



Business Responsibility & Sustainability Policy

(Effective from FY 2022-23)

Business Responsibility & Sustainability Policy

1. Preface

Triveni Engineering & Industries Limited ('the Company') is a public limited company incorporated under the Companies Act, 1913. The equity shares of the Company are listed on BSE Limited and National Stock Exchange of India Limited and as such the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ('Listing Regulations') are applicable and binding on it.

The Securities and Exchange Board of India ('SEBI') has mandated the top 1,000 listed companies to enhance disclosures on Environment, Social and Governance ('ESG') standards by introducing the new reporting format named, Business Responsibility and Sustainability Report ('BRSR') with effect from the financial year 2022-23. The BRSR requirements are based on the principles enunciated in the National Guidelines for Responsible Business Conduct ('NGRBC') by the Ministry of Corporate Affairs ('MCA'), which aims to establish links between the financial results of a business with its ESG performance. The NGRBC mandates businesses to adopt and report on the following nine principles:

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

The Company falls within the list of top 1000 listed entities by market capitalization. In view of the Business Responsibility & Sustainability Reporting, the company formulates this Business Responsibility & Sustainability Policy.

2. Scope and purpose

This Business Responsibility & Sustainability Policy ('BRSR Policy' or 'Policy') has been framed in line with the amended provisions of the Listing Regulations, and to align and ensure adherence of all business activities in line with the core NGRBC requirements of each principle.

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

3. Applicability

This Policy applies to all the directors and employees of the Company across all its functions, units and divisions, and shall be applicable from FY 2022-23.

4. Implementation

The Vice Chairman and Managing Director (VCMD) of the Company shall have the authority to oversee the implementation of this Policy.

The Business Head/CEO (Sugar Business), CEO (Gears Business) and CEO (Water Business) shall jointly and severally act as the BR Head and shall be responsible for implementing the Business Responsibility initiatives and assisted by an internal and external team having multi-disciplinary background. They shall also be responsible for providing clarifications on the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment etc.

The Policy shall be reviewed and evaluated as and when required to establish and confirm that it meets the objectives of the relevant legislation and remains effective. The Executive Sub-Committee of the Board shall be the reviewing authority of this Policy, subject to the approval of the Board and may make suitable changes in this Policy from time to time. However, such alterations shall not be inconsistent with the provisions of any law for the time being in force.

5. POLICY/KEY PRINCIPLES

The Company believes in the highest standards of good and ethical business practices. It believes that good business practices stem from the culture and mindset of the organization. It is therefore not merely about enacting regulations and procedures, but also about establishing an environment of trust and confidence among various stakeholders. The Company's business practices would therefore be governed by the following guiding principles.

5.1 Principle 1 - Ethics, Transparency and Accountability

- The company shall develop necessary governance structures, procedures and practices that ensure ethical conduct at all levels and shall assure access to information about its decisions that impact relevant stakeholders. Detailed policies and guidelines for Code of Conduct for Directors and Senior management are also laid down [Please refer to Annexure-1 (a)].
- The company shall not engage in practices that are abusive, corrupt, or anti-competition as laid down through Anti-Bribery and Anti-Corruption policy [Please refer to Annexure-1(b)]
- The company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely in accordance with the applicable policies and statutory requirements.
- 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.
- 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 encourage its business partners and third parties with whom it conducts business to abide by this policy.

5.2 Principle 2 - Safety and Sustainability of Goods and Services

- The Company shall strive to ensure safety and optimal resource use over the life-cycle of the products - from design & manufacturing to disposal - and ensure that everyone connected with it are aware of their responsibilities.
- The Company shall make sure that the waste products generated during the process of manufacturing are re-cycled or the by-products generated are put to best possible use to safeguard the environment and minimize the hazards.
- The Company shall ensure that the manufacturing processes and technologies required to produce its products are resource efficient and sustainable.
- The Company shall regularly review to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- The Company shall raise the consumer's awareness with regard to their rights, through education, product labelling, 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 recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
- The Company shall strive to treat all its stakeholders and customers with dignity, respect and due understanding.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
- The Company shall work with Supply Chain vendors that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, respecting the confidentiality of information shared, data privacy, occupational health and safety and environment.
- 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.

