



# FLAIR WRITING INDUSTRIES LIMITED

## Environment Policy

### 1. Scope & Applicability

This Environment Policy (hereinafter referred to as the “Policy”) shall apply to:

- The Board of Directors, including Executive and Independent Directors;
- All employees, workers and contract labour;
- Subsidiaries and step-down subsidiaries of Flair Writing Industries Limited (collectively referred to as “**Flair**” or the “**Company**”);
- Value chain partners, suppliers, vendors, distributors and other stakeholders, to the extent relevant to their engagement with the Company.

This Policy applies across all manufacturing facilities, warehouses, offices and distribution operations of the Company. The Company shall endeavour to influence environmental performance across its supply chain through appropriate engagement, monitoring and contractual mechanisms.

Persons covered under this Policy are collectively referred to as “we” or “us”.

This Policy has been approved by the Board of Directors of the Company at its meeting held on May 21, 2026 and shall be effective with immediate effect.

### 2. Purpose of the Policy

Flair Writing Industries Limited recognizes that manufacturing of writing instruments involves use of plastic resins, inks, packaging materials, energy, water and other natural resources. The Company is committed to protection of environment, prevention of pollution at source, responsible use of natural resources and continuous improvement in environmental performance.

This Policy aims to:

1. Ensure responsible use of natural and physical resources with minimal adverse environmental impact;
2. Promote environmental consciousness across operations and decision-making;
3. Reduce ecological footprint across manufacturing facilities and offices;
4. Comply with applicable environmental laws, pollution control norms and regulatory requirements;
5. Promote circular economy principles in product design, manufacturing and packaging.
6. Integrate the environmental considerations into business strategy, expansion planning and capital allocation decisions;



7. Establish measurable environmental objectives and targets, where feasible;
8. Promote innovation in sustainable product design and efficiency;
9. Encourage responsible sourcing of raw materials.

### **3. Environmental Risk Management**

The Company recognizes two key dimensions of environmental responsibility:

#### **(a) Environmental Risks to Business**

These include risks that may impact operations, performance or supply chain, such as:

- Climate change risks (heatwaves, floods, extreme weather);
- Regulatory changes related to plastics, emissions or waste;
- Water scarcity in manufacturing regions.
- Supply chain disruptions due to environmental factors.

#### **(b) Environmental Impact of Business**

These include impacts arising from:

- Energy consumption;
- Use of plastic and polymer materials;
- Ink and chemical usage;
- Water consumption;
- Waste generation (including hazardous and non-hazardous waste);
- Packaging materials.

The Company shall:

- Periodically assess material environmental risks and impacts;
- Prioritize risks based on severity and stakeholder concerns;
- Develop mitigation and action plans;
- Monitor performance through internal controls and review mechanisms;
- Integrate environmental considerations into the Risk Management framework.

### **4. Core Environmental Principles**

Flair Writing Industries Limited shall:

1. Comply with all applicable environmental laws and Pollution Control Board requirements in letter and spirit;
2. Maintain required consents, authorizations and environmental approvals;
3. Commit to prevention of pollution at source;
4. Continuously monitor and improve environmental performance of facilities;
5. Promote awareness among employees through training and communication;
6. Encourage suppliers to adopt sustainable practices;
7. Reduce pollution at source through process efficiency and technological upgrades;



8. Avoid misleading environmental claims in marketing and communication;
9. Strengthen governance systems to ensure accountability in environmental matters.
10. Promote resource efficiency across the product lifecycle
11. Encourage adoption of environmental management system such as ISO 14001 or equivalent standards, where feasible;
12. Ensure transparency in environmental disclosure in statutory filings, BRSR or sustainability reports.

## **5. Responsible Use of Resources**

### **A. Energy, Air & Climate Change**

The Company shall:

- Promote energy conservation in manufacturing and office premises;
- Upgrade to energy-efficient machinery and lighting (e.g., LED systems);
- Monitor electricity and fuel consumption;
- Identify and progressively measure greenhouse gas emissions (Scope 1 & Scope 2);
- Explore renewable energy sourcing where feasible;
- Ensure transport and logistics partners comply with applicable emission norms;
- Develop contingency measures to address climate-related disruptions.
- Establish contingency measures to address the climate related disruptions.

### **B. Water Management**

Given the use of water in manufacturing processes, the Company shall:

- Implement water conservation measures across facilities;
- Promote rainwater harvesting where feasible;
- Reuse and recycle treated wastewater, aiming to reduce freshwater withdrawal;
- Ensure effluent treatment and discharge strictly comply with regulatory norms;
- Raise awareness among employees regarding responsible water usage.
- Engage with local communities and authorities in water conservation initiatives, particularly in water-stressed areas.

### **C. Waste Management & Circular Economy**

As a manufacturer of writing instruments involving plastic components, the Company shall:

- Promote reduction, reuse and recycling of plastic waste;
- Ensure proper segregation of waste at source;
- Safely handle and dispose of hazardous waste (if any) in compliance with law;
- Work towards minimizing waste sent to landfill;
- Comply with Extended Producer Responsibility (EPR) requirements under Plastic Waste Management Rules;



- Encourage R&D initiatives to reduce virgin plastic consumption and explore recycled or alternative materials;
- Increase use of recycled content in products and packaging, subject to quality and regulatory standards;
- Promote sustainable packaging practices;
- Design products that are durable, refillable or recyclable, where commercially feasible;
- Collaborate with recyclers, agencies and stakeholders to improve circularity across the product lifecycle.

#### **D. Biodiversity**

The Company shall:

- Ensure that operations cause minimal disturbance to local ecosystems;
- Maintain green cover within and around manufacturing facilities wherever feasible;
- Conduct environmental impact assessments prior to major expansions where required;
- Comply with environmental clearance conditions, if applicable;
- Avoid sourcing materials that contribute to deforestation or ecosystem degradation, where feasible;
- Encourage plantation and local environmental initiatives.

#### **6. Governance & Implementation**

- The Managing Director, Whole-time Directors and/or designated senior management personnel shall oversee implementation of this Policy.
- The Risk Management Committee shall periodically review environmental performance.
- The Compliance Department shall monitor adherence to applicable environmental regulations.
- The Company shall establish key environmental performance indicators (KPIs) and review them periodically.
- Material environmental performance shall be disclosed in the Annual Report, BRSR or Sustainability Report, as applicable.
- The Company shall provide periodic training to employees on environmental compliance and sustainability practices.
- Adequate financial, technological and human resources shall be allocated for implementation of this Policy.
- Stakeholders may report environmental concerns through the Whistleblower/Vigil Mechanism.



## **7. Non-Retaliation**

The Company prohibits retaliation against any person who, in good faith, reports environmental concerns or violations of this Policy.

## **8. Review & Amendment**

This Policy shall be:

- Approved by the Board of Directors;
- Reviewed at least annually or as required under applicable regulations;
- Reviewed in case of significant regulatory changes, material environmental incidents or major operational expansions;
- Amended with Board approval.

## **9. Disciplinary Action**

Any violation of this Policy may result in disciplinary action, including termination of employment or contract, in accordance with applicable laws and Company procedures.