

Policy on Business Responsibility and Sustainability Policy

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1. Preamble

The Board of Directors of Transworld Shipping Lines Limited (Formerly known as Shreyas Shipping and Logistics Limited) ('the Company') has adopted this Policy on Business Responsibility and Sustainability Policy ('BRSR Policy' or 'Policy') in accordance with the requirements of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 which mandated Business Responsibility and Sustainability Reporting (BRSR) for top 1000 listed entities based on market capitalization (calculated as on March 31 of every financial year) with effect from FY 2022-23. This Policy enlists the initiatives required to be adopted from an environmental, social and governance perspective, in the format as specified by the SEBI Board.

This Policy lays down the Company's commitment to the nine principles laid down in the "National Guidelines on Responsibilities of Business Conduct ('NGRBC')" notified by Ministry of Corporate Affairs (MCA). The primary objective of the Policy is to align and ensure adherence of all business activities in line with the core NGRBC requirements of each principle.

This policy replaces the existing Business Responsibility Policy of the Company dated 25th May 2022.

2. Applicability:

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

It is hereby clarified that these guidelines do not replace or negate the policies / practices of the Company, but are complementary in nature. Adoption of these guidelines do not create any third party right to enforce the same against the Company.

3. Implementation

All the functional heads shall be responsible for implementation of these guidelines with reference to the functions handled by their respective departments.

The Managing Director/ Chief Financial Officer shall be responsible for the overall implementation of these guidelines.

Ms. Namrata Malushte, Company Secretary and Compliance Officer of the Company may be contacted in case of any clarifications required with respect to these guidelines.

4. Disclosures:

This policy shall be disclosed on the Company's website: <https://www.transworld.com/transworld-shipping-lines/policies/>

5. Review and Amendments:

Any subsequent amendment/modification in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (Listing Regulations) or NGRBC and/ or other laws in this regard shall automatically apply to this Policy. The same shall be added / amended /modified from time to time as authorized by the Board of Directors of the Company.

6. Policy Statements:

Our Business Practices shall be governed by the guiding principles of NGRBC.

The NGRBC comprises nine thematic pillars of business responsibility, called 'Principles'. These principles are interdependent, non-divisible and holistic.

Principle 1: Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.

The Company is committed to conducting its business in accordance with the applicable laws, rules and regulations and with highest standards of business ethics. The Company has in place the Code of Conduct ("Code") for its Directors and Senior Management Personnel, Whistle blower policy and Prevention of sexual harassment at workplace.

This Policy is intended to provide guidance and help in recognizing and dealing with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty, accountability and integrity. The objective is to ensure the highest standards of ethical conduct, transparency and accountability while dealing with the stakeholders.

Policy:

- a) The Company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels; promote the adoption of its principle across its value chain and communicate transparently and assure access to information about its decisions that impact relevant stakeholders.
- b) The Company shall not engage in practices that are abusive, corrupt, or anti-competition.

- c) The Company shall truthfully discharge its responsibility on making financial and other mandatory disclosures timely.
- d) The Company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
- 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 service in a manner that is sustainable and safe.

The Company is committed to environmental sustainability through efficient management of all its assets and resources and constantly works towards closely integrating its operations with development coupled with responsible sourcing.

Policy:

- a) The Company ensures that its 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.
- e) The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
- f) 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 employees.

The Company is committed to professional development and growth of employees through selecting the right candidate for right job, monitoring performance for optimum utilization of their potential, providing growth opportunities growth and inculcating the culture of mutual faith and accountability. It is also committed to the holistic growth of employees by motivating them to perform at the peak of their potential by imparting necessary guidance and training at all levels and providing them with opportunities for enhancing their knowledge and honing their skills.

The policies, procedures and practices in the Company are aligned to meet employees' well-being, diversity, non-discrimination, safety and health so as to have a healthy, cordial and harmonious relationships and value enhancement at all levels.

Policy:

- a) 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.
- b) The Company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
- c) The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
- d) The Company shall ensure that no employee is made to work against his / her will or to work as bonded/forced labour or subjected to corporal punishment or coercion of any kind, related to work.
- e) The Company shall provide a work environment that is free from any form of discrimination, exploitation and harassment including but not limited to sexual harassment.
- f) The Company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.
- g) The Company shall strive to instill a sense of duty in every employee including those of service providers at the Company's premises, towards their personal safety, as well as that of their co-workers.
- h) The Company shall strive to take cognizance of the work-life balance of its employees, especially that of women.
- i) The Company shall strive to provide facilities for the well being of its employees including those with special needs.
- j) The Company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
- k) The Company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
- l) The Company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis.
- m) The Company shall 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

The Company gives utmost importance to the healthy engagement with its various stakeholders like employees, suppliers, dealers, customers, shareholders, investors, communities surrounding the operations and government / regulatory authorities.

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 shall strive to give special attention to stakeholders in areas that are underdeveloped.
- d) The Company shall resolve differences with stakeholders in a just, fair and equitable manner.

Principle 5: Businesses should respect and promote human rights

The Company believes that human rights are fundamental, inherent, universal, indivisible and interdependent in nature and hence, continuously strive to ensure that employees' basic human rights are protected.

Policy:

- a) The Company will observe that basic human rights of the employees are respected, valued and protected keeping in mind the Constitution of India, Laws, Policies and the International Bill of Human Rights and accordingly, formulate all policies, practices, procedures and rules of the Company.
- 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 recognizes and respects the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
- d) The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- e) The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
- f) The Company will ensure that each employee is made aware of their basic rights and redressal mechanisms.

Principle 6: Business should respect and make efforts to protect and restore the environment.

The Company is committed to safety, preservation and restoration of environment. It also believes in conservation of natural resources and minimizing hazardous impact on the ecological environment.

Policy:

- a) The Company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- b) The Company shall take measures to check and prevent pollution.
- c) The Company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.

- d) The Company shall continuously seek to improve their environmental performance by use of energy efficient and environment friendly technologies and use of renewable energy.
- e) The Company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.

Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

The Company believes that to protect overall interest of its business and the diverse stakeholder, the Company has to express its fair views, opinions, representations, concerns etc on the policies framed by the competent authorities. The Company may either itself or through various association/forums/chambers make such representations etc before the competent authorities. The Company's engagement with the relevant association/forums/chambers etc is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

Policy:

- a) The Company will make reasonable efforts to ensure that its advocacy positions are consistent with the principles and core elements enhancing business responsibility and transparency.
- b) The Company may, in the best interest of all stakeholders, provide inputs in policy making decisions to various governmental authorities and agencies which concern the business and as well as the society in general, either directly or through the trade and industry chambers and such other collective platforms.

Principle 8: Businesses should promote inclusive growth and equitable development.

The Company has in place a Corporate Social Responsibility Policy framed as per the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 and is carrying out various CSR Activities in accordance with the Schedule VII to the Companies Act, 2013.

Policy:

- a) The Company will identify the impact of the Company's operations on social and economic development and to minimize the negative impacts, if any on the same.
- b) Innovation and investment in products, technologies and processes on continuous basis for the overall well being of the society.
- d) The Company will endeavor to give priority to the regions that are underdeveloped near the business operations of the Company.

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

Customers are one of the most important stakeholders and customer satisfaction is of utmost important for the Company. The foundation of the Company is based on the trust, satisfaction and loyalty of our consumers.

Policy:

- a) The Company, while serving the needs of their customers, will take into account the overall well-being of the customers and that of society.
- b) The Company will ensure that they do not restrict the freedom of choice and free competition in any manner.
- e) The Company will exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- f) The Company will provide adequate grievance handling mechanisms to address customer concerns and feedback.
