



BMW INDUSTRIES LIMITED

CIN: L51109WB1981PLC034212

POLICY ON BUSINESS REPONSIBILITY

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Definitions:

In this Policy document, unless the context otherwise requires-

- a) **“Board of Director or “ Board” means the Board of Directors of the Company;**
- b) **“Senior Management” or Senior managerial personnel” means as defined in Regulation 16(1)(d) of the SEBI (LODR) Regulation 2015;**
- c) **“Director” means a director appointed to the Board of a Company**
- d) **“Managing Director” means the managing director as defined in Section 2(54) of the Companies Act, 2013;**
- e) **“Key Managerial Personnel” means as defined in Section 2(51) of the Companies Act, 2013;**

BR POLICY-1: ETHICS, TRANSPARENCY AND ACCOUNTABILITY

[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMW Industries Ltd (BMWIL) recognizes the importance of high ethics in business, and it firmly believe that for a successful and sustainable business, a strong foundation of ethical corporate citizenship and establishment of good corporate culture is essential. BMWIL is committed to operate its business ethically in a manner such that all stakeholders i.e. investors, creditors, distributors, customers, employees, and even competitors, the governments and society at large, dealt within a fair manner. It has 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.

The core value of ethical policy and practices are trustworthiness, respect, responsibility, fairness and caring. BMWIL take a 'zero tolerance ' approach to corruption and committed to act professionally, fairly and with integrity in all the business dealings and relationships, wherever it operates.

2. Scope of application:

This policy is applicable to all the business divisions of the BMWIL (hereinafter referred as "the Company") and its business associates, subsidiaries, joint ventures, suppliers, contractors, NGOs and other entities which are directly dealing with the Company either in the business operations or in its CSR activities.

3. Policy:

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

4. Measurement of Ethical behaviour:

BMWIL believe that the ethical behaviour of the Company is predicted by the ethical behaviour of its promoters, directors, managers and employees towards its stakeholders i.e. investors, creditors, distributors, customers, employees, the governments and society at large. The measurement of ethical behaviour revolves around following:



- i. Fairness to all stakeholders,
- ii. Transparency in all business dealings;
- iii. Raising that trust and confidence of stakeholders in the way the
Company operates;
- iv. Understanding and discharging societal responsibility;
- v. Long term thinking;
- vi. Overcoming from greed, insecurity, and lack of confidence.
- vii. Following law of the land.

5. General obligations:

BMWIL expects from its all stakeholders to

- i. Contribute to society and human well-being ;
- ii. Avoid harms to others;
- iii. Be honest and trustworthy;
- iv. Be fair and take action without discrimination;
- v. Practice integrity in inter-personal relationships;
- vi. Honor confidentiality;

6. Specific Professional Responsibilities:

BMWIL expects from its all stakeholders to

- i. Live the Company's values - each day;
- ii. Take the ownership and have the passion for winning ;
- iii. Ensure people development and acquire & maintain professional competence Consumer focus;
- iv. Teamwork;
- v. Innovation;
- vi. Integrity;
- vii. Strive to achieve the highest quality, effectiveness and dignity in both
the processes and products of professional work;
- viii. Know and respect existing laws;
- ix. Deal with media tactfully;
- x. Be upright and avoid undue inducements;
- xi. Observe corporate Discipline;
- xii. Conduct yourself in a manner that reflects credit to the Company;
- xiii. Be accountable to Company's stakeholders;
- xiv. Identify, mitigate and manage business risks;
- xv. Protect Company's properties

7. Additional provisions for Board Members and Sr. management:

It is expected from every members of the Board and Sr. management including the functional heads

- i. To participate in a Company meeting, depending upon their eligibility and/ or requirement, and do not involve in related party transactions.
- ii. Do not take directorship in competitor's Company.

8. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Senior Management on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of code to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.

9. General:

- i. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- ii. Company secretary in consultation with the Managing Director shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.



10. Modification /Amendment in the Policy:

Any or all provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.



