



Business Responsibility and Sustainability Policy

Background:

Pursuant to the requirements of Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), the Board of directors of the Company had approved and adopted this Business Responsibility Policy at its meeting held on April 15, 2017.

To give effect to the amendments introduced vide SEBI (Listing Obligations and Disclosure Requirements) (Fifth Amendment) Regulations, 2019, the Board of directors of the Company had approved and adopted revised Policy at its meeting held on May 13, 2022.

This Policy is based on principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of a Business published by the Ministry of Corporate Affairs and towards conducting business by a Company and further confirm to the Principles and Guidelines prescribed under National Guidelines on Responsible business Conduct.

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.

Guiding Principles:

Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. Company's Business practices would therefore be governed by the following guiding principles.

Principle 1: Integrity, Ethics, Transparency and Accountability

- i. The Company should develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of this principle across its value chain.
- ii. The Company should communicate transparently and assure access to information about their decisions that impact relevant stakeholders.
- iii. The Company should not engage in practices that are abusive, corrupt, or anti-competition.
- iv. The Company should truthfully discharge their responsibility on financial and other mandatory disclosures.
- v. The Company should report on the status of their adoption of these Guidelines as suggested in the reporting framework in this document.
- vi. The Company should avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.



Principle 2: Safe and Sustainable products and services

- i. The Company should assure safety and optimal resource use over the life-cycle of the product – from design to disposal – and ensure that everyone connected with it- designers, producers, value chain members, customers and recyclers are aware of their responsibilities.
- ii. The Company should raise the consumer's awareness of their rights through education, product labelling, appropriate and helpful marketing communication, full details of contents and composition and promotion of safe usage and disposal of their products and services.
- iii. In designing the product, the Company should ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.
- iv. The Company should regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
- v. The Company should recognize and respect the rights of people who may be owners of traditional knowledge and other forms of intellectual property.
- vi. The Company should recognize that over-consumption results in unsustainable exploitation of our planet's resources, and should therefore promote sustainable consumption, including recycling of resources.

Principle 3: Employee Wellbeing

- i. The Company should respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
- ii. The Company should 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, disability or sexual orientation.
- iii. The Company should not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- iv. The Company should take cognizance of the work-life balance of its employees, especially that of women.
- v. The Company should provide facilities for the wellbeing of its employees including those with special needs.
- vi. The Company should ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- vii. The Company should provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
- viii. The Company should communicate this provision to their employees and train them on a regular basis.
- ix. The Company should ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis.
- x. The Company should promote employee morale and career development through enlightened human resource interventions.
- xi. The Company should create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.



Principle 4: Stakeholders Engagement

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

Principle 5: Human Rights

- i. The Company should understand the human rights content of the Constitution of India, national laws and policies and the content of International Bill of Human Rights.
- ii. The Company should appreciate that human rights are inherent, universal, indivisible and interdependent in nature.
- iii. The Company should 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.
- iv. The Company should recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- v. The Company should, within their sphere of influence, promote the awareness and realization of human rights across their value chain.
- vi. The Company should not be complicit with human rights abuses by a third party.

Principle 6: Environment

- i. 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.
- ii. The Company should take measures to check and prevent pollution. The Company should assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- iii. The Company should ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- iv. The Company should 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.
- v. The Company should develop Environment Management Systems (EMS) and contingency plans and processes that help them in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to their operations or that of a member of its value chain.



vi. The Company should report their environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.

Principle 7: Policy Advocacy

- i. The Company, while pursuing policy advocacy, must preserve and expand public good and shall not advocate any policy change to benefit the Company or select few alone.
- ii. To the extent possible, Company should utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

Principle 8: Inclusive Growth

- i. The Company should understand their impact on social and economic development, and respond through appropriate action to minimise the negative impacts.
- ii. The Company should innovate and invest in products, technologies and processes that promote the wellbeing of society.
- iii. The Company should 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 their business operations.
- iv. The Company should be sensitive to the local concerns while operating in regions that are underdeveloped.

Principle 9: Consumer Value

- i. The Company, while serving the needs of their customers, should take into account the overall well-being of the customers and that of society.
- ii. The Company should ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
- iii. The Company should disclose all information truthfully and factually, through labelling and other means, including the risks to the individual, to 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. Where required, the Company should also educate their customers on the safe and responsible usage of their products and services.
- iv. The Company should promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- v. The Company should exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- vi. The Company should provide adequate grievance handling mechanisms to address customer concerns and feedback.



