

## **Policy on Business Responsibility and Sustainability Reporting (BRSR)**

### **Background & Scope**

In view of the requirements of Securities and Exchange Board of India (SEBI) for Business Responsibility and Sustainability Report ("BRSR"), Brainbees Solutions Limited ("BSL") has formulated the Business Responsibility and Sustainability Policy ("Policy").

The Policy is based on nine principles enunciated in the National Guidelines on Responsible Business Conduct (NGRBC) by the Ministry of Corporate Affairs (MCA). The primary objective of the Policy is to align and ensure adherence of all business activities in line with the core NGRBC requirements of each principle.

While BSL's existing policies address the requirements of the NGRBC principles, the Company has formulated this Policy to address the core requirements more comprehensively. BSL will continue to periodically assess its Company-level policies and enhance the policy framework to further strengthen its commitment towards Business Responsibility and Sustainability Report ("BRSR").

### **Purpose/Objectives**

To provide guidelines for common understanding and ensuring adherence of BRSR reporting, Brainbees Solutions Limited has adopted the following 9 principles of the BRSR framework as per the SEBI guidelines,

- Principle 1:** Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.
- Principle 2:** Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
- Principle 3:** Businesses should promote the well-being of all employees.
- Principle 4:** Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
- Principle 5:** Businesses should respect and promote human rights.
- Principle 6:** Businesses should respect, protect, and make efforts to restore the environment.
- Principle 7:** Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.
- Principle 8:** Businesses should support inclusive growth and equitable development.
- Principle 9:** Businesses should engage with and provide value to their customers and consumers in a responsible manner.

All these policy statements will be implemented over a period of time.

## Mapping of existing policies with NGRBC principles

The following table illustrates BSL's existing policies that already address requirements of BRSR (NGRBC guided) principles, and such policies have been operational for some duration already. Any future changes in BRSR policy will also have complimentary changes in respective detailed policies.

BRSR Principle	BSL's policies mapped
Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable	<ul style="list-style-type: none"> <li>• Anti-Corruption &amp; Anti-Bribery Policy</li> <li>• Code of Business Conduct and Ethics</li> <li>• Code of Business Conduct and Ethics for Prevention of Insider Trading</li> <li>• Code of Business Conduct and Ethics for Board and Senior Management</li> <li>• Whistle-Blower Policy</li> <li>• Computer Network and Internet Access Policy</li> <li>• Information Security Policy</li> </ul>
Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe	<ul style="list-style-type: none"> <li>• Environment Social Health and Safety Policy</li> </ul>
Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains	<ul style="list-style-type: none"> <li>• Store Policy for Store Manager</li> <li>• Store Policy for Customer Relationship Officers</li> <li>• Human Rights Policy</li> <li>• Employee Development Policy</li> <li>• Leave Policy, Maternity Policy, Soft Loan Policy, Transfer Policy</li> <li>• Relocation Policy</li> <li>• Prevention of Sexual Harassment Policy (PoSH)</li> <li>• Environment Social Health and Safety Policy</li> </ul>
Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders	<ul style="list-style-type: none"> <li>• Code of Practices and Procedures for Fair Disclosure of UPSI</li> <li>• Whistle-Blower Policy</li> </ul>

Principle 5: Businesses should respect and promote human rights	<ul style="list-style-type: none"> <li>• Human Rights Policy</li> <li>• Prevention of Sexual Harassment Policy (PoSH)</li> <li>• Whistle- Blower Policy</li> <li>• Child Labour Policy</li> <li>• Code of Business Conduct and Ethics</li> </ul>
Principle 6: Businesses should respect and make efforts to protect and restore the environment	<ul style="list-style-type: none"> <li>• Environment Social Health and Safety Policy</li> </ul>
Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	<ul style="list-style-type: none"> <li>• Whistle- Blower Policy</li> </ul>
Principle 8: Businesses should promote inclusive growth and equitable development	<ul style="list-style-type: none"> <li>• Corporate Social Responsibility Policy</li> <li>• Human Rights Policy</li> <li>• Code of Business Conduct and Ethics</li> </ul>
Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner	<ul style="list-style-type: none"> <li>• Privacy Policy</li> <li>• Computer Network and Internet Access Policy</li> <li>• Information Security Policy</li> </ul>

<b>PRINCIPLE 1</b>	<b>BUSINESSES SHOULD CONDUCT &amp; GOVERN THEMSELVES WITH INTEGRITY, &amp; IN A MANNER THAT IS ETHICAL, TRANSPARENT &amp; ACCOUNTABLE</b>
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**Policy:**

