

#### APOLLO TYRES LTD

7 Institutional Area Sector 32 Gurugram 122001, India

T:+91 124 2383002 F: +91 124 2383021 apollotyres.com

GST No.: 06AAACA6990Q1Z2

ATL/SEC/21 July 2, 2024

The Secretary,
National Stock Exchange of India Ltd
Exchange Plaza,
Bandra- Kurla Complex,
Bandra (E),
Mumbai- 400 051

The Secretary,
BSE Ltd.
Phiroze Jeejeebhoy
Towers, Dalal Street,
Mumbai - 400001

## Sub: Business Responsibility and Sustainability Reporting

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report for Financial Year 2023-24 (FY24), which also forms part of the Annual Report for FY24 submitted to the Exchanges on July 2, 2024.

This is for your information and record.

Thanking You,

Yours faithfully, For Apollo Tyres Ltd

(Seema Thapar)
Company Secretary & Compliance Officer



# **Business Responsibility and Sustainability Report**

## **SECTION A- GENERAL DISCLOSURES**

## I. Details of the Company

Corporate Identity Number (CIN) of the Listed     Entity:	L25111KL1972PLC002449
2. Name of the listed entity:	Apollo Tyres Ltd.
3. Year of incorporation:	28-09-1972
4. Registered Office Address:	3 <sup>rd</sup> Floor, Areekal Mansion, Panampilly Nagar, Kochi- 682036, Kerala. India
5. Corporate Address:	No.7, Apollo House, Institutional Area, Sector-32, Gurugram-122001,
	Haryana.
6. E-mail:	investors@apollotyres.com
7. Telephone:	0124 2721000
8. Website:	www.apollotyres.com
9. Financial year for which reporting is being done:	April 1, 2023 to March 31, 2024
10. Name of the Stock Exchange(s) where shares	NSE (National Stock Exchange of India Limited) and BSE Limited (formerly
are listed:	Bombay Stock Exchange)
11. Paid-up Capital:	₹ 635,100,946
12. Name and contact details (telephone, email	Name- Ms. Seema Thapar
address) of the person who may be contacted in	Telephone- 0124 2721000
case of any queries on the BRSR report:	Email Id- investors@apollotyres.com
13. Reporting boundary - Are the disclosures under	The disclosures under this report are made on a standalone basis and pertains
this report made on a standalone basis (i.e. only	to only our Indian operations.
for the entity) or on a consolidated basis (i.e. for	
the entity and all the entities which form a part	
of its consolidated financial statements, taken	
together):	
14. Name of the assurance provider:	Not Applicable
15. Type of the assurance obtained:	Not Applicable

#### II. Product/ Services

## 16. Details of business activities (accounting for 90% of the turnover):

S. no.	Description of main activity	Description of business activity	% of turnover of the entity
1	Manufacturing	Tyres, Tubes & Flaps	100%

## 17. Products/Services sold by the entity (accounting for 90% of the entity's turnover):):

S. no.	S. no. Product/Service		% of total turnover contributed	
1.	Tyres, Tubes, and Flaps	22111	100%	

## III. Operations

## 18. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total	
National	5	177	182	
International	2	8	10	

## 19. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (No. of States/ Union Territories)	Pan India
International (No. of Countries)	100+ countries served

What is the contribution of exports as a percentage of the total turnover of the entity?
 12.37%

## c. A brief on type of customers

OEMs, Business Partners, Tyre retailers and distributors, fleets, and end consumers covered across India (both rural and urban).

#### IV. Employees

## 20. Details as on 31st March 2024:

#### a. Employees and workers

S. No.	Particulars	Total (A)	М	ale	Female		
5. 110.		IOLAI (A)	No. (B)	% (B/A)	No. (C)	% (C/A)	
		Employee	es				
1.	Permanent employees (D)	2,315	2,175	93.95%	140	6.05%	
2.	Other than permanent employees (E)	39	28	71.79%	11	28.21%	
3.	Total employees (D+E)	2,354	2,203	93.59%	151	6.41%	
		Workers	5		-	_	
4.	Permanent workers (F)	5,244	5,240	99.92%	4	0.08%	
5.	Other than permanent workers (G)	7,859	7,417	94.38%	442	5.62%	
6.	Total Workers (F+G)	13,103	12,657	96.60%	446	3.40%	

## b. Differently abled Employees and workers:

C NI-	Particulars	T-+-1/A)	М	ale	Female		
S. No.		Total (A)	No. (B)	% (B/A)	No. (C)	% (C/A)	
	Di	fferently Abled	Employees				
1.	Permanent (D)	2	2	100%	0	0%	
2.	Other than permanent (E)	0	0	0%	0	0%	
3.	Total employees (D+E)	2	2	100%	0	0%	
	D	oifferently Abled	l Workers		_	_	
4.	Permanent (F)	13	13	100%	0	0%	
5.	Other than permanent (G)	0	0	0%	0	0%	
6.	Total Workers (F+G)	13	13	100%	0	0%	

## 21. Participation/ Inclusion/ Representation of women

	Total (A)	Number of Female (B)	Percentage (B/A)
Board of Directors*	13	2	15.38%
Key Management Personnel**	4	1	25.00%

 $<sup>^{\</sup>ast}$  BoD includes Managing Director & Whole-time Director

<sup>\*\*</sup> KMP includes Managing Director & Whole-time Director



## 22. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)

	FY 2023-24		FY 2022-23			FY 2021-22			
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	15.30%	18.60%	15.45%	11.00%	30.00%	12.00%	9.00%	18.00%	10.00%
Permanent workers	8.40%	20.00%	8.41%	6.00%	20.00%	6.00%	8.00%	0.00%	8.00%

## V. Holding, Subsidiary and Associate Companies (including joint ventures)

## 23. Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Apollo Tyres Centre of Excellence Limited	Subsidiary	100%	No
2	Trusted Mobility Services Limited	Subsidiary	100%	No
3	Apollo (South Africa) Holdings (Pty) Ltd.	Subsidiary	100%	No
4	Apollo Tyres Africa (Pty) Ltd	Subsidiary	100%	No
5	Apollo Tyres (Thailand) Limited	Subsidiary	100%	No
6	Apollo Tyres (Middle East) FZE	Subsidiary	100%	No
7	Apollo Tyres Holdings (Singapore) Pte. Ltd.	Subsidiary	100%	No
8	Apollo Tyres (Malaysia) SDN BHD	Subsidiary	100%	No
9	Apollo Tyres Cooperatief U.A.	Subsidiary	100%	No
10	Apollo Tyres (Greenfield) B.V	Subsidiary	100%	No
11	Apollo Tyres Global R&D B.V	Subsidiary	100%	No
12	Apollo Tyres (Europe) B.V. (Formerly Apollo Tyres B.V.)	Subsidiary	100%	No
13	Apollo Tyres (NL) B.V. (Formerly Apollo Vredestein B.V.)	Subsidiary	100%	No
14	Vredestein Consulting B.V.	Subsidiary	100%	No
15	Finlo B.V.	Subsidiary	100%	No
16	Apollo Tyres (UK) Holdings Ltd (Formerly Apollo Tyres (UK) Pvt. Ltd.) (ATUK)	Subsidiary	100%	No
17	Apollo Tyres (London) Pvt. Ltd.	Subsidiary	100%	No No
18	Apollo Tyres (UK) Sales Ltd.	Subsidiary	100%	No
10	(Formerly Apollo Vredestein (UK) Limited)	Subsidially	100%	NO
19	Saturn F1 Pvt Ltd.	Subsidiary	100%	No
20	Apollo Tyres (R&D) GmbH (Formerly Apollo Tyres (Germany) GmbH)	Subsidiary	100%	No
21	Apollo Tyres (Germany) GmbH (Formerly Apollo Vredestein GmbH)	Subsidiary	100%	No
22	Reifencom GmbH, Hannover	Subsidiary	100%	No
23	Reifencom Tyre (Qingdao) Co., Ltd.	Subsidiary	100%	No
24	Apollo Tyres AG	Subsidiary	100%	No
25	Apollo Tyres (Schweiz) AG (Formerly Apollo Vredestein Schweiz AG)	Subsidiary	100%	No
26	Apollo Tyres Do (Brasil) Ltda	Subsidiary	100%	No
27	Apollo Tyres (Hungary) Kft	Subsidiary	100%	No
28	Apollo Tyres (Hungary) Sales Kft (Formerly Apollo Vredestein Kft)	Subsidiary	100%	No
29	Apollo Tyres (Nordic) AB (Formerly Apollo Vredestein Nordic A.B.)	Subsidiary	100%	No
30	Apollo Tyres (France) SAS (Formerly Apollo Vredestein France SAS)	Subsidiary	100%	No
31	Apollo Tyres (Belux) SA (Formerly Apollo Vredestein Belux)	Subsidiary	100%	No
32	Apollo Tyres (Austria) Gesellschaft m.b.H. (Formerly Apollo Vredestein Gesellschaft m.b.H.)	Subsidiary	100%	No
33	Apollo Tyres Iberica S.A. (Formerly Apollo Vredestein Iberica SAU)	Subsidiary	100%	No No
34	Apollo Tires (US) Inc. (Formerly Apollo Vredestein Tires Inc.)	Subsidiary	100%	No
35	Apollo Tyres (Polska) Sp. Z.O.O (Formerly Apollo Vredestein Opony Polska Sp. Z.o.o.)	Subsidiary	100%	No
36	KT Telematic Solutions Private Limited	Associate	25%	No
37	CSE Deccan Solar Private Limited	Associate	27.27%	No

## VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013 (Yes/No): Yes

ii) Turnover (in Rs.): ₹ 175,393,305,196.28iii) Net worth (in Rs.): ₹ 104,394,243,470.43

## **VII.** Transparency and Disclosures Compliances

# 25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct

		C	Current FY 202	3-24	Previous FY 2022-23		
Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Investors (Other than Shareholders)	Yes https://corporate.apollotyres.com/ investors/corporate-governance/#? activeTab=Others	0	0	We have considered the Debenture Holders (NCDs)	0	0	We have considered the Debenture Holders (NCDs)
Shareholders	Yes https://corporate.apollotyres.com/ investors/corporate-governance/#? activeTab=Others	34	0	These are based on the fillings made with the Stock Exchange	16	0	These are based on the fillings made with the Stock Exchange
Employees and workers (including contract labourers)	Yes (Apollo COC, HR Policy, Human Rights Policy, & Individual Forums in Plants) https://corporate.apollotyres.com/ content/dam/orbit/apollo-corporate/ investors/corporate-governance/codes-policies/codes-policies/reporting-of- coc-breaches.pdf	0	0	No complaints registered	0	0	No complaints registered
Customers (Distributors, Wholesalers, Retailers, etc.)	Yes 1800-212-7070 - Toll Free Number https://www.apollotyres.com/en-in/support/warranty/	419	0	Only service dealers are available	422	1	Only service dealers are available
Consumers	Yes 1800-212-7070 - Toll Free Number https://corporate.apollotyres.com/ content/dam/orbit/apollo-corporate/ investors/corporate-governance/codes- policies/codes-policies/reporting-of- coc-breaches.pdf	670,240	0	Consumer complaints	614,061	710	Consumer complaints
Contractors	Yes https://corporate.apollotyres.com/ content/dam/orbit/apollo-corporate/ investors/corporate-governance/codes- policies/codes-policies/reporting-of- coc-breaches.pdf	0	0	No Complaints registered	0	0	No Complaints registered
Suppliers	Yes https://corporate.apollotyres.com/ sustainability-and-ethics/Sustainable- Procurement/supplier-code-of- conduct/	0	0	No Complaints registered	0	0	No Complaints registered
Communities	Yes	0	0	No Complaints registered	0	0	No Complaints registered
Implementing Partners (NGOs)	Yes	0	0	No Complaints registered	0	0	No Complaints registered



## 26. Overview of the entity's material responsible business conduct issues.

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk alongwith its financial implications, as per the following format .

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Climate Change	Risk	Climate-related risks consist of both physical risks resulting from the direct impacts of climate change (such as extreme weather events) and transition risks related to efforts to transition to a lower-carbon economy (such as carbon pricing, future government policy and regulation). These risks can lead to significant business impacts, if not managed adequately well in time.	We have planned a clear pathway to manage climate change risk by focusing on reducing our environment footprints through Greenhouse Gas (GHG) emissions reduction, energy efficiency, and renewable energy. The company has made a commitment to become Net Zero by 2050.	Negative Impact
2	Business Conduct	Risk	Compliance with laws, rules and regulations and conducting business in a fair, ethical and honest manner are integral components of company's strategies and operations.	We have a strong Code of Conduct and at Apollo Tyres, Employees are mandatorily undergoing training on Code of Conduct covering topics like anti-corruption, anti-harassment, and the prevention of insider trading and conflicts of interest etc.	Negative Impact
3	Economic Performance	Risk	Rapid shifts in various economic aspects related to industry trends, consumer behavior, cost of raw materials, supply chain disruptions, and geopolitical factors, etc.	In line with our commitment to the triple bottom line social, environmental, and financial, we consistently aim to create value for all our stakeholders, both internal and external.	Negative Impact
4	Working conditions (own workforce)	Opportunity	One of our values is one family which needs the provision of good working conditions for our employees to be motivated and productive. Key focus on occupational health and safety and diversity, equal opportunities, fair treatment, non-discrimination, preventing human rights violations and work-life balance.		Positive Impact
5	Resource Use & Circular Economy	Opportunity	Scarcity of Resources sustainable materials, Natural Rubber, new and recycled materials.	We have committed to use 40% of renewable / recycled input material in their products by 2030. This initiative is aimed at making the product greener. The company is also sourcing recycled raw material from suppliers to increase the sustainable raw material content in the product mix.	Positive Impact

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Product Quality & Safety	Opportunity	Varying road conditions underlines the importance of safe and reliable tires with efficient performance on roads. Our customers and end users expect products which are safe to use and meet the quality parameters.	safety through each stage of the product lifecycle. The company is significantly giving importance to safety, comfort, mileage and	Positive Impact

## **SECTION B- MANAGEMENT AND PROCESS DISCLOSURES**

## **Principles of National Guidelines on Responsible Business Conduct**

P1

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

P4

Businesses should respect the interests of and be responsive to all its stakeholders.

P7

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

P2

Businesses should provide goods and services in a manner that is sustainable and safe.

P5

Businesses should respect and promote human rights.

**P8** 

Businesses should promote inclusive growth and equitable development.

**P3** 

Businesses should respect and promote the well-being of all employees, including those in their value chains.

P6

Businesses should respect and make efforts to protect and restore the environment.

**P9** 

Businesses should engage with and provide value to their consumers in a responsible manner.