5.3 Principle 3 - Employees' Wellbeing

- The Company shall ensure an environment which generates sense of belongingness, loyalty and commitment amongst the employees.
- The company shall strive to respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.

- The company shall provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment. Any such instance shall be dealt promptly, sensitively and confidentially in the most judicious and unbiased manner in accordance with the Company's Policy on Prevention of Sexual Harassment at Workplace.
- The company shall take cognizance of the work-life balance of its employees, especially that of women.
- The company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
- The Company shall provide facilities for the wellbeing of its employees including those with special needs, ensuring timely payment of fair living wages to meet basic needs and economic security of the employees which has been further elaborated through Equal Opportunity policy [Please refer to Annexure-1(c)]
- The company shall attract and retain talent involves many facets including employee engagement, mentoring, training and career development, empowerment and providing various perquisites as per the rules of the Company. The Company shall identify needs and grant necessary training to the employees to develop their skills and overcome such gaps as may be identified during the appraisal processes.
- The Company shall strive to communicate to its employees all the policies related to them so as to keep them aware of the same and allow them to take optimum advantage of the same.

5.4 Principle 4 - Protection of Stakeholders' Interest

- The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of not only its shareholders and employees, but all the stakeholders.
- The company shall systematically identify its stakeholders (both internal and external), understand their concerns, define purpose and scope of engagement, and commit to engaging with them.
- 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 resolve differences with stakeholders in a just, fair and equitable manner and the guidelines for Grievance redressal for all stakeholders have been laid down through Grievance redressal policy [Please refer to Annexure-1 (d)].

5.5 Principle 5 - Respecting and Promoting Human Rights

- The Company shall understand the human rights content of the Constitution of India, national laws and policies and also the guidelines of the International bill of Human Rights,

as well as acknowledging that human rights are inherent, universal, indivisible and interdependent in nature.

- 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, wherever applicable.
- The company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, customers and vulnerable and marginalized groups.
- The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

5.6 Principle 6 - Respecting, Protecting and Restoring the Environment

- 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.
- The company shall continuously seek to improve its environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- The company shall continue to implement the Environment, Health and Safety Policy effectively and shall develop the Environment Management System and contingency plans & processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.
- The company shall take measures to check and prevent pollution and shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest, wherever possible.
- 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.
- The Company shall strive to procure products or services from locally-based suppliers who comply with the local and national regulations pertaining to their business.
- The Company shall promote ecological sustainability and green initiatives by adopting energy saving mechanisms, sensitising employees to reduce carbon footprint of the Company.
- As a part of Green initiative-
 - The Company shall continue to organize tree plantation campaigns regularly and ensure participation of local communities into it.
 - The Company will encourage using electronic methods of communication within and outside its offices and discourage use of paper.
 - The Company will continue to encourage investors/shareholders to hold shares in dematerialized mode and provide their email addresses for dispatch of notices, annual reports etc. for communication purpose.

- The Company will continue to encourage shareholders to provide bank mandate for remittance of dividend through electronic mode.
- 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.
- The Company shall encourage and support its member of value chain to adopt its environmental policy/ management systems.
- The Company shall engage with its Customers to consider the environmental impact and support them in addressing their own environmental impacts.

5.7 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.
- The Company shall strive to engage with the Government and be a part of various chambers and associations to make recommendations/representations before regulators and associations for advancement and improvement of the industry it does business. The executives of the Company shall participate and play an active role in committees, associations etc. constituted for industry reforms and advancement.
- The Company shall ensure that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.
- The Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake policy advocacy in a transparent and responsible manner.

5.8 Principle 8 - Inclusive Growth and Equitable Development

- The Company shall understand the impact of inclusive growth and equitable development on the social and economic development and respond through appropriate action to minimize the negative impacts, if any being created by the Company in the course of its business.
- The company shall innovate and invest in products, technologies and processes that promote the wellbeing of society, putting the local and the underdeveloped regions in priority. The Company shall strive to increase its presence in rural areas for initiating various cane development activities for the benefits of farmers through its sugar mills.
- The company shall undertake, as and when applicable, 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. Besides, the Company shall, through its societal and other community activities, continue to focus on community development initiatives in five key areas i.e. education, healthcare, environment, community enhancement and sports & recreation.

