

TCPL Packaging Limited

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Business Responsibility Policy

This Policy on Business Responsibility is framed in accordance with the requirements of the Listing Regulations and aimed at fulfillment of its social, environmental and economical responsibilities.

This Policy lays down the Company's commitment to the principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs

The Policy is designed to ensure a unified and common approach and shall be applicable to all the employees and Directors of TCPL Packaging Limited ("TCPL or Company"). The Policy shall be reviewed by the Board from time to time.

The Policy is approved by the Board of Directors of the Company at its Board Meeting held on 5th February 2020. The Board of Directors of the Company may amend this policy from time to time in line with such amendments to Listing Regulations.

The Business Practices adopted and followed by TCPL is governed by the following guiding principles :-

PRINCIPLE 1 :-TO CONDUCT AND GOVERN BUSINESS WITH ETHICS, TRANSPARENCY AND ACCOUNTABILITY

TCPL Packaging Limited lays strong emphasis on ethical corporate citizenship and establishment of good corporate culture. TCPL has always believed in adhering to the best governance practices to ensure protection of interests of all stakeholders of the Company in tandem with healthy growth of the Company.

- i) TCPL develops governance structures, procedures and practices that ensures ethical conduct at all levels across its value chain. The company assures access to information about its decisions that impact relevant stakeholders.
- ii) The company does not engage in practices that are abusive, corrupt, or anti- competition.
- iii) The company truthfully discharges its responsibility in preparation of financial statements and other mandatory disclosures.
- iv) Every employee of the company abides by the values and the commitment to ethical business practices reflected in the company's Code of Conduct. The company ensures that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- v) The business partners and third parties with whom the Company conducts business are expected to abide by the principles of the policy.
- vi) The Company avoids complicity with the actions of any third party that violates

any of the principles contained herein.

PRINCIPLE 2 :- TO PROVIDE GOODS AND SERVICES THAT ASSURE SAFETY AND CONTRIBUTE TO SUSTAINABILITY

TCPL endeavours to embed the principles of sustainability, as far as practicable, into the various stages of product or service lifecycle including procurement of raw material / service, manufacturing of product or delivery of service, transportation of raw materials and finished goods to improve the quality of life and people and in this regard :

- i) The company ensures that its products comply with all applicable statutes and regulations. Assurance of safety and optimal resource use over the life-cycle of the product - from design to disposal - and ensuring that everyone connected with it- designers, producers, value chain members, customers and recyclers are aware of their responsibilities.
- ii) The company works towards sourcing significant raw materials and products in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- iii) The company shall raise the consumer's awareness of their rights through education appropriate and helpful marketing communication, full details of contents and composition as per the applicable laws and promotion of safe usage and disposal of their products.
- iv) In designing the products, the company ensures that the manufacturing processes and technologies required to produce it are resource efficient and sustainable. The company continues to progressively factor in relevant social and environmental considerations during the process of development of products.
- v) The Company conducts regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- vi) The company continues to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
- vii) Recognizing that over-consumption results in unsustainable exploitation of our planet's resources, and therefore to promote sustainable consumption, including recycling of resources

PRINCIPLE 3 :- TO PROMOTE THE WELLBEING OF ALL EMPLOYEES

TCPL focuses on ensuring the well-being of all its employees. The safety and health of employees is extremely important to the Company. The company believes in giving its employees ample opportunities to perform, as employee well-being is imperative to achieve a profitable growth. Ensuring diversity, preventing discrimination, safety and health are part of TCPL's Code of Conduct.

- i) The company shall respect the right to freedom of association, participation, collective bargaining and provide access to appropriate grievance Redressal mechanisms.

- ii) The company shall provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
- iii) The company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- iv) The company shall take cognizance of the work-life balance of its employees, especially that of women.
- v) The company shall ensure that no person below the age of eighteen years is employed in the workplace
- vi) The company shall provide facilities for the wellbeing of its employees including those with special needs. The company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- vii) The company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
- viii) The company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non- discriminatory basis. The company shall promote employee morale and career development through enlightened human resource interventions.
- ix) The company shall provide work environment that is free from any form of discrimination, including but not limited to sexual harassment. The company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities. The company shall ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work
- x) The company shall strive to instill a sense of duty in every employee including those of service providers at the Company's premises, towards their personal safety, as well as that of their co-workers

PRINCIPLE 4: STAKEHOLDER ENGAGEMENT

TCPL recognizes employees, business associates, customers, shareholders/investors and communities surrounding the operations and regulatory authorities as key stakeholders. The company continues its engagement with them through various mechanisms such as consultations with local communities, supplier/vendor meets, customer/employee satisfaction surveys, investor forums, etc.