Dis	sclosure Questions	P1	P2	Р3	P4	P5	P6	P7	P8	P9
 Po	licy and management processes									
1.	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the Policies, if available	https://cor	porate.apo	lotyres.com	/investors/	corporate-g	governance	/#?active	Tab=Codes	/Policies
2.	Whether the entity has translated the policy into	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	procedures. (Yes / No)									
3.	Do the enlisted policies extend to your value chain	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1	partners? (Yes/No)	//50	//50	//50	//50	//50	//50		//50	//50
ŧ.	Name of the national and international codes/ certifications/labels/ standards (e.g. Forest	(ISO 9001,	(ISO 14001,	(ISO 45001,	(ISO 20400)	(ISO 2600,	(ISO 14001,	-	(ISO 20400)	(ISO 9001
	Stewardship Council, Fairtrade, Rainforest	ISO	ISO	45001, ISO	20400)	ISO	14001, ISO		20400)	9001
	Alliance, Trustea) standards (e.g. SA 8000, OHSAS,	20400)	45001,	20400)		20400)	20400)			
	ISO, BIS) adopted by your entity and mapped to	20400)	ISO	20400)		20400)	20400)			
	each principle.		20400)							
5.	Specific commitments, goals and targets set by the	Aligned	with Apo	llo Tyres'	vision and	d values c	f fosterin	g an in	clusive cu	lture
	entity with defined timelines, if any.	and esta	blishing a	responsi	ible, susta	inable bu	isiness th	at enric	ches partr	iers,
		commur	nities, and	society,	following	targets a	nd comm	itment	s have be	en
		embrace	ed.							
		Com	mitted to	be Net Z	Zero by 20	)50				
		Redu	uce Scope	e 1 emissi	on intens	ity by 259	% in FY26	comp	ared to F	<b>/</b> 20
		Redu	uce Scope	e 2 emissi	on intens	ity by 35	% in FY26	ó comp	ared to F	<b>/</b> 20
		Sour	ce 30% c	of total po	wer usag	e from Re	enewable	Source	s by FY2	5
		Impr	ove wate	r withdra	wal inten	sity by 25	5% in FY2	6 com	pared to F	Y19
			mitted to		)% of rer	newable	and recy	cled m	aterial in	all it
			mitted to		e Diversi	ty Equity	and Inc	lusion	(DE&I) b	y 129
					ble develo neficiarie:				s by reach itiatives.	ing ou
6.	Performance of the entity against the specific								nagement	
	commitments, goals and targets along-with	-							O 26000	
	reasons in case the same are not met								s (KPIs) au agreed roa	
				tion on th ort FY24.		adopted	by Apollo	, pleas	e refer to	our
~ `	vernance, leadership and oversight									
		responsib	ility repo			related o	challenge	s, targe	ts and	
	Statement by director responsible for the business i								any has	
	achievements (listed entity has flexibility regarding					nd value o	hain The	Comp		
	achievements (listed entity has flexibility regarding Apollo Tyres continuously works towards achieving	sustainal	oility acro	ss its ope	rations ar					r hoth
	achievements (listed entity has flexibility regarding Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for	sustainal or its Visio	oility acro on 2026.	ss its ope Our susta	rations ar ainability (	governan	ce framev	vork pr	ovides fo	
	achievements (listed entity has flexibility regarding Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for identification of key material issues, risks and opport	sustainal or its Visio tunities o	oility acro on 2026. of the org	ss its ope Our susta anisation	rations ar ainability a and strat	governan egies to a	ce framev address th	vork pr iem. Oi	ovides fo ur efforts	are
	achievements (listed entity has flexibility regarding Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for identification of key material issues, risks and opport to minimize the environmental and social impacts of	sustainal or its Vision rtunities of f our busi	oility acro on 2026. of the org iness acti	ss its ope Our susta anisation vities whi	rations ar ainability g and strat le creatin	governan egies to a g value fo	ce framev address th or our stal	vork pr iem. Oi	ovides fo ur efforts	are
7.	achievements (listed entity has flexibility regarding a Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for identification of key material issues, risks and opport to minimize the environmental and social impacts of progress on ESG-related challenges, targets and achievements.	sustainal or its Vision rtunities of f our businievemen	oility acro on 2026. of the org iness acti	ss its ope Our susta anisation vities whi able in th	rations ar ainability g and strat le creatin	governan egies to a g value fo	ce framev address th or our stal	vork pr iem. Oi	ovides fo ur efforts	are
7.	achievements (listed entity has flexibility regarding Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for identification of key material issues, risks and opport to minimize the environmental and social impacts of	sustainal or its Vision rtunities of f our businievemen Name: S	oility acro on 2026. of the org iness acti ts is avail iunam Sai	ss its ope Our susta anisation vities whi able in the kar	rations ar ainability g and strat le creatin e Annual	governan egies to a g value fo	ce framev address th or our stal	vork pr iem. Oi	ovides fo ur efforts	are
7.	achievements (listed entity has flexibility regarding a Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for identification of key material issues, risks and opport to minimize the environmental and social impacts of progress on ESG-related challenges, targets and achievements of the highest authority responsible for	sustainal or its Visio tunities of f our busi nievemen Name: S Designa	pility acro on 2026. of the org iness active ts is available funam Sai tion: Chie	ss its ope Our susta anisation vities whi able in the rkar ef Busines	rations ar ainability g and strat le creatin e Annual	governan egies to a g value fo Report F	ce framev address th or our stal	vork pr iem. Oi	ovides fo ur efforts	are
7.	achievements (listed entity has flexibility regarding Apollo Tyres continuously works towards achieving identified Sustainability as one of the 5 key pillars for identification of key material issues, risks and opport to minimize the environmental and social impacts of progress on ESG-related challenges, targets and achievemental of the highest authority responsible for implementation and oversight of the Business	sustainal or its Visio rtunities of f our busi nievemen Name: S Designa Email: s	pility acro on 2026. of the org iness acti ts is avail: Gunam Sai tion: Chie	ss its ope Our susta anisation vities whi able in the rkar ef Busines	rations ar ainability a and strat le creatin e Annual ss officer lotyres.co	governan egies to a g value fo Report F	ce framev address th or our stal	vork pr iem. Oi	ovides fo ur efforts	are

Disclosure Questions				P1	P2	P3		P4	P5	P6	P7	P	88	P9	
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.				Comm Comm on the <b>Busine</b> - On - Ne	ittee to d ittee me sustaina ess Respo kar Kanv eraj Kan	oversee tl ets once bility rela	ne imp a year ated iss and Su rman nber	or on r sues.	tation o equire	sibility ar of sustaina ment basi	ability r s to dis	elated cuss t	l issue the pr		
					- Ak	shay Chu	ıdasama,	Memb	oer						
	etails of Revie	w of NGRE		Indicate	whether re or / Comm		he Board/		Freq		Annually/	•	-	-	erly/
			F	1 P2		P5 P6	P7 P8	P9	P1	P2 P3	P4 P5	P6	P7	P8	P9
	nance against a up action	bove polici	tł	ne Busine	ess Responess Responess Respor	sibility a	nd Susta	inabilit	ty Com	mittee	Subsequ	ently, i	t is pre	esent	
of relev	ance with statu vance to the pri ation of any no	nciples, and	ements T	he Comp	any is com	npliant w	ith all the	appli	cable la	aws and	d regulati	ons. Th	e stati		the
	as the entity o	ide name o	of the ager										nal ag		
	P1	<u>P2</u>	P3		P4		P5	Po		P		P8		PS	
		es had consi lity Report (		ernal Cor	nsultation'	during f	ormulatio	n of G	Soverna	ance fra	amework	as per	Busine	ess	
	core areas:	es has imple Environme and Human	nt, Commu	nity Enga	agement 8	k Develo	pment, Fa	air Bus	iness F	Practice	s, Custor	ner Cor	ncerns	s, Lab	or

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:

Not Applicable



## SECTION C- PRINCIPAL WISE PERFORMANCE DISLOSURE

## PRINCIPLE 1:

Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable

## **Essential Indicators**

## 1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of	8	Following sessions were conducted in the reporting year-	100%
Directors		(i) Amendments in SEBI Regulations relating to Non-Convertible Securities	
		(ii) Amendments to SEBI (LODR) Regulations, 2015	
		(iii) Amendments made by SEBI/ MCA relating to Online Dispute Resolution (ODR) system and General Meetings	
		(iv) Digitalisation	
		(v) Technology & Innovation	
		(vi) People	
		(vii) Sustainability	
		(viii) Brand	
Key	8	Following sessions were conducted in the reporting year-	100%
Managerial Personnel		(i) Amendments in SEBI Regulations relating to Non-Convertible Securities	
		(ii) Amendments to SEBI (LODR) Regulations, 2015	
		(iii) Amendments made by SEBI/ MCA relating to Online Dispute Resolution (ODR) system and General Meetings	
		(iv) Digitalisation	
		(v) Technology & Innovation	
		(vi) People	
		(vii) Sustainability	
		(viii) Brand	
Employees other than	1,605	Corporate: Know Your Apollo focused on getting to understand the various major departments within Apollo	95.57%
BoDs and KMPs		- All Five @ 5 and Expert Speaks topics delivered content based on: (i) Apollo leadership competency framework, (ii) Apollo Values, (iii) Communication, (iv) DE&I and (v) Change.	
		- Apollo Digital Acumen focused on (i) Digital Taxonomy, (ii) Cloud Technology, (iii) Advanced manufacturing and (iv) Enterprise Processes	
		<ul> <li>Apollo Financial Acumen focused on (i) P&amp;L and Costing concepts, (ii) Balance sheet &amp; Key return ratios, (iii) Free cash flow and its relevance, (iv) time value of money, NPV &amp; IRR, and (v) Project evaluation using DCF</li> </ul>	
		- Apollo Laureate focused on Apollo leadership competency framework: (i) Drive for growth & results, (ii) Strategic planning & direction, (iii) Ownership & accountability, (iv) Innovation & Creativity, (v) Emotional intelligence, and (vi)Build Winning Talent	
		- Cybersecurity training focused on the importance of cyber-attack prevention and Apollo's policy on it	

