

DLF LIMITED

Business Responsibility and Sustainability Policy*

Approved By	Board of Directors
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Business Responsibility and Sustainability Policy

Principle	Contents	Page No.
Principle 1	Ethics, Transparency & Accountability	3-4
Principle 2	Product Lifecycle Sustainability	4-5
Principle 3	Employee Well Being	6
Principle 4	Stakeholder Engagement	6-9
Principle 5	Human Rights	10-13
Principle 6	Preservation of Environment	13-14
Principle 7	Responsible Advocacy	14
Principle 8	Inclusive Growth & Equitable Development	14-15
Principle 9	Providing Value to the Customers in a responsible manner	15

Business Responsibility and Sustainability Policy

DLF Limited ('DLF' or 'Company') is committed to adopt leading industry practices for promoting sustainable business operations and create value for all stakeholders. Our Business Responsibility and Sustainability Policy sets forth the principles and guidelines to promote responsible business conduct across entire operations and is applicable to DLF Limited, its subsidiaries, associates and joint ventures.

DLF also expects our value chain partners including suppliers, vendors and other service providers to abide by the guidelines contained in this Policy.

Principle – 1: To conduct business and govern themselves with ethics, transparency and accountability.

DLF Limited believes in adhering to the highest standards of ethical corporate citizenship and establishment of good governance culture. At DLF, the good governance is a voyage to constantly create sustainable value for the protection of interest of all stakeholders in tandem with compliance with all applicable laws and regulations with healthy growth of the Company.

- The group has developed Code of Conduct which is to be abided by Directors, management and employees at all level to ensure good governance, ethical practices, transparency and accountability in conducting affairs of the group and dealing with stakeholders across the value chain.
- The Directors, management and employees of the group report their compliance to the Code of Conduct.
- The Company shall conduct periodic training programs on awareness of Code of Conduct amongst its employees and stakeholders.
- The annual report of the Company sent to the shareholders contains confirmation to compliance to the Company's Code of Conduct by all the Board members, senior management personnel, duly certified by the CEOs and Whole-time Directors of the Company.
- The Company promptly post on its web-sites information relating to all material events, quarterly, half yearly, annual financial results/ statements (standalone as well consolidated) of the Company at regular intervals. Notices of the general meetings, intimation of record dates, book closures, annual reports, shareholding pattern and such other information are filed as per the SEBI Listing Regulations with stock exchanges and provisions of the Companies Act in such manner that the same is

easily assessable to the investors of the Company. The web-site of the Company will be updated regularly from time to time.

- Complete compliances with all applicable laws and regulations.
- None of the group companies engage in practices that are abusive, corrupt and anti-competitive.
- DLF is committed to conduct its business with the highest standards of integrity. The Company, its Directors and Employees are expected to be aware of and follow all applicable anti-corruption and anti-bribery laws wherever we do business.
- The group will avoid complicity with the actions of any third party that will violates any of the principles contained in these principles.
- The web-site of the Company contained a special window called 'Investor Query Box' which can be assessed by the investors for any query, along-with the availability of email – 'investor-relations' for any grievances.
- DLF has established a Whistle-Blower mechanism that allows its employees, directors, vendors and customers to report any unethical and/or improper practice(s) taking place in the Company, including any suspected violation in the Code of Conduct, for appropriate corrective actions.

Principle – 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their lifecycle.

Sustainable products & Services

DLF Ltd. has fundamental mission of creating a meaningful society by building environmentally sound communities where people can live, work and relax with contentment. We strive to reduce the use of natural resources, energy needs and carbon foot prints while sustainably strengthening the communities we work with.

To support this goal, our policy is to:

- Contribute to creating a recycling-oriented society.
- Make use of sustainable inputs for business operations.
- Create and continually foster a business environment that will support sustainable efforts and best management practices in energy efficiency.
- Achieve targeted improvements at our properties.