- I. BSL has developed a Code of Business Conduct and Ethics to which its Directors and Employees at all levels will abide by in order to maintain good governance, ethical practises, transparency, and accountability in BSL's operations and interactions with stakeholders across the value chain.
- II. BSL will conduct periodic training programmes on awareness of Code of Business Conduct and Ethics among its employees and stakeholders.
- III. The directors and employees of BSL will report self-compliance to the policy on Code of Business Conduct and Ethics.
- IV. In the Annual report of the Company sent to shareholders, the Managing Director will certify compliance of the Company's code of conduct for directors and senior management.
- V. BSL being a listed company will promptly post on its website information regarding quarterly, half yearly and annual financial results / statements (standalone as well as consolidated) of the company and annual financial results of its subsidiaries at regular intervals; notices of general meetings; intimations of "Record-date"; annual reports; shareholding patterns and such other information as required under Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015) and provisions of the Companies Act, 2013 in such manner that the same is easily accessible to the Investors of the Company. The website will always remain updated.
- VI. Neither BSL nor any of its Subsidiaries will engage in practices that are abusive, corrupt or anti-competitive.
- VII. BSL will avoid complicity with the actions of any third party that violates any of the principles contained in these Guidelines.
- VIII. The Company has dedicated e-mail id: [companysecretary@firstcry.com](mailto:companysecretary@firstcry.com) for Investor correspondence.

<b>PRINCIPLE 2</b>	<b>BUSINESSES SHOULD RESPECT THE INTERESTS OF &amp; BE RESPONSIVE TO ALL THEIR STAKEHOLDERS</b>
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**Policy:**

At BSL, our Sustainability Policy Integrates economic progress, social responsibility and environmental concerns with the objective of improving quality of life. We, at BSL, always believe in integrating our business values and operations to meet the expectations of our customers, employees, partners, Investors, communities and public at large.

- I. BSL will uphold the values of honesty, partnership and fairness in its relationship with stakeholders.
- II. BSL shall provide and maintain a clean, healthy and safe working environment for employees, customers, partners and the community.
- III. BSL will strive to consistently enhance its value proposition to the customers and adhere to its promised standards of service delivery.
- IV. BSL will respect the universal declaration of human rights, International Labour Organisation's fundamental conventions on core labour standards and operate as an equal opportunities employer.
- V. BSL shall encourage and support its partners to adopt responsible business policies, Business Ethics and our Code of Business Conduct and Ethics Standards.
- VI. BSL will continue to serve its communities:
  - by implementing sustainable Community Development Programmes including through public/private partnerships in and around the area of operations.
  - by encouraging employees to serve communities by volunteering and by sharing their skills and expertise.
  - by striving to deploy sustainable technologies and processes in all its operations and use scarce natural resources efficiently in its facilities.
- vii. BSL will also help communities that are affected by natural calamities or untoward incidents, or that are physically challenged.
  - by establishing sourcing/ supply chain with emphasis on local procurement. BSL management will commit necessary resources required to meet the goals of ESG.

<b>PRINCIPLE 3</b>	<b>BUSINESSES SHOULD RESPECT &amp; PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS</b>
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**Policy:**

BSL respects the employees' right to freedom of association, participation and collective bargaining. Employees at all levels shall have freedom of association and be free to participate in collective bargaining. Workers' participation in Management shall be governed by a well laid down policy framework.

- I. BSL will provide equal opportunity to all employees starting from their recruitment irrespective of their caste, creed, gender, race, religion, and language. The employees of BSL can belong to any part of the country and will be selected based on individual merit without any discrimination or preference.
- II. BSL will also formulate schemes and policies to address health, superannuation issues and welfare needs of employees and their families.
- III. BSL will provide workplace environment that is safe, hygienic and which upholds the dignity of the employee.
- IV. BSL will ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities on equal and non-discriminatory basis.
- V. BSL will also provide continuous training to its employees for personal and professional skill developments.
- VI. BSL will promote employee morale and career development through various HR policies.
- VII. BSL will frame stringent policies 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.
- VIII. BSL will not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- IX. BSL will take cognizance of the work-life balance of its employees, especially that of women.
- X. BSL focuses on learning and development, to enhance the knowledge & skill and preparing its people to face challenges.

- XI. To take various initiatives to maintain its position as leading Integrated Infrastructure conglomerate in the Country, viz., Talent pool to match organisational growth, creating a performance culture, encouraging learning element across organisation etc.

<b>PRINCIPLE 4</b>	<b>BUSINESSES SHOULD RESPECT THE INTERESTS OF &amp; BE RESPONSIVE TO ALL THEIR STAKEHOLDERS</b>
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**Policy:**

BSL's key stakeholders include employees, suppliers, customers, business associates, Investors, regulatory agencies and communities. Our Investors comprise of shareholders (including Institutional Investors).

BSL values the support of its stakeholders and respects the interests and concerns they have. BSL and its employees shall provide value based services to all the stakeholders.

BSL will have continuous engagement with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.

