



RAIN INDUSTRIES LIMITED

POLICY ON SUSTAINABILITY COMMITMENT

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POLICY ON SUSTAINABILITY COMMITMENT

I. Our Sustainability Commitment

Rain Industries Ltd. (“RIL”), through its family of subsidiaries and ventures (collectively with RIL, “RAIN”) produces materials in the cement and carbon sectors critical for sustainable industrial development in India and worldwide. From our very early years, RAIN has been committed to the concept of sustainable business practices. This is underlined by the core of RAIN’s business model that includes various activities in the areas of environmental performance improvement and long-lasting social responsibility programs.

RIL’s operating sub-parents Rain Cements Ltd. (“RCL”) and Rain Carbon Inc. (“RCI”), both being participants of the UN Global Compact, are engaged in a constant effort to formulate and assess its policies and its strategies to ensure the alignment of its business practices with the UN Global Compact’s globally recognized sustainability principles. We are committed to sustainable business practices to ensure that our activities are in-line with those tenets.

Rain Cements Ltd. has a Sustainable Development Framework which strongly supports the purpose of the company: RCL is dedicated in producing high-quality cement (PPC and OPC) that builds a stronger India, while delivering values to all our stakeholders – our employees, shareholders, customers, and the communities in which we live and work. The 3Rs framework (*Resourceful, Responsible, Reliable*) gives guidance to the organization in its daily operations:



Rain Cements Ltd. Sustainable Development Framework

Rain Carbon Inc.’s commitment towards sustainability starts right from its Resource-Efficient Business Model that includes using industrial byproducts as raw materials and upcycling them into value-added products. Building on the business model, RCI has developed a Sustainability Mission which highlights our purpose – providing carbon products which are essential for

transitioning towards a sustainable society while incorporating sustainability at our own operations. Our sustainability mission encompasses three pillars of the companies' forward-looking approach: resourceful, responsible, and reliable. RCI Resource-Efficient Business Model and details on our value chain can be found in RCI Sustainability Report.



Rain Carbon Inc. Sustainability Mission Statement

We have identified a list of material topics for RAIN. The RCL Sustainable Development Framework and the RCI Sustainability Mission strengthen RAIN's commitment, guiding us in working effectively towards risk mitigation and development of opportunities arising from RAIN's material topics. Our material topics can be found in the latest [RIL Integrated Annual Report](#). At RCL, we have our internal targets for different environmental and social material topics as well as sustainable procurement. For RCI, we have defined ambitions (and first targets) against each of the material topics. RCI ambitions, targets and performance can be found in the latest RCI Sustainability Report (on www.raincarbon.com).

At RAIN, we are committed to incorporate UN GC principles in our processes through our codes, policies and procedure as defined below.

1. Sustainability Governance

At the core, we are committed to meeting the aspirations of all our stakeholders, and we believe that operating our business on the principles of transparency, integrity, and accountability are critical drivers of business growth, while creating sustained value for stakeholders.

a. Sustainability Governance Structure

We are committed to good corporate governance and ensuring accountability at all levels of our company. We have therefore established an organizational structure that ensures the oversight of the organization by the highest governance body, our Board of Directors. The structure is available online in the latest RIL Integrated Report and in the latest RCI Sustainability Report.

b. Code of Conduct and Related Policies

Both RCI and RCL have Codes of Business Conduct and Ethics (referred to hereby as the “Codes of Conduct”) as well as additional specific policies in place to ensure good corporate governance. Covering a broad range of topics including “Anti-Bribery and Anti-Corruption”, “Protection of Corporate Assets”, “Compliance with Laws, Rules and Regulations”, “Workplace Conduct”, “Political and Community Activities”, and “Safety, Health and Environment”. We establish a set of standards to promote compliance with the Codes of Conduct along with local, regional and global anti-bribery and anti-corruption laws and regulations applicable to RAIN such as the U.S. Foreign Corrupt Practices Act (FCPA). RCI’s compliance program provides guidance on our commitment to the highest compliance, ethical, and legal standards when interacting with our customers and suppliers.

2. Environment

As part of our RCI Global Safety, Health and Environment (SH&E) Policy, RCL QEHS and RCL Green Policy, and RCL Energy Management Policy, along with our embrace of local environmental policies for our ISO 14000 certified sites, we are committed to conducting business with respect and care for the environment and to eliminating all environmental incidents from our activities.

We have a resource efficient business model at RCI which helps in reducing the overall environmental footprint and contributes towards a circular economy. The business model at RCL adopts producing PPC which contributes to circularity through the use of fly ash which is a waste product of thermal power plants. Unlike many other cement plants in India, RCL does not have its own coal-based thermal power plant.

