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	Title: Stakeholder Engagement Policy	Effective Date	01-03-2023
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1.0.0 Purpose / Objective:

Spark Minda recognize that stakeholder engagement is an integral part of our business operations. As it is essential for the Group's strong business performance on a sustainable basis as well as to achieving and maintaining public trust and confidence in the Group.

Effective stakeholder engagement on an ongoing basis is essential for us to identify the opportunities and concerns arising from stakeholders' material issues and work towards their effective resolution

This policy is founded on the principles of transparency, active listening, and equitable treatment that favours a consultative and collaborative engagement with all of its Stakeholders by means of effective and responsive communication that makes it possible to forge relations based on trust on an ongoing basis.

The objective of the stakeholder Engagement Policy are to;

- I. Build lasting, stable and mutually beneficial relationship with all the company's internal and external stakeholders.
- II. Develop and promote a good understanding of stakeholders needs, interests and expectations.
- III. Identifying opportunities and threats arising from Stakeholder's challenges
- IV. Set out a method of engagement with stakeholders who impact and influence our long-term resilience.
- V. Improve quality of relationship between Spark Minda and its stakeholders
- VI. Build positive image for the company in order to change the attitudes of stakeholders towards the company.

2.0.0 Scope/ Coverage

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.

3.0.0 Applicability

Unless otherwise stated, this policy is applicable to all units/ companies of Spark Minda Group.

4.0.0 Definition of terms/ abbreviation

Employee	Means all the personnel on the Spark Minda Payroll or a fixed term contract
Stakeholder	Person or group of persons who directly or indirectly affected by Spark Minda, including those who may have interest in Spark Minda business activities.
Stakeholder Engagement	Means efforts to understand and involve its stakeholders and their legitimate Needs and interest in its activities and decision-making processes.

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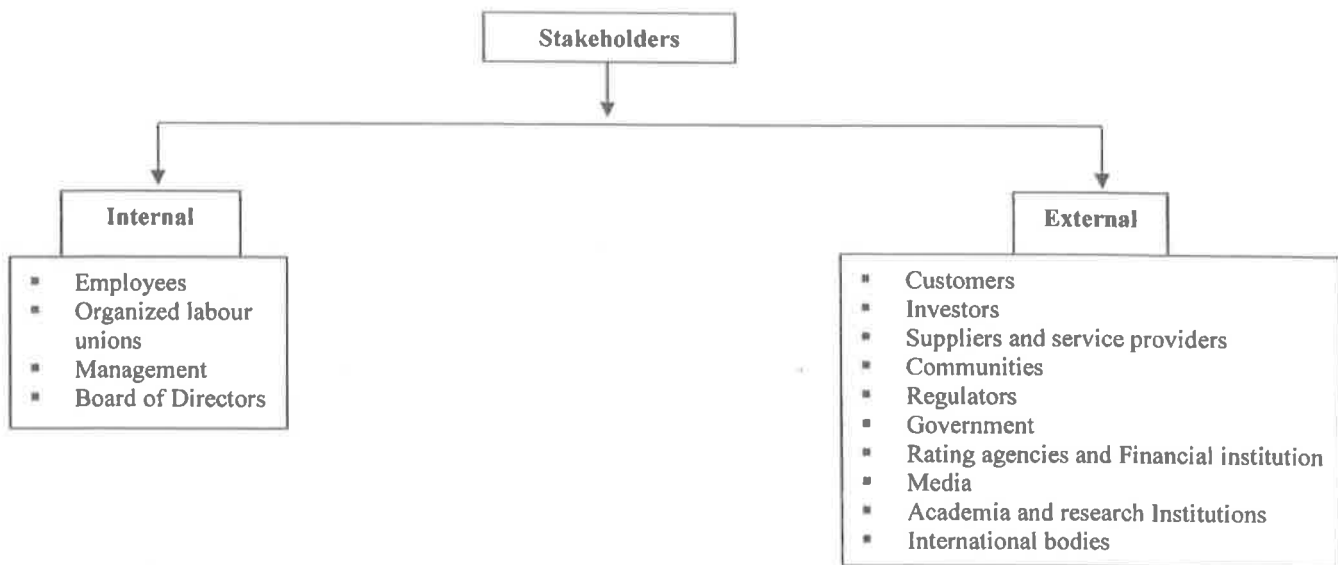
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5.0.0 Objective related to Policy –

5.1.0 Stakeholders

Stakeholders are those individuals, groups of individuals or organizations that impact and/ or could be impacted by our organization’s activities, products or services and associated performance.

At Spark Minda Group we have categorized stakeholders as follows:



5.2.0 Stakeholder Engagement Process

At Spark Minda, we promote a culture of ongoing engagement with every stakeholder group, collecting feedback.

