

*Oriental Aromatics*

**BUSINESS RESPONSIBILITY POLICY**

## **BUSINESS RESPONSIBILTY POLICY**

### **1. BACKGROUND, SCOPE, PURPOSE AND EFFECTIVE DATE:**

The Securities Exchange Board of India (SEBI) has notified SEBI (Listing Obligations and Disclosure Requirements) Amendment Regulations, 2019 (Listing Regulations) effective from 26<sup>th</sup> December, 2019. Vide this notification, SEBI amended Regulation 34 of the Listing Regulations, thereby requiring top 1000 Listed Companies (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report.

Oriental Aromatics Limited (hereinafter referred as “the Company” or “Oriental Aromatics”) being one of the top 1000 listed Company as per the criteria specified above, has approved and adopted this Business Responsibility Policy (“the Policy”) at its meeting held on February 05,2020, being the effective date of the Policy.

This Policy is based on principles laid down in the National Voluntary Guidelines on social, environmental and economic responsibilities of a business published by the Ministry of Corporate Affairs, towards conducting business by the Company.

### **2. OBJECTIVE:**

The main objective of the Policy is to:

- i. Ensure a unified and common approach to the dimensions of Business Responsibility across Oriental Aromatics;
- ii. Act as a strategic driver that will help Oriental Aromatics respond to the complexities and challenges that keep emerging and be abreast with changes in the Regulations.

### **3. SCOPE AND APPLICABILITY:**

This policy shall be applicable to all the employees, Directors and all the business divisions of Oriental Aromatics Limited. It shall also be applicable to all the subsidiaries and stakeholders of the company. The Policy shall be reviewed by the Board from time to time.

#### 4. DEFINITIONS:

- i. **“Board”** shall mean Board of Directors of the Company.
- ii. **“Companies Act”** shall mean the Companies Act, 2013 and Rules thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended.
- iii. **“Listed Entity / Company”** shall mean Oriental Aromatics Limited (Formerly Camphor and Allied Products Limited).
- iv. **“Policy”** means Business Responsibility Policy.
- v. **“Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as notified by the SEBI, as amended, from time to time.
- vi. **“Stock Exchange”** shall mean a recognized Stock Exchange as defined under clause (f) of Section 2 of the Securities Contracts (regulation) Act, 1956.

#### 5. IMPLEMENTATION:

The following persons shall be responsible for the purpose of implementation of Business Responsibility policy:

1. Mr. Dharmil A. Bodani – Chairman and Managing Director
2. Mr. Parag K. Satoskar – CEO
3. Mr. Girish Khandelwal – CFO

Mr. Dharmil A. Bodani has been designated as the Business Responsibility Head for the purpose of this policy.

The Business Responsibility Head may take support of such functional head and internal and external experts as he deems fit, for the effective implementation of the policy. The policies forming part of the Business Responsibility Policy are also supported by other existing policies of the Company.

#### 6. DISCLOSURES:

The Business Responsibility Policy shall be disclosed in the Annual Report and on the website of the Company [i.e. www.orientalaromatics.com](http://www.orientalaromatics.com).

## **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.

## **8. POLICIES BASED ON THE KEY PRINCIPLES, FORMING PART OF OUR BUSINESS RESPONSIBILITY POLICY:**

Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. Company's Business practices would therefore be governed by the following guiding policies:

### **Policy 1: Ethics, Transparency and Accountability:**

Oriental Aromatics lays a strong emphasis on ethical corporate citizenship and establishment of good corporate culture. It has always believed in adhering to the best governance practices to ensure protection of interests of all stakeholders of the Company along with healthy growth of the Company. The Board of Directors have also formulated the Code of Conduct for Board and Senior Management Personnel which lays down the important corporate and organisational values that shape the Company's value system. The Board of Directors and Senior Management Personnel shall affirm the compliance of the same on an annual basis.

#### **I. Key Principles:**

The Company strives to comply with the following core elements of its policy on Ethics, Transparency and Accountability:

- i. Developing governance structures procedures and practices to ensure ethical conduct at all levels; and promote the adoption of this Principle across the value chain.
- ii. Communicating transparently and assuring access to information about the decisions that impact relevant stakeholders.
- iii. Not engaging in practices that are abusive, corrupt, or anti-competition.
- iv. Truthfully discharging responsibilities on financial and other mandatory disclosures.

- v. Reporting on the status of the adoption of these Guidelines, as suggested in the reporting framework in this document.
- vi. Avoiding complicity with the actions of any third party that violates any of the principles contained in these Guidelines.

