



BUSINESS RESPONSIBILTY POLICY

Nila Infrastructures Limited

CIN: L67120GJ1990PLC014094

Registered Office:

First Floor, "Sambhaav House", Opp. Chief Justice's Bungalow,
Bodakdev, Ahmedabad – 380 015

1. EFFECTIVE DATE:

This policy shall be effective from 12.01.2021

2. POLICY:

The Company in conscience about its social, environmental and economic responsibilities and has already adopted various practices and formulated various policies, codes of conduct to discharge its corporate social responsibility and to deal with all its stakeholders in ethical, transparent and fair manner as a responsible corporate citizen.

This policy is framed in line with requirements of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 in view of *SEBI circular No: SEBI/LAD- NRO/GN/2019/45* and re-affirms the Company's commitment to follow the principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business brought out by the Ministry of Corporate Affairs in conduct of its business.

3. SCOPE:

The Company is committed to:

- Enhancing stakeholder's value through value-driven engagement.
- Economic and social well-being of the society, particularly the less fortunate and under-privileged members of the society.
- Promoting inclusive growth of all stakeholders and promote equality
- Minimize the direct and indirect impact of its operations on the environment.

For sustainable development, the management of the Company will endeavor to strike proper balance between economic, social and environmental performance in dealings with various stakeholders of the Group, namely employees, workers, contractors, clients, principals, investors, regulatory agencies, government bodies, and local communities and the society at large. The policy and its elements are applicable to all Departments and Verticals in the Company. The Company will also make its best efforts to impress upon other entities in the value chain and its subsidiaries to participate in the Business Responsibility initiatives depending upon their means and resources.

4. POLICY REVIEW:

This Policy shall be reviewed from time to time so that the policy remains in compliance with applicable legal requirements. The Company Secretary will keep the Policy updated as per applicable statutory guidelines. The CSR Committee shall from time to time review

implementation of this policy and consider amendments therein in the light of changes in applicable laws, rules and regulations.

4. PRINCIPAL WISE POLICY:

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

Company's Philosophy

It is the general policy of the Company to conduct its business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable laws including proper and ethical procedures in dealing with actual or apparent conflicts of interest between personal and professional relationships.

Policy

- i. The Company has developed a Code of Conduct for its Directors and senior management personnel. It shall develop good governance structures, procedures and practices that ensure ethical practices, transparency and accountability in conduct of affairs and dealing with stakeholders at all levels across the value chain.
- ii. The Company shall constantly endeavor to inculcate this ethical behavior at all levels in the organization so that it becomes an essential part of the work culture among all its employees.
- iii. The Company shall communicate transparently and assure access to information about its decisions that impact relevant stakeholders. All business decisions and transactions shall be fair, transparent and amenable to disclosure and be visible to relevant stakeholders. The Company shall ensure maximum appropriate disclosures without jeopardizing the Company's strategic and competitive interests.
- iv. The Company shall not engage in practices that are abusive, corrupt, or anti-competition.
- v. The Company shall truthfully discharge its responsibility on financial and other mandatory disclosures.
- vi. The Company shall avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.
- vii. The Company shall ensure that genuine concerns of misconduct/ unlawful conduct are reported in a responsible and confidential manner through its 'Whistle Blower Policy/ Vigil Mechanism.

Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

Company's Philosophy

The Company is committed to conduct its business in an environmentally responsible manner. This policy is rooted in the Company's core values of quality, reliability and trust guided by the best practices and is driven by our aspiration for excellence in the overall performance of our business. The environmental custodianship and Corporate Citizenship are an integral part of the Company's goal to achieve ecological development along with people development. The Company recognizes the responsibility to assess and minimize the ecological impact of our business activities and protecting the ecosystem.

