

INTRODUCTION

STAR CEMENT LIMITED (SCL) (hereinafter referred as "SCL" or "the Company") is a company listed with both National Stock Exchange of India Limited and BSE Limited. As a responsible cement brand, Star Cement ("the Company") exemplifies ethical business practices, high standards of morality, and a strong commitment to its stakeholders. Conscious about its responsibilities towards the environment and the society the Company sets forth its actions in accordance with the Business Responsibility Policies.

This Policy has been developed in accordance with the requirements of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and validates that the Company's commitment to follow the principles laid down in the National Guidelines on Responsible Business Conduct brought out by the Ministry of Corporate Affairs. All the stated principles form part of the Business Responsibility policy of the Company.

PURPOSE AND APPLICABILITY

The Company aspires to be recognized as a best-in-class cement that drives long term stakeholder value through innovation, superior sustainable performance, and customer driven approach. Through this Policy it lays down a strong commitment towards enhancing its environmental, social and economic excellence in dealing with stakeholder groups namely, customers, investors, depositors, lenders, and the society.

This Policy and its commitments extend to all the Directors, Employees, Officers, and Workers of the Company across all functions, departments, units. The coverage of this policy also includes to all our value chain partners including the vendors, transporters and dealers.

AUTHORITY

These Policies have been adopted by the Company's Board of Directors at its Board Meeting dated 19th May, 2023 and implemented in place of existing Business Responsibility Policy.

IMPLEMENTATION AND MONITORING

- i. All employees and workers across all departments, functions, teams and verticals shall be communicated with and sensitized about the policies through appropriate communication channels.
- ii. The Board of Directors shall have the highest authority to supervise and oversee the implementation of these Policies.
- iii. The Chairman and Managing Director of the Company shall be responsible for ensuring that the policies are administered throughout the operations and businesses of the Company.
- iv. Adherence with the Policies shall be monitored and evaluated by the respective head of the department of the Company at regular intervals.
- v. All grievances/concerns with respect to breach of the policies are encouraged to be reported by all stakeholders including customers, employees, communities, suppliers and investors to the Company Secretary for presenting the same before the Board.

REVIEW & AMENDMENT

These Policies shall be reviewed and evaluated by the Board of Directors as and when required to establish and confirm that it meets the objectives of the relevant legislation and remains effective. The Board of Directors will affirm to the amendments to this Policy in whole or in part.

KEY PRINCIPLES & POLICIES

The Company has adopted separate policies related to the nine principles of Business Responsibility mentioned below as prescribed in the SEBI guidelines:

- **Principle 1:** Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable.
- Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.
- Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains.
- Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.
- Principle 5: Businesses should respect and promote human rights.
- **Principle 6:** Businesses should respect and make efforts to protect and restore the environment.
- **Principle 7**: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- Principle 8: Businesses should promote inclusive growth and equitable development.
- **Principle 9:** Businesses should engage with and provide value to their consumers in a responsible manner.

POLICIES Ethics, Transparency and Accountability Policy

Star Cement Limited recognizes that a responsible governance framework is built on the pillars of ethics, transparency, and accountability. Inherent within us are our values, which uphold the highest standards of business ethics in dealing with stakeholders and compliance with applicable laws, rules and regulations.

Every business and its value chain members shall endeavor to

- ensure adherence to applicable statutory obligations enabling fair competition and treats all its stakeholders in an equitable manner.
- discharge their responsibilities ethically and truthfully on financial and other mandatory disclosures.
- transparently disclose to all its stakeholders and assure access to information about the policies, procedures and performance regarding its material topics
- prevent suspected misconduct, frauds, bribery, corruption, or any other unethical misbehavior, by
 ensuring the incident is timely reported in a responsible and confidential manner through its Vigil
 Mechanism (Link: https://www.starcement.co.in/upload/images/files/Whistle-Blower-Policy-4.pdf).
- avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.
- ensure all mechanisms and procedures are effectively implemented to address incidents of conflicts of interest involving its members, employees and business partners.
- ensure that the business contributes to public finances in a timely manner and complete payment of all applicable taxes as per applicable laws and regulations governing such payments.
- monitor, measure and review progress against the policy on a periodic basis

Product Stewardship Policy

The Company values every resource whether in production or at the end of life and are committed towards reducing its negative impacts on the environment and the society whilst maximizing economic benefits. Accordingly, the Company seeks to identify significant underutilization of such resources in its ecosystem and utilize them as part of a global solution to mitigate climate change.

