



UTTAM SUGAR MILLS LIMITED

BUSINESS RESPONSIBILITY POLICY

1. INTRODUCTION:

Uttam Sugar Mills Limited (**'the Company'**) is a public limited company and the equity shares of the Company are listed on BSE Limited and National Stock Exchange of India Limited. Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires top one thousand listed companies (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report.

Uttam Sugar Mills Limited being one of the top one thousand listed companies, has approved and adopted these policies.

2. SCOPE AND PURPOSE:

This Policy on Business Responsibility or Business Responsibility Policy (**'BR Policy'** or **'Policy'**) has been framed in line in line with the nine principles of the National Voluntary Guidelines proposed by the Ministry of Corporate Affairs and requirements under Regulation 34 and other applicable provisions of the Listing Regulations and is intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

This Policy endorses the Company's commitment to follow the principles and core elements, in conducting its business, as laid down in the National Guidelines on Responsible Business Conduct issued by the Hon'ble Ministry of Corporate Affairs. A yearly report on the status of the adoption / implementation of this Policy shall be included in the Annual Report of the Company.

Further, This Policy shall be addition to the existing USML Code of Conduct and Business Ethics (**'the Code'**) of the Company.

Uttam Sugar Mills Limited (Company) being one of the top one thousand listed companies, has approved and adopted these policies, which are in line with the above referred principles.

3. APPLICABILITY:

This Policy applies to all the directors and employees of the Company across all its units, mills branches, Depots and distillery units of the Company.

4. **DEFINITIONS**

- a) **“Act”** shall mean the Companies Act, 2013 and rules notified thereunder.
- b) **“Audit Committee or Committee”** means Committee of Board of Directors of the Company in accordance with the provisions of the Companies Act, 2013 and as per SEBI Regulations.
- c) **“Board”** in relation to a company, means the collective body of the Directors of the Uttam Sugar Mills Limited (the ‘Company’).
- d) **“Company”** means “Uttam Sugar Mills Limited”, a Company incorporated under the provisions of Companies Act, 1956.
- e) **“Regulations”** shall mean the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- f) **“Stock Exchange”** shall mean a recognized stock exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956.

5. **IMPLEMENTATION:**

- a) The policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company’s website.
- b) The Executive Director & Managing Director of the Company shall be jointly and severally responsible for the implementation of the Policy.
- c) The Executive Director & Managing Director may take support of such functional heads and external experts, which he may deem fit, for the effective implementation of the Policy.
- d) Compliance with the Policy shall be monitored and evaluated by the Executive Director & Managing Director on a regular basis.
- e) Any grievances/ complaints with respect to violation of the policy shall be reported to the Executive Director & Managing Director.

6. **KEY PRINCIPLES:**

6.1 **Principle 1 - Ethics, Transparency and Accountability:**

- 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.
- The Company shall communicate transparently and offer access to information about their decisions that impact relevant stakeholders.
- The Company shall not engage in practices that are abusive, corrupt, or amount to restrictive trade practices.
- The company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- The Company shall truthfully discharge their fiduciary responsibility on financial and other mandatory disclosures.
- The Company shall report on the status of their adoption of these Guidelines as suggested in the reporting framework in this document.

6.2 Principle 2 - Safety and Sustainability:

- The Company will work to ensure safety and optimal resource use over the lifecycle of the product – from design to waste disposal – and ensure that everyone connected with it- designers, producers, customers, recyclers and others engaged in the supply chain are aware of their responsibilities.
- The Company shall raise the consumer’s awareness with regard to their rights, through education, product labeling, appropriate and helpful marketing communication, full details of the contents and composition and promotion of safe usage and disposal of products and services.
- The Company shall strive to treat all its stakeholders and customers with dignity, respect and due understanding.

6.3 Principle 3 - Well Being of all employees:

- The Company shall provide access to appropriate grievance redressal mechanisms to its employees.
- 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 or religion.
- The Company shall not employ child labour, forced or any form of involuntary labour, paid or otherwise.
- The Company shall provide facilities for the well being of its employees.
- The Company shall ensure timely payment of fair living wages to meet need of economic security of its employees.
- The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the basic human dignity of the employees.
- The Company shall provide for upgrading skills and competencies of employees as required by providing access to necessary learning opportunities.
- The Company shall promote employee morale through enlightened human resource interventions.
- The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

6.4 Principle 4 - Protection of Stakeholders’ Interest:

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

6.5 Principle 5 - Respecting and Promoting Human Rights:

- The Company shall respect the human rights enshrined in the Constitution of India, national laws and policies and also the guidelines of the International bill of Human Rights.
- The Company shall acknowledge that human rights are inherent, universal, indivisible and interdependent in nature.
- The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities and consumers.
- The Company shall, within their sphere of influence, promote the awareness and realization of human rights across its value chain.

6.6 Principle 6 - Respecting, Protecting and Restoring the Environment:

- The Company understands its responsibility towards the environment.
- The Company should utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- The Company should take measures to check and prevent pollution.
- The Company should continuously seek to improve their environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies.
- The Company Shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest, wherever possible.

6.7 Principle 7 - Responsibility towards Public and Regulatory Policy:

- The Company shall operate within the democratic setup and constitutional framework.
- The Company shall operate within the specified legislative and policy frameworks prescribed by the Government, which guide its growth and also provide for certain desirable restrictions and boundaries.
- To the extent possible, Company should utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy in a transparent and responsible manner.

6.8 Principle 8 - Inclusive Growth and Equitable Development:

- The Company shall be committed towards minimising the negative impact on society, if any being created by the Company in the course of its business.
- The Company shall be sensitive to the local concerns while operating in regions that are underdeveloped.
- 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.

6.9 Principle 9 - Engaging And Enriching Customer / Consumer value:

- The Company, while serving the needs of their customers, should take into account the overall well-being of the customers and that of society.
- The Company shall ensure that they do not restrict the freedom of choice and support free competition while designing, promoting and selling their products.
- The Company shall continuously strive to provide such goods to its consumers in a manner that creates value for both.
- The Company shall promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles covered under these Guidelines.
- The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.

7. DISCLOSURES:

The policies shall be disclosed in the Annual Report and shall also be communicated to the stakeholders through appropriate channels in the Company.

8. GENERAL

- a) Any or all provisions of these BRR policies would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time.
- b) The Company reserves the right to modify, add, delete or amend any of the provisions of these policies.
- c) In case of any doubt with regard to any provision of the policies and also in respect of matters not covered herein, a reference shall be made to the Chief – Legal And Corporate Affairs & Company Secretary. In all such matters, the interpretation and decision of the Chief – Legal And Corporate Affairs & Company Secretary shall be final.