



MY INDIFUELS PVT LTD

Introduction:

Adherence to the principles of good Corporate Governance and conducting our affairs in a fair, ethical, transparent, and lawful manner is an integral part of My Indi Fuels Pvt Ltd.[MIPL] core values. This policy will be introduced and adopted across all establishments of My Indi Fuels Pvt Ltd. hereinafter referred to as the Company. The basis for this policy document is MIPL's commitment to Responsible Sales and Marketing which includes Social and Ethical responsibility of the company towards its customers, stakeholders, and environment. The Company as a responsible corporate citizen values integrity, honesty, transparency, and safety of its people and environment. This policy is in line with F.No.P-13039(18)/1/2018-CC(P-26825). —Ministry of Petroleum & Natural Gas has issued Gazette notification No. GSR 728 (E) on 29th June 2017 for amending the Motor Spirit and High Speed Diesel (Regulation of Supply, Distribution and Prevention of Malpractices) Order dated 19th December 2005. Clause 6 (A) 1 of the amended order states that the Central Government may permit the direct sale of Biodiesel (B100) for blending with high speed diesel to all consumers, in accordance with the specified blending limits and the standards specified by the Bureau of Indian Standards. The policy should be followed in the same manner as the Company Codes, and commitments to reflect our high standards, core values, and social responsibility commitment.

Context of the organisation:

Understanding the organisation and its context

Headquartered in Lucknow, UP. With more than 8 years of experience, MIPL stands at the forefront of the biofuels energy sector. Our vision is to create alternative fuels that can seamlessly substitute fossil fuels for consumers.

Scope & Applicability

This policy applies to all individuals working with the Company at all levels and grades, including directors, senior executives, officers, employees (permanent, fixed-term or temporary), consultants,

contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, sponsors or any other person associated with My Indi Fuels Pvt. Ltd.

Leadership & Commitment

Governing Body

MIPL has a defined governing body headed by the CEO & COO. This body demonstrates leadership and commitment concerning the Responsible Sales and Marketing policy by:

Approving the organization's Responsible Sales and Marketing policy.

Ensuring that the organization's strategy and Responsible sales and Marketing system (RSMS) are aligned.

Receiving and reviewing information about the content and process of the organization's RSMS at scheduled intervals.

Allocating and assigning the required resources for the effective operation of RSMS.

Exercising supervision over implementation of the organization's RSMS by top management and its effectiveness.

Top Management

The Management shall attend various meetings and provide evidence of its commitment to the development and implementation of the Antitrust and competitive management system for continuous improvement of Company's effectiveness. Management will demonstrate commitment and leadership in accordance with:

Taking account of the effectiveness of the RSMS and review company objectives and functional objectives

Establishing policy and objectives, maintaining documented information, and furnishing them for ready reference to the employees, compatible with the strategic direction of the organization. Integration of RSMS requirements into the Organization's business processes and preparing process documents.

Preparing process exhibits with risks and opportunities. Preparing company-level risk with the mitigation plan, given in risk template and monitored for implementation.

Promoting awareness of the process approach and risk-based thinking. Ensuring that the resources needed for RSMS are available and discussed in formal/informal meetings.

Communicating the importance of Effective System Management and of conforming to RSMS requirements during internal meetings and management review meetings.

Ensuring that the RSMS achieves its intended results and verifying the same through internal audits and objective reviews.

Engaging, directing, and supporting individuals to contribute to the effectiveness of the RSMS. Promoting improvement.

Supporting other relevant management roles to demonstrate leadership as it applies to their areas of responsibility as identified in the job description of the Director, by encouraging the use of reporting procedures for suspected and actual breach of competition law.

Reporting to the governing body on the content and operation of the RSMS and of allegations of serious or systematic breach of competition law at the planned interval.

Once in a six-month management review shall be conducted for review of the activities and shall be attended by Top Management.

Advertising and Product representation principle

Our reputation as a responsible Company extends to the products and services we offer and how we represent them. Company employees, and any third party to which this Principle applies, must represent the company's products and services truthfully, fairly, accurately, and professionally across all sales, advertising, packaging, and promotional platforms. Every Business Unit is responsible for having a process to ensure an appropriate review of advertising and claims about its products and services.

Apply this Principle to all express or implied claims in advertising, which includes product literature, labels, packaging, advertising copy, environmental claims, customer surveys and certifications, promotional materials, technical data sheets, product information sheets, user and maintenance manuals, videotapes, internet sites, social media, and the like.

