



Nazara™

**Nazara Technologies Limited**  
**Business Responsibility Policy**

## **1. BACKGROUND**

The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates, the top 1000 listed companies by market capitalization, to include Business Responsibility Report (“BR Report”) in their Annual Report describing the initiatives taken by the Company from an Environmental, Social and Governance perspective in the format specified by the SEBI.

Nazara Technologies Limited (“the Company”) being one of the top five hundred listed companies as on March 31, 2021, has approved and adopted this policy at its Board meeting held on May 28, 2021.

## **2. SCOPE AND PURPOSE**

Being a public listed company, the Company recognizes that its accountability is limited not only to its investors from a financial perspective but also to the larger society and hence, this Policy on Business Responsibility (“Policy”) lays down the broad principles to guide the Company in delivering its various responsibilities to its stakeholders.

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 a Company. The Policy is intended to ensure that the Company adopts responsible business practices in the interest of the social set up and the environment to contribute beyond financial and operational performance.

## **3. APPLICABILITY**

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

## **4. EFFECTIVE DATE**

This Policy shall be effective from May 28, 2021.

## **5. POLICY**

The 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.

The Company shall conduct its business practices / activities in alignment with the following nine principles as laid down in National Voluntary Guidelines on Social, Environmental and Economic responsibilities of a Business published by the Ministry of Corporate Affairs.

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

- i. The Company shall develop necessary governance structures, procedures and practices to ensure ethical conduct at all levels; and promote the adoption of this principle across its value chain.
- ii. The Company shall communicate transparently and ensure access to information about its decisions to relevant stakeholders.
- iii. The Company shall not engage in practices that are abusive, corrupt, or anti-competitive.
- iv. The Company shall truthfully discharge its responsibility on financial and other mandatory disclosures.
- v. The Company shall ensure that genuine concerns of misconduct/unlawful conduct is reported in a responsible and confidential manner through its Vigil Mechanism.

The above principle is also enshrined in the various policies laid down by the Company from time to time including the Code to regulate, monitor and report trading by Insiders in the Company's securities.

## **Principle 2: Safety and Sustainability of Goods and Services**

- i. The Company shall ensure that its services are delivered through optimal use of resources and shall comply with all applicable laws.
- ii. The Company shall work towards safe and optimal utilization of resources over the life cycle of its products and services – from design to disposal – and ensure that everyone connected with it -designers, producers, customers and recyclers are aware of their responsibilities.
- iii. In designing the product, the Company shall ensure that the technologies required to produce it are resource efficient and sustainable.
- iv. The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
- v. The Company shall recognize and respect the rights of people who may be owners of traditional knowledge and other forms of intellectual property.
- vi. The Company shall recognize that over-consumption results in unsustainable exploitation of our planet's resources, and should therefore promote sustainable consumption, including recycling of resources.
- vii. The Company shall strive to upgrade the work culture and take such initiatives that work towards the conservation of the surrounding environment.

### **Principle 3: Well Being of all Employees**

- i. 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.
- ii. 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.
- iii. 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.
- iv. The Company shall take cognizance of the work-life balance of its employees. The Company shall provide facilities for the wellbeing of its employees including those with special needs.
- v. The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- vi. The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees. The Company shall comply with the statutory provisions with regard to health, safety and wellbeing of its employees.
- vii. 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.
- viii. The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- ix. 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
- x. The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

#### **Principle 4 : Protection of Stakeholders' Interest**

- i. The Company shall systematically identify their stakeholders, understand their concerns, define its purpose and scope of engagement, and commit to engaging with them.
- ii. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
- iii. 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.
- iv. The Company shall give special attention to stakeholders in areas that are underdeveloped. The Company's CSR policy drives initiatives towards the promoting education, community healthcare and livelihood support program. 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.
- v. The Company shall resolve differences with stakeholders in a just, fair and equitable manner. The grievance redressal and the feedback mechanism available for shareholders and customers to assess the services levels and other complaints shall follow the spirit laid down herein.