- i) The company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.
- ii) The company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product and associated operations on the stakeholders.
- iii) The company shall strive to give special attention to stakeholders in areas that are underdeveloped.
- iv) The company shall resolve differences with stakeholders in a just, fair and

equitable manner

PRINCIPLE 5: HUMAN RIGHTS

TCPL respects and promotes human rights for all individuals. The company's commitment to human rights and fair treatment is set in its Code of Conduct. The Code provides to conduct the operations with honesty, integrity and openness with respect for human rights and interests of employees.

- i) The Company shall understand the human rights content of Constitution of India, national laws and policies and the content of International Bill of Human Rights, as well as acknowledging that, human rights are inherent, universal, indivisible and interdependent in nature.
- ii) The company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
- iii) The company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
- iv) The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- v) The Company shall not be complicit with human rights abuses by third party.

PRINCIPLE 6: PRESERVATION OF ENVIRONMENT

TCPL places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. The Company sets high standards in the area of environmental responsibility — striving for performance that does not merely comply with regulations but reduces environmental impacts and believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for future generations.

- i) The company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- ii) The company shall take measures to check and prevent pollution. The company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- iii) The company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- iv) The company shall continuously seek to improve their environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- v) The company shall develop Environment Management Systems and

contingency plans and processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.

- vi) The company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
- vi) The company shall proactively persuade and support its value chain to adopt these principles.

PRINCIPLE 7: RESPONSIBLE ADVOCACY

TCPL believes that a lot can be achieved the company it works together with the Government, legislators, trade bodies and regulators to create positive social and environmental outcomes. TCPL has always strived to create a positive impact in the business eco-system and communities by practicing pro-active advocacy not for securing certain benefits for industry, but for advocating certain best practices for the benefit of society at large. TCPL engages with industry bodies and associations to influence public and regulatory policy in a responsible manner.

- i) The company shall work with industry organizations that are engaged in policy advocacy in a responsible manner and while pursuing the policy advocacy the company shall ensure that their advocacy positions are consistent with these Principles and core elements contained in the Guidelines
- ii) The company shall ensure that policy advocacy is conducted ethically.
- iii) The Company shall utilize to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.

PRINCIPLE 8: INCLUSIVE GROWTH & EQUITABLE DEVELOPMENT

TCPL has always believed to ensure protection of interests of all stakeholders of the Company in tandem with healthy growth of the Company. In compliance with section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, the company has adopted a CSR policy through which it undertakes the projects in accordance with Schedule VII of the Companies Act, 2013.

- i) The company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- ii) Understanding the impact of inclusive growth and equitable development on social and economic development, and responding through appropriate action to minimize the negative impacts
- iii) The company shall make efforts to complement and support the development priorities at local and national levels, and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
- iv) The company shall be sensitive to local concerns while operating in regions that are underdeveloped.
- v) The company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR committee

and as per the CSR policy of the company

PRINCIPLE 9: CUSTOMER VALUE

TCPL is a consumer centric company and the foundation of the company is based on the trust, satisfaction and loyalty of its consumers. TCPL is dedicated to delivering products that excite customers and meet their need gaps. TCPL's products are the result of understanding consumers needs, through modern and sophisticated technology by combining generations of practical experience with a continuous flow of new knowledge. Customers satisfaction has been the backbone of TCPL's sustainable growth over the years.

- i) The company shall take into account the overall well-being of the customers and that of society.
- ii) The company shall ensure that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its products.
- iii) The company shall disclose all information truthfully and factually as per applicable laws, through labelling and other means, including the risks to the individual and to the society from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner.
- iv) The company shall educate its customers on the safe and responsible usage of its products.
- v) The company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
- vi) The company shall exercise due care and caution while providing goods that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- vii) The company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.

IMPLEMENTATION

- i) The policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website www.tcpl.in.
- ii) The Managing Director / Executive Director, through the Human Resource Department along with the Functional Heads of Departments / Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii) Compliance with the Policy shall be monitored and evaluated by the Managing Director / Executive Director on a regular basis.
- iv) Any grievances/ complaints with respect to violation of the policy shall be reported to the Managing Director / Executive Director / the Compliance Officer.