Oriental Aromatics

Business Responsibility & Sustainability Reporting (BRSR) Policy

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Business Responsibility & Sustainability Reporting Policy

1. Purpose:

The Business Responsibility and Sustainability Reporting (BRSR) policy will promote transparency and accountability, serve as a tool to reduce Environment, Social and Governance (ESG) risks associated with the business, encourage us to engage with stakeholders to identify the key business impacts, leading to continuous improvement and better corporate governance.

This BRSR policy is based on principles laid down in the National Guidelines on Responsible Business Conduct (NGRBC) published by the Ministry of Corporate Affairs.

2. Effective Date:

Oriental Aromatics Limited (hereinafter referred as "the Company" or "Oriental Aromatics") has approved and adopted this BRSR Policy with effect from Financial year 2022- 23 and amended with effect 12th February, 2024.

3. Objective:

The main objective of the BRSR policy is to:

- Promote Transparency: Publicly reporting our sustainability and social responsibility efforts, will help build trust and credibility with stakeholders, including investors, customers, employees, and communities.

- Ensure Compliance: BRSR policy will ensure compliance with laws and regulations related to sustainability and social responsibility reporting. It will also prevent legal and reputational risks associated with non-compliance.

- Enhance stakeholder engagement: The policy will lay a roadmap for stakeholder engagement in their sustainability and social responsibility efforts. This can help build relationships with stakeholders, improve understanding of their needs and expectations, and identify opportunities for collaboration.

- Leading to continuous improvement: BRSR policy encourages the company to continuously improve their sustainability and social responsibility efforts by setting goals, measuring progress, and reporting on results.

4. 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 units, including its subsidiaries and stakeholders of the company including value chain partners. The policy shall be reviewed by the Board from time to time.

5. 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
IV. **"BRSR Policy"** means Business Responsibility and Sustainability Reporting 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.

6. ESG Materiality Assessment and Mitigation

To establish robust governance and operational frameworks for the effective management and mitigation of material ESG impacts and risks, Company is committed to systematically identify, assess, and mitigate the material ESG impacts inherent in the operations. Through proactive measuring of impacts, continuous monitoring, and stakeholder engagement, the Company aims to enhance its resilience to ESG challenges.

7. Implementation:

- Mr. Dharmil A. Bodani has been designated as the Head of the BRSR ("BRSR Head") for the purpose of this policy. BRSR Head shall be the highest executive authority in the organization who is responsible for the implementation and the highest authority responsible for oversight.

- The BRSR Head may take support of Mr. Parag Satoskar, CEO & Mr. Girish Khandelwal, CFO and such other functional heads and internal and external experts as he deems fit, for the effective implementation of the policy.

- The CSR Committee shall be responsible for reviewing, monitoring, and for oversight and decision-making on sustainability related issues.

- The CSR Committee shall work along with the ESG committee which shall assist the CSR Committee and shall be responsible for the purpose of implementation of Business Responsibility and Sustainability policy.

8. Disclosures:

The BRSR Policy shall be disclosed in the Annual Report and on the website of the Company i.e. www.orientalaromatics.com.

9. Policy Review and Amendments:

The BRSR 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 BRSR Policy must be consistent with the regulations and must be approved in the manner as may be decided by the Board of Directors.

10. Guiding Principles:

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 principles:

Policy 1: Ethics, Transparency and Accountability:

Policy 2: Sustainable and Safe Products, and Services:

Policy 3: Employee Well-Being:

Policy 4: Stakeholder Engagement:

Policy 5: Human Rights:

Policy 6: Preservation of Environment:

Policy 7: Responsible and Transparent Advocacy:

Policy 8: Inclusive Growth and Equitable Development:

Policy 9: Value to Consumer:

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.

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

a. Developing governance structures procedures and practices to ensure ethical conduct at all levels; and promote the adoption of this Principle across the value chain.

b. Communicating transparently and assuring access to information about the decisions that impact relevant stakeholders.

c. Not engaging in practices that are abusive, corrupt, or anti-competition.

d. Truthfully discharging responsibilities on financial and other mandatory disclosures.

e. Reporting on the status of the adoption of these Guidelines, as suggested in the reporting framework in this document.

f. Avoiding complicity with the actions of any third party that violates any of the principles contained in these Guidelines.

The Company has the following policies that support the Company's initiatives to conduct its business ethically and transparently:

1. Code of Conduct for Directors/Senior Management Personnel
2. Anti-Bribery & Anti-Corruption Policy
3. Policy on Vigil Mechanism
4. Policy on Materiality of Related Party Transaction
5. Code of conduct for prevention of Insider Trading
6. Policy on Diversity of Board of Directors
7. Nomination and Remuneration Policy
8. Risk Management Policy

Grievance Redressal:

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

Responsible authority	Contact details
Chief Financial Officer	Mr. Girish Khandelwal girish@orientalaromatics.com
Company Secretary	Ms. Kiranpreet Gill cs@orientalaromatics.com

Policy 2: Sustainable and Safe Products, and Services:

Oriental Aromatics endeavours to embed the principles of sustainability and safety 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.