5.9 Principle 9 - Engaging and Enriching Customer / Consumer Value

- The company shall take into account the overall well-being of the customers and that of society.
- 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.
- The company shall disclose all information truthfully and factually as per applicable laws, through labelling and other means to the customers/consumers, so that they can exercise their freedom to consume in a responsible manner.
- The company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
- The company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources.
- The company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.
- The company shall ensure the integrity of personal data or information. It shall safeguard the privacy of all such data or information given or obtained of third-party vendors including intellectual property. It shall not misuse and share it with anyone, except in accordance with applicable company policies or law. It shall report the loss, theft or destruction of any confidential information or intellectual property and data of company or that of any third party. Detailed guidelines and policy for the same has been laid down through Cyber Security and Data Privacy policy [Please refer Annexure-1 (e)]



Code of Conduct for Directors & Senior Management of the Company

Philosophy

Triveni's commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, the senior management and all employees of the Company. Consistent with its Values and Beliefs, Triveni has formulated the following Code of Conduct as a guide. The Code does not attempt to be comprehensive or cover all possible situations. It encourages the Triveni team to take positive actions, which are not only commensurate with the Values and Beliefs, but are also perceived to be so. Triveni expects all its employees to implement the Code in its true spirit.

Applicability

The Code of Conduct shall come into force with immediate effect and it shall apply to-

1. all Directors of the Company, whether executive or non-executive including Nominee Directors.
2. all Executives of the Company of the rank of General Manager and above including all functional heads.

Quality of products and services

The Company shall be committed to supply goods and services of the highest quality standards backed by efficient after-sales service consistent with the requirements of the customers to ensure their total satisfaction. The quality standards of the Company's goods and services should at least meet the required national standards and the Company should endeavour to achieve international standards.

Protecting company assets

The assets of the Company should not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.

Financial records

The Company shall prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations.

Internal accounting and audit procedures shall fairly and accurately reflect all of the Company's business transactions and disposition of assets. All required information shall be accessible to company auditors and government agencies.

Equal Opportunities Employer

The Company shall provide equal opportunities to all its employees and all applicants for employment, without regard to their race, caste, religion, marital status, sex, nationality, disability and veteran status. Employees of the Company shall be treated with dignity and in accordance with the Company's policy to maintain a work environment free of sexual harassment, whether physical, verbal or psychological. Employee policies and practices shall be administered in a manner that would ensure that in all matters, equal opportunity is provided to those eligible and that decisions are merit-based.

Gifts and donations

The Company, its Directors and Executives shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favours for the conduct of its business. However, the Company and its Directors and Executives may accept and offer nominal gifts which are customarily given and are of commemorative nature for special events.

Ethical conduct

The Directors and Executives shall deal on behalf of the Company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be such by third parties. Every Director and Executive of the Company shall, in his business conduct, comply with all applicable laws and regulations, both in letter and in spirit.

Concurrent employment

The Executives of the Company shall not, without the prior approval of the managing director of the Company, accept employment or a position of responsibility (such as a consultant or a director) with a competitor company, nor provide 'freelance' services to anyone. In the case of a Director or the Managing Director, such prior approval must be obtained from the Board of Directors of the company.

Confidentiality

The Directors and Executives shall maintain the confidentiality of confidential information of the Company or that of any customer, supplier or business associate of the Company to which Company has a duty to maintain confidentiality, except when disclosure is authorized or legally mandated. The use of confidential information for his/her own advantage or profit is also prohibited.

Shareholders

The Company shall be committed to enhance shareholder value and comply with all regulations and laws that govern shareholders' rights. The Board of Directors of the Company shall duly and fairly inform its shareholders about all relevant aspects of the Company's business and disclose such information in accordance with the respective regulations and agreements.

Third-party representation

Parties that have business dealings with the Company such as consultants, agents, sales representatives, producers, contractors, suppliers, etc. shall not be authorized to represent this Company if their business conduct and ethics are known to be inconsistent with this Code of Conduct.

