



RUBAMIN

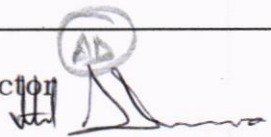
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ESG Policy

Group refers to the Rubamin Private Ltd and its subsidiaries in this document. This policy is meant exclusively for the perusal of, and strictly for circulation within, the Rubamin Private Ltd and its subsidiaries.

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Policy Title	ESG Policy
Employee Value Proposition	Guideline and General Principles
Applicability	This policy is applicable to all employees, Business Partners, Service Partners, Suppliers and Network of Suppliers working with Rubamin Private Limited
Originator and Contact Information	ESG (sustainability@rubamin.com)
Effective Date	September 1, 2023
Prepared by	ESG Department
Approved by	Chairman & Managing Director 

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1. OBJECTIVE

Rubamin Private Limited (hereinafter referred to as “RPL” or “Company” or “We”) strongly believes that incorporating Environmental, Social, and Governance (ESG) principles is essential for building resilient companies and assets that generate lasting value for our investors. This ESG Policy provides a comprehensive overview of how we approach ESG across our organization. Additionally, certain business units maintain their individual ESG policies, which are in harmony with this overarching policy and tailored to their specific investment strategies.

To align with our business strategy, we establish ESG objectives that are shaped by input from our stakeholders. These objectives gain approval and support from our senior management and board of directors. Annually, we monitor data and our progress to provide reports on the results of our initiatives across our corporate operations and global portfolio, focusing on the three dimensions of ESG.

2. SCOPE

This policy applies to all companies of the Group, as well as to all entities not belonging to the Group but over which the Company has effective control, within the limits established by law.

Without prejudice to the provisions of the preceding paragraph, all companies of the Group and their subsidiaries, based on their own special framework of strengthened autonomy, may establish an equivalent policy, which must be in accordance with the principles set forth in this Policy and in the other environmental, social, and corporate governance and regulatory compliance policies of the Governance and Sustainability System.

3. ENVIRONMENTAL STEWARDSHIP

Our environmental commitments are a testament to our unwavering dedication to safeguarding the planet and its natural resources. These commitments guide our actions, as we strive to reduce our ecological footprint, adopt sustainable practices, and contribute to a healthier and more sustainable world. In addition, we are firmly committed to the continual improvement of the environmental management system to enhance environmental performance, making this commitment an integral part of our environmental stewardship.

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- Identifying, measuring, and offsetting the environmental impact of our global operations. We pursue higher-than-required standards in our carbon footprint calculations and offset all our emissions, ranging from client travel to electricity usage and waste generation. We use a variety of methods to identify and measure our environmental impact, including carbon footprint calculations, water usage assessments, and waste audits. We are committed to reducing our environmental impact even further, and we are constantly looking for new ways to do the same.
- Seeking to minimize pollution and use natural resources sustainably. We strive for sustainable usage of natural air, water, and land resources, while ensuring minimal impact on the quality of these resources.
- We continuously strive to optimize resource use, minimize waste, and reduce our carbon footprint. We prioritize the efficient use of resources and promote the circular economy.
- We are dedicated to preventing pollution and minimizing emissions throughout our operations. We implement state-of-the-art technologies and practices to ensure the responsible handling of chemicals.
- We invest in research and development to advance sustainable chemical recycling processes and technologies. Our goal is to contribute to a greener and more sustainable future.
- We are committed to conserving biodiversity in the areas where we operate. We take steps to protect local ecosystems, support habitat restoration, and prevent harm to wildlife.
- Maintaining full compliance with applicable environmental laws, regulations, and other obligations. On certain issues where we have more stringent internal requirements, we operate to even higher standards than what is required by law helping clients become better environmental stewards. We also strive to help our corporate clients be better stewards of the environment—integrating sustainability goals and priorities into their core strategy and operations, designing "greener" supply chains, and meeting the needs of a range of stakeholders, including suppliers, employees, and community members.

4. ENERGY EFFICIENCY MEASURES

- Minimize the environmental impact and carbon footprint of our operations through the efficient use of energy resources, aiming for optimal energy efficiency.

