

**Kewaunee Labway Private Limited**  
**Stakeholder Engagement Policy**

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<b>Reviewed by (VP- Finance, Treasury and Compliance)</b>	<i>Ravi Tibrewal</i>
<b>Approved by (Managing Director)</b>	<i>[Signature]</i>

## 1.0 Introduction

Kewaunee Labway India Pvt. Ltd. ("Kewaunee Labway" or "the Company") recognizes that effective stakeholder engagement is fundamental to responsible business conduct, long-term value creation, and sustainable growth. The purpose of this Stakeholder Engagement Policy is to establish a structured, transparent, and inclusive framework for identifying, engaging with, and responding to the expectations and concerns of stakeholders who are affected by, or can influence, the Company's activities.

This Policy reflects the Company's commitment to ethical conduct, accountability, and respect for stakeholder interests, in line with the principles of ISO 26000 (Social Responsibility) and ISO 20400 (Sustainable Procurement). It aims to ensure that stakeholder engagement is systematic, meaningful, and integrated into decision-making processes across the organization.

## 2.0 Scope and Applicability

This Policy applies to all business activities, locations, and functions of Kewaunee India Labway Pvt. Ltd. It is applicable to employees, management, and the Board of Directors, as well as to interactions with external stakeholders, including customers, suppliers, contractors, service providers, regulators, communities, and other relevant parties.

The Policy covers stakeholder engagement in relation to operational, strategic, governance, environmental, social, and procurement-related matters, including those arising across the Company's value chain.

## 3.0 Principle

Kewaunee's approach to stakeholder engagement is guided by the principles of inclusivity, transparency, accountability, responsiveness, and respect. The Company seeks to engage with stakeholders in a manner that is open, honest, and timely, and that recognizes the diversity of stakeholder perspectives and expectations.

In alignment with ISO 26000, the Company is committed to respecting human rights, promoting fair operating practices, and contributing positively to society through constructive dialogue. In line with ISO 20400, the Company integrates stakeholder engagement into its procurement and supply chain management processes to promote responsible sourcing, ethical behaviour, and long-term supplier relationships.

## 4.0 Definitions

- **Stakeholder** refers to any individual, group, or organization that has an interest in, is affected by, or has the ability to influence the activities, decisions, products, or services of Kewaunee. Stakeholders may be internal or external and may vary depending on the nature and context of the Company's operations and value chain.
- **Stakeholder Engagement** refers to the systematic and ongoing process by which the Company identifies, communicates with, consults, and responds to its stakeholders in order to understand their expectations, concerns, and perspectives, and to integrate relevant inputs into decision-making and business processes.
- **Material Stakeholder** refers to a stakeholder whose interests, expectations, or concerns have the potential to significantly influence the Company's business performance, risk profile, reputation, or sustainability outcomes, or who may be significantly impacted by the Company's activities.
- **Material Issue** refers to an environmental, social, governance, or economic topic that reflects the Company's significant impacts or risks, or that substantively influences stakeholder assessments and decisions. Material issues are identified through stakeholder engagement and internal assessment processes.
- **Value Chain** refers to the full range of activities, relationships, and entities involved in the creation and delivery of the Company's products and services, including suppliers, contractors, logistics partners, distributors, and customers.
- **Sustainable Procurement** refers to procurement practices that integrate environmental, social, and ethical considerations into sourcing and supplier management decisions, in line with ISO 20400, while maintaining quality, cost-effectiveness, and business continuity.
- **Supplier** refers to any external party that provides goods, materials, components, equipment, or services to the Company, including contractors, subcontractors, and service providers.

- **Grievance Mechanism** refers to a formal, accessible process through which stakeholders can raise concerns, complaints, or feedback related to the Company’s activities, behaviour, or impacts, and seek resolution in a fair, transparent, and timely manner.
- **Engagement Mechanism** refers to the tools, channels, and methods used by the Company to interact with stakeholders, including meetings, consultations, surveys, audits, assessments, training programmes, and communication platforms.
- **Inclusivity** refers to the principle of engaging with stakeholders in a manner that respects diversity, avoids discrimination, and ensures that relevant and potentially vulnerable stakeholder groups have an opportunity to be heard.
- **Responsiveness** refers to the Company’s commitment to acknowledge, assess, and appropriately address stakeholder inputs, concerns, and expectations within a reasonable timeframe.

### 5.0 Key Stakeholder Groups

While stakeholder groups may evolve over time, Kewaunee’s key stakeholders typically include employees, contract workers, customers, suppliers and service providers, distributors and channel partners, regulators and government authorities, shareholders and investors, local communities, industry associations, and civil society organizations.

Within the context of ISO 20400, particular emphasis is placed on suppliers and contractors, especially those that present higher environmental, social, or ethical risks within the supply chain.

### 6.0 Stakeholder Identification and Prioritization

The Company adopts a structured approach to stakeholder identification and prioritization, considering factors such as the degree of influence, level of dependency, potential impact on stakeholders, and the significance of stakeholder concerns to the Company’s business objectives.