BR POLICY - 2: PRODUCT LIFE CYCLE SUSTAINABILITY

[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL believe that Sustainable Development meets the needs of the present, without compromising the ability of future generations to meet their own needs. BMWIL endeavors to develop 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.

BMWIL believe that sustainable development calls for concerted efforts towards building an inclusive, sustainable and resilient future for people and planet. In order to achieve sustainable development, BMWIL believe that economic growth, social inclusion and environmental protection must be harmonized. It is the endeavor of BMWIL to introduce the process of change in which the exploitation of resources, the direction of investments, the orientation of technological development and institutional change remain in harmony and enhance both current and future potential to meet the human needs and aspirations.

Keeping in view the above, BMWIL endeavors to provide goods and services that are safe and contribute to sustainability throughout their life cycle.

2. Scope:

This policy is applicable to all the business divisions of the BMWIL and its business associates, subsidiaries, joint ventures, suppliers, contractors, NGOs and other entities which are directly dealing with the Company either in the business operations or in its CSR activities.

3. Policy:

- a. 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 sensitized and empowered to fulfill their roles and responsibilities towards sustainability.

- b. The Company shall raise the consumer's awareness of their rights through education, product labeling, 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.
- c. In designing the products, the Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
- d. 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.
- e. The Company shall continue to recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
- f. 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;
- g. The Company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services;
- h. The Company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling of resources wherever possible ;
- i. 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 ;
- j. The Company shall encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming



more sustainable;

- k. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

4. Fundamental Principle of Sustainable Development:

The United Nations Conference on Environment and Development (UNCED) held in Rio de Janeiro in 1992 laid the following principles on sustainable development. BMWIL endeavors to adhere these principles as a good corporate citizen during its business operations;

- (a) **Principle of Inter-generational equity:** BMWIL endeavors to protect the natural resources for future generation.
- (b) **Principle of Sustainable Use:** BMWIL endeavors to use the natural resources in a prudent manner without or with minimum tolerable impact on nature.
- (c) **Principle of equitable use inter-generational equity:** BMWIL endeavors to use the natural resources but at the same time would take into account its impact on other stakeholders.
- (d) **Principle of Integration:** BMWIL would take all possible actions, while using the natural resources, to take care of environmental aspects and impact of socio-economic activities in such a manner that prudent use of natural resources is ensured.

BMWIL believe that environmental protection does not preclude economic development and that economic development must be ecologically viable now and in the long run. Therefore, it is firm belief of BMWIL that sustainability encompasses ideas and values that inspire people to become custodian of the environment without compromising economic growth.

As a good corporate citizen, BMWIL endeavors to focus on the following

- (a) Absolute value creation for the society;
- (b) Ethical corporate practices;
- (c) Worth of Earth through environmental Protection;

- (d) Equitable business practices;
- (e) Corporate Social Responsibility;
- (f) Innovation of new technology / process / system to achieve eco-efficiency;
- (g) Creating market for all;
- (h) Switching over from stakeholders Dialogue to holistic Partnership;
- (i) Compliance of applicable laws

5. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by Senior Management on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of code to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.

6. General:

- i. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- ii. Company secretary in consultation with the Managing Director and / or Board of Directors shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person/ division.

7. Modification / Amendment in the Policy:

Any of the provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and/ or any other statutory authorities, from time to time.



BR POLICY - 3: EMPLOYEE WELL BEING

[Regulation 34(2)(f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL endeavors to ensure the well-being of all its employees. At BMWIL, the safety, health and work life balance of employees are extremely important. The Company believes in giving its employees ample opportunities so that they shall be motivated, result oriented and committed to achieve excellence in their domain. BMWIL endeavors to provide work environment in which all individuals are treated with mutual respect and dignity.