We strive to achieve this by:

- Sourcing significant raw material, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts.
- Using state of the art sewage treatment plants to treat and re-cycle waste water, which in turn can be used for horticulture and toilets.
- In designing the products, the Company shall ensure that the processes and technologies required to produce it are resource efficient and sustainable.
- The Company shall work towards safe and optimal resource use over the lifecycle of its products and services, including recycling of resources wherever possible.
- The Company shall work with supply chain members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment.
- Using Aerated Concrete Blocks (AAC)/ Fly ash bricks/ Dry wall etc. instead of clay burnt bricks in construction of all the infrastructure projects thus preventing soil depletion and promotion of sustainable brick production in an around DLF Project areas.
- Using energy efficient machinery and gadgets for construction and maintenance of infrastructure.
- Giving priority to local vendors and service providers and ensuring low carbon foot print as well as support to the local economy.
- Providing education, training programs and awareness programs designed to educate partners, investors, employees, associates and other stakeholders about opportunities to save money and protect the environment through improved energy efficiency.
- Creating awareness among the customers, all stakeholders to raise environmental concern
- Ensuring Continuous process improvement approach towards improved client satisfaction to support at or above market tenant satisfaction and occupancy.
- Using energy efficient and sustainable electrical and electronic gadgets and equipment for new construction as well as maintenance of existing infrastructure while maintaining satisfactory level of lifestyle.

Principle – 3: To promote wellbeing of employees.

A key imperative at DLF is to keep its workplaces safe, transparent and friendly for people to work in an inclusive environment that can leverage the unique talent of employees from diverse backgrounds. The biggest asset employees have is their health and well-being. It is therefore increasingly imperative that the Company partners with employees to promote and ensure their well-being.

DLF is committed to create and maintain a workplace that is safe, hygienic, accessible to differently-abled employees and upholds the dignity of all employees. We are committed to continually improve the health and safety of employees by complying with and endeavouring to exceed all applicable legislative, statutory and regulatory requirements.

The definition of wellness has expanded dramatically to include a range of programmes aimed at not only protecting employee health, but actively boosting performance as well as social, emotional & economic well being.

The Company will focus on the following key areas for well being –

- Physical Health & Wellness
- Mental wellbeing
- Medical Facilities
- Online Counselling
- AI Assistant for health record management
- Work Life Balance
- Financial Well-being
- Safety at work place

The Company will connect wellbeing with employee expectations and expand wellbeing programmes to encompass what employees need.

Principle – 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

Stakeholder Engagement Policy

At DLF, we believe great places are for people to experience and are made with the understanding of great people. The places and experiences we create have the potential to deliver a positive impact for the communities they're part of, the customers they serve, the people we invest in, and those who invest in us. We define our stakeholders as our customers who occupy and use our buildings, the communities around us, our employees and our partners who provide goods and services to us. To maximise value creation for us and these stakeholder groups it is crucial that we understand their different needs and expectations.

As a responsible business we are committed to:

- Ensuring proper mapping of all our stakeholders
- Laying down principles of Community Engagement
- Engaging our stakeholder groups to develop and maintain positive, productive relationships
- Ensuring key stakeholders are well informed and have access to information
- Involving our stakeholders in identifying issues which are material to our business
- Implementing initiatives and programmes that contribute to sustainable development and generate shared value
- Benchmarking our stakeholder engagement performance and continuously identifying areas for improvement

Objectives for engaging our stakeholders

As a responsible business we are committed to:

- Collaborating with stakeholders to identify emerging trends and develop solutions to future challenges
- Ensuring that our activities meet our stakeholders' needs
- Identifying material issues in a collaborative way to create value for our business and our stakeholders
- Assessing and creating community support for our projects

Our Values

Our approach to stakeholder engagement is based on six values. Everything we do is bound by these values and we measure our employees against them through our performance processes. Our values are:

1. Customer Service

External and internal customers' expectations should drive the priorities.

2. Innovation

Innovations as constant endeavors.