Policy

- i. The Company shall provide and maintain a clean, healthy and safe working environment for employees, workers, contractors, partners and the community.
- ii. The Company shall strive to consistently enhance its value proposition to the clients/principals and adhere to its promised standards of service delivery.
- iii. The Company shall regularly review and improve upon the process of new construction methodologies, technology development, deployment and commercialization, incorporating the applicable social, ethical, and environmental considerations.
- iv. 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 use scarce natural resources efficiently in its facilities.
- vi. The Company shall lay emphasis on sourcing consumables in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- vii. The Company shall ensure that its services comply with all applicable standards.
- viii. The Company shall strive to reduce and minimize the ecological footprint of the Company's operations and focus on dimensions of energy and water efficiency, sustainable waste management.
- ix. The Company believes that environmental regulations have a critical role to play as Catalysts for sustainable development and strives to comply in both letter and spirit with all environment and related laws, regulations, codes of practice and directives, as relevant and applicable to us.
- x. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 3: Businesses should promote the well-being of all employees and associated workers

Company's Philosophy

The Company focuses on ensuring the well-being of all its employees and its workers, their safety and health. It considers employee well-being as an imperative ingredient to achieve a profitable and sustainable growth.

Policy

- i. The Company shall provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
- ii. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- iii. The Company shall take cognizance of the work-life balance of its employees and workers.
- iv. The Company shall provide facilities for the wellbeing of its employees and its workers including those with special needs. They should ensure timely payment of fair living wages to meet basic needs and economic security of the employees and workers.
- v. The Company shall provide a workplace environment that is safe, hygienic humane and which upholds the dignity of the employees and workers. Business should communicate this provision to their employees, workers and strive to train them on a regular basis.
- vi. The Company shall strive to create a safety culture in the organization by:
 - Integrating safety and health matters in all our activities.
 - Promoting safety and health awareness amongst employees, workers, suppliers and contractors.
 - Continuous improvements in safety performance through precautions and training of employees and workers.
 - Ensuring compliance with all applicable legislative requirements.
 - Empowering employees to ensure safety in their respective workplaces.
- vii. The Company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non- discriminatory basis. It shall focus on learning and development, to enhance the knowledge & skill and preparing its people to face challenges
- viii. The Company shall promote employee morale and career development through enlightened human resource interventions.

- ix. The Company shall create stringent policies, systems and practices to ensure that the employees especially female employees do not suffer harassment and create the environment where they feel safe and secure in discharging their responsibilities.
- x. The Company shall provide its employees and workers access to appropriate grievance redressal mechanisms.
- xi. The Company shall take initiatives to maintain its talent pool to match organizational growth, creating a performance culture and encouraging learning element across the organization
- xii. The Company shall instill a sense of duty in every employee at the Company's premises, towards their personal safety, as well as that of their co-workers;
- xiii. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.

Principle 4: Businesses should respect the interest of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

Company's Philosophy

The Company's stakeholders include employees, workers, suppliers, customers, principals, clients, business associates, investors, regulatory agencies and local communities around its sites of operations. Our Investors comprise of shareholders. The Company values the support of its stakeholders and respects the interests and concerns they have towards it. The Company and its employees shall provide value based services to all the stakeholders.

The Company strives to continuously engage with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.

Policy

- i. The Company shall systematically identify their stakeholders, understand their concerns, define purpose and scope of its engagement, and commit to engaging with them.
- ii. The Company shall acknowledge, assume responsibility and be transparent about the impact of its policies, decisions, services and associated operations on the stakeholders.
- iii. The Company shall strive to 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.

- v. The Company, through its CSR arm and its partnering organizations shall focus on identifying and catering to the needs of common people and especially of marginalized group.
- vi. The Company shall strive to undertake initiatives to engage with and ensure sustainable development of the marginalized groups in the local communities around its area of operation.

Principle 5: Businesses should respect and promote human rights

Company's Philosophy

The Company is committed to respect and protect the human rights of all individuals and strive to achieve them with honesty, just management and fairness. The Company understands that human rights are inherent, universal, indivisible and inter-dependent in nature. The Company upholds the fundamental human rights in line with the legitimate role of business. Its approach includes adherence to corporate business policies and compliance with applicable laws, human rights content of the Constitution of India, National laws and policies.

Policy

- i. The Company shall strive to 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.
- ii. The Company shall strive to 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.
- iii. The Company shall seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- iv. The Company shall, within its sphere of influence, strive to promote awareness and realization of human rights across its value chain.
- v. The Company shall strive to encourage its business partners, contractors, and third parties with whom it conducts business to abide by this policy.
- vi. The Company shall ensure compliance and adherence to all the applicable human rights laws and national laws and strive to percolate these values at all levels in the organization.