Conflicts of Interest

The Directors and Executives should be scrupulous in avoiding 'conflicts of interest' with the Company. In case there is likely to be a conflict of interest, he/she should make full disclosure of all facts and circumstances thereof to the Chairman & Managing Director of the Company and a prior written approval be obtained. A conflict situation can arise in the under-mentioned circumstances:-

- a. when a Director or Executive takes action or has interests that may make it difficult to perform his or her work objectively and effectively;
- b. the receipt of improper personal benefits by a member of his or her family as a result of one's position in the Company;
- c. any outside business activity that detracts an individual's ability to devote appropriate time and attention to his or her responsibilities with the Company;
- d. any significant ownership interest in any supplier, customer or competitor of the Company;
- e. any consulting or employment relationship with any supplier, customer, business associate or competitor of the Company.

Interpretation of the Code

Any question or interpretation under this Code of Conduct will be handled by the Executive Sub-Committee of the Board of Directors of the Company. The Executive Sub-Committee has the authority to waive compliance with this Code of Conduct for any Director or Executive of the Company. The person seeking waiver of this Code shall make full disclosure of the particular circumstances to the Executive Sub-Committee.

TRIVENI ENGINEERING AND INDUSTRIES LTD
Anti-Bribery and Anti-Corruption Policy

Background/Preamble:

Triveni Engineering and Industries Limited (hereinafter referred to as 'The Company', 'TEIL') is committed to doing honest and fair-minded business by following highest standard of morality and corporate governance. The Company has zero tolerance towards bribery, corruption and other forms of unethical practices and is committed to act professionally, fairly and in righteousness manner in all the dealings wherever they operate.

This policy should be read in conjunction with the Company's Code of Conduct for Directors & Senior Management of the Company.

Purpose:

The purpose of this policy is to:

1. Set responsibility for Third party and Employees of the Company to maintain high standard of business practices.
2. Provide guidance on how to recognize and deal with bribery and corruption issues.

Scope:

This Anti-bribery and Anti-corruption Policy is applicable to Triveni Engineering and Industries Limited and all its subsidiaries including Employees, and will be communicated to vendors, sub-contractors and business partners for knowledge and compliance.

Definitions:

'Bribe/ Bribery' refers to the offering, giving, soliciting, promising, or receiving of any item of value or an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behavior or actions of someone to obtain or retain a commercial advantage or to induce him/her/them to act in contravention of the rules and regulations, ethics, trust and integrity. Bribery and corruption can take many forms including cash or gifts to an individual or relatives or associates, unauthorized rebates, non-monetary favors and false political or charitable donations. These actions may be undertaken directly or through a third party. It is illegal and immoral to, directly or indirectly, offer or receive a bribe

'Corruption' is the "abuse of entrusted power for private/commercial gain". Corruption is deceitful behavior that people in positions of power exhibit for personal gain.

'Employees' includes all directors, officers, employees engaged by the Company, directly or indirectly, wherever located regardless of grade and position, in terms of all dealings and transactions in all countries where the Company operates.

'Relatives' includes all persons as stated in Section 2 (77) of the Companies Act, 2013.

'Third party' means any individual or organization who has business dealings with the Company and includes actual and potential business associates, customers, contractors, subcontractors, business partners, suppliers, distributors, business contacts, agents, technical and other consultants and government bodies and officials or any other person associated with or acting on behalf of the Company.

Principles and rules followed by the Company:

- **Fee Payments:**

The Company shall take vital measures to ensure that any fee paid by the Company shall be associated rightfully to the activity being performed.

- **Offer of employment:**

The Company shall follow the standard procedure of recruitment while recruiting any candidate related to the Company's personnel. The Company shall ensure that no exclusive treatment is provided to such Employees in the recruitment process and employment of such Employees (or their Relatives) shall happen only on the basis of education, experience, dedication, sincerity, expertise, and performance. For transparency purposes, new recruits will be required to make a disclosure of their Relatives working in the Company.

- **Donations:**

The Company shall make donations but only if these are virtuous and in compliance with this policy and does not violate the applicable laws. All donations to the political party/s can only be made with the specific approval of the Board of Directors and in compliance with all applicable laws.

