



STAKEHOLDER ENGAGEMENT POLICY

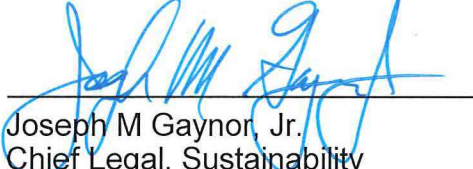
As one of the world's leading carbon black manufacturing companies, Birla Carbon and its affiliate companies create products that contribute to an enhanced standard of living for people throughout the world.

Birla Carbon recognizes that effective stakeholder engagement is an essential component of our business operation to be undertaken at business and site level. It is an important mechanism to understand stakeholders and their needs, involve them in managing risks and resolving conflicts at an early stage, thus ensuring a long term "social license to operate" for a business. Further, engaging with globally recognized subject matter experts on global megatrends and external factors with a potential to materially affect the sustainability of our business is an increasing requirement for effective business leaders.

Every Birla Carbon site shall endeavor to:

- Maintain positive compliance with applicable stakeholder engagement and disclosure regulations;
- Ascertain the nature of impacts on stakeholders, their legitimate concerns, interests and expectations as well as their potential influence on Birla Carbon analyzing the implications of those factors on business operations;
- Embed the principles of inclusiveness, transparency, materiality, completeness and cultural appropriateness in all our engagement activities;
- Seek to disclose information about the company's activities in a timely and culturally appropriate manner to allow for informed and meaningful engagement;
- Resolve stakeholder grievances in a timely and culturally appropriate manner;
- Establish clear accountability by assigning adequate resources and responsibilities for effective stakeholder engagement;
- Promote awareness of the principles and procedures for stakeholder engagement with employees at various levels of our operations through training and communication;

- Undertake engagement in a non-discriminatory and interactive manner that encourages stakeholders to provide feedback and engage positively with the business operations; and
- Seek to learn from globally recognized and accepted subject matter experts in order to strengthen the input data for our future proofing processes.



Joseph M Gaynor, Jr.
Chief Legal, Sustainability
and Risk Officer

Date: 12th July 2018