3. Safety and Social

We have a responsibility to our employees to ensure a safe working environment and that employees feel valued. RAIN’s staff is the main driver of our business success. We are committed to meeting and exceeding stringent local, regional, national and global safety and social standards.

a. Occupational Health & Safety

Health and safety are of central importance to RAIN. We insist our operations follow RAIN’s numerous occupational, health and safety policies as well as various local policies available wherein we elaborate our commitment to the health and safety of our employees. RAIN constantly monitors the company’s performance in ensuring a safe workplace for everybody at

our work locations and introduces improvements to those policies to ensure we continue to be at the top of our industrial class.

b. Labour and Human Rights

From our RIL, RCI and RCL Code of Business Conduct and Ethics policies to our local anti-harassment, anti-discrimination, freedom of association, forced and child labour policies, among others, RAIN is committed to compliance with all applicable national and local laws, rules and regulations supporting human rights. RAIN's Codes of Conduct incorporate the UN's Universal Declaration of Human Rights and the International Labor Organization's fundamental conventions concerning rights at work (*i.e.* numbers 29, 87, 98, 100, 105, 111, 138 and 182) and we insist our management and staff support those principles. To ensure compliance, RAIN observes an open-door policy, has in place internal escalation and reporting policies, and offers robust whistleblower policies allowing anonymous reporting. We are committed to maintaining the highest standards of ethical and legal conduct.

c. Communities

Our commitments include a focus on corporate social responsibility (CSR) and enhancing the quality of life in the communities where we operate. RAIN's CSR Policies facilitate our commitment to improve the quality of life of our workforce, their families and also the community and society at large. We support communities through our Pragnya Priya Foundation in India, RÜTGERS foundation in Europe, and various charities such as United Way in North America.

d. Employees

We are committed to provide a workplace where our employees feel valued and have opportunities to grow and learn. Our guiding principles help our managers become better leaders.

At RAIN we have several internal Human Resources policies as well as learning and development programs in place enabling robust human resource management processes (including international onboarding policy, international training and development policy, international assignment policy, training program).

We are committed to providing equal employment opportunities to all employees and applicants based on qualification and merit, free of discrimination, and with the right of association. It is our policy to prohibit any form of harassment or inequity at any RAIN workplace.

4. Our Value Chain Partners (Supplier Code of Conduct)

We are committed to sustainable procurement and expect our suppliers to follow the same principles as ours. We have a "RAIN Supplier Code of Conduct" and internal RAIN Sustainable Procurement Procedure in place to communicate our expectations with our existing as well as new suppliers.

5. Raising Concerns

All employees, suppliers as well as customers can raise their grievances and report on the breach of RIL, RCI and RCL Codes of Conduct or any other sustainability or company policy. We have RCI Escalation & Reporting Policy and RIL, RCI as well as RCL Whistleblower Policies in place. The policies define the formal procedure to report on any violation. We have an “Open-Door Communication and Non-Retaliation Policy” to prohibit any form of retaliation or reprisal against RAIN personnel who, in good faith, reports actual or suspected violations of the Codes of Conduct or other policy.

II. Key Processes under our Sustainability Commitment

This section briefly highlights our activities to endorse our sustainability commitment. Certain of the activities explained below are further elaborated on our websites as well as in our annual/ integrated and sustainability reports.

1. Sustainability Strategy Development

RAIN’s sustainability strategy is based on a profound double materiality assessment. For instance, at RCI for each material topic we identify one priority focal area to set an overall strategic orientation. We continuously work to define and improve our ambitions and targets to ensure that our sustainability strategy is constantly evolving.

2. Product Carbon Footprint Assessment/ Life Cycle Assessment

Product Carbon Footprint studies are a tool to assess the sustainability of our overall product portfolio, particularly with respect to climate change. For example, RCI has defined processes in place to conduct Product Carbon Footprint assessment in-line with the ISO 14067 standard.

Lifecycle assessment is a process through which the environmental footprint of a product from its raw material extraction till recovery/ recycling is evaluated. By way of illustration, at RCL we carry out Lifecycle assessments for both our products PPC and OPC in-line with ISO 14040 and ISO 14044 standards. We continuously strive to identify and improve our product life cycle impacts through this approach.

3. Endorsing Our Commitment Through Increased Disclosures

We are committed to building trust among our employees, communities, and other stakeholders and believe it should be done through transparent disclosures on our sustainability practices.

a. Sustainability Ratings and Frameworks

Towards our commitment to responsible business practices, we have committed to the 10 principles of United Nations Global Compact to inform and provide guidance in critical areas of human rights, labor, environment and anti-corruption. We also annually update our EcoVadis and CDP sustainability ratings for different legal entities.

b. Annual Sustainability Reporting

RAIN's sustainability activities are elaborated in RIL's Integrated Annual Report. We publish our RCI Sustainability Report annually in conformance with international standards and respective reporting obligations for different legal entities.

4. Sustainability Data Collection and Assurance

The Corporate Sustainability department collects and consolidates – in close collaboration with local sites and global HR and SH&E (Safety, Health and Environment) Departments – environmental (material consumption, energy, GHG emissions, other air emissions, water and waste) as well as global HR and safety-related data for RAIN on an annual basis. We are continuously working on aligning the data collection with international standards (e.g. GRI). For a major part of the data, we have an annual external assurance in place (independent third-party) – assuring the data for our annual sustainability report.

III. General

1. This policy is applicable to Rain Industries Limited and its subsidiaries.
2. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to Email: sustainability@raincarbon.com. In all such matters, the interpretation & decision of the Board of Directors shall be final.
3. In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment/modification in the Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.
4. Any or all provisions of the Policy may be amended with the approval of the Board of Directors.

For Rain Industries Limited

Place: Hyderabad
Date: August 06, 2025

Jagan Mohan Reddy Nellore
Managing Director
DIN: 00017633