Principle 6: Businesses should respect, protect and make efforts to restore the environment

Company's Philosophy

The Company is committed to conduct its business in an environmentally responsible manner. This commitment is consistent with the corporate objectives of the company and is essential to sustainable development. The Company strives to assess potential environmental risks posing the organization and strategize actions to mitigate the same.

Policy

- i. 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, wherever applicable.
- ii. The Company shall take measures to check and prevent pollution.
- iii. 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.
- iv. The Company shall continuously seek to improve its environmental performance by adopting cleaner production methods, promoting use of energy efficient environment friendly technologies and use of renewable energy.
- v. The Company shall encourage environmental responsibility and awareness among staff and stakeholders through developing good practice, training, education and communication;
- vi. The Company shall proactively persuade and support its value chain to adopt this principle.

Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

Company's Philosophy

The Company believes in participation with stakeholders, consultations with Governments, including interactions between industry/ business associations and relevant ministries to support short, medium and long term planning exercises where inputs are invited from each sector.

The Company has always strived to create a positive impact in the business eco-system and communities by practicing pro-active advocacy not for securing certain benefits for industry, but for advocating certain best practices for the benefit of society at large.

Policy

- i. The Company, while pursuing policy advocacy, shall ensure that their advocacy positions are consistent with the principles and core elements contained in this policy enhancing business responsibility and transparency.
- ii. 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

Principle 8: Businesses should support inclusive growth and equitable development

Company's Philosophy

The Company focuses on responsible business practices that emphasize on social and economic issues to achieve inclusive growth. It believes in equitable development, taking into account the interests of the business community and locals, fairness in the treatment of employees, and sustainability in protecting and enhancing resources (human and others) in responding to an array of social and environmental needs. The Company is committed to establishing competitive and sustainable value chains linked to the businesses which create sustainable livelihoods, especially among the poor in rural India.

Policy

- i. The Company shall assess the impact of its operations on social and economic development, and respond through appropriate action to minimize the negative impact. The Company shall innovate and invest in technologies and processes that promote the well-being of society.
- ii. The Company shall make efforts to complement and support the development priorities at local and national levels, and strive to assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
- iii. The Company shall, in regions that are underdeveloped, be especially sensitive to local concerns.

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

Company's Philosophy

The Company is committed to continuously exceed client/customer/principal expectations. We believe that the client/customer/principal have been our strong pillar of support and over the

years of our existence have become our true brand ambassadors. Our client/customer/principal centric approach is the key to our success and growth. The Company strives hard to provide better services and greatest value to its client/customer/principal.

Policy

- i. The Company, while serving the needs of their client/customer/principal, shall take into account the overall well-being of the client/customer/principal and that of society.
- ii. The Company shall ensure that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their services.
- iii. The Company shall promote and advertise its services in ways that do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- iv. The Company shall provide adequate training to employees and workers continuously to meet the challenges of a dynamic business environment and will also provide adequate grievance handling mechanisms to address customers concerns and feedback.
- v. The Company shall maintain privacy of client/customer/principal confidential data in the normal course of its business.

5. POLICY IMPLEMENTATION AND MONITORING:

- The Business Responsibility Policy of the Company shall be circulated across all Departments and verticals and also displayed on the Company's website.
- The Corporate Social Responsibility Committee (CSR Committee) shall monitor implementation of this policy through various activities / initiatives undertaken for this purpose and assess BR performance annually.
- The Chief Operating Officer through Functional Heads of the Departments of the Company shall be responsible for ensuring that the policy is implemented throughout the Company.
- The Chief Operating Officer shall update the CSR committee on the implementation of the policy and feedback and suggestions received in connection therewith.
- Compliance with the Policy shall be monitored and evaluated by the respective Functional Heads of the Departments of the Company on a regular basis.
- Any grievances/ complaints with respect to violation of the policy shall be reported to the Chief Operating Officer who would in turn place the same before the CSR Committee.

This policy has been approved and adopted first time by the Board of Directors at their meeting held on 12.01.2021
