

22.0 Environment, Social & Governance
P22.12 Responsible Marketing Policy
Vardhman Group

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22.12.1. Overview

Responsible Marketing Policy highlights Vardhman's commitment to consumer trust and fairness. It emphasizes transparency and ethical practices in marketing, ensuring that the brand is not only promoting its products but also considering the well-being of its customers. This kind of policy is crucial for building long-term relationships with consumers and other stakeholders.

It seems that the policy also serves multiple purposes:

- Vardhman's dedication at the leadership level ensures that ethical marketing practices are a top priority.
- Direction to Vardhman's marketing teams, ensuring they align with the company's values and adhere to ethical standards when executing campaigns.
- By extending this commitment to partners, suppliers, and other external stakeholders, Vardhman shows that responsible marketing extends beyond just internal teams.

22.12.2. Objective

The objective of this policy is to ensure that the company upholds ethical standards in its marketing practices, avoiding any misleading information that could cause harm to the company, its employees, or external communities. It also focuses on building and maintaining a positive corporate image by accurately and appropriately representing the company's products, services, and values.

This policy emphasizes the company's responsibility to be realistic and transparent in its marketing efforts, ensuring that customers receive truthful and accurate information about its products and services, allowing them to make informed decisions. The policy aims to foster trust and integrity between the company and its audience, while also maintaining a strong, sustainable market presence.

22.12.3. Scope & Applicability

This policy is applicable globally and is mandatory for all employees and any third parties engaged in any form of communication on behalf of the company.

22.12.4. General Principles

1. Provide accurate and balanced information about our company's products/services:

Everything we do in marketing must be legal, accurate, honest, and truthful. Our activities must never mislead customers, nor be likely to do so. We must not omit key information and we must present our communication in a way that is understandable by our consumers at the moment that they receive it.

2. Be transparent about our products and marketing intentions:

Customers can count on us to deliver full transparency and associated information about our products. They can trust that none of our marketing communications and activities will be

misleading. We will be transparent about their commercial purpose, so they are clearly recognizable as marketing, whatever their form or medium used.

3. Protecting Consumer Data and Privacy:

We are strongly committed to protecting the privacy of those who entrust us with personal data. We will only collect data when necessary, use it fairly, and protect it in accordance with legal requirements. As expectations and technology evolve, we will evolve to sustain this commitment.

4. Represent and Portray Diversity, Inclusion, and Protection of Vulnerable Segments:

We are deeply committed to reflecting the rich diversity of our global consumer base, upholding human dignity, and fostering an inclusive environment that is free from stereotypes, violence, antisocial behavior, or discrimination in any form. This commitment extends to actively protecting vulnerable market segments, such as children and individuals with limited market literacy, ensuring that our marketing practices are considerate of their needs and do not exploit their potential vulnerabilities. We collaborate with our suppliers and partners to promote a fairer society that not only respects human rights but also actively safeguards the interests of those who are most susceptible to market influence.

5. Abstain from disinforming customers on competitors' work/product:

One of the goals of our marketing is to create a competitive advantage, however, we must refrain from using strategies that aim to harm, discredit, or disinform our competitors. We must not adopt practices like creating negative reviews of our rivals, providing incentives for reviewers to disparage our rivals, or creating unfavourable publicity about the products or business of our competitors, whether subtly or blatantly.

6. Rejecting exaggerated claims about social and Environmental Impacts:

We firmly reject any form of exaggerated claims about the social and environmental impacts of our work. We recognize that responsible communication entails presenting information in a truthful and responsible manner and avoiding misleading or deceptive practices that could misinform our stakeholders.

7. Training and Compliance:

We are committed to the effective adoption of the Responsible Marketing Policy & Principles and completion of the associated training will be mandatory for all employees working within our Marketing teams and all marketing personnel will be made aware of this Policy. Compliance with training is monitored internally by a regular auditing process and failure to complete training can lead to disciplinary action. We continue to process and monitor on an ongoing basis consumer, customer, and employee feedback on our marketing, for example through our consumer relation lines or our Speak Up Line.

8. Discipline for Non-Compliance:

Any violation of this Policy is taken seriously and will be assessed on a case-by-case basis and by reference to the relevant facts. The procedure for investigation of any alleged violations will be in accordance with Vardhman Group's disciplinary policies and procedures.

22.12.5. Governance

- The Environment, Social & Governance (ESG) Committee of the Board shall govern the Responsible Marketing policy.
- A designated committee oversees the implementation and adherence to this policy.
- This committee is responsible for periodic assessments and reporting compliance to the management.

22.12.6. Policy Review

This policy will be reviewed As & When needed, and typically focuses on ensuring that marketing practices are ethical, transparent, and considerate of customers' well-being, especially to maintain the integrity and effectiveness of responsible marketing efforts.