



BUSINESS RESPONSIBILITY POLICY

1. PREAMBLE:

1.1 Scope and Purpose:

The Regulation 34 and other applicable provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, requires top one thousand listed companies (based on market capitalization of every financial year) to include Business Responsibility Report as a part of its Annual Report. The nine principles to be adopted by companies as part of their business practices were laid down in 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' proposed by Ministry of Corporate Affairs in 2011.

Indiamart InterMesh Limited (Company) being one of the top one thousand listed companies, has approved and adopted these policies, which are in line with the above referred principles.

1.2 Applicability:

These policies apply to the Directors and employees of the Company across all its functions and branches.

DEFINITIONS

- a) **“Act”** shall mean the Companies Act, 2013 and rules notified thereunder.
- b) **“Audit Committee or Committee”** means Committee of Board of Directors of the Company in accordance with the provisions of the Companies Act, 2013 and as per SEBI Regulations.
- c) **“Board of Directors” or “Board”** in relation to a company, means the collective body of the Directors of the Indiamart InterMesh Limited (the ‘Company’).
- d) **“Company”** means “Indiamart InterMesh Limited”, a Company constituted under the provisions of Companies Act, 1956.
- e) **“Regulations”** shall mean the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- f) **“Stock Exchange”** shall mean a recognized stock exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956.

IMPLEMENTATION

The Board of Directors of the Company are responsible for implementation of Business



Responsibility policies of the Company. Mr. Prateek Chandra, Chief Financial Officer of the Company, has been designated as the Business Responsibility Head for the purpose of these policies.

The Business Responsibility Head may take support of such functional head and internal and external experts as he deems fit, for the effective implementation of the policies. These policies are also supported by other existing policies of the Company.

POLICIES:

Though the Company follows or has laid down various internal policies duly approved by the functional heads, which are in line with the principles of 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' but due to lack of any mandate of approval of Board of Directors, may not have been formally approved by the Board.

The Company has already in place the following policies in line with some of the principles of 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business' duly approved by the Board of Directors.

Principle 1: Business should conduct and govern themselves with Ethics, Transparency and Accountability

The Company believes that the business should conduct and govern themselves with Ethics, Transparency and Accountability such as engaging in fair trade practice, communicate transparently and assure access to information about their decisions that impact relevant stakeholders. These aspects are covered under Company's policy for Code of Conduct & Ethics for Directors & Senior Management Personnel and the Company's Code of Conduct. The Company also inculcates its Core Values i.e. Team Work, Responsible, Integrity and Passion (TRIPS) in its employees as part of their induction training 'Shubhaarambh'. In order to ensure Ethics, Transparency and Accountability, the Company has also institutionalized the whistle blower mechanism in the Company and the duly approved policy in relation thereon has been disseminated to all stakeholders including to employees on the exclusive portal for employees.

Principle 8: Businesses should support inclusive growth and equitable development

The Company contributes to growth and equitable development by providing opportunities to small entrepreneurs, SME and MSME's in rural areas by taking various focused initiatives and promoting online way of doing business. As part of its initiatives, the Company identifies certain areas and provides training to small



entrepreneurs primarily for the purpose of increasing employability and potential revenue growth for small entrepreneurs and youth in such rural area. These training programs exposes them to possible opportunities to grow by using internet and technology. The Company's environmental and social responsibility is governed by a CSR Policy of the Company which support inclusive growth and equitable development of the Society.

The rest of the policies governing the Company's Business practices are as mentioned below:

A. POLICY FOR PROVIDING SUSTAINABLE PRODUCTS AND SERVICES

Sustainability is one of the important components of Company's vision and mission statement. For achieving consistent growth and long-term profitability the product and services of the Company, it needs to be reliable and sustainable with its customers. The Company takes cognizance of its role in adoption of environmentally sustainable technologies. The policy for sustainable products and services targets to maintain the right balance between environment protection, social well-being, and economic growth. The Company strives to reduce impact on the environment and promote efficient consumption of resources such as Air Conditioning run time monitoring, Cloud Servers, installation of LEDs, CFL & other low energy consuming office equipment, restricted printer and copier usage, etc.

The policy strives to accomplish the following:

1. Assuring safety and optimal resource use over the life cycle and ensuring that all the concerned persons are aware of their responsibilities.
2. Ensure that consumers are aware of their rights through education, product/services training, appropriate and helpful marketing communication, full details of contents and promotion of usage of company's services.
3. While designing new product or service, the Company should ensure that the technologies required to develop or provide such services are resource efficient and sustainable.
4. Regular review and improvement upon the process of new technology development, deployment, and commercialization, incorporating social, ethical, and environmental considerations.
5. The Company should recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.
6. The Company should recognize that over-consumption and wastage of resources, promote sustainable consumption, including recycling of resources.



B. POLICY ON EMPLOYEE WELL-BEING

Employees as its most treasured assets of an Organization. The Company believes in fostering a work culture with high ethical principles and encourage our employees to perform with total integrity, commitment, and ownership. 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 is committed in strengthening its talent pool by giving them career growth and development opportunities to all its Employees.

