

NELCAST LIMITED
Business Responsibility Policy

Contents

Introduction Scope and Purpose Applicability Implementation Key Principles

Policy 1: Ethics, Transparency & Accountability

Policy 2: Product Lifecycle Sustainability

Policy 3: Employee Well Being

Policy 4: Stakeholder Engagement

Policy 5: Human Rights

Policy 6: Preservation of Environment

Policy 7: Responsible Advocacy

Policy 8: Inclusive Growth & Equitable Development Policy 9: Customer Value

Introduction:

'Nelcast Limited ('the Company') is a public limited company incorporated on June 07, 1982, under the Companies Act, 1956 (Corporate Identity Number L27109AP1982PLC003518).

The equity shares of the Company listed on the BSE and NSE stock exchanges and is traded as permitted securities as per 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 of and furtherance to the existing Nelcast Code of Conduct and Business Ethics ('the Code') of the Company. In view of the above, the Board of Directors of the Company (the Board) approved this Policy at its meeting held on February 10, 2020.

Applicability:

This Policy applies to all the directors and employees of the Company across all its functions, and its plants.

This Policy shall be effective from February 10, 2020

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

Philosophy:

- Nelcast 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 value based governance and practices. It is committed to maintain highest standards of ethics in all sphere of its business activities. The Board of Directors and the Senior Management have the responsibility to set exemplary standards of ethical behavior, both internally within the organization as well as in their external relationship. Management shall constantly endeavor to inculcate this ethical behavior at all levels in the organization so that it becomes essential part of the work culture among all the employees in the Company.

Policy:

- 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

Philosophy :

Company

- Understands the "Service" and a "Service attitude" to customers and fellow associates that forms the basis of its business.
- Understands that mutual trust and respect is the essence of its Human Values.

- Understands Accountability and Commitment setting and meeting aggressive targets
- Understands that Company will always conduct its business with unyielding Integrity and

Ethics.

- Understands Excellence and deliver products and service of the highest quality.
- Understands the importance of Change and see it as an Opportunity and not as a Threat.
- Understands Speed as a Competitive Advantage in a changing and uncertain world, delivering Better, Faster and more Competitive products and services.
- Always be an integral part of the Customers' Success.

Policy:

- 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. In designing the product, company shall ensure that the manufacturing processes and technologies required to produce it 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 Philosophy :

- Nelcast Corporate Philosophy is to encourage practice "to do what is right as a human being". It offers employment with a sense of certainty for successful long term career that would be driven by boundless growth opportunities and exposure to immense learning opportunities, and widening the knowledge horizon.

- It nurtures a cohesive team culture that inspires employees to actively participate in all organizational development initiatives with no limitation of opportunities which makes Nelcast an exhilarating place to be in.
- The Company intends to create a safe environment for the well being of the employees at all times and spread the message of safety to one and all. The Company has spent lot of time , resources, and money to inculcate the safety aspect in the organization.
- With the intent of connecting people for fostering and building people interaction, Nelcast encourages employees to express their concerns in a free and informal manner thereby creating a sense of bonding within the company. The Company gives due importance to the safety and health of employees. The Company has formulated the Safety, Occupational and Health Policy.
- The Company implicitly advocates and follows the human resource management policy comprising of the values and ethics followed in the Company with respect to Human resources.

Policy:

- a. The Company understands the worth of a healthy and sound human resource. The Company shall ensure an environment which generates sense of belongingness, loyalty and commitment amongst the employees. 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
- b. 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. The Company has a Policy on Selection & Remuneration of Directors, KMP and other Senior Managerial Personnels., which deals extensively with the employment and remuneration practices to be followed by the Company. The Company shall promote work-life balance among all its employees specially its women employees. The Company has a Policy on Prevention of Sexual Harassment, which deals extensively on providing a safe working environment and protection from sexual harassment.
- c. The Company shall provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. It shall provide facilities for the well being of its employees including those with special needs. 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 policy as per the provisions of Factories Act, and other applicable laws.
- d. 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.

