



## Business Responsibility & Sustainability Reporting Policy

### 1. Introduction

Triveni Turbine Limited (“The Company”) is a company limited by shares (CIN: L29110UP1995PLC041834). The equity share of the Company is listed on Bombay Stock Exchange and National Stock Exchange. The Company is one of the largest manufacturers of industrial steam turbines globally. The Company designs and manufactures steam turbines upto 100 MW and delivers robust, reliable and efficient aftermarket for turbines and other rotating equipments. The manufacturing units of the Company are situated at Bengaluru, India.

### 2. Purpose of the Policy

The Company recognizes that its accountability is not limited only to its investors and various business stakeholders from financial perspective but also to the society at large. Accordingly, this Policy on Business Responsibility & Sustainability lays down the broad principles to guide the Company in delivering its various responsibilities to its stakeholders and the society. The Policy intends to ensure that the Company adopts responsible business practices in the interest of the society and the environment to contribute beyond financial and operational performance.

### 3. Scope of the Policy

This Policy is formulated in accordance with Regulation 34 and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“SEBI Listing Regulations”). This Policy also reiterates the Company’s commitment to follow the nine principles laid down in the National Guidelines for Responsible Business Conduct covering Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs while conducting its business to the extent these are relevant.

### 4. Implementation of the Policy

The Executive Director of the Company shall be responsible for the implementation of the Policy under overall supervision of Board of Directors and applicable from FY 2022-23 onwards. The Executive Director may take support of such functional heads and internal and external experts, which he may deem fit, for the effective implementation of the Policy. Foreign subsidiaries of the Company shall participate in the Policy to the extent required under the laws of the country of their operations.

## 5. Principle wise Policies/Practices

The Company shall conduct its business practices/activities in alignment with the following Key Principles which are broadly based on the Principles envisaged in the National Guidelines for Responsible Business Conduct in the interest of social set up, environment and governance:

*Principle 1: The Company should conduct and govern itself with ethics, transparency and accountability.*

- i. The Company shall develop governance structure, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of this principle across its value chain. Detailed policies and guidelines for Code of Conduct for Senior management and employees also laid down [Please refer to Annexure-1 (a), (b)]
- ii. The Company shall communicate transparently and assure access to information about their decisions that impact relevant stakeholders.
- iii. The Company shall not engage in practices that are abusive, corrupt, or anti-competition as laid down through Anti-bribery policy [Please refer to Annexure-1(c)]
- iv. The Company shall truthfully discharge their responsibility on financial and other mandatory disclosures.
- v. The Company shall protect its Financial records and prevent any wilful, material misrepresentation of and / or misinformation on the financial accounts and reports
- vi. Protecting company assets – The Company shall implement practices that there are no omissions or material misrepresentation that would compromise the integrity of records, internal or external communications and reports including the financial statements. We shall implement processes that require proper authorisation prior to disclosing company or business-related information, ensure integrity of personal data, protect confidential information and intellectual property of the company and that of any third party involved.
- vii. The Company shall report on the status of their adoption of these Guidelines as suggested in the reporting framework in this document.

The Company shall avoid complicity with the actions of any third party that violates any of the principles contained in these guidelines

*Principle 2: The Company should provide products and services that contribute to sustainability throughout their life cycle*

- i. The Company shall assure safety and optimal resource use over the lifecycle 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 supports environment sustainability with significant focus on thermal efficiency improvements to meet key customer expectations and drive environmental sustainability. The Company shall ensure that its product and services strictly comply with all Statutory Regulations, export controls or trade sanctions as may be applicable while dealing with our customers or other stakeholders.
- iii. In designing the products, the Company shall ensure that the manufacturing processes and technologies required to produce it are resource efficient and sustainable.

- iv. To ensure fair practices in the marketplace, the Company will not compete in a manner which is illegal, unethical or through unfair business practices.
- v. The Company shall offer steam turbines that can help industries produce clean energy solutions from waste heat from industrial equipment like boilers, furnaces, and process heaters among others. Waste Heat recovery improve energy efficiency, recovering waste heat losses and provides an attractive opportunity for an emission free and less costly energy resource.
- vi. The Company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling of resources wherever possible,
- vii. The Company shall work towards sourcing significant raw materials, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- viii. 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.
- ix. 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.
- x. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this Policy.

*Principle 3: The Company should promote the well-being of all employees*

- i. The Company shall provide and ensure equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion and disability.
- ii. The Company respects the right to freedom of association, participation, collective bargaining and provides access to appropriate grievance Redressal mechanism.
- iii. The Company shall not use child labour, forced labour or any form of involuntary labour paid or unpaid.
- iv. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities which has been further elaborated through Equal Opportunity policy. [Please refer to Annexure-1(d)]
- v. The Company shall strive to instil a sense of duty in every employee including those of the service providers at the Company's premises, towards their personal safety, as well as that of their co-workers.
- vi. The Company shall take cognizance of the work-life balance of its employees.
- vii. The Company shall provide facilities for the well-being of its employees, including those with special needs.

- viii. The Company shall ensure timely payment of fair living wages to sustain economic security of the employees.
- ix. The Company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning and development opportunities, on an equal and non-discriminatory basis. The Company shall promote employee morale and career development through enlightened human resource interventions.