- **Gifts and hospitality:**

Gifts can be seen as bribes when they are intended to create reciprocal obligations. Gifts and hospitality can generate real or perceived conflict of interest. Employees shall accept and offer only nominal gifts which are given as a social practice and are of celebratory in nature for special events.

- **Procurement procedure:**

Supply chain partners (suppliers, contractors, service providers etc.) must enlighten themselves with Company's procurement procedure and must adhere to the same. System of internal controls surrounding supplier selection must be adhered. Supplier selection shall not be based on receipt of a gift, hospitality, or payment. It is important that all suppliers are selected on merit basis and adequate documentation is maintained supporting internal controls around supplier selection.

Protection/No retaliation:

The Company ensures that no stakeholder shall suffer any inimical effect because of their refusal of participation in any corrupt activity. The Company has adopted zero tolerance approach towards any kind of retaliation. Any kind of retaliation will be considered as absolute misconduct.

Disciplinary action for non-compliance:

Non-adherence to this Policy shall lead to disciplinary action, as deemed appropriate by the Disciplinary Committee comprising of Corporate HR Head, concerned Unit Head and the concerned Business Head. The recommendations of the disciplinary committee shall be subject to approval by the Vice Chairman and Managing Director of the Company.

Monitoring and review:

The Company reserves the authority to regularly review and make any required modifications to the Policy. The Executive Sub-Committee of the Board of Directors of the Company shall review the policy periodically. All the significant changes shall be conveyed to the stakeholders by the Company.

Training and Awareness:

- The Company shall include Anti-corruption and Anti-bribery training and awareness in the induction program.
- This policy shall be shared with all Employees and Third party and Company's zero tolerance approach shall be conveyed to them, by posting it on the Company's website.
- Reporting manager shall be contacted to resolve any queries regarding this policy

Reporting Mechanism:

The Corporate HR shall keep complaint database secure in all respects. The Company shall maintain 7 years of complaint record which helps in identifying complaint pattern trends, which will facilitate improvement of overall systems.

If in doubts, please contact:

If in doubt as to what might constitute a breach of this Policy, then please contact Corporate HR Head who will give his views after necessary consultations.

TRIVENI ENGINEERING AND INDUSTRIES LTD
EQUAL OPPORTUNITY POLICY

Objective

With 'Respect for Diversity' being one of our core values, Triveni has been committed to being an equal opportunity employer. The same is reinforced by our Corporate Business Principles and our Code of Business conduct.

Scope

The Equal Opportunity Policy is applicable for all job applicants and employees

Policy Framework

We are committed to providing equal opportunities without any discrimination on the grounds of age, color, disability, origin, nationality, religion, race, gender, or sexual orientation and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason.

The above is expected to be achieved through the following measures.

- a) Our employees are personally responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others.
- b) Employment with the Company will be based on merit and not on any irrelevant attributes or characteristics that an individual may possess.
- c) Career progression of employees will be based on performance, ability and potential, and will be consistent with the needs of the business.
- d) The Company will not tolerate harassment, behavior that is discriminatory or behavior that victimizes any individual or group in our workplaces. Appropriate action basis investigation will be taken if employees breach this policy either through discrimination, harassment, bullying or victimizing other employees or by making false claims.
- e) If an employee feels he or she is being subjected to discrimination, harassment, bullying or victimization, he or she can raise the same with the Unit HR / Unit head and /or Business head and/ or Corporate HR. Alternatively whistle blower mechanism can also be used.
- f) All grievances and complaints will be taken seriously and treated with sensitivity and fairness.
- g) In lieu of the Rights of Persons with Disabilities Act 2016 and Rules, the Company shall ensure that proper infrastructure and reasonable accommodation is provided to persons with disability to enable them to effectively discharge their duties at the establishment.
- h) The company commits that no opportunity will be denied to Persons with Disabilities and there will be no discrimination of any manner.

Roles and Responsibilities

Employee Responsibilities

To comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in his capacity as a representative of the Company.

Responsibilities of Managers and supervisors

To take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.

