
POLICIES PURSUANT TO BUSINESS RESPONSIBILITY REPORT

PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH ETHICS, TRANSPARENCY AND ACCOUNTABILITY

1. **Businesses should develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of this principle across its value chain. Businesses should communicate transparently and assure access to information about their decisions that impact relevant stakeholders.**

Governance structure, Procedures & Communication

Page Industries Limited (“PIL”) employees, including leadership team, shall exhibit appropriate deportment, and deal on behalf of the company with professionalism, honesty and integrity, transparency while conforming to high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be so by third parties.

PIL has created a Grievance Redressal mechanism (grievance box) at all manufacturing units and locations for non-staff members, wherein employees can drop their genuine grievances. A committee has been constituted under a senior-level manager to review and address grievances regularly. The same is being reviewed by Head HR – Manufacturing on a monthly basis. Further, issues related to staff members are handled by VP-HR in consultation with CEO and other senior management team members. Issues related to leadership team shall be discussed with CEO and/or MD, and dealt with appropriately.

Relevant information is communicated/available to concerned stakeholders in a transparent manner.

2. **Businesses should not engage in practices that are abusive, corrupt or anti-competition.**

Government Agencies

PIL and its employees do not, unless mandated under applicable laws, offer or give any company funds or property as donation to any government agency or its representative, directly or through intermediaries, in order to obtain any favourable performance of official duties. PIL shall comply with government procurement regulations and shall be transparent in all its dealings with government agencies.

Competition

PIL supports the development and operation of competitive, open markets and promotes the liberalization of trade and investment in the market in which it operates. Specifically, PIL and its employee do not engage in restrictive trade practices, abuse of market dominance or similar unfair trade activities.

PIL markets the company’s products and services on its own merits and does not make unfair and misleading statements about competitors’ products and services. Any collection of competitive information is made only in the normal course of business and is obtained only through legally permitted sources and means.

3. Businesses should truthfully discharge their responsibility on financial and other mandatory disclosures.

PIL prepares and maintains its accounts fairly and accurately, and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the company conducts its business affairs.

Internal accounting and audit procedures reflect, fairly and accurately, all of the company's business transactions and disposition of assets, and have internal controls to provide assurance to the company's board and shareholders that the transactions are accurate and legitimate. All required information is accessible to company auditors and other authorized parties and government agencies. There is no willful omissions of company transactions from the books and records, no advance-income recognition, and no hidden bank account and funds.

Any willful and material misrepresentation of and/or misinformation on financial accounts and reports is regarded as a violation and no employee may make, authorize, abet or collude in an improper payment or unlawful commission.

4. Businesses should report on the status of their adoption of these guidelines as suggested in the reporting framework in this document.

Integrity of Data Furnished

Every employee of PIL ensures, at all times, the integrity of data or information furnished by him / her to the company. S/he is entirely responsible in ensuring that the confidentiality of all data is retained and in no circumstance transferred to any outside person/party in the course of normal operations without the express guidelines from or, approval of the management.

Reporting Concerns

Every employee of PIL is expected to promptly report to the management, and / or third-party ethics helpline, when s/he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanor or act not in the company's interest. Such reporting is made available to suppliers and partners, too.

Any PIL employee can choose to make a protected disclosure under the whistleblower policy of the company, providing for reporting to the Managing Director or CEO or VP-HR. Such a protected disclosure shall be forwarded, when there is reasonable evidence to conclude that a violation is possible or has taken place, with a covering letter, which shall bear the identity of the whistleblower.

The company shall ensure protection to the whistleblower and any attempts to intimidate him / her would be treated as a violation.

5. Businesses should avoid complicity with the actions of any third party that violates any of the principles contained in these guidelines.

Third parties which have business dealings with the PIL, such as consultants, agents, distributors, channel partners, contractors and suppliers, are expected to abide by the terms and conditions of the agreement executed between PIL and them. These terms and conditions ensure ethical business practices of the third parties and their employees in their dealings with PIL and its employees. This has been communicated and reviewed with third parties periodically.

PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES THAT ARE SAFE AND CONTRIBUTE TO SUSTAINABILITY THROUGHOUT THEIR LIFE CYCLE

PIL is committed to conduct its business in an environmentally safe manner. This is in line with the overall corporate objectives of the company. We endeavor to follow the principles of sustainability, as far as practicable, into the various stages of product life-cycle, including procurement of raw material/service, manufacturing of product or delivery of service, transportation of raw materials and finished goods, and waste management. PIL also regularly reviews and improves on the process and technology incorporating social, ethical and environmental considerations.

Just and Fair workplace: Page Industries values each and every of its employees and takes all efforts possible to ensure a healthy, safe and performance oriented work place without any discrimination. PIL has proper mechanisms and processes in place to investigate and act upon any alleged violation of equal opportunity or any other form of discrimination.

PIL strictly follows the rules and regulations laid down by the local governments on the payment of minimum wages and has a fair compensation policy for its executives and management.

PIL also undertakes employee welfare initiatives covering aspects like health and safety, compliance, medical aid and subsidized/free food.

PRINCIPLE 3: BUSINESSES SHOULD PROMOTE THE WELLBEING OF ALL EMPLOYEES

1. **Businesses should respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.**

All employees have the right to join or form association of their own choosing and to bargain collectively for the promotion and defense of their occupational interests. They also have the right to choose not to join an association.

PIL does not interfere in employees' decision to associate, try to influence their decision in any way, or discriminate against those employees who choose to associate.

PIL has established Works Committee as per statutory requirement, in order to improve relations between employees and the employer; to provide an open working atmosphere for employees to express their grievance without inhibition. The Works Committee addresses issues arising during routine work and facilitates reaching of amicable solutions and improves the industrial relations climate. Management has established other Committees, including Prevention of Sexual Harassment Committee, as per statutory requirement.

Three tier grievance redressal mechanism

Employees can approach their Welfare Officer for work related grievance. Welfare Officer discusses the issues with concerned officials and resolve it on an ongoing basis. Unresolved issues are escalated to Unit HR Manager. S/he resolves it by discussing it with all concerned. Still unresolved issues may be escalated to VP-HR. He resolves it or closes it appropriately with suitable response.

2. **Businesses should 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.**

Equal Opportunities Employer

PIL provides equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. It complies with laws and regulations related to non-discrimination in employment.

PIL’s employment policy is premised on its fundamental belief that diversity at the workplace creates an environment conducive to engagement, alignment, innovation and high performance, and is committed to maintaining and promoting non-discrimination in all aspects of recruitment and employment.

HR policies and programs are designed to ensure a work environment that is free from any form of discrimination amongst its 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/minority group.

3. **Businesses should not use child labour, forced labour or any form of involuntary labour, paid or unpaid.**

As per its employment policy, PIL is committed to comply with all statutory regulations including those against child labour. Adherence to provisions of national laws and regulations concerning Forced Labour is strictly practiced. PIL exercises due diligence and ensures that employment contracts / appointment letters are issued to all employees stating the terms and conditions of service and the voluntary nature of employment.

4. **Businesses should take cognizance of the work-life balance of its employees, especially that of women.**

Policies at PIL are designed over & above the statutory requirements, with due care & concern for each and every employee segment and ensures work-life balance of employees, especially women. PIL has developed progressive policies such as, Earned Leave policy, Flexible working hours for specific locations, Health Insurance, Employee Death Relief / support to family members, etc. Best-in-industry crèche facilities are provided at all manufacturing units.



Children’s Day celebration at Crèche



Annual Sports Day

Pregnant employees are also provided with nutritious food free of charge and special dietary supplements.

PIL conducts various employee engagement initiatives, including Annual Sports Championship, monthly celebrations of cultural events, Safety Day, Quality Month, Environment Day, Independence Day, Republic Day, etc. across all locations and units to motivate and maintain the morale of employees.