2. Scope: This policy is applicable to all the business divisions of the BMWIL.

3. Policy:

- i. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- ii. 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, or disability.
- iii. The Company avoids child labour, forced labour or any form of involuntary labour, paid or unpaid. Further, the Company shall ensure that no person below the age of eighteen years is employed in the workplace.
- iv. The Company shall take cognizance of work life balance of its employees especially that of women.
- v. The Company is committed to provide facilities for the wellbeing of its employees including those with special needs.
- vi. The Company shall ensure fair treatment as regards work opportunities, promotion, indiscrimination between employees in similar grade, level, and timely payment of fair living wages to meet basic needs and economic



security of the employees.

- vii. The Company is committed to provide a workplace environment that is safe, hygienic humane and which upholds the dignity of the employees. Further, Company shall communicate this provision to their employees and train them on regular basis.
- viii. 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. The Company shall promote employee morale and career development through enlightened human resource
- ix. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

4. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Human Resource Department (HRD) along with Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Head of Human Resource Department on a regular basis and he shall submit his report to the Company Secretary for placing the same to the Board of Directors.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.



5. General:

- i. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the head of Human Resource Department and/or Company Secretary.
- ii. Head of Human Resource Department and / or Company secretary in consultation with the Managing Director shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.

6. Modification / Amendment in the Policy:

Any of the provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.



BR POLICY - 4: POLICY ON STAKEHOLDERS ENGAGEMENT

[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL believe in the principle that the interest of all stakeholders must be protected and at the same time, Company must be responsive towards them, especially those who are disadvantaged, vulnerable and marginalized. BMWIL believe that stakeholder engagement leads to increased transparency, responsiveness, compliance, organizational learning, quality management, accountability and sustainability.

2. Scope: This policy is applicable to all the business divisions of the BMWIL.

3. Policy:

- i. The Company shall identify their stakeholders, understand their concerns, define purpose and scope of engagement and commit to engage with them.
- ii. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- iii. The Company shall strive to give special attention to stakeholders in areas that are underdeveloped.
- iv. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

4. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels .
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Senior Management on a regular basis.

- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Stakeholders Relationship Committee constituted by the Board of Directors, under Section 178(5) of the Companies Act, 2013, shall consider and resolve the grievances of the stakeholders.
- vi. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.

5. General:

- i. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- ii. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.

6. Modification / Amendment in the Policy:

Any provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.



BR POLICY - 5: POLICY ON HUMAN RIGHTS

[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL recognizes the value of human rights for all individuals. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by business activities before or if they occur through human rights due diligence and mitigation processes.

BMWIL recognizes its impact on the communities in which it operates. BMWIL is committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

2. Scope: This policy is applicable to all the business divisions of the BMWIL.

3. Policy:

- a. 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.
- b. 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.
- c. The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.



- d. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

4. Implementation:

- a. The policy shall be appropriately communicated within the Company across all levels .
- b. The Managing Director, through the Human Resource Department along with Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- c. Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis.
- d. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- e. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board. The Board / Committee shall take appropriate action against the wrongdoer.

5. General:

- i. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- ii. Company Secretary in consultation with the Managing Director and / or Board of Directors shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.



6. Modification / Amendment in the Policy:

Any provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.



BR POLICY - 6: PRESERVATION OF ENVIRONMENT
[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL is committed to adopt business practices that create long term stakeholders value by implementing opportunities and managing risks arising from economic, environmental and social developments. BMWIL places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. It is committed to respect, protect, and make efforts to restore the environment.

BMWIL is focused for performance that does not merely comply with regulations but reduces environmental impacts. BMWIL believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for future generations.

2. Scope:

This policy is applicable to all the business divisions of the BMWIL and its business associates, subsidiaries, joint ventures, suppliers, contractors, NGO and other entities which are directly dealing with the Company either in the business operations or in its CSR activities.

3. Policy:

- i. BMWIL 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.
- ii. BMWIL shall take measures to check and prevent pollution. BMWIL shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- iii. BMWIL shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- iv. BMWIL 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.



BMWIL 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.

- vi. BMWIL 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.
- vii. BMWIL shall proactively persuade and support its value chain to adopt these principles

4. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented across the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Senior Management on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board.

5. General:

- a. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- b. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of



BMW policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.

