



**ITC LIMITED'S FOODS DIVISIONS
NUTRITION AND PUBLIC HEALTH
ENGAGEMENT POLICY**

Philosophy

ITC Foods Division believes in responsible engagement practices with policymakers in the domain of nutrition and public health, either directly or via appropriate trade associations/industry chambers. All engagements in this matter are based on company's code of conduct which is necessary to maintain transparency. This policy is applicable to:

- All employees of ITC Foods across different sites.
- 3rd parties that engage on behalf of ITC Foods.
- All forms of external engagement including formal/informal communications and social interactions pertaining to the business matters of ITC Foods Division.
- Diverse formats including verbal, written, in-person or via electronic media.

Guiding Principles

All employees and designated 3rd party stakeholders will have to abide by the principles clearly stated in ITC's Core Values, ITC's Code of Conduct and ITC's Policy on Responsible Advocacy. ITC's Core Values are aimed at developing a customer-focused, high-performance organisation which creates value for all its stakeholders. ITC's Code of Conduct is derived from three interlinked fundamental principles, viz. good corporate governance, good corporate citizenship and exemplary personal conduct in relation to the Company's business and reputation. ITC's Policy on Responsible Advocacy ensures that engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

Policy

It is our policy:

1. To ensure all employees must seek prior approval from designated line managers and in some cases the Executive Committee members before engaging with any external stakeholders towards nutrition and public health related policy matters. Third parties that are authorised to act on behalf of the company will also have to undergo a similar line of pre-approvals.
2. To ensure while hiring of any former government officials/policymakers, appropriate measures would be taken in understanding and evaluating the current applicable rules & regulations, along with mapping internal potential conflict of interest. Identification of specific responsibilities for the individual amongst other critical requirements would also be undertaken, before engaging and hiring such employees.
3. To not encourage political engagements by employees and designated 3rd parties. If required, it is to be done through relevant industry bodies to provide a comprehensive view. Any

exception to this will require prior approval at CMC/DCE level and to be done in conjunction with Corporate Affairs team.

4. To comply to all applicable national laws in regards to any measures within the domain of nutrition and public health e.g. product formulation & claim guidelines, advertising guidelines, financial measures to address obesity- (e.g. 'Sin tax', 'Fat tax'), Front-of-Pack labelling systems, restrictions on marketing/advertising of products to children which defines the criteria for product healthiness, mandatory fortification of packaged food and beverages, use of fortified ingredients in packaged foods, amongst other, as valid.

Implementation

- This policy is communicated to all employees of the Foods Division and other designated third-party stakeholders in an appropriate and meaningful manner.
- ITC Foods Division has appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions. Divisional / SBU Chief Executives, through members of the respective Executive Committees, will ensure implementation of this Policy.