

K.P. ENERGY LIMITED

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORTING POLICY

TABLE OF CONTENTS

Sr. No.	Particulars	Page Nos.
1	Background and Scope	3
2	Objective	3
3	Guiding Principles	3
4	Policy Amendments	10

1. BACKGROUND & SCOPE:

This Policy is based on principles laid down in the National Voluntary Guidelines 'NVG' on Social, Environmental and Economic responsibilities of a Business published by the Ministry of Corporate Affairs and towards conducting business by a Company and further confirm to the Principles and Guidelines prescribed under National Guidelines on Responsible Business Conduct.

For sustainable development, the management of the K.P. Energy Limited and any of its subsidiary/wholly owned subsidiary, whether existing or proposed to be incorporated as subsidiary/wholly owned subsidiary (collectively defined as the 'Company') are committed to address the needs of all of the Company's stakeholders, including customers, investors, lenders, deposit holders, and society at large, in order to achieve an appropriate balance between economic, social, and environmental performance. Depending on their ability and resources, the company will make all reasonable efforts to persuade its associates and other participants in the value chain to join the business responsibility initiatives.

2. OBJECTIVE

The key objective of this Policy is to ensure a unified and common approach to the dimensions of Business Responsibility across the Company and act as a strategic driver that will help the Company to respond the complexities and challenges that keep emerging and be abreast with changes in regulations. Furthermore, this policy provides guidelines for common understanding and ensure adherence of Business Responsibility and Sustainability Reporting ("BRSR") in the Company.

3. GUIDING PRINCIPLES

A. PRINCIPLE-1 - TO CONDUCT BUSINESS AND GOVERN THEMSELVES WITH ETHICS, TRANSPARENCY AND ACCOUNTABILITY:

- (i) The Company has developed Code of Conduct for directors, management and employees at all levels will abide to ensure good governance, ethical practices, transparency and accountability in conducting affairs of the Company and dealing with stakeholders across the value chain.
- (ii) The Company will conduct periodic training programmes on awareness of code of conduct among its employees and stakeholders.

- (iii) The directors, management and employees of the Company will report their compliance to the policy.
- (iv) In the Annual report of the Company sent to shareholders, the Whole Time Director will certify compliance of the Company's code of conduct by directors and senior management.
- (v) KPI will promptly post on its websites information regarding quarterly, half yearly and annual financial results / statements (standalone as well as consolidated) of the Company and its subsidiaries at regular intervals, Notices of general meetings, Intimations of 'Record-date', Annual Reports, shareholding patterns and such other information as per Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and provisions of the Companies Act in such manner that the same is easily accessible to the investors of the Companies. The website will be updated regularly from time to time.
- (vi) None of the companies will engage in practices that are abusive, corrupt, or anti-competitive.
- (vii) The Company 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 secretarial@kpgroup.co for investor correspondence.

B. PRINCIPLE-2 - TO PROVIDE GOODS AND SERVICES THAT ARE SAFE AND CONTRIBUTE TO SUSTAINABILITY THROUGHOUT THEIR LIFE CYCLE:

Our Sustainability Policy at KPI integrates economic progress, social responsibility, and environmental concerns to improve quality of life. KPI believes in integrating our business values and operations in order to meet the expectations of our customers, employees, partners, investors, communities, and the general public.

- (i) The Company will uphold the values of honesty, partnership and fairness in its relationship with stakeholders.
- (ii) The Company shall provide and maintain a clean, healthy and safe working environment for employees, customers, partners and the community.

- (iii) The Company will strive to consistently enhance its value proposition to the customers and adhere to its promised standards of service delivery.
- (iv) The Company 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) The Company shall encourage and support its partners to adopt responsible business policies, Business Ethics and our Code of Conduct Standards.
- (vi) The Company 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 Company's 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.

The Company 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.

The Company management will commit all the necessary resources required to meet the goals of Corporate Sustainability.

C. PRINCIPLE-3 - TO PROMOTE WELL-BEING OF ALL EMPLOYEES:

The Company always 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) The Company will provide equal opportunity to all employees starting from their recruitment irrespective of their caste, creed, gender, race, religion, and language. The employees of the Company can belong to any part of the country and will be selected based on individual merit without any discrimination or preference.
- (ii) The Company will also formulate schemes and policies to address health, superannuation issues and welfare needs of employees and their families.

- (iii) The Company will provide workplace environment that is safe, hygienic and which upholds the dignity of the employee.
- (iv) The Company will ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities on equal and non-discriminatory basis.
- (v) The Company will also provide continuous training to its employees for personal and professional skill developments.
- (vi) The Company will promote employee morale and career development through various HR policies.
- (vii) The Company 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) The Company will not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- (ix) The Company will take cognizance of the work-life balance of its employees, especially that of women.
- (x) The Company focuses on learning and development, to enhance the knowledge & skill and preparing its people to face challenges.

