Business Responsibility and sustainability Policy

Document Name	*Business Responsibility and sustainability* Policy ("BRSR" Policy)
Preface	This BRSR Policy of Amber Enterprises India Limited ('Amber') sets out our commitment and approach to go beyond regulatory financial compliance and report our social and environmental impacts.
Release Date	16 May 2023
Issued and Approved By	Board of Directors ('**BoD**')

1. DEFINITIONS

Term	Definitions
Amber	Amber Enterprises India Limited
Associates	It includes directors, employees, agents, representatives, vendors, contractors and business partners or any other persons/individuals, who may be acting on behalf of the Company.
Group Companies	It means all the Subsidiary(ies), Step-down Subsidiary(ies) and Associate(s) companies of Amber.
Stakeholders	Stakeholders are investors, employees, customers, suppliers, communities, governments, or trade associations etc.
BRSR	Business Responsibility and Sustainability Reporting
NGRBC	National Guidelines on Responsible Business Conduct
SDGs	Sustainable Development Goals
UNGP	UN Guiding Principles for Business and Human Rights
ILO	International Labour Organization

1. BACKGROUND

The Ministry of Corporate Affairs (MCA), Government of India, released a set of guidelines in 2011 called the National Voluntary Guidelines on the Social, Environmental and Economic Responsibilities of Business (NVGs). This was expected to provide guidance to businesses on what constitutes responsible business conduct.

In order to align the NVGs with the Sustainable Development Goals (SDGs) and the 'Respect' pillar of the United Nations Guiding Principles (UNGP) the process of revision of NVGs was started in 2015. After revision and updation, the new principles are called the National Guidelines on Responsible Business Conduct (NGRBC) 2018. The primary rationale for the update is to capture key national and international developments in the sustainable development agenda and business responsibility field that have occurred since the release of the NVGs in 2011.

Some of the key drivers of the NGRBC are given below:-

1. The UN Guiding Principles for Business and Human Rights (UNGPs)
2. UN Sustainable Development Goals (SDGs)
3. Paris Agreement on Climate Change (2015)
4. Core Conventions 138 and 182 on Child Labour by the International Labour Organization (ILO)
5. Annual Business Responsibility Reports (ABRRs)
6. Companies' Act 2013

Further Securities and Exchange Board of India (SEBI) vide Circular dated May 10, 2021 has made Business Responsibility & Sustainability Report (BRSR) mandatory for Top 1000 listed entities by market capitalization with effect from 2022-23. The report is voluntary for the year 2021-22. The BRSR is a notable departure from the existing Business Responsibility Report ("BRR") and a significant step towards bringing sustainability reporting at par with financial reporting. SEBI Circular further states that The BRSR is an initiative towards ensuring that investors have access to standardized disclosures on ESG parameters. Access to relevant and comparable information will enable investors to identify and assess sustainability-related risks and opportunities of companies and make better investment decisions.

2. OBJECTIVE

The objective of this policy is ensure creation of BRSR Reporting in Amber for Standardized disclosures on ESG (Environmental, Social and Governmental) standards.

We endeavour to provide a comprehensive source of non-financial sustainability information that is relevant to all business stakeholders – investors, shareholders, regulators, and public at large.

3. BRSR VISION

To integrate ESG concerns into policies, plans, programmes and business conduct of the Company

4. SCOPE

This specifies the responsible business conduct of Amber, its group companies and associates

This policy covers organization wide activities which have a direct/indirect or potential impact on the stakeholders and applies to all the functions/departments and levels of the organization.

Furthermore, the NGRBC encourages us to ensure that not only do we follow these guidelines in business contexts directly within our control or influence, but that we also encourage and support our suppliers, vendors, distributors, partners and other collaborators to follow them.

5. OUR COMMITMENT(S)

- Sustainable development in transportation.
- Recycling of packaging materials.
- Minimising waste.
- Efficient use of water and energy.
- Use of biodegradable chemicals.
- Procedures to minimise noise disturbance to neighbours.
- Phasing out of chlorofluorocarbons (CFCs) and other ozone-depleting substances.

6. BUSINESS RESPONSIBILITY AND SUSTAINABILITY COMMITTEE ('BRSR COMMITTEE')

The Company has in place a Responsibility and sustainability Committee ('**BRSR Committee**') for the purpose of adhering to the statutory requirement of implementing the business responsibility and sustainability reporting in accordance with the Environmental, Social, and Governance i.e. ESG parameters.

7. SCOPE OF BUSINESS RESPONSIBILITY AND SUSTAINABILITY COMMITTEE

(A) Business Responsibility and Sustainability Reporting

- Overseeing the Company's alongwith its subsidiaries' sustainability process(es) and disclosures of the performance against the nine principles of the 'National Guidelines on Responsible Business Conduct' (NGBRCs) is correct, sufficient and credible;
- Devising and approval of various policies based on business responsibility and sustainability reporting, which is not limited to below mentioned policies :-

1. Ethics policy;
2. Policy on Product Sustainability;
3. Employee policy;
4. Human Rights Policy;
5. Stakeholder Engagement Policy;
6. Environment policy;
7. Public Advocacy Policy;
8. Policy on Customer service;
9. Cyber security Policy

- Analysing, monitoring and reviewing the policies from time to time;
- To evaluate performance against the policies;
- To ensure compliance with the statutory requirements of relevance to the principles and rectification of any non-compliance;
- To ensure the translation of policies into management procedures;
- To ensure extention of the policies to the value chain partners of the Company;
- To overview the material responsible business conduct and sustainability issues pertaining to the environmental and social matters;
- To appoint an external agency for carrying out independent assessment and evaluation of the policies, if so required;
- To overlook on a quarterly basis the reports shared against the nine principles of the 'National Guidelines on Responsible Business Conduct' (NGBRCs) including the reporting structure and coverage;
- Perform such other activities as may be delegated by the Board of Directors and/or are statutorily prescribed under any law;

- To formulate, review and make recommendations to the Board to amend the BRSR Committee charter from time to time."

(B) <u>Environmental, Social, and Governance ('ESG')</u>

- To set up and define the ESG vision and mission of the Company;
- To set up ESG goals and targets of the Company;
- To articulate the definitions w.r.t the ESG governance;
- To assist in developing the ESG framework including but not limited to ESG policies, management systems and processes;
- To assist in conducting the internal stakeholder consultation and prioritising the materiality areas for the Company;
- To identify the ESG core team for dissemination the required data/information for driving the ESG agenda;
- To engage the ESG core team in workshops w.r.t the National and Global reporting frameworks and indices such as GRI, SASB, SEBI BRSR etc.,;
- To review and approve the data templates and assist in consolidation of the finalized data for reporting requirement;
- To evaluate the disclosure requirement (regulatory & voluntary) from time to time;
- To review and approve the final ESG repot and make requisite recommendation to the Board;
- To endeavour in the direction of sustainable brand creation by aligning with emerging requirements.

8. <u>POLICY STATEMENT</u>

- Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.
- Businesses should provide goods and service in a manner that is sustainable and safe.
- Businesses should respect and promote the well-being of all employees, including those in their value chains.
- Businesses should respect and promote human rights.
- Businesses should respect and make efforts to protect and restore the environment.
- Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- Businesses should promote inclusive growth and equitable development.
- Businesses should engage with and provide value to their customers in a responsible manner

9. REVIEW

The Board shall review, amend and approval the BRSR policy from time to time as and when deemed fit.

"We assure our customers and other stakeholders that we are committed to managing the ESG impacts in a responsible way and we endeavour in the direction of sustainable brand creation by aligning with emerging requirements.

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