In pursuit of the sustainable and safe products and services policy the company is committed to work towards the following:

a. 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.
b. Company's Sustainable Procurement Policy communicate the expectations and position with respect to the sustainable way of sourcing of our input materials. The Policy elevates partnership and improves the communication with our Vendors.

c. Hazardous Identification and Risk Assessment are done at company level to identify the hazards and risk to mitigate the risk and establish a safe and sustainable way to do business.

d. 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.

e. Ensuring that the product design considers resource efficiency and principles of sustainability in the manufacturing processes.

f. Company had adopted 3R (Reduce, Reuse and Recycle) principle to make better use of resources and reduce the use of newer resources and energy.

g. Safe disposal of Waste as per the standard and mandatory norms.

h. Conducting regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.

i. Recognizing and respecting the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.

j. Recognizing that over-consumption results in unsustainable exploitation of our planet's resources, and therefore to promote sustainable consumption including recycling of resources.

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The Company has the following policies in place that helps in Sustainable sourcing:

1. Sustainable Procurement Policy
2. Value Chain Partners and Communities Grievance Redressal policy

Grievance Redressal:

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the Procurement Head or Plant Head. The company has established procedures to redress grievances related to Value Chain Partners.

Responsible authority	Contact details
Ambernath Plant	Mr. Dharmil A. Bodani info@orientalaromatics.com
Vadodara Plant	Mr. Swapnil Borge swapnil@orientalaromatics.com
Bareilly Plant	Mr. Swapnil Borge swapnil@orientalaromatics.com

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.

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

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

b. 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.

c. Ensuring that there is no use of child labour, forced labour or any form of involuntary labour, paid or unpaid.

d. Taking cognizance of the work-life balance of its employees, especially that of women.

e. 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.

f. 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.

g. 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.

h. Creating systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

The Company has following policies that support the Company in ensuring the well-being of all its employees:

1. HR policy
2. Prevention of Sexual Harassment policy
3. Employee Grievance Mechanism

Grievance Redressal:

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the HR manager. The company has established and defined procedures to redress grievances related to Employees and workers.

Responsible authority	Contact details
HR Manager	Mr. Dhirendra Bachhav dhirendra@orientalaromatics.com

Policy 4: Stakeholder Engagement:

Oriental Aromatics considers its employees, customers, its associates, suppliers, shareholders/investors and communities surrounding 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.

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

a. Systematically identify stakeholders, understand their concerns, define purpose and scope of engagement, and commitment to engage with them.

b. Acknowledge and assume responsibility, be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.

c. Give special attention to the perspectives and needs of different stakeholders depending on their vulnerability.

d. Resolve differences with stakeholders in a just, fair and equitable manner.

Grievance Redressal:

Any grievances/complaints with respect to non-compliance with the Policy shall be reported to the plant head for all locations and for corporate office location shall be reported to HR manager. The company has established and defined procedures for each stakeholder to redress grievances in the Grievance Redressal Mechanism section of the BRSR policy.

Responsible authority	Contact details
For OAL Registered Office : HR Manager	Mr. Dhirendra Bacchav dhirendra@orientalaromatics.com
Plant Locations: Factory Manager	Ambernath : jignesh@orientalaromatics.com Bareilly: jpathak@orientalaromatics.com Vadodara: jigar_patel@orientalaromatics.com

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.

The company firmly believes in the following:

a. 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.

b. 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.

c. 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.

d. Promoting within the sphere of our influence, the awareness and realization of human rights across the value chain.

e. Not being complicit with human rights abuses by a third party.

The Company has following policies that promotes human rights for all individuals:

1. Human Rights policy
2. Equal Employment Opportunity policy

Grievance Redressal:

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the HR manager. The company has established and defined internal procedures to redress grievances related to Employees and workers.

Responsible authority	Contact details
HR Manager	Mr. Dhirendra Bachhav dhirendra@orientalaromatics.com

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.

The Environmental Policy is built around the following:

a. **Reduce, reuse, and recycle** - Utilizing natural and manmade resources in an optimal and responsible manner and ensuring the sustainability of resources by reducing, reusing, recycling and managing waste.

b. **Use energy efficiently-** 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. Strive to reduce energy consumption and greenhouse gas emissions in all aspects of business operations.

c. **Conserve water-** Ensure efficient use of water and reduce wastewater discharge at all manufacturing sites.

d. **Abatement of pollution-** 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.

e. 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.

f. Reporting our environmental performance, including the assessment of potential environmental risks associated with the operations, to the stakeholders in a fair and transparent manner.

g. Educate and raise awareness. Ensuring that the technological knowhow and traditional knowledge are shared equitably.

h. Proactively persuading and supporting the value chain to adopt this policy.