#### **Principle 5 : Respecting and Promoting Human Rights**

- i. 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.
- ii. 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.
- iii. 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 shareholders, investors and public at large. The Company shall strive to abide with the aforesaid principle and discourage violating practices by any third party to the extent possible.
- iv. The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.

## **Principle 6 : Respecting, Protecting and Restoring the Environment**

- i. Though the very nature of the businesses of the Company has limited impact on environment, the Company shall continuously aim to reduce even the limited impact on the environment by identifying ways to optimise resource consumption in its operations.
- ii. The Company shall also seek to improve its environmental performance by adopting energy efficient and environmental friendly technologies. Suitable processes and systems may be developed with contingency plans and processes that help in preventing, mitigating and controlling environmental damages caused due to the Company's operations. Wherever possible, the Company shall be involved in proactive persuasion and support to the value chain extended for adoption of this principle.
- iii. The Company shall facilitate and adhere to the principle of respecting, protecting and restoring the environment. The Company shall promote ecological sustainability and green initiatives by adopting energy saving mechanisms, sensitizing employees to reduce the carbon footprint of the Company.
- iv. The Company shall comply with environmental legislations, regulations and other requirements.
- v. The Company shall provide on-going training to bring about a culture of environmental protection as a core value and involve all employees in achieving the above and review environmental performance periodically for adequacy and suitability.

## **Principle 7 : Responsibility towards Public and Regulatory Policy**

- i. The Company shall strive to operate within the specified legislative and policy frameworks prescribed by the Government, which guide its growth and also provide for certain desirable restrictions and boundaries.
- ii. The Company, while pursuing policy advocacy, shall preserve and expand public good and shall not advocate any policy changes to benefit the Company or select few alone.
- iii. The Company shall strive to perform the function of policy advocacy in a transparent and responsible manner while engaging with all the authorities and shall take into account the Company's as well as the larger national interest.
- iv. To the extent possible, the Company shall utilize the trade and industry chambers and associations and other such collective platforms to undertake such policy advocacy.

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

- i. The Company shall understand their impact on social and economic development and respond through appropriate action to minimise the negative impacts.
- ii. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of society.
- iii. The Company shall make efforts to complement and support the development priorities at local and national levels and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
- iv. The Company shall be sensitive to the local concerns while operating in regions that are underdeveloped.
- v. The Company shall be guided by its Corporate Social Responsibility Policy for inclusive growth and equitable development.

### **Principle 9 : Engaging and Enriching Customer / Consumer Value**

- i. The Company shall take into account the overall well-being of the customers and that of society.
- ii. The Company shall promote products / services in ways that do not mislead or confuse the customers.
- iii. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.
- iv. The Company shall also educate their customers on the safe and responsible usage of their products and services.
- v. The Company shall obtain feedback from the customers for further improvement.

## **6. DISCLOSURES**

This Policy shall be appropriately communicated across all levels and shall be appropriately disclosed in the Annual Report and on the website of the Company.

The Company shall ensure that all Principles are followed in compliance with all applicable laws.

The Company shall proactively persuade its business partners and third parties with whom it conducts business to abide by the principles contained in this Policy.

## **7. IMPLEMENTATION**

The Managing Director of the Company shall have the authority to oversee the implementation of this Policy. He shall be responsible for, providing clarifications on the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment, etc.

In view hereof:

Mr. Nitish Mittersain, Joint Managing Director is nominated as the Director responsible for implementation of the Business Responsibility initiatives and implementation of this Policy.

Mr. Nitish Mittersain, is nominated as the Business Responsibility (BR) Head.

Any grievances/ complaints with respect to violation of this Policy shall be reported to the BR Head.

## **8. 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 or such other person / committee authorised by the Board may review the Policy from time to time as may be required, subject, however, to the condition that such alterations shall not be inconsistent with any provision of any law for the time being in force. Changes, if any, shall be effective only upon approval by the Board.