5. **Businesses should provide facilities for the wellbeing of its employees including those with special needs. They should ensure timely payment of fair living wages to meet basic needs and economic security of the employees.**

PIL has been focusing on creating employment opportunities for people with special needs and they are treated on par with other employees, in terms of, wages/salary, career progression, recognition. People with disabilities have been employed across the organization in suitable roles based on their specific skills and aptitudes.

6. **Businesses should provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. Businesses should communicate this provision to their employees and train them on a regular basis.**

PIL strives to provide a safe, healthy, clean and ergonomic working environment for its people. It complies with all health, safety and environmental regulations in the jurisdiction in which it operates and is committed to best practices in the health and safety of employees. It strives to prevent the wasteful use of natural resources and is committed to improving the environment.

PIL, in the process of production and sale of its products, strives for economic, social and environmental sustainability. In this regard, PIL has developed the 'EHS Policy' which is widely circulated and communicated across all manufacturing units and offices. Periodic training and communication on EHS is conducted that educates all employees on the importance of environment, health and safety issues.



Employees taking the 'Safety Pledge'



Awareness on how to keep safe from Malaria, Chikungunya and Dengue



Environment Day celebration

7. **Businesses should ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. They should promote employee morale and career development through enlightened human resource interventions.**

Learning and Development initiatives at PIL through ‘Page School of Learning’ is focused on skill upgradation of employees. PIL addresses Organizational, Functional and Individual development needs through competency mapping and skill matrix process for different segments of employees in the organisation. Development programs are designed based on the 70:20:10 Framework (70% - learning through on the job experience and cross functional assignments; 20% – learning through Coaching & Mentoring; 10% – learning through Formal Education & Structured Courses and Training Programs, including Online learning). The focus of training & development is based on the present and future business requirements. PIL makes significant investments in learning and development which nurtures in-house talent.



Life Skills Training Program



Outbound Training Program

8. **Businesses should create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.**

PIL has put in place suitable processes and mechanisms to ensure issues such as sexual harassment, if any, are effectively addressed. A Committee on Prevention of Sexual Harassment has been constituted as per statutory requirement. PIL demonstrates and promotes ethical and professional behaviour by evaluating employees against expected behaviours in the 'Performance Management System'. PIL values of Honesty, Integrity, Transparency, Ethical Business Conduct and Respect for Individual Employees, are upheld through constant communication and demonstration through management actions and decisions.

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF, AND BE RESPONSIVE TOWARDS ALL STAKEHOLDERS, ESPECIALLY THOSE WHO ARE DISADVANTAGED, VULNERABLE AND MARGINALIZED.

1. **Businesses should systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them.**

PIL believes that an effective stakeholder engagement process is necessary for achieving its sustainability goal of inclusive growth. PIL adopts a systematic approach to address the concerns of all its stakeholders, including employees, customers, suppliers, government and the society. For example: PIL has developed a CSR policy by engaging M/s Grassroots Research And Advocacy Movement (GRAAM) which is a recognized and reputed NGO. It carried out a detailed study of the community's social needs and recommended relevant and important initiatives with the following Vision, Mission & Principles:

Vision:

Enabling better quality of life for less-privileged communities (primarily in the geographical areas that the company functions), in a sensitive and impactful manner through interventions that are relevant, sustainable and environment friendly.

Mission:

- Identify activities that respond to the needs of the community, and bring change to the lives of the needy
- Undertake social development activities in an efficient and sustainable manner
- Impact lives of communities through initiatives that yield long-term benefits
- Implement activities that respect the law of the land, the rights of the stakeholders, and are sensitive to the culture and traditions of local communities

Guiding Principles:

- Respecting all the stakeholders involved
- Ethical functioning, respecting the law of the land and values of the society in which the Company is functioning

