



TOUCHWOOD ENTERTAINMENT LIMITED

BUSINESS RESPONSIBILITY POLICY

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Touchwood Entertainment Limited ('the Company') is a public limited company incorporated on August 1, 1997, under the Companies Act, 1956 (Corporate Identity Number L92199DL1997PLC088865).

The Equity shares of the Company are listed on NSE Limited. The Company's securities are traded at NSE Limited. Accordingly, the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 are applicable and binding on it.

SCOPE AND PURPOSE:

This Policy on Business Responsibility ('BR Policy' or 'Policy') has been framed in line with the requirements of Regulation 34 and other applicable provisions of the Listing Regulations and is intended to ensure that the Company contributes towards sustainable development and fulfils its social, environmental and economical responsibilities.

This Policy endorses the Company's commitment to follow principles and core elements, in conducting its business, as laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business issued by Hon'ble Ministry of Corporate Affairs.

This Policy shall be in addition to and furtherance to the existing Touchwood's Code of Conduct and Business Ethics ('the Code') of the Company.

APPLICABILITY:

Touchwood Entertainment Limited ("the Company") believes in conducting its affairs in a fair, transparent and professional manner and maintaining the good ethical standards, transparency and accountability in its dealings with all its constituents. The Company believes in establishing an environment of trust and confidence among various stakeholders. Company's business practices would therefore be governed by the following guiding principles.

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

- a) The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels; and promote the adoption of its principle across its value chain.
- b) The Company shall communicate transparently and assure access to information about its decisions that impact relevant stakeholders.
- c) The Company shall not engage in practices that are abusive, corrupt, or anti-competition.
- d) The Company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely.

- e) The Company shall avoid complicity with the actions of any third party that violates any of the principles contained in this Policy.

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

- a) The Company shall ensure that its products and services comply with all applicable statutes and regulations.
- b) The Company shall on a regular basis review and improve upon the process of new technology development, deployment and commercialization, incorporating various external and internal considerations.
- c) The Company shall raise the customer's awareness of their rights through education, appropriate and helpful marketing communication, full details of contents and composition and promotion of safe usage
- d) The Company shall ensure that the manufacturing processes and technologies required to produce the products are resource efficient and sustainable and continuously improve the balance between social, economic and environmental impacts and works;
- e) The Company shall ensure that while procuring, manufacturing and delivering goods and services it will follow the Quality policy.
- f) The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
- g) The Company shall continue to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.

Principle 3: Businesses should promote the wellbeing of all employees

- a) The Company understands the worth of a healthy and sound human resource. The Company ensures an environment which generates sense of belongingness, loyalty and commitment amongst the employees.
- b) The Company shall ensure that there is a systematic chain or hierarchy which allows better flow of information, ideas, suggestions and understanding amongst the employees and the senior management and there is in place a proper channel through which the grievances of the employees are taken up and addressed by the senior management.
- c) The Company shall not employ child labour, adolescent labour, forced labour or any form of involuntary labour, paid or unpaid in any of its offices and units.
- d) The Company has a Policy on Prevention of Sexual Harassment, which deals extensively on providing a safe working environment and protection from sexual harassment.
- e) The Company shall provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees.
- f) The Company shall comply with the statutory provisions with regard to health, safety and wellbeing of its employees. The Company shall at all-time have a safety and environment/ apex policy as per the provisions of Factories Act, and other applicable laws.

- g) The Company strives to regularly communicate to its employees all the policies related to them so as to keep them aware of the same and allow them to take optimum advantage of the same.
- h) The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- 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.
- j) It will ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- k) The Company ensures continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. They will promote employee morale and career development through enlightened human resource interventions.