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
		APMEA: Compliance Program, Functional Program, PoSH, Onboarding, Leadership Journey Programs, Sales Program, Technical product base program, Behavioural training programs, Plant specific Technical trainings, safety Programs, Communications, Waste Management, Process training, Diversity and inclusion, One on one coaching on leadership, PTLDP, Vehicle Dynamics, Functional coaching, FUEL, Safety, Quality, Process, Design thinking	
Workers	2100	Functional Trainings (Incoming Material Quality, Product safety, Machine Operation & Work Instruction, 7 QC Tools etc.) Awareness Training (IMS, Fire & Safety Training, 5S Training, ATQM Training etc.) Behavioural Training (Training Employee self-services, Core Values, Communication Skills), QC Story, Process training, Know your Equipment	80%

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year:

		Monetary			
	NGRBC Principle	Name of the Regulatory/ enforcement agencies/ judicial institutions	Amount (in ₹)	Brief of Case	Has an appeal been preferred? (yes/ No
Penalty/ Fine					
Settlement			Nil		
Compounding Fee					
		Non-Monetary			
	NGRBC Principle	Name of the Regulatory/ enforcement agencies/ judicial institutions	Amount (in ₹)	Brief of Case	Has an appeal been preferred? (yes/ No)
Imprisonment			Nil		
Punishment			1 111		

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed:

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
The Competition Commission of India (CCI) issued an order on February 2, 2022 mentioning that it has held five tyre manufacturers and Automotive Tyre Manufactures Association (ATMA) guilty of contravention of the provisions of Section 3 of the Competition Act, 2002 and imposed a penalty of ₹425.53 Crores on the Company.	Competition Commission of India (CCI)
The Company filed an appeal against the aforesaid order before the National Company Law Appellate Tribunal, New Delhi ('NCLAT"). NCLAT through its judgement dated December 1, 2022 disposed off the appeals by remanding back the case to CCI for review. CCI has filed an appeal in the Supreme Court against the Order passed by the NCLAT. Hearing to consider admission of appeal is likely to come in July 2024.	



4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy:

Apollo Tyres believes in conducting the operations in a transparent manner and does not indulge in the acts of bribery and corruption. The aspects of anti-corruption and anti-bribery are covered in our code of conduct which applies to all the Directors, Independent Directors, Senior Management and Employees. The Code of Conduct clearly states that our Company adheres to a zero-tolerance policy regarding the giving or receiving of bribes or any form of corrupt payments.

The said code of conduct can be accessed on the Company's corporate website at:

 $\frac{\text{https://corporate.apollotyres.com/content/dam/orbit/apollo-corporate/investors/corporate-governance/codes-policies/codes-policies/Codes$ 

 $\frac{\text{https://corporate.apollotyres.com/content/dam/orbit/apollo-corporate/investors/corporate-governance/codes-policies/codes$ 

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Directors	0	0
Key Managerial Personnel (KMPs)	0	0
Employees	0	0
Workers	0	0

#### 6. Details of complaints with regard to conflict of interest:

	Current Financi	al Year 2023-24	Previous Financial Year 2022- 23		
	Number	Remark	Number	Remark	
Number of complaints received in relation to issues	0	NA	0	NA	
of Conflict of Interest of the Directors					
Number of complaints received in relation to issues	0	NA	0	NA	
of Conflict of Interest of the KMPs					

7. Provide details of any corrective action taken or underway on issues related to incident / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

The Company filed an appeal against the aforesaid order before the National Company Law Appellate Tribunal, New Delhi ('NCLAT"). NCLAT through its judgement dated December 1, 2022 disposed off the appeals by remanding back the case to CCI for review. CCI has filed an appeal in the Supreme Court against the Order passed by the NCLAT. Hearing to consider admission of appeal is likely to come in July 2024.

8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured)

	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Number of days of accounts payables	61.20	68.20

#### 9. Openness of Business:

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances & investments, with related parties

Parameter	Metrics	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Concentration	a. Purchases from trading houses as % of the total purchases	27.93%	30.45%
of Purchases	b. Number of trading houses where purchases are made from	1	1
	c. Purchases from top 10 trading houses as % of total purchases from	100%	100%
	trading houses		

Parameter	Me	etrics	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Concentration	a.	Sales to dealers/ distributors as % of total sales	62.56%	58.76%
of Sales	b.	Number of dealers/ distributors to whom sales are made	8,400.00	8,346.00
	c.	Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors	3.20%	3.39%
Share of RPTs in	a.	Purchases (Purchases with related parties/ Total Purchases) (In percentage)	32.28%	34.43%
	b.	Sales (Sales to related parties/ Total Sales) (In percentage)	8.28%	10.34%
	c.	Loans & advances (Loans & advances given to related parties/ Total loans & advances) (In percentage)	2.96%	0.0%
	d.	Investments	82.78%	85.50%
		(Investments in related parties/ Total Investments made) (In percentage)		

#### **Leadership Indicators**

#### 1. Awareness programmes conducted for value chain partners on any of the principles during the financial year

programmes held	Topics/ Principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	- Logistics Overview : Reflections and New Initiatives	63.00%
	- Sustainability	
	- Safety & Operations	
	- Tyre Health & Maintenance	
1	Vendor Quality Manual Program	11.00%

# 2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes, Apollo Tyres has established procedures to prevent or manage conflicts of interest involving members of the Board. The Company's Code of Conduct for Directors and Senior Management outlines guidelines pertaining to Conflict of Interest, applicable to all Board Directors and Senior Management. It offers directives for mitigating any actual or perceived conflicts of interest and establishes a mechanism for reporting potential conflict situations. Additionally, the Company's Policy on Related Party Transactions ensures the implementation of proper reporting, approval, and disclosure protocols for transactions between the Company and related parties. Furthermore, in compliance with Section 184 of the Companies Act, 2013, along with relevant regulations, every Director and Key Managerial Personnel is required to disclose any concerns or interests in Form MBP-1 during the first Board meeting they attend as a Director, and subsequently at the initial meeting of the Board in each financial year or wherever there is any changes in the previously provided disclosures. This disclosure includes names of the Companies, bodies corporate, firms or other association of individuals in which Directors are interested. If a Director has a vested interest in any agenda item, they abstain from participating or voting on that particular item to prevent conflicts of interest.



#### **PRINCIPLE 2:**

Businesses should provide goods and services in a manner that is sustainable and safe

#### **Essential Indicators**

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	Current Financial Year 2023- 24	Previous Financial Year (2022-2023)	Details of improvements in environmental and social impacts
R&D CAPEX	80.10% 3.18%	79.08% 2.64%*	<b>Reduce:</b> Low rolling resistance and lightweight of tyres significantly reduced CO2 emissions which positively impacted the scope 3 emissions in the usage phase.
			<b>Recycle:</b> Increasing the utilisation of recycled materials in tyres helped in achieving a circular economy.
			<b>Reuse:</b> Extending the usage lifespan of tyres through enhanced durability and retreading, reduced the environmental impact caused by discarded tyres.
			<b>Replace:</b> Using sustainable raw materials in place of conventional fossil-based materials in tyre compounds improved the carbon footprint.
			<b>Redesign:</b> Optimizing raw materials and dimensions of components enhanced the strength-to-weight ratio & conserved the raw materials used in tyre.

<sup>\*</sup> Data revised as only R&D CAPEX were disclosed in FY23.