- Zero tolerance to child labour, forced labour and any form of discrimination, on the basis of gender, disability (chronic ailments etc.), minorities (sexual minorities etc.) or any other
 - Adoption of a sustainable development approach with greater and proactive responsibility towards environmental protection
 - Inclusive development of the community by complementing strengths of other ethical and like-minded development institutions subscribing to similar values
 - Creating social and human capital that contributes towards a stronger and more prosperous Nation that recognizes the rights of every individual
- 2. Businesses should acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, products & services and associated operations on the stakeholders.**

PIL assumes responsibility for the impact of its policies, decisions, products and services on its stakeholders, and ensures transparency in its decisions and policies, as per the agreements executed with relevant stakeholders. For example, third parties which have business dealings with PIL, such as consultants, agents, distributors, channel partners, contractors and suppliers, are expected to abide by the terms and conditions of their engagement with, and on behalf of, PIL.

- 3. Businesses should give special attention to stakeholders in areas that are underdeveloped.**

PIL gives special attention to all stakeholders especially the communities in which it operates, with the following objectives -

- To implement Social Development Programs for empowering Marginalized and less privileged Communities
- To complement the efforts being made by the Government, Civil Society and other CSR entities in achieving social development
- To identify and ensure constructive convergence with organizations having similar objectives
- To provide leadership and industry benchmarks in CSR initiatives
- To foster a culture of & sensitivity towards CSR amongst employees, business associates and other stakeholders
- To encourage active involvement of senior management and employees as well as create internal champions for CSR



Legal Awareness Program

4. Businesses should resolve differences with stakeholders in a just, fair and equitable manner.

PIL has put in place systems and procedures to identify and address the needs and concerns of its stakeholders in a just, fair, transparent, equitable and systematic manner. PIL has implemented mechanisms to facilitate effective dialogues with stakeholders, identify material concerns and resolves in an equitable and transparent manner. PIL shall be committed to good corporate citizenship in terms of, compliance to all relevant laws and regulations.

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

1. Businesses should understand the human rights content of the Constitution of India, national laws and policies and the content of International Bill of Human Rights. Businesses should appreciate that human rights are inherent, universal, indivisible and interdependent in nature.

PIL believes the human rights of its employees at work are an absolute requirement. PIL's policies on zero tolerance for discrimination and harassment are directed towards adherence to applicable laws and to uphold the spirit of human rights, as enshrined in existing standards such as Fundamental Rights as per the Constitution of India and national laws and policies.

2. Businesses should 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.

PIL encourages and guides its supply chain partners to recognize and adhere to human rights in their operations. PIL plays a positive role in building awareness on human rights for its key stakeholders and encourages respect for human rights of the local communities.

3. Businesses should recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.

PIL shall be committed to good corporate citizenship, not only in the compliance of all relevant laws and regulation but also by actively assisting in the improvement of quality of life of people in the communities in which it operates. PIL conducts management reviews with the concerned stakeholders, from time to time, strives to incorporate them as an integral part its business plan and does not treat these activities as optional. The company shall encourage volunteering by its employees and collaboration with community groups.

4. **Businesses should, within their sphere of influence, promote the awareness and realization of human rights across their value chain.**

PIL is committed to promote the awareness and realization of human rights across its entire value chain by providing a safe and respectful working environment, free from threats, violence, harassment and discrimination. The Company will:

- Treat employees fairly and impartially throughout every stage of their work at PIL including recruitment, progression, terms and conditions and representation;
- Not tolerate harassment or discrimination of any kind;
- Treat each other, suppliers and customers with dignity and respect; and
- Establish a consultative structure allowing all stakeholders to have their say.

5. **Businesses should not be complicit with human rights abuses by a third party.**

PIL ensures human rights are upheld by third parties through stringent terms and conditions, as per the statutory requirements under various laws. PIL conducts periodic audits and accordingly evaluate its third parties. Third parties which have business dealings with the PIL, such as consultants, agents, distributors, channel partners, contractors and suppliers, are expected to abide by the terms and conditions of the agreement executed between PIL and them. These terms and conditions ensure ethical business practices of the third parties and their employees in their dealings with PIL and its employees. This has been communicated and reviewed with third parties periodically.