3. Excellence

Aim to be consistently excellent; not occasionally brilliant.

4. Integrity

Be someone people can trust.

5. Respect

Respecting different background and perspectives.

6. Accountability

Taking responsibility for all actions.

Our Stakeholder Engagement Process

Our engagement process requires us to identify and prioritise material issues with every appropriate stakeholder. Ongoing engagement is achieved through a number of different channels. These may include:

Stakeholder type	Engagement method
<p>Customers Those who occupy or visit our properties:</p> <ul style="list-style-type: none"> – Occupiers/tenants – Employees of occupiers based at our properties – Shoppers and consumers – Potential occupiers, visitors, shoppers and consumers 	<ul style="list-style-type: none"> – Customer satisfaction surveys – Promotion of sustainability programmes and initiatives – Customer engagement meetings – Face-to-face meetings with our employees in asset management and investment – Customer newsletters – Exit surveys across customers
<p>Communities Our neighbours and those who live and work in the areas we do business:</p> <ul style="list-style-type: none"> – Local residents – Local businesses – Local schools and colleges – Local and national charities – Community groups and Local Government 	<ul style="list-style-type: none"> – DLF Foundation / NGOs engagement /charitable trusts – Baseline Survey through Focused Group Discussion (FGD) / Participatory Rural Appraisal (PRA) – Impact Assessment of Projects – Local resident consultation – Skill Development, Health, Education and Scholarship Programmes – Environmental programmes for conservation of natural resources – Local resident consultation /participation – Designated Community Liaison Managers – Community newsletters
<p>Employees Those who are directly employed by our businesses</p>	<ul style="list-style-type: none"> – Internal communications – Employee engagement survey - Skip level meetings – Team meetings – Conferences/ workshops/ trainings – Employee forum to interact with leadership – Scholarship to wards of direct and contractual staff with of certain income group

<p>Partners Those who have a direct working or contractual relationship or share a mutual interest with us.</p> <ul style="list-style-type: none"> – Joint venture partners – Service providers and their employees – Suppliers and their employees – Shareholders – Local and central Government – NGOs – Trade bodies – Industry organisations 	<ul style="list-style-type: none"> – Internal communications – Employee engagement survey – Team meetings – Company conference and Group workshops – Employee forum – Scholarship to wards of partner organisations' staff with of certain income group
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Implementation and evaluation

To be effective in our stakeholder engagement we are risk aware but not risk averse. We always consider potential stakeholder engagement risks prior to selecting the level or method of engagement. Potential risks will include conflicts of views and interest, and engagement challenges.

We will:

- feed stakeholder concern into strategic planning to ensure alignment. The material needs identified by important stakeholders will be moderated by the company's leadership. The ones which can and should be addressed in the opinion of the leadership team, including the Board of Directors will form an input into the strategy process of the Company.
- Present a balanced view to stakeholders, clearly showing how stakeholder engagement has informed how the business is conducted.
- Provide feedback to stakeholder groups. The engagement plan will incorporate feedback on the outcome of the engagement process to stakeholders with whom the company has engaged.
- Generate reports, including input for Integrated Report. The Integrated Report will disclose information on stakeholder engagement, incorporating relevant aspects of the policy and process.

Principle – 5: To respect and promote Human Rights.

DLF group is committed to upholding of fundamental human rights in line with the legitimate role of business. Our approach includes adherence to corporate business policies and compliance with applicable laws for human rights.

- Conduct business in a manner that respects the rights and dignity of all people, complying with all legal requirements.
- Treat everyone who works for DLF group fairly and without discrimination. Employees, other staff, vendors, customers and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- The Company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impact of operations and ensuring all individuals impacted by the business have access to grievance mechanisms.
- The Company shall recognize and respect human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
- The Company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
- The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.
- The Company shall ensure that no person below the age of 18 years is employed in any work place of the Company, project sites, vendors and suppliers workplaces.