Best procedures relating to environment protection is ensured through Company's EHS Policy.

Grievance Redressal:

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the Plant Head. The company has established procedures to redress grievances related to Value Chain Partners.

Responsible authority	Contact details
Chief R&D Officer	Ms. Anita P. Satoskar anita@orientalaromatics.com
Wholetime Director – Operations	Mr. Satishkumar Ray satish.ray@orientalaromatics.com

Policy 7: Responsible and Transparent 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.

The Company aims at doing the following:

a. Ensuring that while pursuing policy advocacy, our advocacy positions are consistent with these Principles and core elements contained in the Guidelines.

b. Utilizing to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.

c. Company works to make sure that every decision is made in a way that is open and accountable, and that there is no room for abuse.

Grievance Redressal:

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

Responsible authority	Contact details
Chief Financial Officer	Mr. Girish Khandelwal girish@orientalaromatics.com
Company Secretary	Ms. Kiranpreet Gill cs@orientalaromatics.com

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 like the Keshavlal V. Bodani Education Foundation. The Foundation undertakes the promotion of educational facilities for the students having learning disabilities.

In order to fulfil its commitment the Company aims at:

a. Understanding our impact on social and economic development and responding through appropriate action to minimise the negative impacts.

b. Innovating and investing in products, technologies and processes that promote the wellbeing of society.

c. 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.

d. Especially staying sensitive to local concerns, while operating in regions that are underdeveloped.

The following policies of the Company act as a force in encouraging community growth and development:

1. CSR policy
2. Value Chain Partners and Communities Grievance Redressal policy

Grievance Redressal:

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the CSR committee or Plant Head. The company has established procedures to redress grievances related to community impact.

Responsible authority	Contact details
CSR Committee - Chairman	Mr. Shyamal A. Bodani info@orientalaromatics.com

Policy 9: Value to Consumer :

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 flavour industry. The continued trust from our consumers and customers has helped us built a legacy over the years. We are guided by our deep insights into our consumers' 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.

a. 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.

b. Ensuring that we do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling our products.

c. 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.

d. Ensuring that promotion and advertisements of our products do not mislead or confuse the consumers or violate any of the principles in these Guidelines.

e. Exercising due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.

f. Providing adequate grievance handling mechanisms to address customer concerns and feedback.

Further in adherence to the BRSR Principle 9 (Businesses should engage with and provide value to their consumers in a responsible manner), The Company also has its Cyber Security & Data Privacy Policy in place which can be accessed at **IT Policy.**

The Cyber Security and Data Privacy policy helps in ensuring that the organization's data is safe from attacks from both internal and external theft/ breaches.

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Grievance Redressal:

Any grievances / complaints with respect to non-compliance with the Policy shall be reported to the below mentioned people. The company has established and defined internal procedures to address concerns and feedback from consumers in a timely manner.

Responsible authority	Contact details
For Customers	Mr. Parag Satoskar CEO parag@orientalaromatics.com Mr. Nitin Budhavalekar Sales Manager – Fragrance and Flavour nitin_budhavalekar@orientalaromatics.com Mr. Roopesh Anchan Vice President – Speciality Aroma Chemicals roopesh@orientalaromatics.com
For Cyber Security & Data Privacy	Mr. Ravi Misra IT Manager ravi@orientalaromatics.com

11. Grievance Redressal Mechanism

Oriental Aromatics Limited recognizes the significance of acknowledging stakeholders' grievances, and to ensure the resolution of all concerns, we have implemented mechanisms for reporting any issues or providing feedback related to our principles. The following channels have been established for our stakeholders to express and address their concerns:

Stakeholder	**Authority and Contact details for grievances**
Shareholders & Investors	Ms. Kiranpreet Gill Company Secretary cs@orientalaromatics.com
Employees and Workers	Mr. Dhirendra Bachhav HR Manager dhirendra@orientalaromatics.com
Community & Value Chain Partners	OAL Registered Office: dhirendra@orientalaromatics.com Plant Locations: Factory Manager Ambernath : jignesh@orientalaromatics.com Bareilly: jpathak@orientalaromatics.com Vadodara: jigar_patel@orientalaromatics.com
Customers	Mr. Parag Satoskar CEO parag@orientalaromatics.com Mr. Nitin Budhavalekar Sales Manager – Fragrance and Flavour nitin_budhavalekar@orientalaromatics.com Mr. Roopesh Anchan Vice President – Speciality Aroma Chemicals roopesh@orientalaromatics.com
Government authorities and regulatory bodies	Mr. Girish Khandelwal Chief Financial Officer girish@orientalaromatics.com Ms. Kiranpreet Gill Company Secretary cs@orientalaromatics.com

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Approved by the Board of Directors on 05th February, 2020
Amended as on 28th March, 2023
Amended as on 12th February, 2024

By Order of the Board of Directors
Sd/-
Dharmil A. Bodani
Chairman and Managing Director
DIN: 00618333