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

- I. Define purpose and frequency of engagement and design appropriate engagements methods
- II. Allows stakeholders to provide feedback and engage positively in business operations.
- III. Consider potential stakeholder engagement risk prior to selecting the level or method of engagement, and devise ways and means to address them.
- IV. Settlement of stakeholder grievances in a fair, equitable and timely manner.

5.3.0 Stakeholder Engagement Matrix

Our methods of engagement include multiple channels and means of communications reliant on each specific stakeholder group and can be grouped under the following broad categories: (I) monitoring, (ii) informing, (iii) consulting and (iv) collaborating. A more detailed list of common modes of engagement deployed for major stakeholders is provided in stakeholder engagement matrix below

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Stakeholders Group	Engagement Channel
Investors	<ul style="list-style-type: none"> ▪ Annual Shareholder meeting ▪ Quarterly investor presentation ▪ Investor conference and meets ▪ Press releases and newsletters
Employees	<ul style="list-style-type: none"> ▪ Employee newsletters ▪ Intranet Portal ▪ Cultural events ▪ Trainings and performance management system ▪ Functional and cross-functional committees ▪ Emails, written communication
Customers	<ul style="list-style-type: none"> ▪ Customer satisfaction surveys ▪ Complaint handling & feedback ▪ Marketing and Advertising ▪ Electronic Communication
Suppliers	<ul style="list-style-type: none"> ▪ Contractor and Supplier meets ▪ Supplier Audits ▪ Regular interaction through phone, e-mail and in person
Community	<ul style="list-style-type: none"> ▪ Awareness camps ▪ Community development through various events ▪ Community meetings, surveys and consultations ▪ CSR interventions and initiatives
Government	<ul style="list-style-type: none"> ▪ Annual reports ▪ Communications with regulatory bodies ▪ Formal dialogues ▪ Face to face meetings ▪ Through Chambers
Media	<ul style="list-style-type: none"> ▪ Written Communication audio & visual communication ▪ Press Conferences

5.4.0 Basic Principles

The Group accepts and promotes the following basic principles to engage and establish relations of trust with its Stakeholders:

a) **Responsibility:** act responsibly and build relationships based on ethics, integrity, sustainable development and respect for human rights and the communities affected by the various activities of the Group.

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b) **Transparency:** ensure transparency in relationships and in financial and non-financial communications, sharing truthful, sufficient, relevant, complete, clear, reliable and useful information.

c) **Active listening:** practice active listening, encouraging bi-directional and effective communication as well as direct, fluid, constructive, diverse, inclusive and intercultural dialogue.

d) **Participation and engagement:** encourage the participation and engagement of the Stakeholders in all of the Company's activities, promoting voluntary consultation processes or similar channels of interaction in application of the law.

e) **Consensus:** work towards consensus with the Stakeholders, especially with local communities and indigenous populations, taking their viewpoints and expectations into consideration.

f) **Collaboration:** promote collaboration with the Stakeholders, in order to contribute to compliance with the Purpose and Values of the Spark Minda Group.

g) **Continuous improvement:** seek continuous improvement, regularly reviewing Stakeholder engagement mechanisms to ensure that they respond in the most efficient way possible to the needs of each moment.

5.5.0 Management Responsibility:

The management Responsibility is to efficiently and effectively administer operations in accordance with the Stakeholder Engagement Policy by providing suitable resources, such as allocating budget, assigning adequate number of dedicated, skilled and knowledgeable staffs, and providing systems for taking suggestions from stakeholders, compiling information, monitoring progress and evaluating results. Stakeholder engagement information should be integrated into organizational governance, strategy and management in order to achieve inclusive organizational acceptance and development of an accountable and strategic response to sustainability.

5.6.0 Stakeholders' concerns

Should a stakeholder have any queries or concerns or require any clarifications relating to the Company may write to the Company at Grievances@mindacorporation.com.

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6.0.0 Special Provisions

Any deviation from policy shall be approved by GCHRO and GCEO.

7.0.0 Supersede

This SOP shall supersede all previous SOPs, policies and templates relating to Stakeholders Engagement Policy.

8.0.0 Confidentiality Level

The document is property of Spark Minda group and will be shared with all the employees.

9.0.0 Training and Awareness

HR team will be responsible for the training and awareness of this policy.

List of Functional Committee Members:

Name of Members	Designation
Neeraj Tewatia	Group IR Head
Dharmendra Saxena	Operations Head – BV I
Ajay Singhroha	Group CHRO
Sanjiv Kumar Jalan	Head - Corporate Audit & Governance




Revision History

Rev No	Description	Date
R00	Original Document	01 Mar 2023

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Approval

Responsibility	Name	Designation	Signature
Prepared by	Sandeep Yadav	GM - Corporate HR	
Reviewed by	Ajay Singhroha	Group CHRO	
Validated by	Sanjiv Kumar Jalan	Head - Corporate Audit & Governance	
Approved by	Ashok Minda	GCEO	

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