BRSR Governance Policies:

To give effect to the above guiding principles, the following Business Responsibility Policies are adopted by the Company. These policies shall be applicable to all the Company, its subsidiaries and associates and all its employees and workers. Wherever applicable, the subsidiary companies can formulate their own policies in line with the guiding principles.

- **Business Ethics & Integrity Policy**

The Code of Conduct of the Company details various business policies for fair market practices, work ethics, integrity in line with the values and commitments of the Reliance group.

We are committed to high standards throughout our operations, maintenance of accurate records, documentation and have established internal control standards and procedures to ensure integrity of all reports and records.

This code expects every employee to conduct business with integrity, in compliance with applicable laws, and in a manner that excludes considerations of direct or indirect personal advantage / gains.

- **Conflict of Interest Policy**

Rinfracore employee should steer clear of any situation, which involves or may involve a conflict between their personal interest and the interest of the Company.

Employees should conduct themselves and arrange their affairs in a way that ensure they are not involved in any arrangements/ transactions circumstances and relationships that might dissuade them from acting in the best interest of the company.

Managers should strive to instill, encourage, and appreciate intellectual integrity in their colleagues.

- **Supplier Code of Conduct**

Purchase decisions should be made purely on the basis of quality, service, price, delivery, best value, or similar factors. Extraneous or personal interest / advantage should never be the criteria for arriving at purchase decisions.

Suppliers / other service providers are required to ensure that their actions in no way contravene any provisions of Rinfracore's Business Ethics Policies.

Suppliers should conduct their operations sustainably with the aim to protect the environment. They should not be in violation of any human rights / labour laws.

Suppliers should demonstrate high standards of ethics and integrity.

- **Anti corruption and Anti bribery Policy**

Rinfracore is committed to following fair market policies and competing fairly and ethically for all business opportunities.



RInfra employees, in line with the code of conduct of the Company, are strongly discouraged from disparaging, misrepresenting or harassing a competitor; stealing trade secrets; bribery; kickbacks or any other corrupt practices.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in placement of business, or who participate in negotiating contracts must be particularly careful to avoid actions that create the appearance of favouritism or that may adversely affect the company's reputation.

Employees should neither seek nor accept for themselves or others any gifts, favours, business courtesies without a legitimate business purpose. And should avoid a pattern of accepting frequent courtesies from the same person's or companies.

Employees should refrain from entering into agreements and practices that unreasonably restrict competition and are in restraint of free trade such as price fixing and boycotting suppliers or customers. Any commercial strategy based on the intention to run a competitor out of business through unfair pricing or otherwise cannot be followed. Disparaging, misrepresenting, or harassing a competitor, stealing trade secrets, bribery, corruption and kickbacks are strongly discouraged.

- **Environment policy -**

At RInfra preservation and promotion of environment is of fundamental concern in all its business activities. RInfra, having a leading role in delivering reliable and quality products and services to all consumers at competitive costs, is conscious of its responsibility towards creating, conserving and ascertaining safe and clean environment for sustainable development.

The Company is committed to achieve excellence in environmental performance and towards achieving these objectives, the Company shall -

- Adopt appropriate operational practices and suitable technologies to monitor, control and minimize the impact of its activities on environment.
- Continually improve its environmental performance by setting objectives and targets to prevent or reduce pollution and waste and minimize use of resources.
- Comply with all the relevant legislative and regulatory environmental requirements.
- Develop and maintain a highly motivated workforce trained for effective management of environment and emergency situations.
- Provide relevant information on environmental policy to the concerned authorities and interested parties and ensure that the policy is understood, implemented and maintained by employees at all levels within the organization.
- Evaluate and modify environmental management practices keeping in view regulatory requirements, community concerns and technological advancements.
- Conserve natural resources by their responsible and efficient use in all the operations.
- Plant trees, develop green belts and promote lush green surroundings at our generating locations and establishments to work in harmony with nature; and
- Make this policy available to public.

- **Health and Safety Policy**

RInfra firmly believes that health and safety of its employees, who are an asset to the company, is of utmost importance. Safety is an essential and integral part of each and every activity at RInfra. Therefore all work shall be carried out with utmost care, giving due consideration to safety which shall not be compromised under any circumstances. Accidents and risk to health are preventable through continuous improvement in working environment and involvement of all employees making thereby a safe, healthy and accident free work place.