Human Resources Responsibilities

To provide advice and address grievances relating to the employment of persons with disabilities and/or any other complaints regarding discrimination in any other form against any job applicant/employee

Interpretation & Guidance

In the event that any additional guidance and/or further interpretation is required, Corporate HR may be contacted.

Review Timelines

The policy will be reviewed basis changes in legal and market guidelines.

Communication of Policy

The Policy will be available on intranet to all employees and our website.

TRIVENI ENGINEERING AND INDUSTRIES LTD

GRIEVANCE REDRESSAL POLICY

Background/Preamble:

Triveni Engineering and Industries Limited (hereinafter referred to as 'the Company' and 'TEIL') is committed to developing a conducive workplace where grievances are quickly and fairly adjudicated. The Company's goal is to encourage a strong and positive ecosystem for all its stakeholders by hearing them out, responding to their problems and by resolving them within the stipulated period.

Purpose:

The Company is committed to developing an ethical workplace, maintaining healthy industrial relations, communications, and dialogue, and ensuring that all stakeholders are treated fairly and equally, in principle and practice.

The objective of Grievance Redressal Policy is to provide a reachable mechanism for settlement of Grievances and to adopt such measures in the Company as would ensure swift redressal of Grievances of the stakeholders leading to increased satisfaction at the workplace which has a direct bearing on overall efficiency of the Company.

This policy provides a platform for stakeholders to address their grievances, concerns, or complaints in a systematic and trustful manner. The policy aims to:

- Treat all stakeholders fairly, equally, and without any biases.
- To institute a system to ensure that all complaints are treated promptly and dealt within the allotted time frames.
- Create an effective Grievance Redressal system that will enable fair and equitable resolution of complaints or concerns.

Coverage:

The policy is applicable to all the TEIL stakeholder, except employees and trainees, across all Indian operation.

Exclusion:

Any complaints received from the customers in the ordinary course of business relating to goods supplied, service rendered or project execution will not be covered under this policy as the same needs to be decided/attended to by the concerned business vertical in accordance with the contractual obligations under the contract with the customer.

Definition:

"Policy" means "Grievance Redressal Policy"

"Stakeholders" means Customers, Business partners, Vendors, Regulatory bodies, Shareholders and Investors, Lenders and Rating agencies, Communities, Government Agencies & Local Authorities, Service Providers and Suppliers, Media, and Public at large.

“Grievance” - A grievance is an act of omission or occurrence which a stakeholder feels as injustice that can be established based on facts and figures.

“Grievance Handling Officer (GHO)” – In relation to the shareholders/investors, the Compliance officer of the Company will be responsible for handling Grievances (as detailed in Part B) whereas in respect of other stakeholders, GHO will normally be the Corporate HR Head. The Vice Chairman and Managing Director (VCMD) may nominate any other employee as the GHO, based on the requirements and specific expertise required for a specified period /financial year.

“Complaint” - any communication that expresses dissatisfaction, in respect of the conduct or any act of omission or commission or deficiency of service and in seeking a remedial action but does not include the following -

- Complaints that are incomplete or not specific in nature.
- Communications in offering suggestions.
- Communications seeking guidance or explanation.

Guidelines relating to Grievance Redressal :

- The Policy aims at resolving stakeholder’s (covered under the Policy) Grievances as fairly and as quickly possible.
- Stakeholders may lodge Grievances without fear of oppression.
- All Grievances will be in writing and no verbal Grievance shall be entertained.
- Any intentional Grievance raised to malign the reputation of an individual or false allegation shall be considered as misconduct and shall not be taken into consideration for redressal. The Company reserves the right to take an appropriate action against such grievances
- If the Grievance arises out of an order given by Management, the said order shall be complied with before the concerned stakeholder raises the order as Grievance.
- Grievance shall be treated with utmost confidentiality and sensitivity.
- Grievances from the stakeholders (other than shareholders and investors) will be handled in accordance with Part A whereas Grievances from shareholders and investors will be handled in accordance with Part B.

