

Business Responsibility and
Sustainability Policies
OF
JAIN FARMS AND RESORTS LIMITED

1. PREAMBLE:

Jain Farms and Resorts Limited (“the Company”) is committed to its social, environmental and economic responsibilities and has adopted various practices and formulated various policies, codes of conduct to discharge its corporate social responsibility and to deal with all its stakeholders in ethical, transparent and fair manner as a responsible corporate citizen.

The Securities Exchange Board of India (SEBI) vide regulation 34 of SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015 (as amended from time to time) has made it mandatory for top 1000 companies in India based on market capitalization to include Business Responsibility and Sustainability Report as a part of its Annual Report.

SEBI had prescribed the format for the Business Responsibility Report (BRR) in respect of reporting on ESG (Environment, Social and Governance) parameters by listed entities. In terms of amendment to regulation 34 (2) (f) of LODR Regulations vide Gazette notification no. SEBI/LAD-NRO/GN/2021/22 dated May 05, 2021, it has now been decided to introduce new reporting requirements on ESG parameters called the Business Responsibility and Sustainability Report (BRSR). The BRSR seeks disclosures from listed entities on their performance against the nine principles of the ‘National Guidelines on Responsible Business Conduct’ (NGBRCs) and reporting under each principle is divided into essential and leadership indicators. The essential indicators are required to be reported on a mandatory basis while the reporting of leadership indicators is on a voluntary basis. Listed entities should endeavor to report the leadership indicators also.

Policy is based on principles laid down in the ‘National Guidelines on Responsible Business Conduct’ (NGBRCs), towards conducting business by a company. The Policy is applicable to all Directors and Employees of the Company.

This Policy endorses the Company’s commitment to follow principles and core elements, in conducting its business, as laid down in the ‘National Guidelines on Responsible Business Conduct’ (NGBRCs).

Policy Statements

Principle 1:

Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable

Philosophy:

Jain farms and Resorts Limited ("the Company") is committed to conduct its affairs in a fair, transparent and professional manner and maintaining good ethical standards, transparency and accountability in dealing with all its stakeholders.

Policy:

a. The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of this principle across its value chain.

b. The Company shall communicate transparently and assure access to information about their decisions that impact relevant stakeholders.

c. The Company shall not engage in practices that are abusive, corrupt, or anti competition.

d. The Company shall truthfully discharge their responsibility on financial and other mandatory disclosures.

e. The Company shall avoid complicity with the actions of any third party that violates any of the principles contained in this Policy.

Principle 2:

Businesses should provide goods and services in a manner that is sustainable and safe

Philosophy:

Jain farms and Resorts Limited (The Company) is committed to conduct its business in an environmentally responsible manner. The Company endeavors 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, and disposal by consumers to improve the quality of life and people.

Policy:

a. The Company shall assure safety and optimal resource use over the life-cycle of the product – from design to disposal – and ensure that everyone connected with it- designers, producers, value chain members, customers and recyclers are aware of their responsibilities.

b. The Company shall raise the consumer's awareness of their rights through education, product labelling, appropriate and helpful marketing communication, full

details of contents and composition and promotion of safe usage and disposal of their products and services.

c. In designing the product, The Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.

d. The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.

e. The Company shall recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.

f. The Company shall recognize that over-consumption results in unsustainable exploitation of our planet's resources, and should therefore promote sustainable consumption, including recycling of resources

Principle 3:

Businesses should respect and promote the wellbeing of all employees, including those in their value chains.

Philosophy:

The Company is committed in ensuring the well-being of all its employees, their safety and health. It considers employee well-being as imperative ingredient to achieve a sustained growth of the organization.

Policy:

a. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.

b. 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.

c. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.

d. The Company shall take cognizance of the work-life balance of its employees, especially that of women.

e. The Company shall 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.

f. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees. Business should communicate this provision to their employees and train them on a regular basis.

g. 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. They should promote employee morale and career development through enlightened human resource interventions.

h. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Principle 4:

Businesses should respect the interests of and be responsive to all its stakeholders.