With regard to health and safety objectives, RInfra will: -

- Comply with the requirement of all relevant statutory provisions
- Incorporate appropriate health and safety criteria and factors into business decisions as well as selection and placement of personnel at appropriate levels and assigning the responsibility thereof
- Provide and maintain safe and healthy work place through operational procedure, safe systems and methods of works
- Develop safety awareness to protect all employees from foreseeable work hazards
- Provide appropriate levels of training and support to management and employees to ensure that they are able to fulfill health and safety responsibilities
- Work with major suppliers, contractors and customers to facilitate their health and safety performance improvement and also make it obligatory for them to follow the plant safety rules, procedures, systems and safe practices
- Conduct audits and mock drills on site to ensure that operations are in compliance with health and safety management requirements and for emergency preparedness
- Ensure that appropriate resources are available to fully implement health and safety policy and continuously review the policy's relevance with respect to legal and business development

The Company firmly believes that accidents are preventable and aims in achieving "Zero Accident Level"

- **Equal Opportunity Policy**

This Equal Opportunity Policy is in accordance with the relevant statutory provisions including the provisions of the Rights of Persons with Disabilities Act, 2016 along with the Rights of Persons with Disability Rules, 2017. We will abide by the principles of the Policy in letter and in spirit. We will uphold the highest standards of ethics, values and governance across all our people practices.

- Treat everyone with respect and dignity. This includes all employees and workers, contractors and their employees, vendors, suppliers, clients and their representatives, people in the communities in which we operate and anyone with whom we engage.



- Ensure zero tolerance toward any form of bullying, harassment and behaviour that is discriminatory or victimizes any individual or group in our workplaces including zero tolerance towards sexual harassment.
 - Have a robust framework to attract, engage and retain talent of all genders, nationalities and abilities.
 - Provide employment opportunities on merit without any discrimination based on gender, sexual orientation, disability, marital status, pregnancy & maternity, caste, socio-economic status, religion, faith, nationality, ethnicity, race, colour, age, religious or political views.
 - Ensure equal opportunities with respect to recruitment, learning, development, promotion, employee benefits, separation and other aspects of employment relationship based solely upon merit, performance, potential and qualifications required for the job.
 - Provide, subject to job requirements and merit, fair and equitable opportunity to all persons including those with disabilities, while considering them for positions where they can be suitably employed and take appropriate measures to ensure a conducive environment for persons with disabilities to perform and excel in their role.
 - Encourage and support our partners to adopt the above said guiding principles.
-
- **Code of Conduct and Other Relevant Policies**

The Code of Conduct and other relevant policies are enclosed herewith as annexures



Code of Conduct

Reliance Group continually reviews corporate governance best practices to ensure that they reflect global developments. It takes feedback into account, in its periodic reviews of the guidelines to ensure their continuing relevance, effectiveness and responsiveness to the needs of local and international investors and other stakeholders.

The Code of Conduct Policy adopted by Reliance Group is organized in following

sections:

- A: Values and Commitments at Reliance

- B: Code of Ethics

- C: Business Policies

A: Values & Commitments at Reliance

At Reliance Ethics is a simple process that involves defining what is right or wrong, and then doing the right thing.

We believe that any business conduct can be ethical only when it rests on the nine core values of **Honesty, Integrity, Respect, Fairness, Purposefulness, Trust, Responsibility, Citizenship and Caring**. Strong commitments to these values have long been building principles for Reliance Group. These values are not to be lost sight of by anyone at Reliance Group under any circumstances irrespective of the goals that are intended to be achieved.

Commitment to Stakeholders

In all our relationships we demonstrate our steadfast commitment to all our stakeholders:

Our employees

We strive to treat our employees with honesty, just management, due dignity and fairness. We are committed to provide our employees with a good, safe and healthy working environment. We encourage the involvement of employees in the planning, direction and fair appraisal of their work.

Our customers

Reliance Group strives to win and maintain customers by developing and providing products and services which offer value in terms of price, quality, safety and environmental impact, which are supported by the requisite technological, environmental and commercial expertise.



Our environment

Reliance Group is committed to acting as a concerned and responsible community participant, reflecting all aspects of good corporate citizenship. Reliance Group works with its community by volunteering and supporting education, medical welfare and other worthy causes that lead to sustainable development.

B: Code of Ethics

Reliance Group's Code of Ethics is in alignment with its values and commitments. The essence of this code is that each employee should conduct the Company's business in a way that upholds its values and commitments.

