

ADANI WILMAR LIMITED

PRINCIPLE-WISE
BUSINESS RESPONSIBILITY POLICIES
AS PER NATIONAL VOLUNTARY GUIDELINES (NVGs)

SCOPE

For sustainable development, the management of the Adani Wilmar Limited (defined as “AWL”) will continue its efforts to strike proper balance between economic, social and environmental performance in dealings with various stakeholders of AWL, namely, customers, investors, lenders, deposit holders and the society. AWL will make its best efforts to impress upon other entities in the value chain and its associates to participate in the Business Responsibility initiatives depending upon their means and resources.

Principle - 1

To conduct business and govern themselves with ethics, transparency and accountability:

❖ Policy:

- i. AWL has developed a Code of Conduct (“CoC”) and directors, management and employees at all levels will abide to ensure good governance, ethical practices, transparency and accountability in conducting affairs of AWL and dealing with stakeholders across the value chain.
- ii. AWL will conduct periodic training programs on awareness of CoC among its employees and stakeholders.
- iii. The directors, management and employees of AWL will report their compliance to the policy.
- iv. In the Annual report of the Company sent to shareholders, the Managing Director will certify compliance of the Company’s CoC by directors and senior management.
- v. AWL will promptly post on their website information regarding quarterly, half yearly and annual financial results / statements (standalone as well as consolidated) of the company at regular intervals, Notices of general meetings, intimations of ‘Record-date’, Annual Reports, shareholding patterns and such other information as per Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and provisions of the Companies Act, 2013 (as amended from time to time) in such manner that the same is easily accessible to the investors of the Company. The website will be updated regularly from time to time.
- vi. AWL will not engage in practices that are abusive, corrupt, or anti-competitive.
- vii. AWL will avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.
- viii. The website will also contain a special window called ‘Investor Relations’ which may be accessed by investors and customers of the Company for redressal of their grievances. The Company has dedicated e-mail id investor.relations@adaniwilmar.in for investor correspondence.

Principle - 2

To provide goods and services that are safe and contribute to sustainability throughout their life cycle:

❖ Policy:

At AWL, our Sustainability Policy integrates economic progress, social responsibility and environmental concerns with the objective of improving quality of life. We at AWL Limited always believe in integrating our business values and operations to meet the expectations of our customers, employees, partners, investors, communities and the public at large.

- AWL will uphold the values of honesty, partnership and fairness in its relationship with stakeholders.

- AWL shall provide and maintain a clean, healthy and safe working environment for employees, customers, partners and the community.
- AWL will strive to consistently enhance its value proposition to the customers and adhere to its promised standards of service delivery.
- AWL will respect the universal declaration of human rights, International Labour Organisation's fundamental conventions on core labour standards and operate as an equal opportunities employer.
- AWL shall encourage and support its partners to adopt responsible business policies, Business Ethics and our CoC Standards.
- AWL will continue to serve its communities:
 - by implementing sustainable Community Development Programmes including through public/private partnerships in and around the area of operations.
 - by encouraging AWL employees to serve communities by volunteering and by sharing their skills and expertise.
 - by striving to deploy sustainable technologies and processes in all its operations and use scarce natural resources efficiently in its facilities.
 - AWL will also help communities that are affected by natural calamities or untoward incidents, or that are physically challenged.
 - by establishing sourcing/ supply chain with emphasis on local procurement.

AWL management will commit all the necessary resources required to meet the goals of Corporate Sustainability.

Principle - 3

To respect and promote well-being of all employees, including those in their value chain:

❖ Policy:

AWL has migrated from an era of industrial relations to employee relations. It respects the employees' right to freedom of association, participation and collective bargaining. Employees at all levels shall have freedom of association and be free to participate in collective bargaining. Workers participation in management shall be governed by a well laid down policy framework.

- i. AWL will provide equal opportunity to all employees starting from their recruitment irrespective of their caste, creed, gender, race, religion, and language. The employees of AWL can come from any part of the country and will be selected based on individual merit without any discrimination or preference.
- ii. AWL will also formulate schemes and policies to address health, superannuation issues and welfare needs of employees and their families.
- iii. AWL will provide a workplace environment that is safe, hygienic and which upholds the dignity of the employees.
- iv. AWL will ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities on equal and non-discriminatory basis.
- v. AWL will also provide continuous training to its employees for personal and professional skill development.
- vi. AWL will promote employee morale and career development through various HR policies.
- vii. AWL will frame stringent policies and practices to ensure that the employees especially female employees do not suffer harassment and create the environment where they feel safe and secure in discharging their responsibilities.
- viii. AWL will not use child labour, forced labour or any form of involuntary labour paid or unpaid.

- ix. AWL will take cognizance of the work-life balance of its employees, especially that of women.
- x. AWL focuses on learning and development, to enhance the knowledge and skill and preparing its people to face challenges.
- xi. AWL shall take various initiatives to maintain its position as leading integrated Food and FMCG company in the country, viz., talent pool to match organisational growth, creating a performance culture, encouraging learning element across organisation etc.

Principle - 4

To respect the interest of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised.

❖ Policy:

AWL's key stakeholders include employees, suppliers, customers, business associates, investors, banks/ financial institutions, regulatory agencies and local communities around its sites of operations. Our investors comprise of shareholders (including Institutional Investors).

AWL values the support of its stakeholders and respects the interests and concerns they have towards it. AWL and its employees shall provide value based services to all the stakeholders.

AWL has continuous engagement with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.

AWL endeavors to enhance stakeholder value by addressing the diverse interests of various stakeholders including but not confined to shareholders, consumers, customers, employees, business partners, local community, Government and the general public.

