



**STAKEHOLDER ENGAGEMENT POLICY
of
JAYASWAL NECO INDUSTRIES LIMITED**

Preamble

Jayaswal Neco Industries Limited (hereinafter referred to as 'JNIL, or 'The Company'), recognizes and appreciates that engagement with and active cooperation of its Stakeholder is essential for the Company's sustainable business performance and for achieving and maintaining public trust and confidence in the Company.

This Stakeholder Engagement Policy ("Policy") is founded on the principles of transparency, active listening and equitable treatment that favors a consultative and collaborative engagement with all its Stakeholder using effective and responsive communication that makes it possible to forge relations based on trust on an ongoing basis.

Purpose

The purpose of the policy is:

- to set out a method of engagement with Stakeholder who impact and influence our long-term resilience.
- to develop and promote a good understanding of stakeholders' needs, interests and expectations.
- to provide guidance on how the Company should be engaging with its Stakeholder so as to strengthen and maintain relationships with its Stakeholder.
- to identify the opportunities and threats arising from stakeholders' material issues; to assist with strategic, sustainable decision-making.

Scope

This Policy outlines JNIL's overarching approach to engagement with our Stakeholder and the coordination of such. This Policy has been put in place to ensure that stakeholder engagement is applied consistently across all JNIL operations.

This Policy:

- sets out principles for engagement with our Stakeholder.
- forms part of the Company's operating philosophy, policies, standards, and values.
- is monitored as and when required.
- supports and should be read in conjunction with the Company's policies on ethics, Environmental, Social & Governance and Corporate Social Responsibility etc.

Definitions

1. "Company" means Jayaswal Neco Industries Limited ("JNIL").
2. "Policy" means "Stakeholder Engagement Policy"
3. "Stakeholder" means "Shareholders, Employees, Customers, Regulators, Lenders, Investors, Government Agencies & Local Authorities, Service Providers and Suppliers, Media, Community and public at large.

Policy Statement

In relations with its Stakeholder, the Company accepts and promotes the following basic principles:

- i. Development of a responsible business model in order to be an innovative, transparent, integrating, open and committed capable of creating sustainable value for all its Stakeholder on a shared basis therewith;
- ii. Maintenance of a strategy of strong involvement in the communities in which it operates;
- iii. Allocation of the necessary resources to the proactive continued and systematic establishment of fluid channels for dialogue with Stakeholder, to establish balanced relationships between corporate values and social expectations, considering their interests, concerns and needs.
- iv. Having a dynamic organizational structure that allows for the promotion and coordination of responsible actions with Stakeholder and using various instruments to favor communication and dialogue therewith, within a constant process of adaptation to their needs, expectations, and interests: direct contact, the Company's corporate website, the Company's proactive presence on social media, with a particular impact on social and environmental issues;
- v. The Company is responsible for designing, approving and overseeing the Stakeholder relations strategy.

Feedback

Our stakeholder methods of engagement include various channels and means of communication and feedback processes like e-mails, one-to-one meetings, consortium meetings and calls, published communications, disclosures, etc. reliant on each specific stakeholder group.

Accountability & Grievance Procedure

Stakeholder engagement is decentralized at JNIL so there is not a single team that manages all relationships and queries or concerns from Stakeholder. JNIL employees are accountable for managing relationships and meeting the expectations of internal and external Stakeholder within their areas of responsibility.

Where a stakeholder is not satisfied with the service or assistance that they receive from their JNIL point of contact, there are several opportunities that allow for anonymity (if desired) as well as independence to ensure a voice for concerned Stakeholder.

Review of policy

The Board will review this Policy every so often and as required to ensure it remains consistent with the Board's objectives and responsibilities.

APPENDIX 1 STAKEHOLDER ENGAGEMENT MATRIX

PURPOSE OF ENGAGEMENT	FREQUENCY OF ENGAGEMENT	METHODS OF ENGAGEMENT
Shareholders		
To provide current and future shareholders with relevant and timely information.	On a formal basis, to coincide with the release of quarterly, half yearly, yearly results and as and when required.	Annual General Meeting
To manage shareholder expectations and reputational risk.		Extraordinary General Meetings as and when called for and Postal Ballot.
To maintain strong relationships, keep abreast of market developments and inform the shareholder targeting strategy.		
To ensure good governance and deepen the trust placed in the company and the brand.		
To get feedback that informs strategy, business operations and how we govern.		Meetings with financial institutions, shareholders, and analysts. (if required), Timely updates as per the requirement of Listing Regulations.
Employees		
To provide staff with a strategic direction and keep them informed about Company activities.	Ongoing and daily engagement at all levels as required by staff.	Regular, direct communication between managers, teams and individuals.
To provide a safe, positive and inspiring working environment.		There's also a robust combination of face-to-face, written, that include emails and intranet communications.
To understand and respond to the needs and concerns of staff members.		
Customers		
To understand them, their aspirations, businesses and financial service needs better.	Ongoing, dependent on customer needs and	Interactions through sales agents, marketing department and senior management .

To provide appropriate advice, proactive solutions and value-adding services.	identified sales, service or guidance opportunities.	
To ensure that the Company maintains high service levels that they expect and deserve.		Customer events, face-to-face meetings and other surveys as well as marketing and advertising activities.
To inform product development and prioritization		The company tracks time to time performance for Customer satisfaction and plans to improve it.
To develop products that embody customer-centric innovation.		Formal written correspondence, emails and newsletters and messages disseminated through social media.
To ensure the accuracy of customers' personal and/or business information		
Regulators		
To maintain open, honest and transparent relationships and ensure compliance with all legal and regulatory requirements.	Daily event-based, weekly, monthly, quarterly, half-yearly and yearly and as required.	Various industry and regulatory forums and meetings. One-on-one discussions with various executive officials at prudential meetings as well as onsite meetings. Submission of compliance through online/offline mode.
Government Agencies, Local Authorities & Industry Forums		
To build and strengthen relationships with the government	As deemed necessary by either party.	Various engagements with state and central governments, local bodies, industry forums, chamber of commerce, etc. through participation in consultative industry and sector programs/ forums.
To provide input into legislative development processes that will affect the economy and the company's activities and operations.		
To continue learning through interaction with the industry and cross-sectorial organizations.		
Service Providers and Suppliers		
As required or dictated by performance contracts and/or agreements.	Ongoing, as required	One-on-one negotiations and meetings for finalization follow-up and after-sales service.
To obtain products or services required for conducting Company's business.		Following communication platforms:

To maintain an ideal and timely supply of goods and services for operations.		1. Supplier Development 2. Vendor Assessment & Audits 3. Official Communications
To encourage responsible practices across the supply chain, local procurement, supplier conduct and environmental considerations.		
To include critical suppliers in cross-functional teams so as to contribute expertise and advice before specifications are developed for products or services.		
Media		
To leverage the reach to share the business story with Stakeholder.	Interactions in response to business-related media inquiries as and when required.	Launches of various products
To communicate with relevant Stakeholder and the broader public		Interaction with key business media on relevant matters as and when required.
To protect and manage reputation.		
Others - Community and public at large		
To create partnerships that serve to facilitate integrated sustainability activities.	Ongoing – as stakeholder needs require.	Company's website, annual report, social media handles, press releases and media statements.
To obtain input from environmental experts, communities and non-governmental organizations (NGOs) regarding key focus areas.		CSR follows a proper community engagement process as it's a continuous engagement model strives for sustainable development.
To create awareness of the 'shared growth' commitment and initiatives		
Lenders and investors	As deemed necessary by either party	One-to-one and consortium meetings and calls and mail communications. Disclosures, media updates and information on website.