PART A

Stakeholders Grievance and Redressal Policy (Other than Investors)

Grievance Redressal Process

The following process should be followed for expressing and seeking redressal of Grievances:

- The GHO is assigned to receive and acknowledge the Complaints from stakeholders other than investors.
- Stakeholders can raise their grievances through the dedicated channel by stating all relevant facts, dates and the names of any individual concerned. If not comfortable, the stakeholders can choose to not disclose their identity unless considered necessary by the Company to properly investigate the grievances.

Channels through which the stakeholders can register their complaints
Email Id (in respect of Grievances from stakeholders other than shareholders/Investors:xxx)

- The GHO may determine if it is necessary to make further inquiries and/or investigate the background facts or the allegations made by the stakeholder within 10 working days of receipt of the Complaint.
- The GHO may reject the Grievance outright if additional inquiry reveals it to be frivolous. Accordingly, the stakeholder will be informed
- GHO may delegate investigation of the Grievance to the concerned unit head or a team of concerned HODs. Accordingly, after investigation a report would be submitted to the GHO along with recommendation for further administrative action.
- The Grievances will be resolved within 60 working days of registration and the complainant will be notified of the status of their complaint resolution.
- The GHO shall preserve records pertaining to grievance/complaint received, resolution and closure of the grievance.
- If the complainant is not satisfied with the approach in which his or her issues have been resolved or if the GHO has not addressed the issues appropriately, the Grievance may be escalated to the VCMD by the complainant.

The complainant can contact VCMD through:
Emails: xxx (a new email ID may need to be created for this purpose)

Communication of the Policy:

The stakeholders will be made aware of the Policy through various communication channels, meetings or personal interactions. Further, TEIL shall put the Policy on its website for easy accessibility.

Review and monitoring:

The Grievance Handling Officer is responsible to oversee the implementation and compliance of the policy and report any shortcomings or discrepancies to the concerned authority as per the organizational hierarchy.

Vice Chairman & Managing Director is authorized to interpret / clarify, supplement and issue operational guidelines related to this Policy. With the introduction of this policy, all previous policies on Grievance Redressal stand superseded.

PART B

Policy Title	Investors' Grievance and Redressal Policy
Responsibility	Company Secretary & Compliance Officer
Applicability	This Policy is applicable to Investors/Shareholders of Triveni Engineering & Industries Limited
Purpose	<p>The Company is listed on BSE Limited and National Stock Exchange of India Ltd. and is governed by the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations) and the Companies Act, 2013 ('Act'). As per Listing Regulations as amended, including the circulars, notifications issued thereunder from time to time, the Company is required to ensure adequate and timely redressal of all investors/shareholders grievances pertaining to securities of the Company. Accordingly, adequate mechanism is put in place for expeditious redressal of investor complaints.</p> <p>In the event of any conflict between the provisions of this Policy and other applicable laws, the provisions of applicable law shall prevail.</p>
Rights of Shareholders	<p>Subject to and in accordance with applicable laws,</p> <ul style="list-style-type: none"> • access to relevant, sufficient and timely information concerning the investors/shareholders including general meetings, annual reports etc., to enable them to participate in the corporate governance process. • to participate effectively and vote in general shareholder meetings • to obtain effective redressal for violation of their rights as an investor/shareholders
Obligations of the Company	<ul style="list-style-type: none"> • The Company shall ensure that it is registered on the SCORES platform or such other electronic platform or system of the SEBI as shall be mandated from time to time, in order to handle investor complaints electronically in the manner specified by SEBI from time to time. • The Company shall file with the recognized stock exchange(s) on a quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter. The said statement shall