AWL shall endeavor to focus on catering to the needs of common people, especially of marginalized communities and undertake several initiatives to engage with and ensure sustainable development of the marginalized people in the local communities around its sites of operations.

The employees of AWL will offer assistance, encouragement and service to the customers in fair, equitable and consistent manner.

AWL shall give special attention to its stakeholders from underdeveloped areas of operations. As a part of CSR activities, AWL will provide:

- (a) Education: "Enhancing the Quality of Primary Education"
- (b) Health: "Enhancing Preventive and Primary Care"
- (c) Sustainable Livelihood: "Enhancing Socio-Economic Stature"
- (d) Rural Infrastructure: "Enhancing Rural Civic Amenities"

Principle - 5

To respect and promote human rights

❖ Policy:

Background

AWL is committed to upholding the fundamental human rights in line with the legitimate role of business. Our approach includes adherence to corporate business policies and compliance with applicable laws including internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labour Organization's declaration on Fundamental Principles and Rights at Work.

Purpose/Objectives

To provide guidelines for common understanding and ensuring adherence within AWL.

Scope

This policy applies to all direct employees, consultants (including fixed term appointees), associates, trainees, suppliers, vendors, etc. associated with the businesses of AWL.

The following guidelines shall be observed by AWL in its business processes:

- i. Conduct business in a manner that respects the rights and dignity of all people, complying with all legal requirements.
- ii. Recognise responsibility to respect human rights and avoid complicity in human rights abuses.
- iii. Treat everyone who works for AWL fairly and without discrimination. Employees, agency staff, vendors, customers and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- iv. Respect the rights of people in communities impacted by our activities. AWL will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- v. AWL will, within its sphere of influence, promote the awareness and realisation of human rights across its value chain.
- vi. AWL shall ensure compliance with and adherence to all the applicable human rights laws and national laws. AWL's policies strive to percolate these values at all levels in the organisation.

Principle - 6

Businesses should respect and make efforts to protect and restore the environment

❖ Policy:

As an environmentally responsible Company, AWL is committed to environment and social sustainability through all its operations.

- i. AWL is committed to manufacturing its products in an environmental friendly manner, fulfilling all its compliance obligations with minimal utilization of natural resources and continuously striving to enhance environmental performance.

- ii. AWL shall dispose of all waste originating from its factories in the safe manner strictly adhering to the regulatory requirements.
- iii. AWL is determined to achieve its goal of “Reduce, Reuse and Recycle” across its entire operations / processes for sustainable development.
- iv. AWL is committed to environmentally friendly processes in its operations and shall prioritize them while introducing any new process, operation, product or services. This policy will also extend to the selection of vendors and suppliers, who also adheres to such practices.
- v. AWL shall prioritize energy efficiency for selecting or switching over to new system and take all necessary initiatives to reduce carbon emissions.
- vi. Apart from the above, AWL is committed to enhance its efforts of sustainable environmental management, through sustained efforts outlined below.
 - a. Increase use of alternate sources of energy to reduce environmental impact and reliance on non-renewable resources.
 - b. Ensuring strict compliance to the environmental laws and regulations and also encourage partners and vendors to adopt such practices.
 - c. Reduction of waste generation and ensuring proper waste disposal system.
 - d. Build a system of continuous maintenance and monitoring processes to ensure meeting the above environmental objectives.

Principle - 7

Businesses should engage in influencing public and regulatory policy responsibly

❖ Policy:

AWL interacts with Government and Regulatory Authorities on public policy frameworks.

- i. AWL while pursuing advocacy policy, ensures that their advocacy positions are consistent with the principles and core elements contained in this policy enhancing business responsibility and transparency.
- ii. To the extent possible, AWL utilizes the trade and industry chambers and associations and other such collective platforms to undertake such advocacy policy.
- iii. All of the above engagement actions by AWL with the public and regulatory bodies regarding the policy shall be in conformity with the CoC.

Principle – 8

Businesses should support inclusive growth and equitable development

❖ Policy:

AWL is committed to establishing competitive and sustainable value chains linked to the businesses which create sustainable livelihoods, especially among the poor in rural India.

AWL commits its objective of inclusive growth and equitable development in and around its businesses as well as towards nation building at large.



AWL's CSR Vision is to accomplish passionate commitment to the social obligation towards communities, fostering sustainable and integrated development, thus improving quality of life.

For inclusive growth and equitable development, AWL through CSR focuses on the following sectors:

- Primary Education and Health Care - Aim is to enhance the quality of Primary education and the Preventive and Primary health care leading to "Ignited Minds for a Healthy Life".
- Sustainable Livelihood Development - Aim is to enhance socio-economic status of the women, youth and other marginalized sections while optimizing Natural Resource Management leading to "Ignited Minds for an Empowered Life".
- Rural Infrastructure Development – Aim is to enhance Rural Civic Amenities by bridging gap without duplicating efforts, leading to "Ignited Minds for a Better Living".

Principle - 9

Businesses should engage with and provide value to their customers in a responsible manner

❖ Policy:

AWL is committed to continuously exceed customer expectations, in pursuit of its aim to be the most admired organisation of the country.

Customer satisfaction is the key to our growth and success in this line of business. AWL strives hard to provide better services to the customers at large.

- i. AWL will serve the needs of its customers, taking into account the overall well-being of the customers and that of society.
- ii. AWL will promote and advertise its services in ways that do not mislead or confuse the consumers or violate any of the principles in this policy.
- iii. AWL will provide adequate training to employees continuously to meet the challenges of a dynamic business environment and will also provide adequate grievance handling mechanisms to address consumers concerns and feedback.
- iv. AWL will maintain privacy of consumer's confidential data in the normal course of its business.