Always represent Company's products and services truthfully, fairly, accurately, and in a professional manner in emails, conversations, contracts, sales materials, advertising, packaging, promotions, and all other platforms of communications.

Substantiate claims, as appropriate, through testing based on sound statistical and scientific principles, or approved through the company business unit's claims approval process.

Do not overstate a product's performance.

Do not make claims that have not been approved or appropriately substantiated.

Follow the procedures required by the business unit for review and approval of advertising, taking written approval (if required) from marketing, R & D, technical service, clinical, quality, product responsibility, regulatory and toxicology, and Legal Affairs.

Avoid advertising or claims inconsistent with the Company's corporate values.

Do not engage in deceptive acts or practices or other unfair methods of competition.

Do not make false or deceptive statements about Company products or services.

Do not make false or deceptive comparisons of the Company and any competitors' products or services.

Do not unfairly criticize or discredit a competitor or its products or services.

Do not misrepresent the quality or effectiveness of a product or service.

Do not present one's products or services as those of another, such as by simulating a competitor's packaging or trademarks.

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Product Sustainability

We strive to attain Product Sustainability by connecting our business practices and corporate responsibility opportunities to develop and deliver more sustainable and innovative offerings creating long-term value.

Foster a culture of corporate responsibility and sustainable chemistry within our Company Comply with applicable global regulatory requirements and voluntary commitments.

Enhance cooperation and communications across our value chain.

Process

The mechanism to ensure accurate product information

The marketing communication department manages the website and social media, including working with website developers, posting regular media updates. All social media updates and website content pertaining products and offerings is approved by the business heads to avoid misinformation or false claims.

Marketing communication team needs to take all the relevant product information from the R & D team and the marketing department for developing content for all marketing materials including brochures, newsletters, and mailers, followed by approvals from Business Heads and R & D team

Antitrust and competitive Principle

Company is committed to engage in a fair and vigorous competition, in compliance with all antitrust and competition laws and regulations globally.

Do not agree with competitors to stop doing business with certain customers or suppliers.

Do not discuss cost, profit, and margin with the competitors.

Do not get involved in discussions or interactions with competitors that may create the appearance of improper agreement.

Consult with concerned authority before you consider any of the following arrangements. The exclusive sale or purchase arrangements.

Relations with or terminations of distributors .

Selective price discounting

Bundling of goods or services.

Restrictions on the resale of company products or service .

Failure to comply with the anti-competition laws could lead to civil penalties for the Company and the individual involved, significant business disruption and harm to company's business reputation. Violation of this will result in disciplinary action, including termination from employment.

Ensuring our Business is compliant with the competition laws

Identify the key competition law compliance risks faced by our business. Some examples are: Any employee who has contact with our competitors at any industry events or otherwise Cases where a previous employee moved to a competition or joined from a competitor Any employee with an information about competitors' prices or business plans Entering into a long-term exclusive contract for 5 years or more.

Analyze and evaluate the risks, work out how serious the identified risks are. Rate them as low, medium, or high. In particular, businesses should consider assessing which employees are in the high-risk areas.

Manage the risks, set up policies, procedures, and training to ensure that the risks you have identified do not occur, and find ways to detect and deal with them if they do.

Respect and Protection of intellectual Property Rights

Recognizing that intellectual property is an important company asset and a strength of the company, we shall properly maintain, manage, and protect our intellectual property rights while utilizing them effectively.

Being conscious that our company products and technology are globally developed, we shall actively acquire intellectual property rights worldwide, such as patents that are results of advanced, creative Research and Development, and endeavour to protect our intellectual property rights through the entire global group.

We shall appropriately execute our rights in regards to infringement by third parties. Respecting the intellectual property rights of other companies

In the interests of fair competition, we shall not imitate the products of any other companies during the development, manufacture, or sale of our products

Customer Complaint Handling and Feedback Process

The Marketing/Sales team will take/provide feedback from customers against the corrective actions/feedback of complaints.

The complaint will be considered as closed if no negative feedback (verbal/written) is received concerning complaint within one month.

Primary benefits by integrating customer feedback in salesforce.

Sharing feedback organization-wide reinforces the fact that every team has an impact on customer experience.