This process supports informed decision-making and ensures that engagement efforts are proportionate, focused, and aligned with material risks and opportunities, including those related to sustainability, procurement, and compliance.

### 7.0 Engagement Objectives

The objectives of stakeholder engagement at Kewaunee Labway India Pvt Ltd include understanding stakeholder expectations and concerns, building trust-based relationships, improving the quality of decision-making, identifying and managing risks, and enhancing the social, environmental, and economic performance of the Company.

Through effective engagement, the Company seeks to create shared value, mitigate adverse impacts, and strengthen its reputation as a responsible and reliable business partner.

### 8. Modes of Stakeholder Engagement

Stakeholder engagement at Kewaunee Labway India Pvt Ltd is conducted through structured and appropriate mechanisms that are tailored to the nature of the stakeholder relationship, the level of impact or influence, and the purpose of engagement. The Company seeks to ensure that engagement is meaningful, regular, and responsive, enabling constructive dialogue and informed decision-making.

The table below outlines the Company’s key stakeholder groups and the typical modes of engagement adopted for each group:

<i>Stakeholder Group</i>	<i>Purpose of Engagement</i>	<i>Key Modes of Engagement</i>	<i>Frequency</i>
<i>Employees and Contract Workers</i>	To understand workforce expectations, ensure safe and fair working conditions, support professional development, and address workplace concerns	Team meetings, town halls, performance reviews, training programmes, employee surveys, grievance redressal mechanisms	Ongoing / Periodic
<i>Senior Management and Board</i>	To support strategic decision-making, governance oversight, and risk management	Board meetings, management reviews, strategy sessions, compliance and risk reporting	Periodic

<b>Customers</b>	To understand customer requirements, improve product and service quality, and enhance satisfaction	Client meetings, feedback surveys, customer audits, complaint handling mechanisms, contract reviews	Ongoing
<b>Suppliers and Contractors</b>	To promote responsible sourcing, ethical conduct, quality, and sustainability performance in line with ISO 20400	Supplier assessments, audits, performance reviews, capacity-building sessions, contractual requirements, grievance mechanisms	Periodic / Risk-based
<b>Distributors and Channel Partners</b>	To align on business expectations, compliance requirements, and performance standards	Review meetings, performance evaluations, contractual communication, training sessions	Periodic
<b>Regulators and Government Authorities</b>	To ensure legal and regulatory compliance and maintain transparent relationships	Statutory filings, inspections, audits, formal correspondence, meetings	As required
<b>Local Communities</b>	To understand and manage social and environmental impacts and contribute positively to community development	Community meetings, consultations, CSR initiatives, grievance mechanisms	Periodic
<b>Industry Associations and Professional Bodies</b>	To contribute to industry best practices and remain informed of regulatory and technical developments	Membership participation, workshops, conferences, working groups	Periodic
<b>Civil Society and Other External Stakeholders</b>	To understand broader societal expectations and emerging risks	Consultations, dialogue sessions, written communication	As appropriate

For suppliers and contractors, engagement mechanisms are designed to support continuous improvement, ethical behaviour, and long-term partnerships, consistent with the principles of sustainable procurement under ISO 20400.

## 9.0 Integration with Business and Procurement Processes

Stakeholder engagement outcomes are integrated into relevant business processes, including strategy development, risk management, policy formulation, operational planning, and procurement decisions.

In line with ISO 20400, supplier-related feedback and engagement outcomes are used to inform responsible sourcing decisions, supplier development programmes, and continuous improvement initiatives across the supply chain.

## 10.0 Grievance Redressal and Feedback Mechanisms

Kewaunee Labway India Pvt Ltd is committed to providing accessible and effective mechanisms for stakeholders to raise concerns, provide feedback, or seek clarification. Grievance redressal mechanisms are designed to be fair, transparent, and timely, and to protect stakeholders from retaliation.

Stakeholder feedback and grievances are reviewed systematically, and appropriate corrective or preventive actions are taken to address legitimate concerns.

## 11.0 Communication and Disclosure

The Company endeavors to communicate relevant information to stakeholders in a clear, accurate, and timely manner. Communication may take the form of direct engagement, contractual documentation, policy disclosures, sustainability or annual reports, and other appropriate channels.

Disclosures are made in a manner that balances transparency with confidentiality and legal obligations.



#### **12.0 Monitoring, Review, and Continuous Improvement**

Stakeholder engagement activities are periodically monitored and reviewed to assess their effectiveness and relevance. Feedback from stakeholders is used to identify areas for improvement and to enhance engagement practices over time.

This Policy and the associated stakeholder engagement processes will be reviewed periodically to ensure continued alignment with business needs, stakeholder expectations, and the principles of ISO 26000 and ISO 20400.

#### **14. Policy Ownership and Approval**

This Policy is owned by the designated Sustainability, Compliance, or Governance function of Kewaunee Labway India Pvt. Ltd. and is approved by the Board of Directors. The Board retains ultimate responsibility for ensuring that stakeholder engagement is conducted in a responsible, consistent, and effective manner.