



INDIAN ENERGY EXCHANGE LIMITED

ESG POLICY

FOR

VALUE CHAIN PARTNERS

(Approved by the CSR & Sustainability Committee on June 24, 2025)

INTRODUCTION

Indian Energy Exchange Limited (the ‘Company’ / ‘IEX’) is committed to sustainable and ethical practices and align its operations with the nine principles of the National Guidelines for Responsible Business Conduct (NGRBC). The NGRBC has been designed by the Ministry of Corporate Affairs (MCA) to assist businesses to perform above and beyond the requirements of regulatory compliance. In line with the nine principles of NGRBC, we commit to fostering responsible practices across our value chain. Our approach ensures that environmental care, respect for human rights, fair business conduct, and good governance extend beyond our organization to the entities we engage with.

DEFINITIONS

- **Value Chain:** An organization’s value chain encompasses the full range of an organization’s upstream and downstream activities that convert input into output by adding value. It includes entities with which the organization has a direct or indirect business relationship and which either (a) supply products or services that contribute to the organization’s own products or services, or (b) receive products or services from the organization.

SCOPE OF THE POLICY

- This policy document extends these principles to IEX value chain partners which individually comprise 2% or more of its purchases and sales (by value), respectively, or other value chain partners identified by the Company from time to time, setting clear expectations to ensure consistency in our shared commitment to responsible business practices.
- Value chain partners are expected to implement the expectations listed herewith in their business practices wherever applicable and feasible.

PRINCIPLES OF THE POLICY

1. Ethics, Integrity and Transparency

Conduct and govern with integrity in a manner that is ethical, transparent, and accountable.

Expectations	Description
Ethical Behavior	Promote ethical behavior throughout the organization.
Anti-Corruption	Promote anti-corruption practices to prevent bribery and unethical conduct.
Reporting Mechanisms	Establish secure and confidential channels for employees to report unethical behavior without fear of retaliation.
Financial Transparency	Maintain accurate and transparent financial records, ensuring all transactions are properly documented and reported.
Open Communication	Communicate openly and honestly with all the stakeholders, including employees, customers, suppliers, and regulators.

Expectations	Description
Disclosure of Information	Disclose relevant information in a timely and accurate manner, including financial performance, business practices, and any potential conflict of interest.
Responsibility	Accept responsibility for the impact of business decisions and activities on stakeholders, society, and the environment.
Compliance	Adhere to applicable laws, regulations, and standards governing business operations.
Corrective Actions	Implement effective mechanisms to address and remediate any violations of ethical, transparency or accountability standards.

2. Sustainable and Safe Provision of Goods and Services

Aim to provide goods and services that are sustainable and safe, ensuring they meet high standards for environmental stewardship and consumer safety.

Expectations	Description
Resource Efficiency	Utilize resources efficiently to minimize waste and environmental impact. This includes adopting practices that reduce energy, water consumption, and material use.
Sustainable Sourcing	Source materials responsibly, prioritizing renewable resources and suppliers that adhere to sustainable practices.
Environmental Impact	Continuously assess and mitigate the environmental impact of products and services throughout their lifecycle, from design to disposal.
Innovation	Invest in and adopt innovative technologies and practices that enhance sustainability
Product Safety	Ensure all products meet or exceed safety standards and regulations by conducting thorough testing and quality control processes.
Risk Management	Implement robust risk management processes to identify, assess, and mitigate potential safety hazards associated with goods and services.
Compliance	Adhere to relevant safety regulations and standards, ensuring products and services are compliant with legal requirements

3. Respecting and Promoting Employee Well-Being

Respect and promote the well-being of employees, ensuring a safe, healthy, and inclusive working environment.

Expectations	Description
Health and Safety Standards	Comply with applicable health and safety regulations and strive to exceed these standards where possible.