Philosophy:

The Company values the support of its stakeholders (i.e. distributors, dealers, suppliers, customers, other business associates and local community near to the premises) and respects the interests and concerns they have towards it. The Company believes that it has a responsibility to think and act beyond interest of shareholders to include all its stakeholders specially interest of weaker section of society.

Policy:

a. The Company shall systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them

b. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders

c. The Company shall give special attention to stakeholders in areas that are underdeveloped.

d. The Company shall resolve differences with stakeholders in a just, fair and equitable manner

Principle 5:

Business should respect and promote human rights. Philosophy

Jain farms and Resorts Limited (The Company) is committed to respect and protect the human rights of all individuals and strive to them with honesty, just management and fairness. The Company understands that human rights are inherent, universal, indivisible and inter-dependent in nature. The Company upholds the fundamental human rights in line with the legitimate role of business. Its approach includes adherence to corporate business policies and compliance with applicable laws, human rights content of the Constitution of India, National laws and policies and the content of International Bill of Human Rights.

Policy:

a. The Company shall 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

b. 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.

c. The Company shall 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.

d. The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.

e. The Company shall not be complicit with human rights abuses by a third party.

Principle 6:

Business should respect and make efforts to protect and restore the environment.

Philosophy:

Jain farms and Resorts Limited (the Company) believes in setting high standards in the area of environmental responsibility and striving for performance that does not merely comply with regulations but reduces environmental impacts.

Policy:

a. 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.

b. The Company shall take measures to check and prevent pollution. They should assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.

c. 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.

d. 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.

e. The Company shall develop Environment Management Systems (EMS) and contingency plans and processes that help them in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to their operations or that of a member of its value chain.

f. The Company shall report their environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.

g. The Company shall proactively persuade and support its value chain to adopt this principle.

Principle 7:

Businesses, when engaged in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Philosophy:

Jain farms and Resorts Limited (the Company) believes in engaging with industry bodies and associations to influence public and regulatory policy in a most responsible manner and advocating the best practices for the benefit of society at large.

Policy:

a. The Company shall, while pursuing policy advocacy, shall ensure that their advocacy positions are consistent with the Policies of the Company.

b. To the extent possible, the Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

Principle 8:

Businesses should promote inclusive growth and equitable development

Philosophy:

Jain farms and Resorts Limited (The Company) believes in conducting responsible business practices that emphasize on social and economic issues to achieve inclusive growth. It believes in equitable development, taking into account the interests of the business community and local developers, fairness in the treatment of employees, and sustainability in protecting and enhancing resources (human and others) in responding to an array of social and environmental needs.

Policy:

a. The Company shall understand their impact on social and economic development, and respond through appropriate action to minimize the negative impacts.

b. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.

c. 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.

d. The Company operating in regions that are underdeveloped shall be especially sensitive to local concerns

Principle 9:

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

Philosophy:

The Company is committed to continuously exceed customer expectations. Customer satisfaction is the key to our growth and success in this line of business. The Company strives hard to provide better services and greatest value to its customers.

Policy:

a. The Company shall, while serving the needs of their customers, should take into account the overall well-being of the customers and that of society.

b. The Company shall ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products

c. The Company shall disclose all information truthfully and factually, through labelling and other means, including the risks to the individual, to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, businesses should also educate their customers on the safe and responsible usage of their products and services.

d. The Company shall promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in this Policy .

e. The Company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.

f. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.

Implementation:

This Policy shall be communicated within the Company across all levels

The Managing Director (BRS Head), through functional/unit heads shall be responsible for ensuring the Policy is implemented throughout the organization.

Compliance of the Policy shall be monitored and evaluated by the Company on regular basis.

Any grievance /complaints with respect to the Policy shall be reported to the BRS head.

Review:

The Managing Director shall from time to time review implementation of this policy and consider amendments therein in the light of changes in applicable laws, rules and regulations.