	<p>also be placed before the Board of Directors of the Company on quarterly basis for their review.</p> <ul style="list-style-type: none"> • The Company shall respect the rights of shareholders that are established by law or through mutual agreements, to the extent applicable. • The Board of Directors of the Company shall maintain high ethical standards and shall take into account the interests of shareholders. • The Company shall maintain a functional website wherein the contents of said website should be updated from time to time and the website shall contain all the relevant information about the Company, including the following: <ul style="list-style-type: none"> ○ Details of its business; ○ Financial information including annual reports ○ Contact information of the designated officials of the Company who are responsible for assisting and handling investor grievances; ○ Information, notices, circulars etc. concerning shareholders; ○ All intimations and announcements made by the Company to stock exchanges; and ○ Any other information which may be relevant for the investors/shareholders.
Grievance Management	<ul style="list-style-type: none"> • In order to comply with the relevant provisions of the Act and Listing Regulations, the Company has constituted a Committee of Directors namely, Stakeholders Relationship Committee ('SRC'), • The terms of reference of the SRC include, inter-alia, to consider and resolve grievances of the investors/shareholders, including complaints related to transfer, transmission of shares, demat and remat of equity shares, non-receipt of annual reports, declared dividends, transfer of shares/ dividend to Investor Education protection fund, and to review the measures/initiatives taken by the Company to improve the investors' complaints redressal mechanism etc. • The Company is currently registered on the SCORES platform of the SEBI and shall deal with investor complaints in the manner specified by the SEBI. • The Company has a separate designated email for redressal of investor complaints i.e. shares@trivenigroup.com

	<p>The Company seeks to redress complaints as expeditiously as possible and endeavor to redress the complaint not later than 10 working days from the date of receipt.</p> <ul style="list-style-type: none"> • The Company has a functional website i.e. www.trivenigroup.com whereat all financial and other relevant information are available. • The Compliance officer of the Company is responsible to oversee the redressal of shareholders/investors complaints.
Role of SRC	<p>The SRC shall periodically review the status of investors' complaints and their redressal undertaken by the Company, but at least once in a year.</p> <p>The SRC is authorized to interpret/clarify, amend, supplement and issue operational guidelines related to this Policy, as and when deem appropriate.</p>

Version History:

Version	Approved By	Approval Date	Effective Date	Clause(s) Modified

**Indicative table*

**TRIVENI ENGINEERING AND INDUSTRIES LTD
CYBER SECURITY AND DATA PRIVACY POLICY**

Background/Preamble:

Triveni Engineering and Industries Limited (hereinafter referred to as 'the Company' and 'TEIL') recognizes the importance of cyber security and data privacy in ensuring sustainable growth and business continuity across the organization. Information systems and data resources of TEIL are critically important assets for its business operations and effective supply chain and customer services.

TEIL is committed in establishing and improving cyber security preparedness and minimizing its exposure to associated risks to safeguard TEIL assets. All TEIL businesses and functions implement adequate security policies, processes, and controls to protect confidentiality, maintain integrity, and ensure availability of all information assets.

Purpose and Scope:

This Policy outlines the measures and procedures that the Company has implemented to protect its data and information systems from cyber threats. The policy applies to all employees or any external person who may have access or use the company's information systems and data.

Commitment:

This policy requires all Businesses under TEIL:

1. To comply with the applicable national cyber security standards.
2. For implementation of control and monitoring measures for all hardware and software assets in use throughout the organization
3. For implementation of management protocols for protection and security of stakeholders' assets in identifying the risks to information and cyber systems
4. To ensure that the critical information is protected from unauthorized access, use, disclosure, modification, and disposal, whether intentional or unintentional
5. (i) To ensure the confidentiality, integrity and availability of such information acquired permanently or in transit, provided
(ii) To conduct regular cyber-security audits following appropriate national standards to maintain compliance
6. To establish clear-cut reporting channels for any form of violation of the Cyber Security and Data Privacy policies and any other specific information security and management policy as the case may be.
7. To protect TEIL stakeholders, information and assets from threats that could potentially disrupt business and TEIL brand and reputation
8. To communicate the importance of cyber security and to continually enhance information security capabilities to all the concerned

9. To ensure compliance with this policy by all concerned in the respective Business Heads/Department Heads in their respective business domains
10. To report periodically all breaches of information security, actual or suspected, and thereafter the same be investigated by the designated/assigned personnel and to take appropriate corrective and preventive actions
11. Training and Communication:

The Company shall provide regular information security awareness to employees or any external person who may have access or use the company's information systems and data. The awareness shall cover topics such as:

- Information security policies and procedures
- Phishing and social engineering
- Incident reporting and response

This policy also applies to all information, computer, and data communication systems owned, licensed, and administered by TEIL. The content and robustness of implementation of this policy will be reviewed periodically and revised accordingly, as needed.