Expectations	Description
Regular Audits	Conduct periodical health and safety assessments if necessary to identify and mitigate potential hazards.
Emergency Preparedness	Develop and maintain emergency preparedness and response plans.
Training	Provide regular health and safety training for employees to ensure they understand and adhere to safety protocols.
Non-Discrimination	Implement practices that prevent discrimination based on race, gender, age, religion, disability, or other protected characteristics.
Equal Opportunity	Ensure equal opportunity in hiring, promotion, and professional development.
Diversity and Inclusion	Promote diversity and inclusion at all levels of the organization.
Harassment-Free Workplace	Enforce a zero-tolerance practice towards harassment, sexual harassment and bullying, providing a safe and respectful environment for employees.
Fair Wages	Ensure employees receive fair wages that meet or exceed the local labour laws.
Benefits	Try and provide comprehensive benefits that support the wellbeing of employees and their families, including health insurance, paid leave, and retirement plans.
Feedback Mechanism	Establish regular feedback mechanisms to understand employee needs and concerns and take appropriate action to address them.

4. Respect for Stakeholders

Respect the interests of all stakeholders and be responsive to their needs and concerns, ensuring open communication and active engagement.

Expectations	Description
Stakeholder Mapping	Identify relevant stakeholders, including employees, customers, suppliers, communities, investors, and regulatory bodies.
Regular Engagement	Engage with stakeholders regularly to understand their interests, needs, and concerns.
Inclusive Dialogue	Ensure that engagement processes are inclusive, allowing stakeholders to participate and voice their opinions.
Clear Communication	Provide clear, accurate, and timely information to stakeholders about business practices, performance and impacts
Accessibility	Ensure communication channels are accessible to stakeholders, allowing them to reach out with their inquiries and feedback.
Regular Updates	Keep stakeholders informed about important developments, changes and decisions that may affect them.

Expectations	Description
Respect and Fairness	Treat stakeholders with respect and fairness, acknowledging their rights and interests.
Sustainability	Consider the long-term impacts of business decisions on stakeholders and prioritize sustainable practices.

5. Promoting and Respecting Human Rights

Respect and promote human rights, ensuring that all business practices are conducted in a manner that protects and upholds the dignity and rights of individuals

Expectations	Description
Adherence to Standards	Comply with human rights standards as per local labour laws.
Non-Discrimination	Implement practices that prevent discrimination based on race, gender, age, religion, disability etc.
Equal Opportunity	Ensure equal opportunity in hiring, promotion, and professional development
Diversity and Inclusion	Foster a diverse and inclusive work environment that respects and values individual differences
Prohibition of Forced Labour	Ensure that no forced, bonded, or involuntary labour is used in business activities.
Prohibition of Child Labour	Adhere to local labour laws on child labour, ensuring that no child labour is used in business activities.
Workplace Safety	Provide a safe and healthy working environment for employees, ensuring compliance with relevant health and safety regulations.
Health and Safety Training	Offer periodic health and safety training to employees wherever applicable
Risk Mitigation	Identify and mitigate potential health and safety risks in the workplace
Prevention of Sexual Harassment (POSH)	Implement and adhere to the POSH regulations ensuring a safe, respectful and inclusive workplace.

6. Protecting the Environment

Respect the environment and make efforts to protect and restore it, ensuring that all business practices contribute to environmental sustainability.

Expectations	Description
Compliance	Adhere to relevant environmental laws, regulations, and standards.
Environmental Impact Assessment	Conduct environmental impact assessments to identify and mitigate potential environmental risks wherever applicable.
Resource Efficiency	Use resources efficiently, aiming to reduce energy, water, and material consumption.

Expectations	Description
Waste Reduction	Implement practices to minimize waste generation and promote recycling and reuse.
Hazardous Waste Management	Ensure proper handling, storage, and disposal of hazardous waste to prevent environmental contamination.
Green House Gas (GHG) Reduction	Monitor and reduce greenhouse gas emissions across all operations where feasible
Energy Efficiency	Invest in energy-efficient technologies and practices where feasible.
Renewable Energy	Increase the use of renewable energy sources where feasible.
Biodiversity Conservation	Protect and conserve biodiversity in areas impacted by business operations.
Habitat Restoration	Engage in activities that restore and rehabilitate natural habitats.
Sustainable Land Use	Adopt sustainable land use practices to prevent habitat destruction and degradation.
Air and Water Quality	Implement measures to prevent/reduce air and water pollution, ensuring emissions and effluents meet regulatory standards.
Soil Protection	Prevent/Reduce soil contamination through responsible waste disposal and chemical management.
Noise and Light Pollution	Minimize noise and light pollution to reduce the impact on local communities and wildlife.
Employee Training	Provide training to employees on environmental practices and sustainability.
Stakeholder Engagement	Engage with stakeholders to raise awareness and promote environmental initiatives.
Community Involvement	Support and participate in community-based environmental projects and initiatives.