This code expects every employee to conduct business with integrity, in compliance with applicable laws, and in a manner that excludes consideration of direct or indirect personal advantage / gains.

The principles and procedures in this Code of Ethics apply to all material transactions, large or small, and describe the conduct expected from every Reliance Group employee including retainers.

Code of Ethics covers following areas:

- I. Conflict of Interest
- II. Payments and Gifting
- III. Receipt of Gifts
- IV. Purchases through suppliers and other service providers
- V. Political Contributions

I. Conflict of Interest

1. A conflict of interest may exist when an employee is involved in an activity or has a personal (direct or indirect, by himself or through any relative) interest, which in the opinion of the Company, interferes with the employee's objectivity in performing Company duties and responsibilities.
2. Activities that create the appearance of a conflict of interest also are automatically deemed to be covered by this policy in order not to reflect negatively on the reputation of Reliance Group and / or its employees. Such activities, arrangements, transactions, agreements are not allowed and must be discontinued by the employees immediately.
3. Following are the expectations from the employees in order to avoid Conflict of Interests:



- Provide truthful, accurate and complete information about certain facts, transactions, and relationships that may have bearing on issues related to conflicts of interests.
 - Identify conflict of interests that involve them and discontinue the activities that result in or can result in conflict of interests.
 - Avoid any relationship, influence, or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their job.
 - Place Company's interest in any business transactions ahead of any direct or indirect personal interest or personal gain to the individual employee or to the employee's spouse, family member, friend or other individual.
 - Not to use their position / title / authority associated with their office to induce a benefit for themselves or others.
4. Any person to whom this policy is made applicable cannot undertake any of the following activities:
- Undertaking full-time employment or significant and active managerial or decision-making role in any business enterprise other than Reliance.
 - Setting up, operating, advising, representing, or getting involved in any manner whatsoever with business enterprise that competes with any of Reliance Companies.
 - Holding an investment interest (either directly or indirectly through any relative*) or any kind of financial involvement or acting as an officer, member, director, partner, consultant, representative, agent, advisor, broker, intermediary or employee or in any other capacity in any outside business enterprise, if the outside business enterprise does or proposes to do business with any of Reliance Companies (as a supplier, customer, consultant, advisor, agent, broker, intermediary, representative or in any other way).
- (*Relatives include the following: Spouse, Father, Mother, Sons, Son's Wife, Daughters, Daughter's Husband, Father's father, Father's Mother, Mother's Father, Mother's Mother, Son's son, Son's Son's wife, Son's Daughter, Son's Daughter's Husband, Daughter's son, Daughter's Son's wife, Daughter's Daughter, Daughter's Daughter's Husband, Brother (including step brother) Brother's Wife, Sister (including Step -Sister) Sister's Husband, Member's of HUF)
- Participating in any activity that might lead to or give the appearance of unapproved disclosures of proprietary information.
5. Exceptions to the Policy
- An employee can accept an office in a non-profit organization if he obtains prior approval from the management.
 - An employee can accept an office or hold an investment in any outside entity



(which is doing or proposes to do business with any of Reliance Group Companies e.g. Joint Venture) if he has obtained approval from the management and such investment / office is held on behalf of or as a nominee of the Company.

II. Policy on Payments & Gifting

The general principles to be considered while making any payment or giving gift on behalf of the Company, are as under:

1. Gifts, payments, business courtesies, favours and entertainment may be given to others at Company expense only if they meet following criteria:
 - They are consistent with customary business practices
 - They are not in contravention of any applicable law
 - Public disclosure of the facts will not create the appearance of impropriety or embarrass either the company or the employee
2. Permissible exceptions include: offering Reliance Companies advertising or promotional items such as a calendar, or similar item displaying the Company logo and name, and providing modest hospitality connection with business activities.
3. Commissions, rebates, discounts, credits, waivers, and allowances should be paid or granted only by the company on whose books the related sale is recorded, and such payments should:
 - Bear a reasonable relationship to the value of goods delivered or service rendered.
 - Be by cheque or bank transfer or in kind and not to individual officers, employees or agents of such entity or a related business entity.
 - Be supported by documentation that is complete and that clearly defines the nature and purpose of the transaction.
4. If any doubt exists as to the impact an offer of a business courtesy could have on the reputation of the company or of those involved, the business courtesy should not be offered.
5. An employee should never use personal funds or resources to do something that cannot be done with Reliance Group's resources

III. Policy of receipt of Gifts

Employees shall bear following principles in mind before accepting any gifts or business courtesies:

1. All business courtesies offered to and accepted by employees of Reliance Group are courtesies that belong to Reliance Group. Employees do not have a right to keep a



- business courtesy for personal use.
2. When offered a business courtesy, employees should determine whether it is appropriate to accept the courtesy on behalf of Reliance Companies after considering why it is being extended and possible repercussions on acceptance.
 3. When local customs or practices make it inappropriate to decline the business courtesy at the time it is offered, employees should accept the courtesy and follow guidelines as under:
 - a. Return it to the donor with a polite explanation that Reliance Group's policy prohibits retention of the business courtesy.
 - b. Promptly forward the courtesy to the department dealing with community welfare and charities for appropriate disposal.
 4. An employee may keep a business courtesy in following circumstances:
 - When the courtesy is usually associated with customary business practices.
 - Promotes successful working relationships and goodwill with persons or firms with whom Reliance Group Companies maintain or may establish a business relationship. Such courtesies include infrequent business meals and entertainment that are shared with the person who has offered to pay for the meal or entertainment. However, employees should use good judgments and decline invitation for meals and entertainment that are inappropriately lavish or excessive.
 - Conforms to the reasonable and ethical practices of the marketplace, such as flowers, fruits baskets, and other modest presents, that commemorate a special occasion.
 - Does not create actual conflict of interest or divided loyalty, such as placing the interests of the person or firm that offered the courtesy above the interests of Reliance Group Companies, including the Company's interest in conducting business fairly and impartially.
 - Does not create the appearance of an improper attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
 - Novelty, advertising, or promotional items of nominal value, such as calendars, pens, and mugs may generally be retained.
 5. Employees shall neither seek nor accept for themselves or others any gifts, favours, business courtesies or entertainment without a legitimate business purpose, nor seek or accept loans (other than conventional loans at market rates from lending institutions) from any person or business organization that does or seeks to do



business with, or is a competitor of the company.

6. Employees should avoid a pattern of accepting frequent courtesies from the same persons or companies.
7. The following actions made by employees would be completely unacceptable:
 - Asking for a business courtesy.
 - Accepting a business courtesy when:
 - An attempt is being made by the donor to offer the courtesy in exchange for or to influence, favourable action by Reliance Companies.
 - An attempt is being made to motivate an employee to do anything that is prohibited by law, regulations, or Reliance Group or donor policy.
 - An attempt is being made to gain an unfair competitive advantage by improperly influencing an employee's discretionary decisions.
 - Using a company position as a means of obtaining business courtesies, such as personal discounts (on products, services, or other items). Employees may accept Reliance Companies' approved discounts or discounts available to all Reliance employees.
 - Accepting offers of expense-paid trips for pleasure from persons or firms with whom Reliance Companies maintains or may establish a business relationship.
 - Accepting a gift in cash or cash equivalents of any amount.

IV. Policy on purchases through suppliers and other service providers

1. Following are the General Guidelines for making purchases through suppliers / service providers:
 - Purchase decision should be made purely on the basis of quality, service, price, delivery, best value, or other similar factors. Extraneous or personal interest / advantage should never be the criteria for arriving at purchase decisions.
 - Care should be taken to avoid actual / potential conflicts of interest and the appearance of partiality regarding all business transactions with suppliers and other service providers.
 - A supplier's or potential supplier's proprietary information and resources should be protected by employees of Reliance Group.
 - Reliance Group's proprietary or sensitive information must not be disclosed to a supplier or potential supplier unless disclosure is authorized and in accordance with Inside Information Policy as outlined in this code.
 - All company employees acting for the company should avoid following actions:



- Soliciting, accepting, or attempting to accept any kickback.
- Including, directly or indirectly, the amount of any kickback in the price charged under a contract, either as prime contractor or sub-contractor.

(The term 'kickback' includes any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind whether in cash or kind that is provided directly or indirectly to anyone for the purpose of inappropriately or improperly obtaining or rewarding favourable treatment.)

V. Policy on Political contributions

1. Employees shall not make any contribution of company funds to any political party or committee, domestic or foreign, or to any candidate or holder of any office of any government –National, State, local or foreign unless it is legally permissible and is appropriately authorized.
2. Reliance Group Company employees should not make illegal political contributions, either directly or indirectly, through the use of expense accounts or through payments to third parties or on their own account.