- I. BSL will endeavour to enhance stakeholder value by addressing the diverse Interests of various stakeholders including but not confined to shareholders, consumers, customers, employees, business partners, local community. Government and the general public.
- II. BSL, through its partnering organisations/implementing agencies will focus on sustainable development of the marginalised groups in the local communities.
- III. The employees of BSL will offer assistance, encouragement and service to stakeholders in fair, equitable and consistent manner.
- IV. As a part of Corporate Social Responsibility, BSL will provide:
  - (a) Education: "Enhancing the Quality of Primary Education"
  - (b) Health: "Enhancing Preventive and Primary Care"
  - (c) Sustainable Livelihood: "Enhancing Socio-Economic Stature" (0) Rural Infrastructure: "Enhancing Rural Civic Amenities"

<b>PRINCIPLE 5</b>	<b>BUSINESSES SHOULD RESPECT &amp; PROMOTE HUMAN RIGHTS</b>
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BSL is committed to uphold fundamental human rights in line with the legitimate role of business. Our approach will include adherence to corporate business policies and compliance with applicable laws Including Internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation's declaration on Fundamental Principles and Rights at Work.

**Policy:**

- I. Conduct business in a manner that respects the rights and dignity of all people, complying with all applicable legal requirements.
- II. Recognise our responsibility to respect human rights and avoid complicity in human rights abuses.
- III. Treat everyone who works for BSL fairly and without discrimination. Employees, agency staff, vendors, customers and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- IV. Respect the rights of people in communities Impacted by our activities. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimise and/or mitigate them.
- V. BSL will, within its sphere of influence, promote the awareness and realisation of human rights across its value chain.
- VI. Ensure compliance and adherence to all the applicable human rights laws and national laws. BSL's policies strive to percolate these values at all levels in the organisation.

<b>PRINCIPLE 6</b>	<b>BUSINESSES SHOULD RESPECT &amp; MAKE EFFORTS TO PROTECT &amp; RESTORE THE ENVIRONMENT</b>
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**Policy:**

This Principle emphasizes the importance of environmental stewardship in ensuring long-term economic prosperity & societal well-being by highlighting the interconnections of environmental issues at the local, regional, & global levels, making it critical for businesses to address pollution, biodiversity conservation,



sustainable natural resource management, & climate change (mitigation, adaptation, & resilience) in a fair, comprehensive, & systematic manner.

- I. BSL will commit to assess the environmental consequences of its products & operations and take steps to reduce & mitigate consequences, where they cannot be avoided.
- II. BSL will identify and evaluate environmental and climate impacts and its associated risks for all activities and formulate a mitigation strategy and environmental goals.
- III. BSL will strive to adopt environmental practices & methods that reduce or eliminate the negative impacts on/of their operations & supply chain.
- IV. BSL will engage internal and external stakeholders, including employees, customers, value chain partners and communities, continuously to provide training and raise awareness about environmental management policies and environmental impacts.
- V. BSL will strive to substantially increase the share of renewable energy in the global energy mix and achieve the sustainable management & efficient use of natural resources.
- VI. BSL will conduct independent assessment/ evaluation/assurance by an external agency to fulfill the BRSR principles requirement.

<b>PRINCIPLE 7</b>	<b>BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC &amp; REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE &amp; TRANSPARENT</b>
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**Policy:**

BSL interacts with Government/ Regulatory Authorities on public policy frameworks.

- I. BSL while pursuing advocacy policy, will ensure that their advocacy positions are consistent with the principles and core elements contained in this policy enhancing business responsibility and transparency.

- II. BSL will use Code of Business Conduct and Ethics as a guide for its actions in influencing public and regulatory policy.

<b>PRINCIPLE 8</b>	<b>BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH &amp; EQUITABLE DEVELOPMENT</b>
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**Policy:**

BSL is committed to establishing competitive and sustainable value chains linked to the businesses which create sustainable livelihoods, especially among the poor in rural India.

BSL through its implementing agencies are investing the resources of BSL to support Inclusive growth and equitable development in and around Its businesses as well as towards Nation Building at large.

CSR Vision is to fulfill obligation towards communities, fostering sustainable and integrated development, thus improving quality of life.

For Inclusive growth and equitable development, BSL through its implementing agency partners focuses on following sectors:

- Primary Education - Aim is to enhance the quality of Primary education leading to "Ignited Minds for Brighter Future".
- Health Care - Aim is to enhance the Preventive and Primary health care leading to "Ignited Minds for a Healthy Live".
- Sustainable Livelihood Development - Aim is to enhance socio-economic stature of women, youth and other marginalised groups.

<b>PRINCIPLE 9</b>	<b>BUSINESSES SHOULD ENGAGE WITH &amp; PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER</b>
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**Policy:**

BSL is committed to continuously exceed customer expectations, in pursuit of its aim to be the most admired organisation of the Country. The customer satisfaction is the key to BSL's growth and success in this line of business. BSL strives hard to provide better services to customers at large.

- I. BSL will serve the needs of its customers taking into account the overall well-being of the customers and that of society.

- II. BSL will promote and advertise its services in ways that do not mislead or confuse the consumers or violate any of the principles in this policy.
- III. BSL will provide adequate training to employees continuously to meet the challenges of a dynamic business environment and will also provide adequate grievance handling mechanisms to address customers concerns and feedback.

BSL will maintain privacy of consumer's confidential data in the normal course of its business.