- 2. i. Does the entity have procedures in place for sustainable sourcing? (Yes/No)
  - ii. If yes, what percentage of inputs were sourced sustainably?

Yes, Apollo has drafted a 'Sustainable Procurement' vision, along with a robust policy and a set of guiding principles. In our supplier selection process, we conscientiously incorporate Social, Ethical, and Environmental key performance indicators (KPIs). These KPIs align with the guidelines outlined in the ISO20400:2017 Standard for Sustainable Procurement. The assessment system and selection process for all the new suppliers incorporates all these factors.

The Apollo's suppliers are guided by the Apollo Tyres Sustainable Procurement Policy (ATSPP), which specifically addresses raw materials other than Natural Rubber. Additionally, for the Natural Rubber Supply Chain, we adhere to the Apollo Sustainable Natural Rubber Policy (ASNRP). Furthermore, we diligently oversee the sourcing of materials from our ISO 14001 and ISO 45001 certified partners. In the current financial year 2023-24, 76% of the raw materials by value are procured from ISO 14001 certified suppliers, and 64% of the raw materials by value are sourced from ISO 45001 certified suppliers for Apollo operations in India.

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for

Plastics (including packaging)	As part of EPR Compliance, we have tied up with a recycler, authorized by the CPCB, who is responsible for collecting and recycling the post-consumer plastic waste on our behalf, in accordance with our recycling targets.
	Additionally, as part of our commitment towards environmentally friendly recycling practices, all empty plastic boxes and bags are returned to respective vendors. Other non-returnable plastic material is sold to scrap dealers for reusing or recycling.
E-Waste	Not Applicable, as our operations do not generate any post-consumer E-waste. However, the E-waste generated at our premises is disposed safely with the help of authorized recyclers, in accordance with the CPCB guidelines.
Hazardous Waste	Not Applicable  The hazardous waste generated at our facilities is stored in accordance with the regulatory requirement and disposed through an authorized vendor.
Other Waste	As per the regulation, we are required to purchase EPR credits from the registered recyclers through CPCB portal for End of Life Tyres. We are in the process to buy the credits to be 100% compliant with the EPR regulation.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same

**EPR for Tyres:** Yes, On July 21, 2022, the Ministry of Environment, Forest and Climate Change has notified Extended Producer Responsibility (EPR) regulation on End-of-Life Tyres (ELT) in India. As per the regulation requirement, we have registered on Central Pollution Control Board (CPCB) portal as a producer and we are in the process to buy EPR credits from the registered recyclers as per the regulation..

**EPR for Plastic waste:** Yes, Extended Producer Responsibility (EPR) is applicable to Apollo Tyres Ltd, and we engage with Central Pollution Control Board (CPCB) registered Recyclers, as part of our compliance commitment.

#### **Leadership Indicators**

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product / Service	Product /Service % of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
22111	ENDURACE LD	3.53%	Cradle to Grave	Yes	No
22111	AMAZER 4G	0.39%	Cradle to Grave	Yes	No
22111	ALNAC 4G	0.44%	Cradle to Grave	Yes	No
22111	ALT188-HR	0.03%	Gate to Gate	No	No

If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of Product / Service	Description of the risk / concern	Action Taken
ENDURACE LD AMAZER 4G ALNAC 4G ALT188-HR	AMAZER 4G to global warming is at the value chain during	The Company has continued its research on tyre weight optimisation to reduce the amount of raw materials used in the raw material acquisition phase, improve fuel economy during use phase and reduce the generation of waste in the disposal phase. The use of renewable or recycled materials, with the aim to optimize performance such as rolling resistance and wear, alongside sustainable manufacturing practices are being explored for product development.
		The Company uses efficient techniques for re-treading truck tyres to provide extended life cycle of the tyre body material to 2-3 times, thus avoiding the need for frequent replacements.

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate insultantesial	Recycled or re-used input material to total material			
Indicate input material	Current Financial Previous Financial Year 2023- 24 Year 2022- 23*			
Bead Wire	0.169% 0.18%			
Carbon Black	0.001% 0.00%			
Fabric	0.004% 0.01%			
Others	0.000% 0.00%			
Reclaim Rubber	0.573% 0.46%			
Steel Cord	0.846% 0.85%			
Zinc Oxide	2.767% 2.97%			
Total	4.36% 4.47%			

<sup>\*</sup>Note: In the reporting year, based on R&D definition above category are classified as recycled material for FY 22-23 & FY 23-24

## PRINCIPLE 3:

Businesses should respect and promote the well-being of all employees, including those in their value chains

## **Essential Indicators**

## 1. a. Details of measures for the well-being of employees:

					% of e	mployees c	overed by				
Category	Total	Health in	Health insurance A		Accident insurance		Maternity benefits		y Benefits	Day Care 1	facilities
Category	(A)	Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
				Pe	rmanent e	mployees					
Male	2,175	2,175	100%	2,175	100%	0	0%	2,175	100%	1,950	89.66%
Female	140	140	100%	140	100%	140	100%	0	0	100	71.43%
Total	2,315	2,315	100%	2,315	100%	140	6.05%	2,175	93.95%	2,050	88.55%
		_		Other th	an Permai	- nent emplo	yees		_	_	_
Male	28	2	7.14%	2	7.14%	0	0%	0	0%	0	0%
Female		0	0	0	0	0	0%	0	0%	0	0%
Total	39	2	5.13%	2	5.13%	0	0%	0	0%	0	0%

## b. Details of measures for the well-being of workers:

					% of v	workers co	vered by					
Category	Total	Health in	nsurance	Accident in	Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
Category	(A)	Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)	
				Р	ermanent	workers						
Male	5,240	5,240	100%	5,240	100%	0	0	1,255	23.95%	0	0%	
Female	4	4	100%	4	100%	4	100%	0	0	4	100%	
Total	5,244	5,244	100%	5,244	100%	4	0.08%	1,255	23.94%	4	0.08%	
				Other t	han Perma	- anent worl	kers		_	_		
Male	7,417	7,417	100%	7,327	98.79%	0	0	2,824	38.07%	0	0%	
Female	442	442	100%	436	98.64%	442	100%	0	0	442	100%	
Total	7,859	7,859	100%	7,763	98.78%	442	5.62%	2,824	35.93%	442	5.62%	

## c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent)

	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Cost incurred on well-being measures as a % of total revenue of the company	0.10%	0.09%

## 2. Details of retirement benefits, for Current FY and Previous Financial Year.

	Current	t Financial Yea	r 2023-24	Previous Financial Year 2022-23			
Benefits	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	
PF	100%	100%	Yes	100%	100%	Yes	
Gratuity	100%	100%	Yes	100%	100%	Yes	
ESI	0%	2%	Yes	1%	7%	Yes	
Others-WC	100%	98%	Yes	67%	100%	Yes	

3. Accessibility of workplaces- Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

At Apollo Tyres, we hold the diversity of our workforce in high regard and pledge to uphold equal opportunities while condemning discrimination and harassment. Our "Equal Opportunity Policy" aligns with legal requirements outlined in "The Rights of Persons with Disabilities Act, 2016 and Rules, 2017". The company is committed to offering necessary support and accommodation to ensure the well-being of all employees, including those with special needs, enabling them to perform their duties effectively within the organisation.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

Apollo Tyres Ltd's Code of Conduct ensures that 'equal opportunity' is not merely a procedural formality, but a fundamental principle rooted in fairness, respect, and human dignity. The Company have a comprehensive 'Equal Opportunity Policy' which is readily accessible to every employee via the ATL Intranet.

The Policy ensures equal opportunity for all, transcending barriers of caste, creed, gender, race, religion, disability, or sexual orientation throughout the recruitment process at Apollo Tyres Ltd.