C: Business Policies

I. Policy on Fair Market Practices

1. We believe in and strive to protect the free enterprise system. We are committed to the maintenance of an efficient, free and competitive market structure. We compete fairly and ethically for all business opportunities.
2. Employees should refrain from entering into agreements and practices that unreasonably restrict competition and are in restraint of free trade such as price fixing and boycotting suppliers or customers.
3. Any commercial strategy based on the intention to run a competitor out of business through unfair pricing or otherwise cannot be followed.
4. Disparaging, misrepresenting, or harassing a competitor; stealing trade secrets; bribery; and kickbacks are strongly discouraged.
5. Organizational conflicts in which one business unit's activities may preclude or impede the pursuit of a related activity by another business unit should be avoided.

II. Policy on Inside Information

1. Employees usually have 'non-public' information about Reliance Group Companies or about a company with which Reliance Group Companies does business. Such



information is termed 'inside information'. Inside information includes, but is not limited to, information about:

- new products or processes
- mergers, acquisitions or dispositions of businesses or securities
- problems being faced by the company
- sales, profitability
- significant litigation or other financial, technical, commercial, legal information
- pricing policies
- Business policies

2. Guidelines on Inside Information

- Employees should not give or release inside information, without proper authority, to anyone not employed by the company, or to another employee who has no need or appropriate authority to receive the same.
 - Employees should not use inside information obtained during the Company's employment (including information about customers, suppliers or competitors) for the direct or indirect personal gain of the self or anyone else. This includes, but is not limited to, taking advantage of such information by:
 - trading or providing information for others to trade in securities or
 - acquiring an interest of any kind of property, including but not limited to plant or office sites or adjacent properties or
 - advising or assisting or informing a customer, contractor, supplier, consultant, advisor, agents, intermediary, contractor, broker, and representative of the company in a manner which leads to direct or indirect personal gain of the employee or anyone else.
3. Data transmitted or stored electronically are the assets of the Company requiring protection. Each data user throughout the company is responsible for compliance with the standards and related procedures with reference to safe guarding such data.
4. If during the course of employment in Reliance Companies employees have developed any patent, know how, invention, or process or if they have been entrusted in preparation of any market/other research report, the same is prohibited from being used outside the company.

III. Policy on Financial and Accounting Integrity

1. We are committed to the maintenance of accurate and complete corporate records. Accordingly employees are expected to maintain high standards in accounting practices.

2. Transactions between Reliance Group and outside individuals and organizations must be promptly and accurately entered in our books and systems in accordance with generally accepted accounting practices and principles.
3. Rationalising or even considering misrepresentation of facts or falsification of records is completely illegal and will result in disciplinary action.
4. All accounts and records shall be documented in a manner that:
 - clearly describes and identifies the true nature of business transactions, assets, liability, income and expenditure.
 - properly and timely classifies and records entries on the books of account in conformity with Generally Accepted Accounting Practices and Principles.
 - no record or entry or document shall be false, distorted, misleading, misdirected, and deliberately left incomplete or suppressed.

The company has established internal control standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable.

IV. Policy on External Communication

1. Reliance Group recognizes that open communication is essential. Reliance Group seeks to form a constructive and productive relationship with all aspects of media.
2. Only authorised executives from Corporate Communications Department of Reliance Group Company are permitted to give an interview or publish an article written by him, in various sections of media / radio / TV shows etc.
3. Refer to Reliance Group Policy on Media Interaction for detailed guidelines.
4. Employees who are invited in official capacity at various forums for a speech / discussion etc. need to take approval from Business / Function Head before confirmation of such participation.
5. However employees may, in their personal capacity, publish any literature / participate in discussion not related to Reliance Group Businesses. They shall not use their official title in case of such participation.

V. Policy on Work Ethics

Interpersonal relations based on the values of respect, harmony and mutual developments are key. Code of work ethics as defined hereunder, is to give managers a clearer direction on these issues.

1. Business Confidentiality
 - Employees are expected to maintain business secrecy and confidentiality by



ensuring that Policy on Inside Information is implemented.

2. Favouritism in the workplace

- All Departmental / Business Heads must treat each and every employee in their department equally.
- Employees are expected to work to create an environment where people are valued as individuals and treated with respect, dignity, fairness and equality, thus leaving no room for displays of favoritism.

3. Avoiding Conflict of Interest

- The employee should conduct himself and arrange his affairs in a way that ensures he is not involved in any arrangements, circumstances, relationships that might dissuade him from acting in the best interest of the company.
- Managers should strive to instill, encourage, and appreciate intellectual integrity in their colleagues.