6. Modification / Amendment in the Policy:

Any provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.

BR POLICY - 7: Inclusive Growth & Equitable Development
[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL believe in inclusive growth, a concept that provides equitable opportunities to every section of the society during economic growth & development and which has direct links to macroeconomic and microeconomic.

2. Scope:

This policy is applicable to all the business divisions of the BMWIL.

3. Policy:

- i. BMWIL shall ensure that advocacy position remains consistent with its values and philosophy;
- ii. BMWIL shall ensure that policy advocacy is conducted ethically.
- iii. BMWIL to undertake various social programs for the society in which it operates, through its' CSR policy;

4. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Company Secretary on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.

- v. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board.

5. General:

- a. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- b. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.

6. Modification / Amendment in the Policy:

Any provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.



BR POLICY - 8: RESPONSIBLE ADVOCACY
[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL understand that it operates in various diversified sectors which require consistent, balance and transparent interactions with various regulatory authorities and social organizations. BMWIL believe that the engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and the need to balance interest of diverse stakeholders. The Company believes that equal balancing of ardent advocacy and careful social responsibility is important for public relations.

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

2. Scope:

This policy is applicable to all the business divisions of the BMWIL.

3. Policy:

- i. BMWIL shall ensure that advocacy position remains consistent with its values and philosophy;
- ii. BMWIL shall ensure that policy advocacy is conducted ethically.
- iii. To establish strong public relations through various social organizations, industry chambers, and Business Organizations ;

4. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.



- iii. Compliance with the Policy shall be monitored and evaluated by the Senior Management on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board.

5. General:

- a. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- b. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.

6. Modification / Amendment in the Policy:

Any provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.



BRR POLICY - 9: Customer Value

[Regulation 34(2) (f) of SEBI Listing Regulations, 2015]

1. Philosophy:

BMWIL believe that for a successful business, a consistent efforts are essential to engage with and provide value to their customers and consumers in a responsible manner.

BMWIL is committed to engage with and provide value to their customers and consumers in a responsible manner.

2. Scope:

This policy is applicable to all the business divisions of the BMWIL.

3. Policy:

- i. BMWIL shall take into account the overall well-being of the customers and that of society while serving the needs of its customers.
- ii. BMWIL shall disclose all information truthfully and factually as per applicable laws through labeling and other means, including the risks to the individual, 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.

Further, wherever required, BMWIL shall educate their customers on the safe and responsible usage of its products and services.

- iii. BMWIL shall promote and advertise its products in a way that do not mislead or confuse the consumers.
- iv. BMWIL 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.



- v. BMWIL shall provide an adequate consumer feedback mechanism to address consumer concerns and feedback.

4. Implementation:

- i. The policy shall be appropriately communicated within the Company across all levels.
- ii. The Managing Director, through the Functional Heads of the Departments/ Unit Heads of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- iii. Compliance with the Policy shall be monitored and evaluated by the Senior Management on a regular basis.
- iv. Any grievances/ complaints with respect to violation of the policy shall be reported to the Company Secretary.
- v. Company Secretary shall report the non-compliance of the policy to the Board of Directors or duly constituted committee of the Board.

5. General:

- a. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Company Secretary.
- b. Company secretary in consultation with the Managing Director and / or Board of Directors, shall clarify the doubt and communicate the same to the respective person. In case, clarification or doubt is subject matter of policy then, Company Secretary shall refer the matter to the Board of Directors for their direction. On receipt of direction/ clarification, Company Secretary shall communicate the same to the respective person / division.



6. Modification / Amendment in the Policy:

Any provisions of this Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, or Ministry of Corporate Affairs or SEBI and / or any other statutory authorities, from time to time.

The Policy adopted on the Board Meeting Dated 14th September, 2020

Implementation of Policy shall be under Supervision of Mr Vikram Kapur, Company Secretary of the Company and Mr. Harsh Kumar Bansal and Mr. Vivek Kumar Bansal, Managing Directors of the Company shall periodically monitor the policy.