The scope and content of human rights evolve in response to the political, economic, social and cultural issues faced and focus would be on respecting and promoting:

- Health and safety
- No child labour
- Fair Wages
- Financial transparency
- Freedom of expression
- Right to privacy and protection of personal data
- Non-discrimination of any kind
- Protection of women against sexual violence at work & providing a safe workplace for women

PREVENTION & REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

1.0 PREAMBLE

To provide for protection against sexual harassment of women at workplace and for prevention, prohibition and redressal of complaints of sexual harassment and for matters connected there with or incidental thereto.

2.0 APPLICABILITY

This policy applies to women employees who are employed for work on regular, temporary or ad-hoc/ daily wages basis, either directly or through an agent, at any business location of the company and/or its subsidiaries. This policy document will be made available at all locations associated with the company with a clear objective to establish a similar approach in dealing with this issue.

3.0 DEFINITION OF SEXUAL HARASSMENT

A broad definition of sexual harassment consists of any physical or verbal behaviour and any form of behaviour or communication that has unnecessary, improper or unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances. It may consist of, but not be limited to, any of the following:

- 3.1 Unwelcome sexual advances, physical contact, requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature.
- 3.2 Transmitting any message, by mail, telephone, e-mail etc which is obscene, lewd, suggestive or blatantly sexual in nature.
- 3.3 Any explicit or implicit communication wherein a sexual favour or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. hereby creating a hostile environment.
- 3.4 Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes.
- 3.5 Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day-to-day dealings.
- 3.6 Any pervasive pattern of behavior, which makes employees uncomfortable, insecure or feels humiliated or disadvantaged on the basis of gender differentiation.
- 3.7 Actual sexual assault.

As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

Further the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in her employment or
- Implied or explicit threat of detrimental treatment in her employment or
- Implied or explicit threat about her present or future employment status or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her or
- Humiliating treatment likely to affect her health or safety

4.0 COMPANY POLICY ON PROHIBITION OF SEXUAL HARASSMENT

The Company will implement measures to prevent and prohibit all forms of sexual harassment, whether it occurs within or outside the workplace.

This applies equally to relations between superior and subordinates as well as between peers. Any incident of sexual harassment will be immediately investigated and appropriate action will be taken against the offending employee(s) based on the nature and seriousness of the offense and will include strict disciplinary action including termination of service.

GUIDELINES FOR WOMAN SAFETY

Keeping in view the focus on Women Safety, the following guidelines will be followed:

- Late sitting in case of female employees be discouraged beyond working hours in normal course.
- Prior approval of HOD (not less than VP) be obtained, if for reasons of work exigency, she is required to work late on any day beyond 8.00 pm, by exception.
- Onus of ensuring safe drop back facility will vest with the HOD concerned in case of late sitting. Reporting Manager will ensure that the female employee concerned is not traveling alone and reaches home safely.
- Female employees in every business are being reached out to, regularly by respective HR teams to understand their concerns and issues relating to workplace safety and transport arrangements.
- Exemption from the Authorities will be obtained specifically if the nature of specific business operations (Clubs/ Malls etc.) requires female employees to stay beyond 8.00 pm on an ongoing basis. (In such cases all arrangements for drop back will be made as indicated at bullet point No. 3 above.

- The company has established an “Internal Complaints Committee” for redressal of complaints relating to Sexual Harassment. The committee includes an external member, who is an expert on issues relating to sexual harassment.

Principle – 6: Businesses should respect, protect, and make efforts to restore the Environment.

Protecting our shared environment:

Protecting our shared environment is of fundamental importance to all of us at DLF. We recognise the positive impact we can make in protecting and adding to the environmental richness including the natural resources (water, air, energy and raw materials) and bio-diversity of the ecosystem we operate in. We believe this not only makes sound commercial sense for business sustainability, it is also a matter of delivering towards future generations for sustainability.