4. Other related standards

The following guidelines are suggested:

- Punch in the attendance recording system every day while coming to and leaving office.
- Refrain from using office assets and properties (including proprietary information) for personal work.
- Safeguard company's physical property and other assets against unauthorized use or removal. Maintain company property and assets with appropriate care.
- Do not withhold / purposely delay information required by another department/ colleague.

5. Transparency

- All employees of Reliance Group should conduct all the business transactions and take all decisions which are relevant to their function, in a transparent and reasoned manner keeping in mind, the established norms of confidentiality and secrecy which are necessary to protect the business and competitive interests of Reliance Group.
- The employees should endeavour to create an internal communication network in their spheres of operation and activity, which is transparent and unhindered by levels in organizational hierarchy.

VI. Policy on Personal Conduct

Reliance Companies employees are expected to ensure that their conduct at all times, in official as well as personal capacity is such that Reliance Companies reputation is upheld.

Following are the guidelines on Personal Conduct:

1. In official as well as personal capacity, employees at no times should indulge in any action /behaviour that :
 - violates any law; or
 - is indicative of personal indiscretion; or
 - is socially unacceptable; or
 - amounts to criminal offence; or
 - involves any form of moral turpitude.
 2. Employees should exercise sound judgement and common sense to judge as to whether his / her actions can be construed as improper conduct. Employees need to ask themselves whether his conduct befits a cultured, mature, and socially responsible adult.
 3. Some examples improper conduct include:
 - Getting drunk and misbehaving in a party or a social function or in public.
 - To be under the influence of liquor, narcotics or any other form of intoxication while representing Reliance Group or reporting to work at the Reliance Group's premises or at a customer's / supplier's premises.
 - Using abusive – expletive infested language.
 - Inflicting verbal abuse on anyone.
 - Loud and irresponsible behavior in public which causes discomfort and embarrassment to surrounding people.
 - Manhandling or physical assault on any one.
 - Undue show of authority
 - Reporting to work in an inappropriate dress or presenting oneself in a shabby manner
- Respect for the self as well as for others has to be the guiding principle for personal conduct. However, it is imperative that employees remember to exercise sound judgment and demonstrate a serious sense of responsibility and maturity all times and in official as well as personal capacities.

VII. Policy on Health Safety and Environment

“Safety of person overrides all the Production Targets” – is the Health, Safety and Environment Policy of Reliance Group.

To attain this, the Health Safety and Environment in the plants are safeguarded by the following provisions:

- Properly designed plants.
- Continuous monitoring of plant and ambient environment as well as of various

effluents –liquid, gas and solid – to maintain a clean and safe environment in and around the plants.

- Effective use of safe working procedures and practices.
- Meeting in all respects the applicable statutory requirements.
- Clearly defined procedures for inspection, operation and emergency shut down and their updating.
- Continuous, systematic and micro level auditing – internal as well as external – of work procedures and practices.
- Continuous and systematic education of Company's Contractors' and Transporters' personnel for observing safe work practices.
- A detailed investigation of all incidents including the minor ones and near-miss incidents followed by recommendations to avoid recurrence.
- Analysis of the findings of investigations of accidents in similar industry and taking steps to prevent such accidents in the plants.
- Keeping abreast with the latest international codes, standards and practices.
- Pre-employment and periodic medical check-ups of employees for early identification of occupational health hazards.

Policy on Prevention of Sexual Harassment

Reliance Group promotes a productive work environment. It shall not tolerate any verbal or physical conduct of a sexual nature by any employee that harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile environment.

Employees are expected to read and comply with the Reliance Group Policy on Prevention of Sexual Harassment.

Policy on Prevention of Insider Trading

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every director, officer, designated employee of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No director, officer,

designated employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.



Employees are expected to read and comply with the Reliance Group Policy on Prevention of Insider Trading.

Violation of Code of Conduct Policy

1. All employees, trainees, consultants or retainers of Reliance Group are covered under this Policy.
2. If any person to whom this Policy is applicable is found violating any provisions of the Policy, he shall be subject to disciplinary action, based on the severity of the violation, up to termination.



INFORMATION SECURITY MANAGEMENT SYSTEMS (ISMS) OVERVIEW POLICY

1. INTRODUCTION

Information Systems (IS) Security Policy is intended to provide management direction and support for IS Security. This indicates the clear policy direction and demonstrates support for, and commitment to, IS Security through the issue and maintenance of an IS Security policy across the organization.