*Principle 4: The Company should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized*

- i. The Company shall systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them.
- ii. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- iii. The Company shall give special attention to stakeholders in areas that are underdeveloped.
- iv. The Company shall resolve differences with stakeholders in a just, fair and equitable manner and the guidelines for Grievance redressal for all stakeholders have been laid down through Grievance redressal policy. [Please refer to Annexure-1 (e)]
- v. The Company's Corporate Social Responsibility (CSR) policy that drives the initiatives undertaken by the Company towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders shall ensure the above principles. [Please refer to Annexure-1 (f)]

*Principle 5: The Company should respect and promote human rights*

- i. The Company shall implement 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 shall appreciate that human rights are inherent, universal, indivisible and interdependent in nature
- iii. 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 and the detailed guidelines have been laid down through Human rights policy. [Please refer Annexure-1 (g)]
- iv. The Company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
- v. The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- vi. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

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### *Principle 6: The Company should respect, protect, and make efforts to restore the environment*

- i. The Company shall take measures to check and prevent pollution. The Company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
- ii. The Company shall minimize the overall environmental footprint through reduction in consumption of natural resources, pollution prevention, waste minimization, using renewable energy and reduction of carbon footprint etc. wherever possible.
- iii. The Company shall strive to procure products or services from locally-based suppliers and sub-contractors who comply with the local and national regulations pertaining to their business.
- iv. The Company shall encourage and support its member of value chain to adopt its environmental policy/ management systems.
- v. The Company shall engage with its Customers to consider the environmental impact and support them in addressing their own environmental impacts.
- vi. The Company shall measure waste generation and water usage where possible across the operations and conduct the business in a manner that aims to prevent pollution and minimize the consumption of natural resources
- vii. 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.
- viii. The Company shall 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.
- ix. The Company shall proactively persuade and support its value chain to adopt these principles.

### *Principle 7: The Company, when engaged in influencing public and regulatory policy, should do so in a responsible manner*

- i. The Company shall work with industry organisations that are engaged in policy advocacy in a responsible manner;
- ii. The Company shall ensure that policy advocacy is conducted ethically.
- iii. The Company, while pursuing policy advocacy, must preserve and expand public good and shall not advocate any policy change that adversely affects its stakeholders and society, in general to benefit the Company or select few alone.
- iv. To the extent possible, the Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.
- v. The Company shall strive to perform the function of policy advocacy in a transparent and responsible manner while engaging with all the authorities and will take into account the Company's as well as the larger national interest.

*Principle 8: The Company should support inclusive growth and equitable development*

- i. The Company shall understand their impact on social and economic development, and respond through appropriate action to minimise the negative impacts.
- ii. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- iii. The Company shall 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, if any
- iv. The Company shall be sensitive to the local concerns while operating in regions that are underdeveloped.
- v. The Company shall enhance its philosophy to reach out to the community by supporting service-oriented philanthropic institutions in the field of education, healthcare and technology development as the core focus areas.
- vi. The Company shall be guided by its Corporate Social Responsibility Policy for inclusive growth and equitable development. The CSR Policy is available on the website of the Company at <https://www.triveniturbines.com/sites/default/files/uploads/investor/Corporate-Social-Responsibility-Policy.pdf>

*Principle 9: The Company should engage with and provide value to their customers and consumers in a responsible manner*

- i. The Company, while serving the needs of their customers, shall take into account the overall well-being of the customers and that of society.
- ii. The Company shall adopt clean technology wherever applicable.
- iii. 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.
- iv. The company shall disclose all information truthfully and factually as per applicable Laws.
- v. The company shall educate/ train its customers on the safe and responsible usage of its products and services.
- vi. The company shall promote and advertise its products in ways that do not mislead or confuse the consumers.
- vii. The company shall exercise due care and caution while providing goods and services that result in environment pollution and exploitation of natural resources.
- viii. The Company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.

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- ix. 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 Information Security policy & Risk management policy. [Please refer Annexure-1 (h), (i)]

### 6. Policy Monitoring & Improvements

We shall implement this policy and related policies mentioned in Annexure-1 and initiate practices which supports the above guidelines in all our operations. The guidelines will be applicable to all its employees, and they will observe these principles while dealing with any one or more of our stakeholders. Implementation of the policy will be monitored and will provide mechanisms for receiving any feedback, suggestions or complaints that can improve its effectiveness.

### 7. Policy Review and Amendments

This Policy would be subject to modification in accordance with the guidelines / clarifications as may be issued from time to time by relevant statutory and regulatory authorities. The Board may modify, add, delete, or amend any of the provisions of this Policy. Any exceptions to the Business Responsibility Policy must be consistent with the Regulations and must be approved in the manner as may be decided by the Board of Directors.

| Annexure-1 |   |
|------------|---|
| S. No.     | Policy Details                                  |
| a)         | Policy for Code of Conduct of Senior Management |
| b)         | Policy for Code of Conduct of other employees   |
| c)         | Anti-bribery Policy                             |
| d)         | Grievance redressal Policy                      |
| e)         | Equal Opportunity Policy                        |
| f)         | CSR Policy                                      |
| g)         | Human Rights Policy                             |
| h)         | Information Security Policy                     |
| i)         | Risk management Policy                          |

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