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

- a) Touchwood recognises the interest of all communities including those of disadvantaged, vulnerable, marginalized and weaker sections of the society and proactively engage with them.
- b) The Company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.
- c) The Company shall acknowledge and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- d) The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of all the stakeholders.
- e) The Company shall regularly and systematically identify its internal stakeholders like employees and workers and external stakeholders like shareholders, suppliers, customers, government bodies including regulators, banks and financial institutions.
- f) The management of the Company shall remain accessible to all stakeholders in order to understand their concerns and respond accordingly.
- g) The Company shall endeavour to maintain healthy stakeholder's engagement, allow stakeholders participation and shall promote collective decision making process as far as practically possible.
- h) The Company's CSR policy shall drive initiatives towards the benefit of the disadvantaged, vulnerable and marginalized stakeholders. The website of the Company shall display all such policies and other relevant information from time to time to keep the stakeholders aware about position of the Company.
- i) The Company shall resolve differences with stakeholders in a just, fair and equitable manner

Principle 5 : Businesses should respect and promote human rights

- a) Touchwood recognises the human rights and treat others with dignity and respect. It believes that it is one's rights to live with dignity and respect. Company has adopted
 - i) Whistle Blower/Vigil Mechanism policy which covers aspects ensuring human / safety rights of its employees
 - ii) policy on "Prevention of Sexual Harassment at work place"(POSH) to provide safe and healthy work environment to its employees by establishing guidelines to deter any sexual harassment at work.
- b) The Company shall understand and appreciate that human rights are inherent, universal, indivisible and interdependent in nature
- c) 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.
- d) The Company shall recognize and respect the human rights of all relevant stakeholders and groups within the workplace, including that of communities, customers and vulnerable and marginalized groups.
- e) The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain

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

- a) Touchwood is committed to offer services in a way that ensures entitlement of all to a Clean environment.
- b) The Company strives to
 - i) Comply with ISO 14001:2004 Standards
 - ii) Comply with environmental legislations, regulations and other requirements.
 - iii) Continual improvement in environmental performance by Conservation of natural resources Prevention of Pollution (at source/ reduction of negative impacts/ recycle/reuse)
- c) The Company to provide on-going training to bring about a culture of environmental protection as a core value and involve all employees in achieving the above.
- d) Review environmental performance periodically for adequacy and suitability.

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

- a) The Company recognizes that it operates within the specified legislative and policy frameworks prescribed by the Government, which guide its growth and also provide for certain desirable restrictions and boundaries.
- b) The Company while pursuing any advocacy of any matters for the improvement of the public good takes care that it shall not advocate any policy change to benefit the Company or select few alone.
- c) The Company as a corporate citizen understands its responsibility to operate within the regulatory framework.

Principle 8 : Businesses should support inclusive growth and equitable development

- a) The company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- b) The company shall be sensitive to local concerns while operating in regions that are underdeveloped.
- c) The Company shall undertake CSR activities in accordance with applicable provisions of the Companies Act, 2013 as per the recommendation of the CSR committee and as per the CSR policy of the company.
- d) The Company shall make efforts to innovate and invest in the processes and technologies to promote the wellbeing of society (especially girl child) and the underdeveloped regions in priority

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

- a) The Company shall take into account the overall well-being of the customers and that of society.
- b) 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.
- c) The Company shall disclose all information truthfully and factually as per applicable laws, through labelling.
- d) The Company shall promote products in ways that do not mislead or confuse the customers.
- e) The Company shall carry customer satisfaction survey to address their concern and to obtain feedback about our Company for further improvement

DISCLOSURES & IMPLEMENTATION

This Policy shall be appropriately communicated across all levels and shall be appropriately disclosed on the website of the Company i.e. at www.touchwood.in. The Company shall ensure that all Principles are followed in compliance with all applicable laws. The Company shall encourage its business associates to abide by the principles contained in this Policy.

POLICY REVIEW AND AMENDMENTS

The Board of Directors may in their discretion and in accordance with the guidelines /clarifications as may be issued from time to time by relevant statutory and regulatory authorities, make any changes /modifications and/or amendments to this Policy as deemed necessary.