 $\frac{\text{https://corporate.apollotyres.com/content/dam/orbit/apollo-corporate/investors/corporate-governance/codes-policies/codes-policies/Code%20of%20Conduct-Oct%2010,%202023.pdf}$ 

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Condor	Permanent e	Permanent workers		
Gender	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	94.00%	100%	100%
Female	100%	100%	NA	NA
Total	100%	98.00%	100%	100%

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Apollo has established a framework which facilitates employees and workers across all levels
Other than Permanent Workers	in addressing their grievances. The employees and workers can directly report their grievances
Permanent Employees	through the Line Manager and HR Business Partner (HRBP) for their respective business vertical
Other than Permanent Employees	The complaints raised by the complainant are assessed carefully in a transparent manner. Based on the assessment of each raised concern, appropriate actions are taken promptly.
	We have also made available a dedicated email address $\underline{\text{coc.report@apollotyres.com}}$ for those seeking to report a concern while maintaining strict confidentiality.

7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:

	Curre	nt Financial Year 2023-2	24	Previous Financial Year 2022-23								
Category	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)						
	Total Permanent Employee											
Male	2,175	0	0%	2,965	0	0%						
Female	140	0	0%	75	0	0%						
Total	2,315	0	0%	3,040	0	0%						
		Total Perma	nent Work	ers								
Male	5,240	4,992	95.27%	4,789	4,521	94.40%						
Female	4	4	100%	6	6	100%						
Total	5,244	4,996	95.27%	4,795	4,527	94.41%						



#### 8. Details of training given to employees and workers:

		% of e	mployees c	overed by		Previous Financial Year 2022-23				
Category	Total	safety measures		On Skill Upgradation		Total	On Health and safety measures		On Skill Upgradation	
	(A)	No. (B)	% (B / A)	No. (C)	% (C / A)	(D)	No. (E)	% (E / D)	No. (F)	% (F / D)
				Empl	oyees					
Male	2,203	2,203	100%	2001	90.83%	2,965	3,254	109.75%	2,728	92.01%
Female	151	151	100%	132	87.42%	75	93	124.00%	71	94.67%
Total	2,354	2,354	100%	2133	90.61%	3,040	3,347	110.10%	2,799	92.07%
				Woı	kers	-	-		_	_
Male	5,240	5,240	100%	3,172	60.53%	12,667	12,667	100%	7,600	60.00%
Female	4	4	100%	4	100%	292	292	100%	190	65.07%
Total	5,244	5,244	100%	3,176	60.56%	12,959	12,959	100%	7,790	60.11%

#### 9. Details of performance and career development reviews of employees and worker:

Catalana	Curren	t Financial Year 2	2023-24	Previous Financial Year 2022-23									
Category	Total (A)*	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)							
Employees Employees													
Male	1709	1709	100%	2,827	2,714	96.00%							
Female	74	74	100%	67	67	100%							
Total	1783	1783	100%	2,894	2,781	96.09%							
		Worke	rs										
Male	5237	5237	100%	4,789	4,789	100%							
Female	4	4	100%	6	6	100%							
Total	5241	5241	100%	4,795	4,795	100%							

<sup>\*</sup>Note: Total number mentioned here includes the number of candidates eligible for the performance review, which includes the permanent employees and workers.

## 10. Health and safety management system:

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

At Apollo Tyres Ltd, the Occupational Health and Safety (OHS) Management System is implemented as per ISO 45001 Standard across all manufacturing plants and are also certified for ISO 45001 Standard.

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity? The company employs diverse methods and procedures to identify hazards and risks associated with the workplace, as outlined below:

Hazard Identification and Risk Assessment (HIRA) Register covering routine and nonroutine activities carried across departments.

Job Safety Analysis on non-routine activity and development of method statement for nonroutine activities.

GEMBA, Switch ON, Safety Interactions, Hazard identification and Near Miss Reporting.

And, carrying out Health and Safety Audits, both internally and externally on a periodic basis.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N) Yes.

Hazard identification and near-miss reporting process is available to enable workers to report on work-related hazards including near-misses, unsafe working conditions, and unsafe acts.

Behavior Based Safety (BBS)/ Safety Interaction (SI) program is available to enable workers to share work related hazards/risks including unsafe working conditions and unsafe acts.

## d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

Yes

Apollo Tyres has the provision of non-occupational medical and healthcare services for its employees and workers such as occupational health centre, ambulance, duty Doctor, and nursing staff being available at plant premises. The Company also provides group Mediclaim insurance and ESI as applicable.

## 11. Details of safety related incidents, in the following format:

Safety Incidents/ Number	Category	Current Financial Year 2023-24	Previous Financial Year 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-	Employees	0.14	0.16
person hours worked)	Workers	0.05	0.60
Total recordable work-related injuries	Employees	5	2
_	Workers	2	15
Number of fatalities	Employees	0	0
_	Workers	0	0
High consequence work-related injury or ill-health (excluding	Employees	0	1
fatalities)	Workers	0	0

#### 12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

In accordance with the company's health and safety mission of "prioritizing well-being through unwavering safety," Apollo Tyres Ltd consistently endeavors to enhance safety performance and promote health and safety awareness among employees and workers. To achieve this, the company has implemented several measures to ensure a safe and healthy workplace for all stakeholders:

Regularly conducting mandatory induction safety training and job-specific safety sessions for all employees and workers. Encouraging the identification of hazards and proactive reporting of near misses and unsafe conditions among employees and workers through a Hazard and Near Miss reporting program, followed by prompt action implementation.

Reinforcing safe behaviors among employees and workers and addressing at-risk behaviors through programs such as Behaviour Based Safety (BBS) and Safety Interaction (SI), accompanied by corrective actions. Conducting periodic safety audits to review workplace conditions and implementing remedial actions to further enhance safety measures, procedures, and reporting systems.

Promoting timely and effective reporting and investigation of all incidents and implementing corrective and preventive actions within specified timeframes.

Conducting hazard identification and risk assessment for all departmental operations.

Regularly convening safety committee meetings with other stakeholders to ensure compliance with local safety regulations, identify areas for improvement, implement corrective actions, and evaluate key performance indicators.

Integrating health and safety into Risk Management projects to strengthen risk controls throughout the company.

#### 13. Number of Complaints on the following made by employees and workers:

	Curre	nt Financial Year 2023-2	24	Pre	vious Financial Year 202	2-23
	Filed Pending Resolution at end of year Remark Filed Pending Resolution at end of year			Pending Resolution at end of year	Remark	
Working Conditions	0	0	-	0	0	-
Health and Safety	0	0	-	0	0	-

## 14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%



## 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

Workplace safety incidents are thoroughly investigated, and the root causes are shared with all employees, accompanied by corrective actions. These identified corrective actions are diligently tracked for timely closure, followed by subsequent trainings and modifications to work instructions, as well as upgrades to risk assessment sheets. The communication of root causes and sharing of corrective actions are carried out not only at the location where the incident occurred but also at other plants where similar potential situations may exist. Risks are addressed in the following manner:

Improvement of additional engineering controls / safety poka yokes (avoid unexpected surprises) based on Risk Management Projects.

Strengthening the safety training, standards, and SOPs with adequate health and safety instructions to ensure adequate risk awareness and safe behaviour.

Strengthening the BBS programs with improved quality of safety Installations with workers.

Roof lifeline system installed.

#### **Leadership Indicators**

## Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Apollo has established a partnership with the Life Insurance Corporation of India to offer comprehensive insurance coverage to our employees. In the unfortunate event of an employee's demise, a life insurance cover of ₹ 5,00,000 is provided. Furthermore, in the event of death resulting from an accident, the insurance company will process a claim equivalent to 60 months (100 months for field employees) of the basic component. Additionally, the workers are covered under Workmen Compensation.

## 2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

At Apollo Tyres Ltd, prioritizing business ethics, transparency, and accountability is fundamental, and we hold our business partners to the same standards. The Company undertakes various activities to ensure that our business partners comply with statutory and regulatory requirements, which include:

**GST Payments:** GST payments related to raw material billing for Apollo Tyres are transferred to the tax authorities of the Government of India. Once suppliers upload invoice data, including GST details, onto the GST portal, Apollo Tyres can access this information in Form 2A. This enables Apollo to claim GST credits against finished goods sales.

**PF** and **ESI** payments by labor contractors: Apollo's plant accounting and commercial teams are verifying that labor contractors have fulfilled their obligation to deposit statutory dues such as PF and ESI for their employees consistently before making payments for their invoices.