- Increase the adoption of renewable energy sources and low-emission technologies to work toward achieving carbon neutrality in our operations.
- Install renewable energy solutions, such as solar panels, at our sites and corporate locations to offset grid electricity consumption.
- Prioritize the purchase of Energy Star rated equipment and appliances wherever feasible in our facilities to reduce energy consumption.
- Utilize energy-efficient lighting solutions like T5 or LED lights throughout our facilities to reduce electricity consumption.
- We assess the environmental impact of our products and services, including their energy use and emissions. We seek opportunities to improve product sustainability and reduce associated environmental impacts.
- Opting for energy-efficient Air Conditioning systems, such as Variable Refrigerant Volume, in all upcoming sites and consider upgrades for existing facilities.
- Maintain indoor temperatures at levels that promote energy efficiency while ensuring employee comfort.
- Foster awareness of energy conservation practices among our employees through digital communication channels.

5. WATER POLLUTION

- Use water efficiently across value chain through setting short term and long-term water intensity targets.
- Enable water quality checks at every point of use, with zero deviation towards detrimental effects.
- Periodically review the quality and availability of water – from traditional and non-traditional resources – to ensure that our water supply requirements are met in the short, medium, and long term.
- Strive towards water positivity through continual reduction in water intensity by focusing on water conservation, optimising by technological intervention and waste-water treatment in the direct production of our products.
- Monitor, track, asses monthly/annual water consumption and make strategies to Recover, Reduce, Recycle and Reuse the wastewater.

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- Taking cognizant efforts to replenish ground water through rainwater recharge within our operational locations.
- Assessing water use across our operations and evaluating its detrimental water related risks and impacts on ecosystem.
- Raise awareness of our collective impact on water resources, and educate our consumers, employees, suppliers, and other stakeholders.
- Benchmark with national and international water standards & adopt best practices.

6. WASTE MANAGEMENT

- Rubamin is committed to maximizing the use of waste materials as valuable raw resources. We prioritize waste-to-product conversion, minimizing the generation of waste materials within our processes.
- Our goal is to minimize waste generation in all aspects of our operations. We implement efficient processes and technologies to reduce waste to the greatest extent possible.
- We actively promote recycling and reuse of waste materials within our facilities. All recyclable materials are sorted, processed, and reintroduced into our production processes wherever feasible.
- When waste disposal is necessary, we ensure that it is done in full compliance with local, regional, and national regulations. We utilize approved waste disposal methods and partners to responsibly manage any residual waste.
- In cases where hazardous waste is generated, we adhere to strict handling, storage, and disposal procedures as mandated by relevant laws and regulations.
- We regularly review and update our waste management practices to adopt innovative technologies and strategies that further reduce waste and enhance resource efficiency.
- We provide comprehensive training to all employees regarding proper waste handling, segregation, and disposal practices to ensure compliance with our waste management policies.
- We work closely with suppliers to minimize packaging waste and to encourage the responsible management of waste materials within our supply chain.

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- **Waste Receipt:** We have established efficient and accountable procedures for waste receipt, ensuring that waste materials are appropriately documented, received, and managed.
- **Waste Storage:** Our waste management policy includes stringent protocols for waste storage, with a focus on segregation, containment, and proper labelling to minimize environmental impact and ensure worker safety.
- **Waste Handling:** We implement safe and responsible waste handling practices, adhering to industry best standards. This includes the use of suitable equipment and trained personnel to minimize risks and prevent pollution. We are committed to decontamination procedures that reduce the hazardous nature of waste materials and promote safe handling and disposal.
- We actively engage with local communities to address any concerns related to waste management. We are committed to being a responsible and responsive member of the communities in which we operate.
- We strictly adhere to all relevant waste management laws, regulations, and permits. Our operations are designed to meet or exceed these regulatory requirements.

7. BIODIVERSITY POLICY

To implement its commitment to biodiversity, the Group shall be guided by the following main principles of conduct, which apply to all its activities and businesses:

- Integrate biodiversity in internal strategic and decision-making processes of the Group, as well as in the analysis, management and reporting of long-term risks;
- Identify, quantify and assess, on an ongoing basis and throughout the life cycle of the facilities, the impacts and dependencies of the Group's activities on natural capital, including diversity and the protection of wild animals and protected and vulnerable species, fostering respect for them in all lines of conduct;
- Avoid locating new infrastructure projects in spaces that are protected due to their ecological, biological, cultural and/or landscape value or areas catalogued as having high value for biodiversity;
- Manage and compensate in quantity and quality the negative impacts produced on the environment, giving priority to solutions based on

nature, facilitating the connectivity of populations and encouraging the development of special protection or private conservation areas;

