

ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) POLICY

The Company is committed to integrating Environmental, Social and Governance (ESG) principles into its strategy, operations and decision-making processes. Through responsible manufacturing, ethical governance and stakeholder engagement, the Company seeks to create sustainable long-term value while minimizing environmental impacts and contributing positively to society. This Policy is applicable with effect from the date of approval by the Board of Directors.

1. Purpose

This Environmental, Social and Governance (ESG) Policy establishes the Company's commitment to conducting business responsibly, ethically and sustainably while creating long-term value for shareholders and other stakeholders. The policy applies to all manufacturing operations, employees, directors, contractors, suppliers and business partners engaged in the Company's paper and cable businesses.

2. Scope

This Policy covers:

- Paper manufacturing operations
- Fiber & Cable manufacturing operations
- Corporate offices
- Warehouses and distribution centers
- Supply chain and procurement
- Contractors and service providers

3. Objectives

The Company aims to:

- Minimize environmental impact.
- Promote circular economy principles.
- Ensure safe and healthy workplaces.
- Respect human rights.
- Maintain high standards of corporate governance.
- Create sustainable value for all stakeholders.
- Comply with applicable environmental, labour and corporate laws.
- Improve ESG performance through measurable targets.

4. ESG Guiding Principles

The Company shall conduct its business based on the following principles:

- Accountability
- Transparency
- Ethical conduct
- Respect for stakeholder interests
- Compliance with applicable laws
- Sustainable resource management
- Continuous improvement
- Responsible innovation

4. Environmental Commitment

4.1 Climate Change

The Company shall:

- Reduce greenhouse gas emissions.
- Improve energy efficiency.
- Increase renewable energy consumption.

- Conduct periodic energy audits.
- Establish science-based emission reduction targets where feasible.

Key KPIs

- Energy consumption per tonne of production
- CO₂ emissions (Scope 1 & Scope 2)
- Renewable energy percentage

4.2 Sustainable Raw Materials

Paper Division

The Company shall:

- Procure wood from legally compliant and sustainably managed sources.
- Encourage farm forestry and agro-forestry.
- Promote recycled fiber usage.
- Prevent illegal logging.

Cable Division

The Company shall:

- Source sustainable raw materials responsibly.
- Encourage recycled material usage.
- Procure conflict-free materials where applicable.
- Evaluate supplier sustainability practices.

4.3 Water Stewardship

The Company will:

- Reduce freshwater consumption.
- Increase water recycling.
- Operate efficient effluent/ sewerage treatment plants.
- Monitor groundwater extraction.
- Work towards Zero Liquid Discharge where technically and economically feasible.

KPIs

- Water consumption per tonne
- Water recycled (%)
- Effluent compliance

4.4 Waste Management

The Company shall:

- Reduce waste generation.
- Maximize recycling.
- Recover paper sludges where feasible.
- Dispose fiber & cable scrap through authorized recyclers.
- Dispose hazardous waste only through authorized agencies.

Target:

- Zero waste to landfill (long-term objective).

4.5 Air Pollution

The Company will:

- Maintain emissions within regulatory limits.
- Install pollution control equipment.
- Monitor stack emissions continuously where applicable.

- Reduce particulate matter and NOx/SOx emissions.

4.6 Biodiversity

The Company shall:

- Protect surrounding ecosystems.
- Promote plantation activities.
- Avoid operations causing significant biodiversity loss.
- Restore degraded land where feasible.

5. Social Responsibility

5.1 Employee Welfare

The Company is committed to:

- Equal opportunity employment.
- Non-discrimination.
- Fair remuneration.
- Employee development.
- Work-life balance.

5.2 Occupational Health & Safety

The Company shall:

- Maintain a safe workplace.
- Provide PPE.
- Conduct regular safety audits.
- Investigate incidents.
- Conduct emergency response drills.
- Preventive health check-ups

Target:

Zero fatalities and continuous reduction in Lost Time Injury Frequency Rate (LTIFR).

5.3 Human Rights

The Company prohibits:

- Child labour
- Forced labour
- Human trafficking
- Harassment
- Discrimination

The Company supports internationally recognized human rights principles.

5.4 Diversity & Inclusion

The Company encourages:

- Gender diversity
- Equal opportunities
- Inclusive workplace
- Women leadership development

5.5 Community Development

CSR initiatives may include:

- Education
- Healthcare
- Drinking water
- Skill development

- Rural livelihood
- Environmental conservation
- Plantation programmes

5.6 Customer Responsibility

The Company shall:

- Supply safe, compliant products.
- Ensure product quality.
- Respond promptly to customer complaints.
- Improve customer satisfaction.

6. Governance

6.1 Ethical Conduct

The Company shall maintain:

- Integrity
- Transparency
- Fair competition
- Ethical business Practices

All employees shall comply with the Code of Conduct.

6.2 Board Oversight

The Board shall:

- Review ESG strategy periodically.
- Monitor ESG risks.
- Approve sustainability targets.
- Review annual ESG performance.

6.3 Compliance

The Company shall comply with:

- Applicable Companies Act provisions.
- Environmental laws.
- Labour laws.
- Occupational safety regulations.
- Pollution Control Board requirements.
- Securities regulations applicable to listed entities.

6.4 Risk Management

ESG risks shall be integrated into the Enterprise Risk Management framework, including:

- Climate risk
- Water risk
- Regulatory risk
- Supply chain risk
- Cybersecurity risk
- Human capital risk

6.5 Anti-Corruption

The Company maintains zero tolerance towards:

- Bribery
- Fraud
- Corruption
- Conflict of interest

6.6 Whistle Blower Mechanism

Employees and stakeholders may report unethical conduct confidentially without fear of retaliation.

6.7 Data Privacy

The Company shall safeguard confidential information and personal data using appropriate cybersecurity measures.

7. Sustainable Supply Chain

Suppliers are expected to:

- Follow environmental laws.
- Maintain safe workplaces.
- Respect human rights.
- Avoid child labour.
- Follow ethical business practices.
- Support responsible sourcing.

Supplier ESG assessments may be conducted periodically.

8. ESG Targets

The Company may establish annual targets relating to:

- Carbon emission reduction
- Energy efficiency
- Renewable energy
- Water recycling
- Waste recycling
- Safety performance
- Employee training
- Gender diversity
- Sustainable procurement

9. Monitoring & Reporting

The Company shall:

- Monitor ESG KPIs regularly.
- Maintain ESG data systems.
- Conduct internal reviews.
- Report on ESG performance annually in accordance with applicable statutory disclosure requirements and recognized reporting frameworks, as applicable.

10. Review and Approval

This Policy shall be reviewed not more than three years or as and when required and approved by the Board of Directors.

The Policy has been drafted by Company Secretary after reviewed by the concerned senior executives and approved by the Board of Directors on 12.08.2026 and for a period of three years w.e.f. 12.08.2026.