Regarding our raw material partners, additional adherence to labor-related matters is managed through the implementation of the Apollo Supplier Code of Conduct and compliance within the raw material supply chain:

- a) As a part of Apollo Tyres Sustainable Procurement Policy ATSPP Section III, Labor Practice It is a requirement and expectation that compensation is paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits stipulated under local or international laws.
- b) As a part of Apollo Sustainable Natural Rubber Policy-ASNRP Section 1: Labor and Human Rights-Support Decent Living Wages and Benefits: It is ensured that compensation paid to workers is complying with all the applicable wage laws, including the ones relating to minimum wages, overtime working hours, piece rates, and other aspects of compensation. Provision of mandatory benefits through local or international laws is also ensured.

3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total Numbe employees		No. of employees/ workers that are rehabilitated or whose family member have been placed in suitable employment			
	FY 2023-24	FY 2022- 23	FY 2023-24	FY 2022- 23		
Employees	0	1	0	0		
Workers	0 0		0	0		

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes, Apollo consistently allocates resources to enhance human capital development, focusing on cultivating contemporary skills and capabilities. Simultaneously, we offer employees a rich diverse experience to enable a smooth transition to alternate opportunities. Under our comprehensive transition assistance program, we cover aspects related to wellness, financial planning, and counselling support. We also offer the extension of the fixed term work contracts to the retiring employees, in accordance with the skill set required for the business operations. Furthermore, depending on business requirements, the opportunity to become a business partner at Apollo is also extended to such employees.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working Conditions	

6. Provide details of any corrective actions taken or underway to address significant risks /concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Apollo performs regular assessments of health and safety practices and working condition of value chain partners with an aim to identify areas of improvement, and based on the findings and recommendations, the corrective and preventive measures are provided.

There is a specific checkpoint in the supplier assessment checklist on fatal accident at supplier's end which downgrades the supplier audit assessment score. However, no significant issues were identified during the assessment.

## PRINCIPLE 4:

Businesses should respect the interests of and be responsive to all its stakeholders

## **Essential Indicators**

1. Describe the processes for identifying key stakeholder groups of the entity.

In alignment with the board approved policy on Stakeholder Engagement, Apollo Tyres has structured framework for engaging with its stakeholders and fostering enduring relationships with each one of them. We recognize the value of each stakeholder group and their specific priorities and consistently engage with them to get their insights which in turn contribute to Company's performance. Based on the approach of materiality, we have identified the key stakeholders along with their concerns. The Company has identified and prioritised its key stakeholder groups: Customers, Supply Chain Partners, Community, NGOs, Government/ Corporate partners, Investors etc.

 $The above-mentioned policy can be accessed via the link- \\ \underline{https://corporate.apollotyres.com/content/dam/orbit/apollo-corporate/investors/corporate-governance/codes-policies/codes-policies/stakeholder-engagement-policy.pdf$ 



## 2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers (OEM & Replacement)	No	<ul> <li>Customer Care - 1800-212-7070</li> <li>Apollo Quick Service Application</li> <li>Direct approach to all our Apollo Offices</li> <li>Other Customer Engagement activities</li> </ul>	As and when required/ Periodically	<ul> <li>Information of Products, Quality &amp; safety, new product information etc.</li> <li>Customer Grievance resolution</li> <li>Customer aftersales service</li> <li>Climate change/ESG disclosures</li> </ul>
Community (Trucking community, Women and children from the community around our manufacturing locations)	Yes	a) One-to-one & one-to-group communication b) Social media engagement c) Awareness through IEC materials like posters, pamphlets, hoardings, foe behavior change. d) Mid-media events (street plays, game shows etc.) e) SHG meetings f) Village Development Committee Meeting g) Livelihood and Income Generation Trainings	Daily, Monthly and Quarterly	<ul> <li>Addressing the health risks faced by truck drivers, due to their mobile lifestyle and lack of access to healthcare services. Providing health care solutions to its stakeholders in the form of healthcare centers.</li> <li>Recognizing the crucial role of women in economic development and aiming to support gender equality and poverty alleviation through a livelihood initiative.</li> <li>Providing the livelihood opportunity to the women at their doorsteps. Issues related to type of income generation activities, financial and technical support required for setting up the income generation units.</li> </ul>
NGO, Corporate Partners, and Government Bodies	No	Meetings	Quarterly, Half yearly	<ul> <li>Collaborating with grassroots organisations, local governments, and corporate partners to implement CSR projects and maximize outreach.</li> <li>Complying with statutory / mandatory requirements</li> <li>Regulatory guidance whenever needed.</li> <li>Explore partnership opportunities and secure technical and financial support for CSR projects.</li> </ul>
Supply Chain partners (Raw Material Suppliers, Logistics Partners etc.)	No	a) Meetings b) Field Visits c) Physical visits d) Virtual meetings e) Emails f) Telephone calls g) Vendor quality manuals h) Supplier engagement meets	Quarterly, Half yearly, Annual	<ul> <li>To promote sustainable supply chain initiatives.</li> <li>Support rubber tapping communities and ensuring the wellbeing of supply chain partners.</li> <li>Awareness amongst suppliers about Climate change and ESG requirements.</li> <li>Screening &amp; Assessment</li> <li>Timely delivery &amp; Quality</li> </ul>

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investor and Shareholder	No	Stock Exchange Fillings, Annual Report, Annual General Meetings, Emails, Postal Ballots, etc.	Periodic	Statutory Requirement
Employee and Workers	No	Newsletter, Training & Awareness sessions, FGDs, Townhall, e-mails, health-helpline, etc.	Periodically and as & when needed	<ul> <li>HSE related concerns</li> <li>Achievements, reward &amp; recognition</li> <li>Training &amp; Awareness</li> <li>Employee feedback</li> </ul>
Consumers	No	Digital websites-product and BOFO website and social media	As per customer plans	- HSE related concerns

#### **Leadership Indicators**

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The Company endeavors to reduce the environmental, economic, and social impacts of its operations in a compliant and responsible manner by adopting sustainable procurement policies and practices. It aims to continuously improve customer satisfaction by providing cost-effective and quality materials on time, while collaborating with stakeholders on ESG aspects to promote sustainable business practices.

To achieve this, the Board provides strategic oversight and has established a Business Responsibility and Sustainability Committee to guide and monitor ESG progress. The company employs a diverse approach to stakeholder engagement.

Regular updates on sustainability initiatives are provided to the Board, and a sustainability report reflecting ESG initiatives overseen by the Board is available on the company website and circulated to shareholders as part of the Annual Report at Apollo Tyres Ltd.

Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, a regular and proactive engagement with the Company's key stakeholders is being maintained to effectively take their opinion on our business. Additionally, through materiality assessment, the Company engages with its stakeholders in terms of identifying and prioritising the issues relevant to economic, environmental and social topics. Based on stakeholder's interest and expectation with our business, material topics are identified and considered for strategic decisions of the organisation to formulate targets and action plans on ESG. For further details, please refer Sustainability Report FY24.

organisation

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

Engagement with trucking community: The company is dedicated to offering ongoing healthcare support to its trucking community. Limited access to healthcare facilities and continuity in treatment are major concerns faced by the trucking community. Through its healthcare centers, the company provides access to healthcare facilities at the doorsteps of the trucking community.

Engagement with rural women: Market linkage and access to finance pose significant challenges for rural women seeking livelihood opportunities. The company addresses these issues by investing in capacity-building trainings and facilitating financial and government connections. For instance, in Baroda, the company has established more than 800 Self-Help Groups and conducted income-generation trainings for underprivileged women. Additionally, it has aided in the formation of a Credit Cooperative Society and an Organic Farming Cooperative and Marketing Society. Through these efforts, over 3,900 women have been connected with various government schemes, accessing benefits worth 7.38 crore.