The Employee well-being policy aims to achieve the following:

1. Providing and maintaining 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.
2. Strict no usage of child labour, forced labour or any form of involuntary labour, paid or unpaid.
3. Cognizance of the work-life balance of its employees, especially that of women.
4. Facilities for the wellbeing of its employees including those with special needs.
5. Timely payment of fair living wages to meet basic needs and economic security of the employees.
6. Providing a workplace environment that is safe, hygienic humane and which upholds the dignity of the employees and train employees about their well- being through, frequent mailers, trainings, etc.
7. Ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis.
8. Promoting employee morale and career development through enlightened human resource interventions.
9. Ensuring a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

C. POLICY FOR STAKEHOLDER ENGAGEMENT

The Company considers stakeholder engagement as a channel of dialogue with its Employees, Customers, Investors, Business Associates, Suppliers and Community Stakeholders. Various engagement mechanisms have been identified for each of the stakeholder groups. The Company strongly believes that an effective stakeholder engagement is good for both the Stakeholder and Company.



Stakeholders	Modes of Engagement	Frequency
Shareholders and Investors	Annual General Meeting	Quarterly & Annual
	Investor Call/Meetings	
	Board Meetings / Communications	
	Annual Report	
Customers	Satisfaction Surveys / Grievance Forms	Throughout the Year
	Helpdesk & Customer Care	
	Ongoing Survey Feedbacks	
	Ombudsperson Function	
Employees	Employee Engagement Surveys – HR Surveys, Administration Surveys	Throughout the Year
	Annual Boot camp, functions and programmes	
	Trainings and Development Programme	
	Employee Grievance Mechanism	
	Whistle Blower Mechanism	
Business Associates	One on one Meeting/ Conferences	Throughout the Year
Community	CSR initiatives	Throughout the Year

This policy strives to achieve the following:

1. Systematic identification of stakeholders, understand their concerns, defining purpose and scope of engagement, and commitment to engaging with them.
2. Responsibility and transparency about the impact of their policies, decisions, product & services, and associated operations on the stakeholders.
3. The Company should give special attention to stakeholders in areas that are underdeveloped.
4. The Company should resolve differences with stakeholders in a just, fair, and equitable manner.

D. POLICY FOR PROTECTING HUMAN RIGHTS

The Company's Code of Conduct governs activities regarding employees across the Company and its subsidiaries. Respecting human rights is the fundamental part of the Company. The Company discourages dealing with any supplier/contractor if it is in violation of human rights. We aim to identify, assess, and manage the human right impacts of our business activities based on the operational context, our leverage and business relationships.

The human rights policy of the Company has the following elements:



1. Prohibits Discrimination

The Company believes in the philosophy of non-discrimination amongst its employees and endeavours to maintain meritocracy. The Company employs people based on the merits or ability to perform their responsibility efficiently without any discrimination of any kind.

2. No Forced or Child Labour

The Company prohibits the employment of Force Labour or Child Labour in relation to its operations and services and it complies with local laws and requirements as may be applicable from time to time.

3. Safe, Healthy, Respectful Work Environment

The Company takes its responsibility in providing a safe, healthy, and respectful work environment to its employees. The Company also protects its employees from harassment and any conduct that may foster an offensive or hostile work environment, including unwelcome or unsolicited sexual advances, threats of physical harm or violent behaviour.

Training and awareness initiatives are continuously developed and integrated into our training plan and implemented in relevant training programs for the employees to ensure such safe, healthy and respectful work environment.

4. Transparency

The Company encourages its employees to report, on a confidential basis, potential violations of human rights and other policies through several channels across the company and its subsidiaries, including through the whistle-blower mechanism and customer service channels.

E. POLICY FOR PROTECTION, AND EFFORTS TO RESTORE THE ENVIRONMENT

The nature of the businesses of the Company has limited impact on environment; however, the Company assume responsibility towards environmental burdens caused by our activities and services. We have identified ways to optimize resource consumption in our operations.

The Company's Environment Protection Policy strives:

1. Optimal and responsible use of resources of environment through reducing, reusing, recycling and managing waste.
2. Company to take measures to check and prevent pollution directly or indirectly.
3. Ensuring the sustainability of resources by reducing, reusing, recycling and managing waste.



4. Improving environmental performance by promoting use of energy efficient and environment friendly technologies.
5. Proactively persuade and support its value chain to adopt this policy.

F. POLICY FOR PROVIDING VALUE TO CUSTOMERS

One of main components of the Company mission is Customer Value and satisfaction. The Company emphasize on customer satisfaction through continuously adding value to its services. The Company focuses on delivering superior value through enhanced offerings on the internet and other platforms.

The Company's policy on providing value to customer embraces the following:

1. Consider the overall well-being of the customers and that of society.
2. Ensuring that the Company does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its services.
3. True and fair disclose of all information of product and services through appropriate means.
4. Ensuring that the promotion & advertisements of services do not mislead or confuse the customers or violate any of the principles in these policies.
5. Providing adequate grievance handling mechanisms to address customer concerns and feedback on regular basis.

REVIEW, REVISION AND DISCLOSURE

The Executive Directors and Officials responsible for Business Responsibility of the Company reserves the right to modify, add, delete, or amend any of the provisions of these policies as and when required.

Further, in case of any doubt about any provision of the policies and in respect of matters not covered herein, a reference shall be made to Executive Directors and Officials responsible for Business Responsibility of the Company.

Any or all provisions of these Business Responsibility Policies would be subject to revision/ amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time. Any subsequent amendment/modification in the Regulations, in this regard by the Government or any other regulatory authority shall automatically apply to this policy.

The policies shall be disclosed in the Annual Report and shall also be communicated to the stakeholders through appropriate channels in the Company.