To support this goal, our policy is to:

- Comply with or exceed the requirements and spirit of applicable environmental legislation and regulations
- Optimize the use of natural resources in order to reduce pollution, minimize wastage and maximise reutilisation/ recycling
- Enrich the bio-diversity of the nature surrounding our areas of business.

We will strive to achieve this by:

- Aligning organizational processes, establishing quantifiable targets, as appropriate, reviewing programs and processes for continuous compliance and improvements.
- Continually improving the environment sustainability performance of our end-products (such as using energy efficient lighting and HVAC systems, using feasible renewable energy sources, treatment and recycling of wastewater, harvesting rainwater)
- As far as possible, purchasing products and services that minimise the damage on environment on a lifecycle basis, encouraging the use of energy efficient raw materials containing recycled materials, minimising the generation of solid wastes, recycling the reusable wastes and disposing the excess waste through environmentally safe manner
- Enriching the biodiversity by maximising the green landscape in our real estate projects and encourage tree plantation
- Engaging our employees, suppliers and vendors to reduce risks from environmental, health or safety hazards for themselves and others in the vicinity of our operations.

Training employees, associates and other stakeholders to promote environmental awareness and encouraging them to work in an environmentally responsible manner

- Communicating the environmental commitment and performance of the organization to our clients, customers and public to raise awareness and encourage.

To support this goal, our policy is to:

- Periodically update the Environmental Policy based on review and feedback.

Principle – 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.

DLF believes that a lot can be achieved by the Company together with the Government, legislators, trade bodies and regulators to create positive social and environmental outcomes. DLF 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 is a member of major trade bodies, chambers and associations and undertakes policy advocacy through these platforms, while ensuring compliance to all applicable regulations and ensuring fair competition in the marketplace.

The Company does work for advancement of public good along with the industry colleagues and such work mainly involves creating framework of policies for urban development and inclusive development in the industry through various industry bodies i.e. PHD Chamber of Commerce, ASSOCHAM, CREDAI, CII, NAREDCO, APRERA etc.

Principle – 8: Businesses should support inclusive growth and equitable development.

- DLF believes that social and economic development can be achieved by building inclusive and sustainable communities. In order to achieve inclusive growth and equitable development, DLF is of a strong view that economic growth, social inclusion and environment protection need to be harmonized.
- DLF is committed to ensure protection of interest of all stakeholders. In order to achieve inclusive growth and equitable development and create greater impact, the Company has decided to carry out all its CSR work through DLF Foundation which will implement social, educational and environmental Projects in partnership with various other NGOs/trusts and specialist organisations in compliance with Schedule VII of the Companies Act, 2013.

Our Commitment:

- DLF endeavors to take appropriate actions for understanding the impact of its business operations on social and economic development and shall respond through suitable actions to minimize the negative impact, if any.
- DLF shall innovate and invest in products, technologies and processes that promote sustained development for the well-being of society.
- DLF shall make efforts to complement and support the development priorities at local and national levels.
- DLF shall undertake its CSR activities as per the recommendation of the CSR Committee and in accordance with CSR Policy approved by the Board. Further, the Company shall ensure that CSR Policy be kept updated in line with the requirement of Section 135 read with Schedule VII of the Companies Act, 2013.

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

We at DLF believe creating value for our customers is of utmost significance. Our customer satisfaction policy reflects the commitment towards continuous enhancement of customer experience across our product portfolio.

We strive to achieve this by:

- Engaging with our customers and providing guidance and awareness for promoting safe and responsible use of our properties.
- Designing our products to align with customer needs and expectations, while respecting their freedom of choice and ensuring free competition.
- Treating all customers with utmost respect, ensuring equitable access to our services, without any discrimination.
- Engaging with customers fairly, providing correct and accurate information about our products and services.
- Ensuring highest degree of ethics, honesty and transparency while promoting or advertising our products.
- Respecting customer's right to privacy and ensuring that customer's data and information is kept confidential and not disclosed to any third parties without explicit consent of our stakeholders, unless required by law to do so.