7. Responsible and Transparent Engagement in Public and Regulatory Policy

Engage in influencing public and regulatory policy in a manner that is responsible, transparent, and aligned with ethical standards

Expectations	Description
Integrity	Conduct policy engagement activities with integrity and honesty.
Ethical Conduct	Avoid any practices that could be perceived as corrupt or unethical, such as bribery or undue influence.
Compliance	Adhere to laws and regulations governing lobbying and political engagement.
Reporting	Regularly report on policy engagement activities, including the objectives, stakeholders involved, and outcomes.

Expectations	Description
Alignment with Values	Ensure that policy positions and advocacy efforts align with the company's values and commitment to sustainability, human rights and ethical conduct.
Responsibility	Accept responsibility for the impact of policy engagement activities on society, environment, and the economy.
Feedback Mechanism	Implement mechanisms for stakeholders to provide feedback on policy positions and engagement activities.
Continuous Improvement	Regularly review and improve policy engagement practices based on stakeholder feedback and changing regulatory landscapes.

8. Promoting Inclusive Growth and Equitable Development

Promote inclusive growth and equitable development, ensuring that business practices contribute to creating opportunities for all stakeholders and reducing disparities.

Expectations	Description
Diversity and Inclusion	Foster a diverse and inclusive work environment that values and respects the contributions of all employees.
Equal Hiring Practices	Implement fair and non-discriminatory hiring practices to ensure equal opportunity for employment.
Professional Development	Provide opportunities for professional development and advancement for all employees, regardless of background or identity.
Diverse Supplier Network	Promote diversity and inclusion in the supply chain by actively seeking out and partnering with minority-owned, women-owned and other diverse suppliers.
Community Investment	Invest in community development projects and initiatives that promote economic empowerment, education, healthcare, and environmental sustainability.
Partnerships	Collaborate with local organizations, governments, and other stakeholders to address community challenges and foster inclusive growth.
Education Programs	Provide access to education and training programs that equip individuals with the skills and knowledge needed to succeed in the workforce.
Skill Development	Offer opportunities for skills development and vocational training, particularly for disadvantaged groups.

9. Responsible Engagement and Value Creation for Customers

Engage with consumers in a responsible manner, prioritizing well-being, safety, and satisfaction, while delivering products and services that provide tangible value.

Expectations	Description
Product Safety	Ensure that all products meet safety standards and regulations to protect consumers from harm.

Expectations	Description
Quality Assurance	Maintain high standards of quality and integrity in product manufacturing and distribution
Transparency	Provide clear and accurate information about products, including ingredients, manufacturing processes, and potential risks.
Fair Pricing	Set prices that are fair and reasonable, reflecting the value provided by the product or service.
Consumer Education	Educate consumers about the value and benefits of products and services to help them make informed purchasing decisions
Honesty and Integrity	Ensure that marketing and advertising practices are honest, transparent, and free from deceptive or misleading claims.
Respect for Privacy	Respect consumer privacy and adhere to data protection regulations in all marketing activities.
Social Responsibility	Avoid promoting harmful or unhealthy behaviors and contribute to positive social change through marketing campaigns.
Accessibility	Provide accessible channels for consumers to provide feedback, ask questions, and seek support.
Responsive Customer Service	Respond promptly and effectively to consumer inquiries, complaints, and feedback.
Continuous Improvement	Use consumer feedback to identify areas for improvement and enhance products and services.
Sustainable Practices	Promote responsible consumption by offering sustainable products and encouraging environmentally friendly behaviors.
Waste Reduction	Implement initiatives to minimize packaging waste and encourage recycling and reuse.

ADHERENCE WITH THE POLICY

All value chain partners are expected to adhere to this Policy by integrating the nine principles of the NGRBC into their business operations and decision-making processes, thereby upholding ethical standards, minimizing environmental impact, and fostering inclusive, responsible, and transparent governance.

POLICY REVIEW

The Policy will be reviewed periodically, and any change will be communicated to the value chain partners.



VERSION CONTROL

No.	Amendment Date	Approval Date	Approval Authority	Description
1.1	-	June 24, 2025	CSR & Sustainability Committee	Original Policy