## **II. Implementation:**

- i. The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally be responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
- ii. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.
- iii. Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy.

## **III. Grievance Redressal**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

### **Policy 2: Sustainable Products and Services:**

Oriental Aromatics endeavours to embed the principles of sustainability in all its operations starting from workplace management, various stages of production and service lifecycle including procurement of raw material / service, manufacturing of product or delivery of service, transportation of raw materials and finished goods. The policy for sustainable products and services targets to maintain the right balance between environment protection, social well-being and economic growth.

#### **I. Key Principles:**

In pursuit of the Sustainable Products and Services policy the company is committed to work towards the following:

- i. Optimal resource use over the life-cycle 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. Raising consumer awareness with regard to their rights, through education, product labelling, appropriate and helpful marketing communication, full details of the contents and composition and promotion of safe usage and disposal of their products and services.

- iii. Ensuring that the product design considers resource efficiency and principles of sustainability in the manufacturing processes.
- iv. Conducting regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- v. Recognizing and respecting the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.
- vi. Recognizing that over-consumption results in unsustainable exploitation of our planet's resources, and therefore to promote sustainable consumption including recycling of resources.

## **II. Implementation:**

- i The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
- ii The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.
- iii Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy.

## **III. Grievance Redressal**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

### **Policy 3: Employee Well-being:**

Oriental Aromatics believes that employees are the backbone of an organisation and building a culture of mutual trust and respect with the principles of fairness and transparency play a vital role in the success of the organization. The company's policy focuses on ensuring the well-being of all its employees. A healthy and motivated workforce is the key to achieving business goals and to this end the Company shall endeavour to support the professional growth of its employees and reward performers.

## **I. Key Principles:**

The Company's employee well-being policy aims to achieve the following:

- i. Respecting the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.

- ii. Ensuring 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.
- iii. Ensuring that there is no use of child labour, forced labour or any form of involuntary labour, paid or unpaid.
- iv. Taking cognizance of the work-life balance of its employees, especially that of women.
- v. Providing facilities for the wellbeing of the employees including those with special needs ensuring timely payment of fair living wages to meet basic needs and economic security of the employees.
- vi. Providing a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees. Ensuring awareness of these provisions to the employees and training them on a regular basis.
- vii. Ensuring continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and non- discriminatory basis. Promoting employee morale and career development through enlightened human resource interventions.
- viii. Creating systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

## **II. Implementation:**

- i. The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
- ii. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.
- iii. Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy.

## **III. Grievance Redressal**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

## **Policy 4: Stakeholder Engagement**

Oriental Aromatics considers its employees, customers, business associates, suppliers, shareholders/investors and communities surrounding our operations and regulatory authorities, etc as key stakeholders. The Company strongly believes that an effective stakeholder engagement is based on good faith and goes beyond public relations. The Company is conscious of and respects the interests and needs of all its stakeholders.

### **I. Key Principles:**

To carry out constant stakeholder engagement, the company aims to do the following:

- i. Systematically identifying stakeholders, understanding their concerns, defining purpose and scope of engagement, and commitment to engage with them.
- ii. Acknowledging and assuming responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- iii. Giving special attention to stakeholders in areas that are underdeveloped.
- iv. Resolving differences with stakeholders in a just, fair and equitable manner.

### **II. Implementation:**

- i. The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
- ii. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.
- iii. Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy.

### **III. Grievance Redressal:**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

## **Policy 5: Human Rights:**

Oriental Aromatics respects and promotes human rights for all individuals. The company's commitment to human rights and fair treatment is set in its Code of Conduct. The Code provides to conduct the operations with honesty, integrity and openness. The principles stated in our code and policies which include respect for human rights and dignity of all stakeholders, extend to the group, joint venture, suppliers and all those who work with us.

### **I. Key Principles:**

The company firmly believes in the following:

- i. Understanding the human rights content of Constitution of India, national laws and policies and the content of International Bill of Human Rights, as well as appreciating that, human rights are inherent, universal, indivisible and interdependent in nature.
- ii. Integrating and respecting the principles of 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.
- iii. Recognizing and respecting the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
- iv. Promoting within the sphere of our influence, the awareness and realization of human rights across the value chain.
- v. Not being complicit with human rights abuses by a third party.

### **II. Implementation:**

- i. The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
- ii. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.
- iii. Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in the Business Responsibility Policy.

### **III. Grievance Redressal:**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

## **Policy 6: Preservation of Environment:**

Oriental Aromatics places highest corporate priority in ensuring and adhering to best procedures relating to environment protection. The Company constantly strives to improve energy efficiency, use renewable energy, procure greener products and manage wastes with an aim to reduce the impact on the environment. The company constantly identifies ways to optimise resource consumption in its operations and also believes that it has a responsibility to take care of the planet and preserve its beauty, resources and strength for generations to come.

