

STAKEHOLDER MANAGEMENT POLICY

OF

THANGAMAYIL JEWELLERY LIMITED

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1. Introduction

Thangamayil Jewellery Limited (the “Company”) recognizes that effective stakeholder management is a crucial component of our business operation. In order to understand the needs of stakeholders and to involve them in managing risks and resolving conflicts and to ensure that the long term ‘social license to operate’ for a business, a systematic structure to identify them and to establish sufficient modes of engagement with them is required.

2. Scope

Each business unit in every operating location is required to carry out stakeholder engagement in accordance with the principles of this policy, and to ensure that they maintain and commit to play a role in nurturing the Company’s stakeholder relationships.

3. Objective

- a) Ascertaining the nature of impacts on stakeholders, their legitimate concerns, interests and expectations as well as their potential influence on the company analysing the implications of those factors on business operations;
- b) Embedding the principles of inclusiveness, transparency, materiality, completeness and cultural appropriateness in all our engagement activities;
- c) To ensure the disclosure of information about the company’s activities in a timely and culturally appropriate manner to allow for informed and meaningful engagement;
- d) To ensure the stakeholder grievances are resolved in a timely and culturally appropriate manner;
- e) Designing appropriate engagement methods and plans that meet international standards, are tailored to the stakeholders’ needs and have well-defined objectives and outcomes that can be documented and monitored;
- f) Promoting awareness of the principles and procedures for stakeholder engagement with employees at various levels of our operations through training and communication;
- g) Undertaking engagement in a non-discriminatory and interactive manner that encourages stakeholders to provide feedback and engage positively with the business operations;
- h) To identify potential engagement risks.

4. Stakeholder Identification and Prioritization

Relevant stakeholders are those individuals, groups of individuals or organisations that affect and/or could be affected by an organisation’s activities, products or services and by the associated performance about the issues addressed by the engagement. An organisation may have many stakeholders, each with distinct attributes and often with diverse and conflicting interests and concerns.

Establishing a methodology for systematically identifying stakeholder groups that can contribute to achieving the purpose of the engagement and/or could be affected by its outcome is fundamental to the engagement process.

A method for systematically identifying stakeholder groups should consider the scope of the engagement and may be guided by attributes of stakeholders such as the following:

- **Dependency** – groups or individuals who are directly or indirectly dependent on the organisation’s activities, products or services and associated performance, or on whom the organisation is dependent in order to operate
- **Responsibility** – groups or individuals to whom the organisation has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities
- **Tension** – groups or individuals who need immediate attention from the organisation about financial, wider economic, social or environmental issues
- **Influence** – groups or individuals who can have an impact on the organisations or a stakeholder’s strategic or operational decision-making
- **Diverse perspectives** – groups or individuals whose different views can lead to a new understanding of the situation and the identification of opportunities for action that may not otherwise occur.

Based on the above criteria, we have identified, inter-alia, our key stakeholders:

- Shareholders
- Government/Regulatory authorities
- Dealers
- Suppliers
- Employees/Workers
- Bankers
- Communities

5. Stakeholder Engagement Process

At Thangamayil Jewellery Ltd, we promote a culture of consistent engagement with every stakeholder group to seek their feedback in order to improve our business processes.

The stakeholder engagement process shall be used which further shall be subject to change as per the relevant circumstances. The basic overview of the engagement process shall take into consideration the profiling and mapping of stakeholders.

The engagement process shall further develop a clear understanding of who the relevant stakeholders are and how and why they may want to engage with the organisation.

We strive to abide by the following principles when engaging with any stakeholder:

- **Inclusivity** - Inclusivity is the participation of stakeholders in developing and achieving an accountable and strategic response to sustainability. An inclusive organisation accepts its accountability to those on whom it has an impact and who have an impact on it.
- **Materiality** - Materiality is determining the relevance and significance of an issue to an organisation and its stakeholders. A material issue is an issue that will influence the decisions, actions and performance of an organisation or its stakeholders.

- **Responsiveness** - Responsiveness is an organisation's response to stakeholder issues that affect its sustainability performance, and is realised through decisions, actions and performance, as well as communication with stakeholders.

Common modes of engagement with Stakeholders:

The common modes of engagement with stakeholders shall, amongst other, be email, meetings, reports, website.

6. Stakeholder Concerns

a) Grievance redressal

b) The purpose of this clause in the policy is to formalize the management of grievances of both internal and external stakeholders and minimize the social risks to the business. The grievances, if any, will be managed internally with confidentiality and aims to reduce conflicts and strengthens the relationship between the Company and its stakeholders. The Stakeholders may use the below redressal channel to raise their grievance should they not find any specific mechanism in any other policy of the Company.

c) Definitions

- **Grievance** - An issue, concern, problem or a claim that a stakeholder wants to be addressed by the company in a formal manner
- **Internal Stakeholders** – Groups or individuals within a business who work directly within the business such as employees and contractual support staff.
- **External Stakeholders** - Groups or individuals outside a business who are affected in some way by the decisions of the business, such as investors, lenders, value chain partners, customers, community, media and the Government.

d) Grievance Redressal Channel

Stakeholders may register complaints by writing to us at companysecretary@thangamayil.com

This policy shall be reviewed periodically by stakeholder relationship committee for its suitability and updated as necessary.