- Develop plans for monitoring flora and fauna, especially protected or vulnerable species, so that the interaction of infrastructure with the environment can be continuously assessed;
- Promote biodiversity awareness and training for the Group’s professionals as well as for subcontracted personnel and that of its suppliers; and
- Report on the biodiversity actions of the Group, the presence of facilities in protected areas, and research, preservation, education and awareness-raising actions, periodically publishing a biodiversity report.
- Protect biodiversity and make sustainable use of natural capital by adopting a hierarchy of conservation, integrating best practices throughout the life cycle in the management thereof and promoting actions for the regeneration and conservation of natural heritage;
- Continuously identify, quantify and assess throughout the life cycle of the facilities, the impacts and dependencies of the Group’s activities on natural capital, with a focus on biodiversity, through the promotion of research and improving understanding of the ecosystems of the environments of the territories in which it operates;
- Partnering with Stakeholders, considering their biodiversity needs and expectations, and participating in projects for the enhancement of biodiversity and the protection of and respect for animals; and
- Highlighting and raising awareness of the importance of biodiversity protection and conservation through training, internal and external education, awards, publications, and sponsorship, and internal and external communication of the impact of the Group’s activities in this area.

8. SOCIAL RESPONSIBILITY

The safety and well-being of our employees, contractors, and the communities in which we operate are of paramount importance to us. Our commitment to social responsibility includes:

- We maintain a strong focus on occupational safety. Our safety protocols encompass rigorous training, the provision of personal protective equipment, and the continuous improvement of safety procedures. We also conduct regular safety drills and risk assessments to identify and mitigate potential hazards.
- Beyond our workforce, we prioritize the well-being of the communities in which we operate. We have emergency response plans in place to address any incidents that may affect the safety of local residents.

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Additionally, we engage in ongoing dialogue with communities to address any concerns and ensure open lines of communication.

- We actively invest in community development projects that align with our expertise and resources. This includes supporting education, healthcare, infrastructure, and local economic development, fostering a sense of partnership with the communities we serve.
- We are committed to fostering a workforce that is diverse in terms of gender, race, ethnicity, and other attributes. We actively seek to create an inclusive environment where all employees are treated with respect and have equal opportunities for professional growth and advancement.
- Our hiring and promotion processes are designed to ensure equal opportunity for all employees, free from discrimination or bias.

9. OCCUPATIONAL HEALTH AND SAFETY POLICY (OHS POLICY)

The management of Rubamin Private Limited is committed to

- Safeguard all employees including contract employees and all stakeholders by minimizing the adverse effects arising from our manufacturing, recycling, and its related activities.
- Comply applicable statutory, necessary standards and other requirements related with Occupational Health and Safety.
- Continual improvements in the OHS by carrying out risk assessment of all routine & non-routine activities and accordingly applying control measures.
- Monitoring the Health of all employees through pre-employment and periodical medical check-up.
- Committed to fulfilment of Safety and health needs & expectation of workers and other interested parties.
- Committed to consultation and participation of workers or their representative in OHS matters.

The company shall do arrangement for Information, Education, Training and Retraining to all employees and interested parties including Contractors, Sub-contractors, transporters, other agencies, and the Public as necessary about Safe work practices, associated Hazards & control measures, use of personal protective equipment, Emergency preparedness etc.

The company shall give due importance to OHS aspects in all decisions making including new projects, purchase of equipment, plant machinery &

material selection etc and HSE performance of individuals in their career advancement.

Unit shall review OHS performance and prepare relevant objectives & targets periodically.

The OHS policy and OHS performance shall be reviewed periodically and prepared relevant targes, which will be communicated to all employees, people and interested parties.

10. DIVERSITY, EQUALITY, AND INCLUSIVITY

At Rubamin, we are firmly committed to fostering a workplace that thrives on equality, embraces diversity, and champions inclusivity. Our policy framework is succinctly defined as follows:

- We provide equal opportunities for all employees, irrespective of their background, race, gender, religion, age, disability, or sexual orientation. Discrimination of any form will not be tolerated.
- We actively seek diversity in our workforce, valuing the unique perspectives and experiences that individuals from various backgrounds bring to the table. We encourage diversity in recruitment, promotion, and leadership roles.
- We cultivate an inclusive culture where every voice is heard and respected. We create an environment where employees feel comfortable expressing themselves, contributing ideas, and being their authentic selves.
- We provide training and awareness programs to educate our employees on the importance of diversity and inclusivity. This includes addressing unconscious biases and fostering cultural competence.
- We ensure that our compensation and benefits are fair and equitable, based on skills, qualifications, and performance, without any bias.
- We make reasonable accommodations to ensure that employees with disabilities can perform their jobs effectively. Our facilities and resources are accessible to all.
- We have a zero-tolerance policy for discrimination, harassment, or any form of prejudicial behaviour. We provide clear channels for reporting such incidents and ensure swift action is taken.