Every business and its value chain members shall endeavour to:

- adhere to the legislative requirements related to product safety, quality, public health and environment as applicable.
- explore, deploy and commercialize new technology developments that enhance resource efficiency and reduce impact on climate change to minimize adverse environmental and social impacts.
- engage with and sensitize stakeholders across value chain on the environmental and social issues and impacts across product life cycle from design to disposal and their responsibility.
- work with experts and value chain members to identify existing and potential environment, health and safety risks and inherent hazards of materials used in production and in disposal.
- safely collect, reuse and recycle their product packaging at end of life as a part of extended producer responsibility where applicable.
- monitor, measure and report progress against this policy on periodic basis.

Employee Welfare Policy

The Company focuses on ensuring the well-being of all its employees, their safety and health. It considers employee well-being as imperative ingredient to achieve a profitable growth. Committed towards wellbeing of all employees, every business along with its value chain members shall endeavor to

- adhere to the applicable national and local regulatory requirements
- provide equal opportunities during recruitment of a potential employee or during the course of employment irrespective of gender, caste, creed, color, religion disability or sexual orientation.
- ensure implementation of appropriate systems and processes in place to support the work-life balance of all its employees.
- ensure a diverse, inclusive and equitable work environment built on respect and dignity by implementing the "Human Rights Policy".
- Uphold the dignity of its employees and contract workers by providing a workplace that is safe and hygienic
- ensure the organization's infrastructure and its products and services are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016
- ensure a workplace where employees especially female employees feel safe and secure in delivering their responsibilities and free from any form of harassment.
- communicate and inform all its employees about all the policies related to them, to keep them educated and aware of the same.
- monitor, measure and review progress against the policy on an annual basis
- to respect the right to freedom of association, participation of workers, and collective bargaining of all employees including contract and casual labour, and provide access to appropriate grievance redressal mechanisms.
- not to use child labour, coercive or forced labour, or any form of involuntary labour, paid or unpaid
- ensure fair, timely and transparent payment of statutory wages of all its employees, including contract and casual labour without discrimination.
- to ensure continuous upgradation of skill and competence of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. To promote career development through human resource interventions.

6

Stakeholder Engagement Policy

The Company recognizes the need for meaningful stakeholder engagement to improve decision making and accountability. Engaging with stakeholders builds trust, encourages transparency and better management of risk.

Every business and its value chain members shall endeavour to:

- assume responsibility and be transparent about the impact of their policies, decisions, products and associated operations on all stakeholders, and the natural environment.
- systematically identify its stakeholders, understand their concerns, define purpose and scope of their
 engagement. Integrate stakeholder engagement into governance and relevant decision-making
 processes that contributes to developing or improving organisational strategy, identifying and
 addressing operational issues.
- resolve any differences and address grievances in a just, fair and constructive manner by establishing appropriate mechanisms for all its stakeholders
- ensure benefits derived from business is fairly distributed amongst stakeholders.
- monitor, review and report progress against the policy.

Human Rights Policy

The Company is committed to upholding human rights aligned with national and international regulations as applicable. Respecting the dignity of people and their inherent rights comprises the essential requirement of action towards promoting and preserving the well-being of the different social elements in which it carries out its business.

This commitment takes reference from the United Nations Guiding Principles on Business and Human Rights. Its purpose is to guide the entire organization in its strategic vision, operations and relationships with stakeholders.

Every business and its value chain members shall endeavour to:

- adhere to applicable labour laws related to human rights;
- promote and respect employee's right to freedom of association, participation and collective bargaining of their choice and ensure opportunities for fair and constructive negotiations to reach mutual agreements.
- implement mechanisms to prevent use of child labour, forced labour or any form of involuntary labour, paid or unpaid.
- offer fair living wages exclusive of overtimes that shall meet the needs of the employee as per local living standards.
- prevent any form of discrimination, harassment or abuse based on caste, race, birth, nationality, gender, origin, religion, disability, family responsibility, marital status, political opinion, age, union membership and sexual orientation.
- communicate to employees and representatives within a reasonable timeframe in case of change in operations.
- avoid complicity with human rights exploitations and abuses by a third party.
- sensitize employees of the fundamental constituents of human rights within the Constitution of India, relevant national laws and policies, and the International Bill of Human Rights and their application to businesses as outlined in the United Nations Guiding Principles for Business and Human Rights.
- empower employees and value chain members through communication and training to identify and report cases of non-compliance through the whistleblower mechanism.
- undertake third party audits to build trust in our assessment for external stakeholders and to identify the non-conformities.
- develop remediation plan for cases resulting in violation of labour priorities.
- monitor, measure and report progress against this policy.

