



OMAXE LIMITED

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***CORPORATE OFFICE: 7, LOCAL SHOPPING CENTRE, KALKAJI,
NEW DELHI-110019***

Business Responsibility Policies (Placed before the Board on 28.05.2017)

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1. BACKGROUND, SCOPE, PURPOSE AND EFFECTIVE DATE

The Securities Exchange Board of India (SEBI) on 2nd September, 2015 has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) effective from 1st December, 2015.

On 22nd December, 2015, SEBI notified SEBI (Listing Obligations and Disclosure Requirements) (Amendments) Regulations, 2015 to be effective from 1st April, 2016. Vide this notification, SEBI amended Regulation 34 of the Listing Regulations, thereby requiring top five hundred listed companies (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report.

Omaxe Limited (the “Company” or “Omaxe”) being one of the top five hundred listed company as per the criteria mentioned above, the Company has approved and adopted this Business Responsibility Policy (the “Policy”) at its meeting held on May 28, 2017, being the effective date of the Policy.

This Policy is based on principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of a Business published by the Ministry of Corporate Affairs, towards conducting business by a company.

The key objective of this Policy is to ensure a unified and common approach to the dimensions of Business Responsibility across the Company and to act as a strategic driver that will help Omaxe respond to the complexities and challenges that keep emerging and be abreast with changes in regulations.

The Policy is applicable to all Directors and Employees of the Company.

2. DEFINITIONS

2.1 “**Board**” shall mean Board of Directors of the Company.

2.2 “**Companies Act**” shall mean the Companies Act, 2013 and Rules thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended.

2.3 “**Listed Entity / Company**” shall mean Omaxe Limited.

2.4 “**Policy**” means Business Responsibility Policy.

2.5 “**Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as notified by The SEBI, as amended, from time to time.

2.6 “**Stock Exchange**” shall mean a recognized Stock Exchange as defined under clause (f) of Section 2 of the Securities Contracts (regulation) Act, 1956.

3. IMPLEMENTATION OF THE POLICY

The Chairman & Managing Director of the Company shall be responsible for the implementation of the Policy. The Chairman & Managing Director may take support of such functional heads and internal and external experts, which he may deem fit, for the effective implementation of the Policy. Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.

4. POLICY

Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. Company's Business practices would therefore be governed by the following guiding principles.

Policy 1: Ethics, Transparency & Accountability

Philosophy:

The Company lays a strong emphasis on ethical corporate citizenship and establishment of good corporate culture. We have 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.

Policy:

1. The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels across its value chain.
2. The Company shall assure access to information about its decisions that impact relevant stakeholders.
3. The Company shall not engage in practices that are abusive, corrupt, or anti-competition.
4. The Company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely.
5. Every employee of the Company shall abide by the values and the commitment to ethical business practices reflected in the company's Code of Conduct.
6. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
7. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy.

Policy 2: Product Lifecycle Sustainability

Philosophy:

The Company 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, design and development 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:

1. The Company shall ensure that its products and services comply with all applicable statutes and regulations;
2. The Company shall work towards ensuring that all goods and services are procured, manufactured and delivered embedding the principles of labour practices, human rights, ethics, occupational health, safety and environment as defined in the Company's policies namely:
 - a. Code of Conduct
 - b. Policy on Ethics, Transparency and Accountability
 - c. Policy on Employee Well Being
 - d. Policy on Human Rights
 - e. Policy on Customer Value
3. The Company shall work towards sourcing significant raw materials, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts ;
4. The Company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services;
5. The Company shall continue to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
6. In designing the products, the Company shall ensure that the construction processes and technologies required to produce it are resource efficient and sustainable.
7. The Company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling of resources wherever possible;
8. The Company shall work with supply chain members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment;
9. The Company shall encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming more sustainable.
10. The Company shall work towards building capacity such that all the value chain partners, namely the third party manufacturers, service providers including transporters and suppliers of significant raw materials, are sensitised and empowered to fulfil their roles and responsibilities towards sustainability;

11. 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 as per the applicable laws and promotion of safe usage and disposal of their products and services.
12. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Policy 3: Employee Well Being

Philosophy:

The Company 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 Omaxe's Code of Conduct.

Policy:

Diversity, Equal Opportunity, Freedom of Association

1. 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.
2. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.

Prevention of Child Labour/ Forced Labour and Harassment

3. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
4. The Company shall ensure that no person below the age of eighteen years is employed in the workplace ;
5. 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 ;
6. The Company shall provide a work environment that is free from any form of discrimination on the basis of caste, creed, gender, race, religion, disability or sexual orientation, including but not limited to sexual harassment ;
7. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Employee Well Being:

8. 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.
9. The Company shall take cognizance of the work-life balance of its employees, especially that of women.
10. The Company shall provide facilities for the wellbeing of its employees including those with special needs.

11. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
12. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
13. The Company shall ensure continuous skill 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.

Policy 4: Stakeholder Engagement

Philosophy:

The Company recognises employees, business associates (network of suppliers, stockists and dealers), customers, shareholders/investors and communities surrounding our operations and regulatory authorities as key stakeholders. The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of all the 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.

Policy:

1. The Company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.
2. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
3. The Company shall strive to give special attention to stakeholders in areas that are underdeveloped.
4. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

Policy 5: Human Rights

Philosophy:

The Company appreciates and believes that human rights are inherent, universal, indivisible and interdependent in nature. The Company 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.

Policy:

1. 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.
2. 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.
3. The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
4. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Policy 6: Preservation of Environment

Philosophy:

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

Policy:

1. 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.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.
7. The Company shall proactively persuade and support its value chain to adopt these principles.

Policy 7: Responsible Advocacy

Philosophy:

The Company 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. Omaxe 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. Omaxe engages with industry bodies and associations to influence public and regulatory policy in a responsible manner.

Policy:

1. The Company shall work with industry organisations that are engaged in policy advocacy in a responsible manner;
2. The Company shall ensure that policy advocacy is conducted ethically. To the extent possible, the Company should utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

Policy 8: Inclusive Growth & Equitable Development

Philosophy:

Omaxe 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.

Policy:

1. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
2. 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.
3. The Company shall be sensitive to local concerns while operating in regions that are underdeveloped.
4. 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.

Policy 9: Customer Value

Philosophy:

Omaxe is a consumer centric company and the foundation of the Company is based on the trust, satisfaction and loyalty of our consumers across the world. The Company is dedicated to delivering products that excite customers and meet their need gaps. Omaxe's products are the result of understanding customers' unmet needs, through path breaking technology by combining generations of practical experience with a continuous flow of new knowledge. An invigorating synergy of modern science has been the backbone of Omaxe's innovative product pipeline to ensure sustainable growth over the years to come.

Policy:

1. The Company shall take into account the overall well-being of the customers and that of society.
2. 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.
3. 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.
4. The Company shall educate its customers on the safe and responsible usage of its products and services.
5. The Company shall promote and advertise its products in ways that do not mislead or confuse the customers.
6. 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.
7. The Company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.

5. DISCLOSURES

The Business Responsibility Policy shall be disclosed on the website of the Company i.e. at www.omaxe.com

6. POLICY REVIEW AND AMENDMENTS

This Policy would be subject to modification in accordance with the guidelines / clarifications as may be issued from time to time by relevant statutory and regulatory authorities. The Board may modify, add, delete or amend any of the provisions of this Policy. Any exceptions to the Business Responsibility Policy must be consistent with the Regulations and must be approved in the manner as may be decided by the Board of Directors.