D. PRINCIPLE - 4 - TO RESPECT THE INTEREST OF AND BE RESPONSIVE TOWARDS ALL STAKEHOLDERS, ESPECIALLY THOSE WHO ARE DISADVANTAGED, VULNERABLE AND MARGINALISED:

The Company's key stakeholders include employees, suppliers, customers, business associates, investors, regulatory agencies and local communities around its sites of operations. Our Investors comprise of shareholders (including Institutional Investors).

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

The Company has continuous engagement with its various stakeholders to understand their concerns and assess their requirements and respond to their needs in an effective manner.

- (i) The Company endeavors 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) The Company, through its CSR arm – KP Human Development Foundation focuses on catering to the needs of common people and especially of marginalised group.
- (iii) To undertake several initiatives to engage with and ensure sustainable development of the marginalised groups in the local communities around its sites of operations.
- (iv) The employees of the Company/ KP Human Development Foundation will offer assistance, encouragement and service to the customers in fair, equitable and consistent manner.

E. PRINCIPLE-5 - TO RESPECT AND PROMOTE HUMAN RIGHTS:

The Company is dedicated to upholding fundamental human rights in alignment with the legitimate role of business. Our approach involves adhering to corporate business policies and complying with relevant laws, including internationally recognized human rights as outlined in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

The following guidelines shall be observed by the Company in its business processes:

- (i) Conduct business in a manner that respects the rights and dignity of all people, complying with all legal requirements.
- (ii) Recognise our responsibility to respect human rights and avoid complicity in human rights abuses.
- (iii) Treat everyone who works for the Company 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) The Company 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. The Company's policies strive to percolate these values at all levels in the organisation.

F. PRINCIPLE-6 - TO RESPECT AND MAKE EFFORT TO PROTECT AND RESTORE THE ENVIRONMENT:

We at KPI are aware of the responsibility attached to our business operations and their subsequent effects on the environment and society at large. We make an effort to maximise positive contributions while minimising any negative effects. We are committed to protecting and restoring the environment.

- (i) The Company's governance and control mechanisms are designed to address applicable environment regulatory and compliance requirements for all sites across and all stages of its life cycle from establishment to closure.
- (ii) The Company implements best practices with respect to water management, waste management, emissions, climate change mitigation, protection of biodiversity and ecosystem across the value chain.
- (iii) As a company in the renewable energy business, we are committed to reducing our energy consumption and increasing the use of renewable energy sources. We prioritize renewable energy for our own operations as we understand the value of its by bringing in contributing to green energy. Additionally, we encourage our clients to adopt renewable energy and help in promoting a sustainable future.
- (iv) The Company will strive to establish business practices that utilize resources in an optimal manner by integrating sustainability principles like reduce, reuse, recycle, recover and replenish (5R) into all aspects of our business.
- (v) The Company communicates openly with all key stakeholders including suppliers, service providers, contractors and key business partners for improving environment, health and safety performances.

- (vi) The Company endeavors to enhance the awareness of environment conservation amongst the community through its Corporate Social Responsibility (CSR) initiatives.

G. PRINCIPLE-7 - BUSINESSES, WHEN ENGAGED IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A RESPONSIBLE MANNER

The Company is committed to adhere to the social, environmental, and economic guidelines set by regulators and legislative bodies. At KPI, we are dedicated to upholding ethical standards and values such as equity, integrity, and transparency in all aspects of our operations.

- (i) Our ethical approach ensures that the Company remains unbiased, transparent, and refrains from engaging in any activities that could negatively impact the nation's interests or have adverse social consequences.
- (ii) The Company actively collaborates with trade associations to establish higher industry standards and exchange best practices. Additionally, we actively contribute to public policy discussions to share our industry perspective and expertise.

H. PRINCIPLE-8 - BUSINESSES SHOULD SUPPORT INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

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

CSR Vision is to make the world a healthier place by reducing carbon footprints and improving the quality of life through CSR initiatives. The company has developed a 'Corporate Social Responsibility (CSR)' policy to promote a sense of responsibility and contribution, which is benefit to the various groups of people such as unprivileged children, women, senior citizens, etc. We define Corporate Social Responsibility as a company's approach to balancing economic, social, and environmental goals while meeting stakeholder expectations and increasing shareholder value.

I. **PRINCIPLE-9 - BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CUSTOMERS AND CONSUMERS IN A RESPONSIBLE MANNER**

The company is committed to provide value to our customers in a responsible and sustainable manner, while maintaining high standards of ethical conduct in all our business activities.

Customer satisfaction is the key to our growth and success in this line of business. The Company strives hard to provide better services to customers at large.

- i. The Company will serve the needs of its customers taking into account the overall well-being of the customers and that of society.
- ii. The Company will promote and advertise its services in ways that do not mislead or confuse the clients or violate any of the principles in this policy.
- iii. The Company 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.
- iv. The Company will maintain privacy of consumer's confidential data in the normal course of its business.

4. **POLICY AMENDMENTS**

Any subsequent amendment / modification in the Listing Regulations, NVGs and / or other laws in this regard shall automatically apply to these Policy. The same shall be added / amended / modified from time to time. The Board is authorized to amend or modify the Business Responsibility Policy, in whole or in part, from time to time.