Environment Policy

The Company is committed to conduct its business in an environmentally responsible manner. It always ensures optimal use of natural resources and reduce over consumption of resources. Constant efforts to improve performances have resulted in considerable reduction in use of energy and natural resources.

Every business and value chain member shall endeavor to

- comply and/or exceed all applicable environmental legislation(s).
- assess risks and opportunities and consider environmental criteria in decision making.
- formulate relevant policies, procedures, and mechanisms to assess, measure and resolve its adverse impacts on the environment at all its locations, at all stages of its lifecycle from formation to closure.
- outline key performance indicators and the related targets to monitor and track their performance.
- develop Environment Management Systems (EMS) contingency plans and processes that helps in preventing, mitigating controlling environmental damages and disasters, which may be caused due to operations or that of a member of its value chain.
- continuously improve their environmental performance by adopting innovative, resource-efficient and clean technologies and solutions.
- address climate change impact through development of both mitigation and adaptation measures
 and build climate resilience and in line with India's Nationally Determined Contributions to the Paris
 Climate Change Agreement and the National/State Action Plans on Climate Change.
- Monitor and assess the environmental damage from pollution with due regard to public interest
- utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste and promoting the same amongst their value chain members.
- enhance water positivity by replenishing more water than we use through optimised consumption
 of water resources, identifying alternative water sources and maintaining zero liquid discharge
 status at all sites.
- encourage environmental accountability, responsibility and awareness among value chain partners through demonstration of good practices, training, and communication.
- undertake due diligence on environmental parameters for all mergers and acquisitions, wherever requires
- review the implementation of policy and management systems on a periodic basis

Responsible Advocacy Policy

The Company participates actively either individually or in associating with industry associations in expressing the concerns of the stakeholder community to competent authorities. The Company advocates for or against changes in governing laws or regulations to strengthen its implementation and benefit the common interests of stakeholder groups. Every business and its value chain members shall endeavor to

- ensure its advocacy positions are aligned with principles of responsible business.
- provide a balanced viewpoint in consideration of stakeholders' interests and business continuity.
- effectively utilize the trade and industry chambers and associations and other relevant platforms to undertake such policy advocacy.
- address grievances pertaining to any legislative / regulatory authority or framework collectively through policy advocacy.
- ensure the promotion of fair and transparent competition and respect.

Inclusive Growth and Equitable Development Policy

As a responsible corporate citizen, the Company upholds it's responsibly in proactively addressing socioeconomic and environment concerns in alignment with the national and state level sustainable development agenda.

The Company believes that inclusive growth can be achieved through equitable development of vulnerable communities including local suppliers and fostering innovations that address a plethora of environmental and social needs.

Every business and its value chain members shall endeavor to

- adhere to local, regional and national legislative requirements.
- assess, measure and understand the positive and negative impacts of its operations on social and economic development and respond through appropriate action to prevent and mitigate its undesirable impacts on the society.
- Meet the national and local development agenda by engaging, collaborating and seeking feedback from all concerned stakeholders especially vulnerable communities to identify their environmental and social concerns and mitigate them through its CSR programmes.
- innovate and develop products, technologies and processes that promote the well-being of all segments of the society, including vulnerable and marginalized groups.
- enhance procurement of goods and services especially from vulnerable communities where feasible
- respect all forms of intellectual property and traditional knowledge and make efforts at the same time to ensure that benefits derived from their knowledge are shared equally and impartially.
- 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 business operations monitor, measure and review progress against the policy on a periodic basis
- ensure appropriate actions to minimize any adverse impacts that it has on social, cultural and economic aspects of society including arising from land acquisition and use, construction of facilities and operations.

Customer Relations Policy

The Company believes that customers are their most priced asset and uphold their trust, by maintaining transparency in communication and ensuring their satisfaction through provision of high-quality products.

In an endeavor to be recognized as the preferred choice for cement amongst consumers, the Company aims at providing customer experience that delivers superior value.

The business along with the value chain partners will endeavor to

- adhere to the local, regional and national legislative requirements on customer complaints management and data protection.
- ensure that it will not restrict the freedom of choice and free competition in any manner while designing, promoting and selling the products.
- promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- empower customers to exercise their rights by providing awareness regarding the risks to the
 individual, to society and to the planet from the use of the products including information and
 guidance on, safe and responsible usage and disposal of their products through product labelling
 and other means.
- exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- establish a transparent and accessible grievance handling mechanism to satisfactorily resolve customers queries and feedback.
- maintain privacy of consumer's private and confidential data in the normal course of its business.
- monitor, measure and report progress against this policy.
- ensure to minimize and mitigates any adverse impact of its goods and services on consumers, the natural environment and society at large.