



BUSINESS RESPONSIBILITY POLICY

OF

RESTAURANT BRANDS ASIA LIMITED
(Formerly known as Burger King India Limited)

Document Control:

Version	Approved by	Date
Version 1.0	Board of Directors	May 26, 2021
Version 2.0	Board of Directors	August 12, 2022

Business Responsibility Policy

1. Introduction:

Restaurant Brands Asia Limited ('the Company') is a public limited company incorporated on November 11, 2013 under the Companies Act, 2013 (Corporate Identity Number L55204MH2013FLC249986).

The equity shares of the Company are listed on the BSE Limited ("BSE") Limited and National Stock Exchange ("NSE") Limited of India and accordingly the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') are applicable and binding on it.

2. Scope and Purpose:

As per Regulation 34(2) of the Listing Regulations it is mandatory for the Company to include / provide a Business Responsibility and Sustainability report in its Annual Report for the top 1000 listed companies based on market capitalization as per suggested framework as provided by the Securities and Exchange Board of India ("SEBI") based on the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs and is intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and governance responsibilities.

The framework has laid out the following principles to assess compliance with Environmental, Social and Governance ('ESG') norms:

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

Principle 3: Business should respect and promote the well-being of all employees, including those in their value chains.

Principle 4: Businesses should respect the interest of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

Principle 5: Businesses should respect and promote human rights.

Principle 6: Business should respect, and make efforts to protect and restore the environment.

Principle 7: Businesses, when engaging in influencing public, and regulatory policy, should do so in a manner that is responsible and transparent.

Principle 8: Businesses should support inclusive growth and equitable development.

Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.

With respect to each of the above principles, the Company has formulated a separate policy to ensure compliance with the same. In order to ensure compliance with the ESG norms, this document consolidates all the relevant policies under a single document hereby referred to as Consolidated Business Responsibility Policy (the “**Policy**”).

In view of the above, the board of directors of the Company (“Board”) has approved this Policy.

3. Applicability:

This Policy applies to all the directors, employees and constituents of the Company across all its functions and units.

This Policy shall be effective from May 26, 2021.

4. Implementation:

The Whole-time Director and Group Chief Executive Officer of the Company shall have the authority to oversee the implementation of this Policy. The Group Chief People Officer of the Company shall be responsible for implementing the Business Responsibility initiatives and shall be responsible for, providing clarifications on the Policy, guiding the staff in implementation, reviewing the results, audit, impact assessment, etc.

In view hereof:

The Whole-time Director and Group Chief Executive Officer and the Group Chief People Officer of the Company shall be the reviewing authority of this Policy, subject to the approval of the Board.

5. Interpretation

"Executive Management" shall mean executive / whole-time directors and Senior Management Personnel of the Company.

"Senior Management Personnel" means employees of the Company who are members of its core management team excluding Board and comprising all members of management one level below the executive directors, including the functional heads and key managerial personnel.

"Applicable Law" means the various statutes, delegated legislation (rules, regulations, bye-laws), notifications, binding orders of governmental or statutory authorities, newly introduced and as may be amended from time to time as and to the extent the same is applicable to the Company.

6. Key Principles:

6.1 Ethics, Transparency and Accountability

Policy of the Company on this principle is to ensure;

1. That its governance structures, practices and procedures ensures ethical conduct at all levels and promote the adoption of this principle across its value chain.
2. That it always communicates transparently and assures access to information about their decisions that impact relevant stakeholders.
3. That it does not engage in practices that are abusive, corrupt, or anti-competition.
4. That it truthfully discharges its responsibility on financial and other mandatory disclosures.
5. That it avoids, involvement in practices, either by itself or to the extent possible by any third party that are in violation of this Policy.

The compliance to the above principle shall be ensured through the following policies and adequate / necessary business processes:

- a) Code of Conduct (Annexure 1)
- b) Vigil Mechanism Policy (Annexure 2)
- c) Code of Conduct for Board of Directors and Senior Management Personnel (Annexure 3)

6.2 Safety and Sustainability of Provision of Goods and Services

Policy of the Company on this principle is to ensure:

1. To work towards safe and optimal use of resources over the lifecycle of its products and services, including recycling of resources wherever possible.
2. To take appropriate steps to raise the consumer's awareness of their rights through education, product labelling, appropriate and helpful marketing communication, full details of contents and composition and promotion of safe usage and disposal of their products and services.
3. That the manufacturing processes and technologies required to produce its products are resource efficient and sustainable.
4. Regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
5. Recognition that over-consumption results in unsustainable exploitation of our planet's resources, and should therefore, promote sustainable consumption, including recycling of resources.

The compliance to the above principle shall be ensured through adequate / necessary business processes development by the Company.

6.3 Well Being of All Employees, including those in their Value Chains

Policy of the Company on this principle is to ensure:

1. That we provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, sex, gender, race, religion, disability or sexual orientation.
2. Respect for the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms.
3. Not to use child labour, forced labour or any form of involuntary labour, paid or unpaid, in any form or manner.
4. That we strive to take cognizance of the work-life balance of our employees, especially that of women.
5. That we strive to provide facilities for the wellbeing of our employees including those with special needs.
6. That we ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
7. That we provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees.
8. That we ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis.
9. That we promote employee morale and career development through enlightened human resource interventions.
10. That we recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.

