Education:** Educate consumers about the value and benefits of products and services to help them make informed purchasing decisions
- VI. **Honesty and Integrity:** Ensure that marketing and advertising practices are honest, transparent, and free from deceptive or misleading claims
- VII. **Respect for Privacy:** Respect consumer privacy and adhere to data protection regulations in all marketing activities
- VIII. **Social Responsibility:** Avoid promoting harmful or unhealthy behaviours and contribute to positive social change through marketing campaigns.
- IX. **Accessibility:** Provide accessible channels for consumers to provide feedback, ask questions, and seek support
- X. **Responsive Customer Service:** Respond promptly and effectively to consumer inquiries, complaints, and feedback
- XI. **Continuous Improvement:** Use consumer feedback to identify areas for improvement and enhance products and services
- XII. **Sustainable Practices:** Promote responsible consumption by offering sustainable products and encouraging environmentally friendly behaviours
- XIII. **Waste Reduction:** Implement initiatives to minimize packaging waste and encourage recycling and reuse.

8. Review and Amendments:

This policy will be updated periodically reviewed by the Board of Directors to reflect changes in regulations and operational practices. Amendments will be approved by the Board of Directors.

9. Implementation and Oversight:

The Managing Director and Chief Executive Officer will oversee policy implementation. The Managing Director will serve as the BRSR Head, supported by relevant functional heads and experts.

10. Grievance Redressal

Any grievances regarding non-compliance with this policy should be reported to the company's ID at kolkata@ddevgroup.in. for resolution.

11. Disclosure

This policy as updated, from time to time, will be published on the website of the company