Customer information security

It is Company policy to comply with all applicable privacy and data protection laws. Company will adhere to the following guidelines to the extent required by applicable laws:

- **Notice** – *Company will provide timely and appropriate notice to individuals about its data collection practices.*
- **Consent** – *Company will collect, use, disclose and transfer personal information only with the individual's consent, which may be express or implied, depending on the sensitivity of the personal information, the individual's reasonable expectations and legal requirements.*
- **Purpose limitation** – *the company will collect personal information only for specific, limited purposes. The information we collect will be relevant, adequate, and not excessive for the purposes for which it is collected.*
- **Direct marketing** - *the company will not use personal information for direct marketing purposes without giving the individual an opportunity to "opt-out."*
- **Transfers to third parties and other countries** - *the company will take appropriate measures, by contract otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country*
- **Quality** – *the company will take commercially reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date.*
- **Access** – *Company will maintain procedures to give individuals reasonable access to their personal information and, when appropriate, the ability to correct or delete inaccurate or incomplete information.*
- **Security** – *Company will take commercially reasonable measures to protect personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction.*
- **Disclosure mechanism** - *The company will disclose the identity and usual location of the person accountable for data protection in the organization, and hold this person accountable for complying with the above measures and applicable law.*

- **Accountability** – the company will designate individuals within the company to be accountable for compliance with laws and related company policies.
- **Enforcement** – the company will provide internal controls for verifying compliance with laws and related Company policies and procedures.
- **Complaint process** – the company will provide a fair process for investigating and resolving complaints and communicate the process to the individuals

Responsible Sales and Marketing Objectives

| Parameters | Annual Target |
|--|---------------|
| Total number and nature of confirmed incidents of breach of trust and competitive principle | Zero |
| Total number of confirmed incidents in which employees were dismissed or disciplined for falsely representing the company products. | Zero |
| Fulfilling ethical compliance requirements imposed by a customer. | 100% |
| Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations of responsible sales and marketing. | Zero |
| Public legal cases regarding competition law brought against the organization or its employees during the reporting period and the outcomes of such cases. | Zero |

From the company level objectives, the functional objectives shall be prepared and the respective personnel will monitor the status regularly in the monitoring sheet. The objectives shall be communicated to all concerned persons by the respective HODs which shall be updated annually based on the discussion in the management review meeting.

The objective management plan shall be prepared to achieve the Responsible sales and marketing objectives which shall include: Objectives; resources require; responsibility; timelines; and method of evaluation of results and who will impose sanctions or penalties.

Support

Resources - The Company shall identify the resource requirements and provide timely resources in terms of qualified personnel, infrastructure, and automation system. The resource for the establishment, implementation, and maintenance of the Responsible sales and Marketing Management system as well as improving its effectiveness shall be provided.

The Ethics Line Coordinator shall consider the capabilities and constraints on existing internal resources. In cases in house resources are limited then services of external providers shall be taken.

Competence - *The Company shall ensure that the necessary competence has been achieved and appropriate records for the education, experience, training, and qualification are maintained as per our competency model. The new employee shall be trained properly in the identified area. The effectiveness of the training provided, and action taken shall be evaluated afterward. The competence and training shall also be evaluated and provided to the contract employees.*

Awareness and training

To ensure that all directors, officers, employees, consultants, and contractors of the Company are aware of the policy, a copy of the policy shall be provided to them and they shall be advised that the policy is available on the Company's website for their review

Training on this policy shall form a part of the induction process for all suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures, and government & public bodies (including their advisers, representatives and officials, politicians and political parties).

At the time of joining, the organization shall provide Responsible Sales and Marketing awareness training and shall conduct the training on regular basis as appropriate to their roles, the risks of bribery to which they are exposed, and any changing circumstances. The Company shall maintain the training calendar and training report as a part of its documented information.

Communication

The organization shall ensure internal and external communication between Functional Heads and various levels of employees regarding the processes of the Responsible sales and marketing management system and their effectiveness. Such communication related to RSMS shall include:

- a) What it will communicate.*
- b) When to communicate.*

- c) *With whom to communicate.*
- d) *How to communicate.*
- e) *Who communicates?*
- f) *the languages in which to communicate.*

Who is responsible for the Policy?