### **I. Key Principles:**

The Environmental Policy is built around the following:

- i. Utilizing natural and manmade resources in an optimal and responsible manner and ensuring the sustainability of resources by reducing, reusing, recycling and managing waste.
- ii. Taking measures to check and prevent pollution and assessing the environmental damage and bearing the cost of pollution abatement with due regard to public interest.
- iii. Ensuring that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- iv. Continuously seeking to improve environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- v. Developing Environment Management Systems (EMS) and contingency plans and processes that help in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to our operations or that of a member of our value chain.
- vi. Reporting our environmental performance, including the assessment of potential environmental risks associated with the operations, to the stakeholders in a fair and transparent manner.
- vii. Proactively persuading and supporting the value chain to adopt this policy.

### **II. Implementation:**

- i. The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
- ii. The Business Responsibility Policy shall be appropriately communicated within the Company across all levels and shall be displayed on the Company's website.
- iii. Compliance with the Policy shall be monitored and evaluated on regular basis. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various

principles enunciated in the Business Responsibility Policy.

### **III. Grievance Redressal:**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary

### **Policy 7: Responsible Advocacy**

Oriental Aromatics believes that a lot can be achieved when the company works together with the Government, legislators, trade bodies and regulators thus providing positive, social and environmental outcomes. 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.

#### **I. Key Principles:**

The Company aims at doing the following:

- i. Ensuring that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.
- ii. Utilizing to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.

#### **II. Implementation:**

- i. The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
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### **III. Grievance Redressal:**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

## **Policy 8: Inclusive Growth and Equitable Development:**

Oriental Aromatics has always encouraged community growth and development and Education is a core part of our mission to help solve society's toughest problems. The Company undertakes the initiatives through the CSR committee of the Board as per the CSR policy of the Company. The CSR projects are in accordance with Schedule VII of the Companies Act, 2013 and rules made thereunder.

The CSR initiatives have been carried out by the Company either directly or by implementing agency the Keshavlal V. Bodani Education Foundation. The Foundation undertakes the promotion of educational facilities for the students having learning disabilities.

### **I. Key Principles:**

In order to fulfill its commitment the Company aims at:

- i. Understanding our impact on social and economic development, and responding through appropriate action to minimise the negative impacts.
- ii. Innovating and investing in products, technologies and processes that promote the wellbeing of society.
- iii. Making efforts to complement and support the development priorities at local and national levels and assuring appropriate resettlement and rehabilitation of communities who have been displaced owing to our business operations.
- iv. Especially staying sensitive to local concerns, while operating in regions that are underdeveloped.

### **II. Implementation:**

- i The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
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### **III. Grievance Redressal:**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

## **Policy 9: Customer Value**

The foundation of the company is based on the trust, satisfaction and loyalty of our consumers across the world. The Company is one of the largest manufacturers of variety of terpene chemicals, camphor, and other speciality aroma chemicals. It is also a one shop solution provider for the fragrance and flavor industry. The continued trust from our customers has helped us built a legacy over the years.

We are guided by our deep insights into our customers' requirements, enabling us to execute our plans with precision. We strongly believe this to be the only sure way to grow and stay ahead of the curve in the increasingly competitive global market.

### **I. Key Principles:**

- i. Ensuring that while serving the needs of our customers, we take into account the overall well-being of the customers as well as society at large.
- ii. Ensuring that we do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling our products.
- iii. Making full disclosures of all information truthfully and factually, through labelling and other means, including the risks to the individual, to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, education of customers on the safe and responsible usage of our products and services should be undertaken.
- iv. Ensuring that promotion and advertisements of our products do not mislead or confuse the consumers or violate any of the principles in these Guidelines.
- v. Exercising due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- vi. Providing adequate grievance handling mechanisms to address customer concerns and feedback.

### **II. Implementation:**

- i The Managing Director, Chief Executive Officer and Chief Financial Officer of the Company shall jointly and severally responsible for implementing the Business Responsibility Policy. The Managing Director of the Company shall be Head for Business Responsibility and will oversee the implementation of the Policy.
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### **III. Grievance Redressal:**

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to Chief Financial Officer or Company Secretary.

*Approved by the Board of Directors in the meeting held on 05<sup>th</sup> February, 2020*

By Order of the Board of Directors

Sd/-

Dharmil A. Bodani

Chairman and Managing Director

DIN:00618333