PRINCIPLE 6: BUSINESS SHOULD RESPECT, PROTECT, AND MAKE EFFORTS TO RESTORE THE ENVIRONMENT

Environmental Health and Safety Policy: PIL is committed to protect the Environment, Health & Safety of its employees, customers and the communities in and around our manufacturing hubs & locations. Our endeavor is to safeguard, conserve and sustainably utilize social and environmental resources, in pursuit of our economic objectives.

Guiding Principles: We will meet or exceed all applicable environmental, health and safety laws and regulations.

Environment: (a) we shall endeavor to reduce waste, and control pollution; (b) we will efficiently use raw materials, water and energy, and explore opportunities to reuse, reduce and recycle; and (c) we will minimize adverse impact on the environment and risks to the community across our value chain, during the production process, transportation, storage and distribution of our goods and services.

Health & Safety: (a) we shall conduct all our operations in a manner that ensures the safety of our employees, consumers, contractors, visitors and all other stakeholders; (b) we shall strive to ensure that all employees are trained, informed and motivated to act safely, with respect to the environment; and (c) we shall continuously monitor and improve our EHS systems and practices, in line with benchmarked standards.

PIL shall strive to provide a safe, healthy, clean and ergonomic working environment for its people. It shall comply with all health, safety and environmental regulations in the jurisdiction in which it operates. PIL shall be committed to best practices in the health and safety of employees. It shall prevent the wasteful use of natural resources and be committed to improving the environment, and shall endeavor to offset the effect of climate change in all spheres of its activities.

PIL, in the process of production and sale of its products and services, shall strive for economic, social and environmental sustainability.

All employees of PIL are expected to adhere to the EHS Policy and standards.

PRINCIPLE 7: BUSINESSES, WHEN ENGAGED IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A RESPONSIBLE MANNER

PIL, while pursuing advocacy will ensure that their advocacy positions are consistent with the principles and core elements contained in this policy.

To the extent possible, PIL will utilize the trade and industry chambers and associations and other such collective platforms to undertake such advocacy.

PIL performs its role in a transparent and responsible manner while engaging with all the authorities and while doing so it takes into account both its corporate as well as the larger national interest in mind.

PRINCIPLE 8: BUSINESSES SHOULD SUPPORT INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

It is always the intent of the Company to make a positive difference in the society. The concept of Corporate Social Responsibility has gained prominence from all avenues. Organizations have realized that they shall extend their support to the Government to obtain desired results in its endeavor to uplift the downtrodden of society. With the rapidly changing corporate environment, more functional autonomy, operational freedom etc.,

PIL has adopted CSR as a strategic tool for sustainable growth. For the Company, in the present context, CSR means not only investment of funds for social activity but also integration of business processes with social processes. Full CSR Policy can be viewed by clicking below link: <http://www.jockeyindia.com/page/policies-documents>

PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CUSTOMERS AND CONSUMERS IN A RESPONSIBLE MANNER

PIL as an organization takes significant efforts to ensure good governance by complying with all applicable laws of the land. The Company's uncompromising commitment to providing world-class products and services to customers are also supported by its care and concern for the safety of its customers/consumers.

Product Responsibility: PIL is committed to providing products and services that offer best-in-class quality and user experience. The Company adopts stringent Quality and inspection standards, hygiene standards, benchmarked manufacturing practices and robust quality assurance systems for its products. This process of value creation is supported by the following actions: -

1. Customer need identification through demand planning and active engagement with the distribution, sales network and with engagement with the consumer;
2. A mechanism of analyzing and prioritizing the requirements for product enhancements, revisions and new product developments;
3. Protect usage details including “wash-care” are furnished on package of all final products, before being dispatched to the market;
4. Evaluation of ‘value for customer’ initiatives; and
5. Project monitoring for the implementation of the above.

Responsiveness to customers: A well-established system is in place for dealing with customer feedback. Consumers are provided multiple options to connect with the Company through email, telephone, website and feedback forms.