Ethics Committee If confronted with a request or demand for price-fixing with the competitor or other violation of this Policy, the complainant's demand must be immediately rejected and reported to the Company's Ethics Committee of the respective business comprising of the following incumbents:

- 1. Chief Executive Officer of the Business*
- 2. Chief Finance Officer of the Business*
- 3. Marketing Head as the case may be*
- 4. Group Chief Finance Officer*
- 5. Head — Group Corporate Human Resources*
- 6. Company Secretary*

COMPLIANCE:

It is the responsibility of each of the employees and third parties to act with integrity and to ensure that they have read, understand, and comply with the policy. Besides, all employees shall be required to confirm that they have understood and complied with the policy annually. All the employees are expected to sign a declaration at the time of Joining Declaration (as per Annexure-II)
Violation/Breach of this policy or refusal to cooperate shall result in disciplinary action, up to and not limited to suspension, or termination of employment with the Company.

Internal audit:

Audits shall be performed regularly and the interval between audits of any particular department shall not be greater than six months. Unscheduled audits may be carried out at the discretion of the management or Company Ethics Officer based on the requirement. An Internal audit of Responsible sales and marketing Management System shall be carried out at least once in 6 months to:

a) Determine whether Responsible Sales and Marketing Management System

i. Shall conform to the planned arrangements for Responsible sales and marketing Management System and standard requirements,

ii. Shall be implemented and maintained per the requirements our Responsible sales and marketing Management System as given in this policy.

It shall be ensured that the auditors are independent of the specific activities or areas being audited by them and shall be provided for audit training. If the need arises, outside auditors can also be employed at the discretion of the Company Ethics Officer.

Audit Report and Follow-Up

All the audit findings and verification of audit results shall be reported to the top management and governing body for the review and evaluation of the system and shall also be discussed in the management review meetings. The audit plan/schedule, audit nonconformity reports, and clause wise audit checklist shall be maintained as evidence of the implementation of the audit program and the audit results.

Management review

The Responsible Sales and Marketing Management system shall be established and systematically reviewed for its continuing suitability and effectiveness in confirming the standard requirements in our Company. The review shall include implementation of this policy and objectives to identify any area, which requires improvement and evaluate the need for changes for the effective functioning of the system.

Management review inputs

The agenda, time, and date of management review meeting shall be circulated to all HODs and Ethics Committee members to attend the management review meeting with supporting documents related to agenda points to discuss in the meeting. Inputs to management review shall include current performance and improvement opportunities related to the items listed as under:

- a) The status of actions from previous management reviews.*
- b) Changes in external and internal issues relevant to RSMS.*
- c) Information on the performance and effectiveness of RSMS, including trends in:*
- d) Nonconformities and corrective actions; Monitoring and measurement results; Audit results; Investigations; Nature and extent of the breach of competition law risks faced by the organization*
- e) Effectiveness of actions to address risks.*
- f) Opportunities for continual improvement of the Responsible sales and Marketing management system.*

Nonconformity and corrective action

The company shall establish the system for identification, documentation, evaluation, segregation, and disposition of non– conformity including audit results and customer complaints. The concerned persons shall be informed of the disposal of non–conformity. If a non–conformity is identified, then the Company shall take appropriate action regarding the consequences of the non– conformity. The details of non–conformity and concession accepted by the Company Ethics Officer, end-user, or other body as applicable shall be reported and retain documented information. The Documented information on the nature of non– conformities and any subsequent actions taken, including concessions obtained shall be maintained.

Corrective action

The corrective action planning shall include the evaluation of the significance of problems affecting the Responsible sales and marketing Management system. The major or repetitive non–conformities shall be identified for taking corrective action in the areas as defined below:

The Functional Head shall review the non-conformities (including customer complaints) as identified in their areas and analyse it. The root cause of non-conformities shall be identified in the areas like man, management (system) and money (Resources).

After analysis of the non-conformities or deficiencies for major or repetitive problems, the need for corrective action shall be taken.

POWER TO AMEND

Any amendment in this policy shall be approved by the CEO (Chief Executive officer) & COO (Chief Operating Officer).

The management shall have the overriding right to withdraw and/or amend the guideline at its discretion as it deems fit from time to time. The decision of the management shall be final and binding.

Annexure I – Declaration by the Employee

To,

The Company Ethics Officer

DECLARATION: RESPONSIBLE SALES AND MARKETING DECLARATION

I, Mr/Ms.....Employee Codeconfirm that I have gone through the Guideline on Responsible sales and Marketing of My Indifuels Pvt Ltd and having understood the same I declare that our Company will not engage in any activity, practice or conduct which are in contravention of the clauses of the Guidelines, including but not limited to the Competition Act 2012, or any equivalent local law that our company is subjected to.

In case of any violation or intended violation by any party, I will report immediately the same to you.

Signature_____ Date_____