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- We are committed to continually improving our diversity and inclusion initiatives, seeking feedback from our employees, and adapting our policies to create a more inclusive workplace.

11. COMMUNITY RELATIONS

At Rubamin, we are guided by our commitment to Corporate Social Responsibility (CSR). Our mission is to enhance the well-being of marginalized communities in our region through purposeful collaborations with non-governmental organizations. Our CSR efforts are centered on delivering concrete benefits to those in need, emphasizing education, life skills, and vocational training to promote financial independence among the underprivileged.

In alignment with our CSR policy, we are equally dedicated to promoting environmental sustainability and engaging our employees in community-building initiatives. We consider our employees as active partners in our endeavour to uplift under-resourced communities, and we wholeheartedly encourage their involvement in various outreach programs.

Our aim is to create enduring value not only for our company but also for the communities we serve, fostering positive change and sustainable progress for all.

12. STAKEHOLDER ENGAGEMENT POLICY

At Rubamin, we are committed to recognizing and respecting the interests and concerns of our stakeholders. Our stakeholder policy is built on the following principles:

- We actively engage with our stakeholders, including customers, employees, suppliers, investors, and the communities in which we operate. We seek to understand their perspectives, needs, and expectations.
- We provide clear and accurate information to our stakeholders regarding our business practices, performance, and decision-making processes. Open communication is a cornerstone of our relationships.
- We treat all stakeholders fairly and equitably, without discrimination or bias. We ensure that our interactions are based on honesty, integrity, and ethical conduct.

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- We take prompt and appropriate action to address stakeholder concerns and feedback. We are committed to continuous improvement in response to their input.
- We consider the long-term impact of our actions on stakeholders and strive to make decisions that contribute positively to their well-being and the sustainability of our business.
- We adhere to all relevant laws and regulations that pertain to our interactions with stakeholders. We also respect industry standards and best practices.
- We hold ourselves accountable for the commitments and promises we make to our stakeholders. We take ownership of our actions and their consequences.
- Our stakeholder policy guides our interactions and relationships, ensuring that we uphold our responsibilities to all parties involved and work collaboratively to achieve shared goals and mutual benefit.

13. GOOD GOVERNANCE

We actively engage with our stakeholders, including shareholders, employees, customers, and the communities in which we operate. We value their input and strive to address their concerns and expectations.

- Our Board of Directors is composed of a diverse group of individuals with varied backgrounds and expertise. We prioritize the inclusion of independent directors to ensure impartial decision-making and oversight.
- We have a comprehensive code of conduct in place that outlines expected ethical behaviour for all employees and stakeholders. This includes guidelines on issues such as conflicts of interest, anti-competitive practices, and compliance with laws and regulations.
- We maintain mechanisms for employees and stakeholders to report concerns or unethical behaviour, including a confidential whistleblower hotline. We ensure that whistleblowers are protected from retaliation.
- We have stringent anti-bribery and anti-corruption policies in place to prevent corrupt practices within our organization. This includes clear guidelines on gifts, entertainment, and interactions with government officials.

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- We take cybersecurity seriously and implement robust data protection measures to safeguard sensitive information. This includes encryption, intrusion detection systems, and regular security assessments.
- We engage with our stakeholders regularly through channels such as shareholder meetings, employee forums, customer surveys, and community meetings. This two-way communication allows us to understand their expectations, address concerns, and adapt our policies and practices accordingly.
- We provide avenues for stakeholders to provide feedback on our ESG performance and policies. This feedback helps us refine our strategies and make improvements where necessary.
- We maintain strict internal control procedures to ensure the accuracy and integrity of our financial reporting. This includes regular internal audits and controls to prevent financial irregularities.

Rubamin is unwavering in its commitment to Environmental Stewardship, Social Responsibility, and Good Governance. We believe that by adhering to these principles, we can contribute positively to society and the environment while achieving sustainable growth and long-term success as a chemical recycling company.

14. REVIEW

This Policy will be reviewed and updated whenever required and will also be hosted on the website of the Company.