- e. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- f. 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.
- g. It will ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- h. 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.

Philosophy:

- Nelcast recognises the interest of all communities including those of disadvantaged, vulnerable, marginalized and weaker sections of the society and proactively engage with them.

Policy:

- a. The Company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.
- b. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- c. The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of all the stakeholders. 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. The management of the Company shall remain accessible to all stakeholders in order to understand their concerns and respond accordingly. 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.
- d. The Company's CSR policy drives 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.

e. The Company shall resolve differences with stakeholders in a just, fair and equitable manner

Principle 5 : Businesses should respect and promote human rights

Philosophy:

- Nelcast recognises the human rights and treat others with dignity and respect. It believes that it is one's fundamental rights to live with dignity and respect. Company has adopted
 - a. vigil mechanism policy which covers aspects ensuring human / safety rights of its employees
 - b. policy on "Prevention of Sexual Harassment at work place"(POSH) to provide safe and healthy work environment to its employees by establishing a guidelines to deter any sexual harassment at work.

Policy:

- a. The Company shall understand the human rights content of the Constitution of India, national laws and policies. It shall appreciate that human rights are inherent, universal, indivisible and interdependent in nature
- b. 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.
- c. The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, customers and vulnerable and marginalized groups.
- d. 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

Philosophy:

- Nelcast is committed to manufacture products and offer services in a way that ensures entitlement of all to a Clean environment. The Company has an environment policy document.

Policy:

The Company strives to

- a. Comply with IATF Standards
- b. Comply with environmental legislations , regulations and other requirements.
- c. Continual improvement in environmental performance by
 - Conservation of natural resources
 - Prevention of Pollution (at source/ reduction of negative impacts/ recycle/ reuse)
 - Setting and review suitable objectives & targets.
- d. Provide on-going training to bring about a culture of environmental protection as a core value and involve all employees in achieving the above.
- e. 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

Philosophy:

- The Company as a corporate citizen understands its responsibility to operate within the democratic setup and constitutional framework.

Policy

- 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 is the member of
 - Indian Institute of Foundry (IIF)
 - Confederation of Indian Industry
 - Automotive Components Manufacturers of Association (ACMA)
 - Society of Indian Automobile Manufacturers
 - Madras Management Association
 - Indo American Chamber of Commerce.
 - TECA

Principle 8 : Businesses should support inclusive growth and equitable development

Philosophy:

- The Company serves society by taking forward this philosophy and catalyzing societal welfare through projects in the healthcare, education , sports activities, focusing on the needy and weaker sections of the Society.

Policy :

- a. The Company undertakes CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR committee and as per the CSR policy of the company.
- b. The Company makes efforts to innovate and invest in the processes and technologies to promote the wellbeing of society, putting the locals (especially farmers) and the underdeveloped regions in priority

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

Philosophy:

- Nelcast has long standing relationships with its customer. The Company acknowledges that no business can survive in absence of customers.
- The driving force behind the Company's management is Quality and Customer Satisfaction. Nelcast's quality policy is "To satisfy customer needs and retain leadership by manufacturing and supplying quality products and services through continuous improvement by motivated employees".

Policy :

- 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 once in two years through an external agency to address their concern and to obtain feedback about our Company for further improvement..

Implementation:

1. The policy shall be appropriately communicated within the Company across all levels and shall be displayed on the website of the Company www.nelcast.com.

2. The Managing Director, shall be responsible for the implementation of the Business Responsibility initiatives and assisted by the Business units heads of the Company who shall be the reviewing authority of this policy, shall oversee the implementation of the Policy. Mr. S.K. Sivakumar, Group – Chief Financial Officer & Company Secretary shall be the BR head who subject to the approval of the Board may make suitable changes in this policy from time to time, however such alterations shall not be inconsistent with the provisions of any law for the time being in force.
3. Compliance with the Policy shall be monitored and evaluated by the Company on a periodic basis.
4. Any grievances/ complaints with respect to violation of the policy shall be reported to the BR Head.