2. IS SECURITY DEFINITION

“IS security protects information systems from a wide range of threats in order to ensure business continuity, minimize business damage and maximize return on investments and business opportunities.”

Information systems security is driven by the following control objectives:

- Confidentiality concerns the protection of sensitive information from unauthorized access.
- Integrity relates to the accuracy and completeness of information as well as to its validity in accordance with business values and expectations.
- Availability relates to information being available when required by the business process now and in the future. It also concerns the safeguarding of necessary resources and associated capabilities.

3. SECURITY POLICY OF RELIANCE INFRASTRUCTURE LTD. (RInfra)

The Security Policy states:

“Information is an important business asset of significant value to the organization. Our information assets include business documents, personnel, data stored on computers, transmitted across network, printed out or written on paper, sent by fax, stored on tapes or diskettes or spoken in conversation or over the telephone, servers, software, database systems, services and data of all business partners associated with RINFRA.

The objective of information security is to maintain confidentiality, integrity and availability of information assets to ensure business continuity and minimize damage by preventing and minimizing the impact of security incidents.

RINFRA shall establish appropriate security controls for all information assets of all business, operational and functional units by building the necessary infrastructure and resource base with a focus on continual improvement.

All the employees of RINFRA are directly responsible for implementing this policy.”

4. RESPONSIBILITY FOR INFORMATION SECURITY

All employees and other third parties who require access to RInfra's information and associated assets are responsible for ensuring that this policy is adhered to. Management at all levels is responsible for ensuring that the information users are aware of, and adhere to, this policy.

5. APPLICABILITY OF THE POLICY

This Policy applies to all RInfra's employees, its customers, its consultants and other individuals affiliated with External Parties who have access to RInfra information. Throughout this document, the word "user" is used to collectively refer to all such individuals.

6. OWNERSHIP AND MAINTENANCE

a. POLICY OWNER / CUSTODIAN

The Chief Information Security Officer (CISO) is the owner of this policy relating to Information Security Policies and Procedures.

b. UPDATE AND MAINTENANCE

The Chief Information Security Officer (CISO) being the policy owner is responsible for updating of contents and overall maintenance of the policy.

7. PERIODIC OVERVIEW

- The policy shall be reviewed, every year or at the time of any major change in existing IS environment affecting policies and procedures, whichever is earlier, by the Head IT and Chief Information Security Officer (CISO). The review reports shall be submitted to Information Security Steering Committee (ISSC).
- All policies and supporting documents would expire in 2 years time and hence they would mandatory need to be reviewed and changed within 2 years timeframe and revalidated.

8. INTERNAL ISMS AUDITS

Internal Audit Department of RINFRA shall conduct internal ISMS audits at planned intervals to determine whether the control objectives, controls, processes and procedures of its ISMS:

- Conform to the requirements of ISO 27001 standard and relevant legislation or regulations
- Conform to the identified information security requirements
- Are effectively implemented and maintained
- Perform as expected

An audit program shall be planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits. The audit's criteria, scope, frequency and methods shall be defined. Selection of auditors and



conduct of audits shall ensure objectivity and impartiality of the audit process. Auditors shall not audit their own work.

The responsibilities and requirements for planning and conducting audits, and for reporting results and maintaining records shall be defined in a documented procedure.

9. AWARENESS AND TRAINING

In order to ensure that the employees are adequately made aware of their do's and don'ts, suitable awareness trainings, visual aids, employee communication etc would be provided. Further it would be responsibility of every manager to ensure that the communication to their teams is complete and the ownership is clearly established.

10. NON COMPLIANCE OF THE INFORMATION SECURITY POLICY

Non-compliance to the minimum requirements or violation of this information systems security policy could result in action that may include, but is not limited to, the following:

- Suspension
- Termination
- Other disciplinary action
- Civil and/or criminal prosecution

11. DISTRIBUTION OF POLICY

The Information Security Policy is an internal document and is meant for internal usage within the company. Duplication and distribution of this policy without an authorized release is prohibited. The ISO 27001 Core team will decide on the number of copies that will be in circulation and the persons with whom the document will be available.

Every person in custody of the document has the responsibility for ensuring its usage limited to "within the organization". The custodian of the document will also ensure that the document is continually updated with amendments that may be issued from time to time. Any loss or mutilation of the document must be reported promptly to the Chief Information Security Officer.

RELIANCE