The compliance to the above principle shall be ensured through the following policies and adequate / necessary business processes:

- a) Code of Conduct (Annexure 1)
- b) Vigil Mechanism Policy (Annexure 2)
- c) Policy on Prevention of Sexual Harassment at workplace (Annexure 4)

6.4 Protection of Stakeholders' Interest

Policy of the Company on this principle is to ensure:

1. That we understand the concerns of our stakeholders, define their purpose and scope of engagement, and commit to engaging with them.
2. That we acknowledge, assume responsibility and be transparent about the impact of our policies, decisions, product and services and associated operations on the stakeholders.
3. That we strive to give special attention to stakeholders in areas that are underdeveloped.
4. That we resolve differences with stakeholders in a just, fair and equitable manner.

The compliance to the above principle shall be ensured through adequate / necessary business processes developed by the Company.

6.5 Respecting and Promoting Human Rights

Policy of the Company on this principle is to ensure:

1. That basic human rights of the constituents are respected, valued and protected keeping in mind the Constitution of India, Applicable Laws, Policies and the International Bill of Human Rights and accordingly, formulate all policies, practices, procedures and rules of the Company.
2. That we integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
3. That we recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
4. That we shall within our sphere of influence, promote the awareness and realization of human rights across our value chains.
5. That we shall not be complicit with human rights abuse by a third party.
6. That each employee is made aware of their basic rights and the redressal mechanisms.

The compliance to the above principle shall be ensured through the following policies and adequate / necessary business processes:

- a) Code of Conduct (Annexure 1)
- b) Vigil Mechanism Policy (Annexure 2)
- c) Policy on Prevention of Sexual Harassment at workplace (Annexure 4)

6.6 Respecting, Protecting and Restoring the Environment

Policy of the Company on this principle is to ensure:

1. That we utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
2. That we take measures to check and prevent pollution. The Company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
3. That, benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
4. That we continuously seek to improve our environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
5. That we develop Environment Management Systems (EMS) and contingency plans and processes that shall help us in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to our operations.
6. That we strive to report our environmental performance, including the assessment of potential environmental risks associated with our operations, to the stakeholders in a fair and transparent manner.
7. That we proactively persuade and support our value chain to adopt these principles.

The compliance to the above principle shall be ensured through the following policies and adequate / necessary business processes:

- a) Code of Conduct (Annexure 1)
- b) Policy on Corporate Social Responsibility (Annexure 5)

6.7 Responsibility Towards Public and Regulatory Policy, in a responsible and transparent manner

Policy of the Company on this principle is to ensure:

1. That we will take reasonable efforts to ensure that our advocacy positions are consistent with the principles and the core elements which enhances business responsibility and transparency.
2. That we may, in the best interest of all stakeholders, provide inputs in policy making decisions to various governmental authorities and agencies which concern the

business and as well as the society in general, either directly or through the trade and industry chambers and such other collective platforms.

The compliance to the above principle shall be ensured through adequate / necessary business processes.

6.8 Inclusive Growth and Equitable Development

Further, the Company's fundamental principles for inclusive growth and equitable development includes:

1. To understand its impact on social and economic development, and respond through appropriate action to minimise the negative impacts.
2. To innovate and invest in products, technologies and processes that promote the well-being of society.
3. To make efforts to compliment and support the development priorities at local and national levels, and to assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
4. To operate in regions that are underdeveloped and should especially be sensitive to local concerns.

The compliance to the above principle shall be ensured through:

- a) Policy on Corporate Social Responsibility (Annexure 5)

6.9 Engaging and Enriching Customer / Consumer Value in a responsible manner

Policy of the Company for enhancing the customer's value and satisfaction is to ensure:

1. That while serving the needs of their customers, we will take into account the overall well-being of the customers and that of society.
2. That we will ensure that we do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling our products.
3. That we will disclose all information truthfully and factually, through labelling and other means, including the risks to the individual, to society and to the planet from the consumption of the products, if any, so that the customers can exercise their freedom to consume in a responsible manner. Where required, the Company shall also educate their customers on the safety and responsibility on the consumption of our products.
4. That we will promote and advertise our products in ways that do not mislead or confuse the consumers or violate any of the principles in these guidelines.
5. That we will exercise due care and caution while providing products that result in over exploitation of natural resources or lead to excessive conspicuous consumption.

6. That we will provide adequate grievance handling mechanisms to address customer concerns and feedback.

The compliance to the above principle shall be ensured through adequate / necessary business processes.

7. Monitoring

On an annual basis, the Board of the Company shall monitor and assess the Business Responsibility and Sustainability performance of the Company.

8. Review and Authority to Make Alterations in The Policy

The Board may review the Policy subject to recommendation for alterations made by the Whole-time Director and Group Chief Executive Officer and the Group Chief People Officer from time to time as may be required, subject, however, to the condition that such alterations shall not be inconsistent with the provision of any law, as may be applicable for the time being in force. Changes, if any, shall be effective only upon approval by the Board.