#### **PRINCIPLE 5:**

Businesses should respect and promote human rights

## **Essential Indicators**

## 1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

		FY 2023-24		FY 2022-23							
Category	Total (A)  No. of employees / workers covered (B)		% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)					
Employees											
Permanent	2,315	2,315	100%	3,040	3,040	100%					
Other than permanent	39	39	100%	91	91	100%					
Total Employees	2,354	2,354	100%	3,131	3,131	100%					
		Wo	rkers								
Permanent	5,244	2,969	56.62%	4,795	4,795	100%					
Other than permanent	7,859	5,159	65.64%	8,164	8,164	100%					
Total Workers	13,103	8,128	62.03%	12,959	12,959	100%					

## 2. Details of minimum wages paid to employees and workers, in the following format:

	% of employees covered by					Previous Financial Year 2022-23				
Category	Total	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
	(A)	No. (B)	% (B / A)	No. (C)	% (C / A)	(D)	No. (E)	% (E / D)	No. (F)	% (F / D)
				Emple	oyees					
Permanent										
Male	2,175	0	0%	2,175	100%	2,965	0	0%	2,965	100%
Female	140	0	0%	140	100%	75	0	0%	75	100%
Total	2,315	0	0%	2,315	100%	3,040	0	0%	3,040	100%
Other than Permanent										
Male	28	0	0%	28	100%	72	0	0%	72	100%
Female	11	0	0%	11	100%	19	0	0%	19	100%
Total	39	0	0%	39	100%	91	0	0%	91	100%
				Wor	kers					
Permanent										
Male	5,240	0	0%	5,240	100%	4,789	0	0%	4,789	100%
Female	4	0	0%	4	100%	6	0	0%	6	100%
Total	5,244	0	0%	5,244	100%	4,795	0	0%	4,795	100%
Other than Permanent										
Male	7,417	2,344	31.60%	5,073	68.40%	7,878	2,206	28%	5,672	72.00%
Female	442	43	9.73%	399	90.27%	286	72	25.17%	215	75.17%
Total	7,859	2,387	30.37%	5,472	69.63%	8,164	2,278	27.90%	5,887	72.11%

## 3. a. Details of remuneration/salary/wages, in the following format:

		Male		Female		
	Number	Median remuneration/ salary/ wages of respective category (In Lakh/ annum)	Number	Median remuneration/ salary/ wages of respective category (In Lakh/ annum)		
Board of Directors (BoD)*	11	58.06	2	58.06		
Key Managerial Personnel (KMP)**	3	1122.00	1	117.60		
Employees other than BoD	2,155	12.65	143	13.50		
and KMP						
Workers	5,202	7.64	4	3.05		

<sup>\*</sup> BoD exclude Managing Director & Whole-time Director

#### b. Gross wages paid to females as % of total wages paid by the entity

	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Gross wages paid to females as % of total wages	3.58%	2.13%

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, human rights impacts or issues are handled by the Group Head of Human Resources at Apollo Tyres Ltd.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

Apollo Tyres Ltd has an established process for employees and workers to raise grievances and concerns. The concerns can be raised through the following channels:

Employees and workers can raise concerns directly through their line managers.

Concerns can also be escalated to the HR business partner for the business area or region.

In addition, concerns can also be raised anonymously through e-mail coc.report@apollotyres.com

## 6. Number of Complaints on the following made by employees and workers:

	Current Financial Year 2023-24			Previous Financial Year 2022-23		
	Filed during the year	Pending resolution at end of year	Remark	Filed during the year	Pending resolution at end of year	Remark
Sexual Harassment	3	Nil	The complaints were resolved.	Nil	Nil	-
Discrimination at workplace	Nil	Nil	-	Nil	Nil	-
Child Labour	Nil	Nil	-	Nil	Nil	-
Forced Labour/ Involuntary Labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil	-	Nil	Nil	-
Other human rights related issues	Nil	Nil	-	Nil	Nil	-

## 7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Total Complaints reported under Sexual Harassment on of Women at Workplace	3	0
(Prevention, Prohibition and Redressal) Act, 2013 (POSH)		
Complaints on POSH as a % of female employees / workers	0.50%	NA
Complaints on POSH upheld	3	0

<sup>\*\*</sup> KMP includes Managing Director & Whole-time Director



#### 8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

Apollo Tyres Ltd upholds it commitment to equal opportunities and does not support discrimination and harassment of its employees and other external stakeholder in any form. The Company adheres to the values like Confidentiality, Transparent Support and Protection of Rights during the complaint registration process by the complainant. The complainants are also provided with a channel where they can report their complaint confidentially in writing via the email to: coc.report@apollotyres.com.

The Company ensures that complainants and witnesses are shielded from retaliation, victimization, or discrimination while addressing complaints related to sexual harassment.

According to the ATL Code of Conduct, Apollo Tyres is committed to safeguarding employee rights by prohibiting dismissal or victimization based on lawful disclosures. The company takes a zero-tolerance stance against harassment or victimization of reporters and pledges full support from senior management for employees who raise concerns in good faith. Any form of retaliation is treated as a serious disciplinary offense. Apollo Tyres ensures confidentiality of employee concerns and helps throughout investigations, including the option of temporary re-deployment. Additionally, the company extends support to non-employees involved in the process and respects the wishes of employees regarding identity disclosure. If disciplinary proceedings follow, employees may be asked to come forward as witnesses and will be provided with necessary advice and support.

#### 9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

The company clearly states human rights expectations in the CoC (Code Of Conduct) which is applies to our customers, suppliers and shareholders. Human Rights are fundamental to Apollo Tyres business agreements and is guided by the Supplier Code of Conduct which is in alignment with the ISO20400:2017 standard on Sustainable Procurement and its guiding principles. Furthermore, the Company adheres to a framework based on 7 core subjects, which includes Human Rights as one of the fundamental core subjects. The guidelines for deployment in the Apollo Tyres supply chain is also based on the subjects mentioned above. Additionally, the Supplier Code of Conduct is a mandatory prerequisite during the selection and onboarding of new suppliers. It is to be adhered to alongside the terms and conditions of commercial procurement contracts.

Furthermore, Apollo Tyres is an active member of the Global Platform for Sustainable Natural Rubber (GPSNR). This platform collaborates with stakeholders across the Natural Rubber Supply Chain to promote sustainability. The requirements related to natural rubber procurement are harmonized with the GPSNR's policy framework and guidelines, which encompasses human rights as one of the sections.

#### 10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)*
Child labour	1 out of 5 Plants (20%)
Forced/involuntary labour	No Specific compliance
Sexual harassment	1 out of 5 Plants (20%)
Discrimination at workplace	1 out of 5 Plants (20%)
Wages	1 out of 5 Plants (20%)

<sup>\*</sup>Please note the while calculating the percentage, only the manufacturing plants have been considered. Plants are selected on sample basis for conducting assessment by Internal audit team.

## 11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

Not applicable

#### **Leadership Indicators**

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

Nil

2. Details of the scope and coverage of any Human rights due diligence conducted.

Nil

## 3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Apollo Tyres' Equal Opportunity policy aligns with statutory compliance outlined in "The Rights of Persons with Disabilities Act, 2016 and Rules, 2017." The company ensures the provision of suitable facilities and amenities to enable individuals with disabilities to effectively fulfill their responsibilities within the organisation.

#### 4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	•

**Note:** Apollo Tyres have a Supplier Audit System where the suppliers are audited on a periodic basis based on defined audit criteria and frequency. As a part of the audit checklist, we assess our suppliers on requirements pertaining to Child Labor, Forced Labor/ Involuntary Labor, Sexual Harassment, Discrimination at workplace, and Wages, and others.

## 5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above. -

Apollo Tyres Ltd supplier audit system is well-defined, featuring a standard Supplier Audit checklist that comprehensively covers requirements, including those pertaining to Occupational Health, Safety, and Environment (HSE). Following audits conducted during the reporting period, we have identified no risks or concerns to date, resulting in no corrective actions being deemed necessary or applicable.

#### PRINCIPLE 6:

Businesses should respect and make efforts to protect and restore the environment

#### **Essential Indicators**

## 1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

Parameter	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
From 'Renewable Sources' in GJ		
Total Electricity Consumption (A) GJ	487,280	323,556
Total Fuel Consumption (B) GJ	278,368	329,079
Energy consumption through Other Sources (C) GJ	-	-
Total Energy Consumption from renewable sources (A+B+C) GJ	765,648	652,635
From 'Non-Renewable Sources'		
Total Electricity Consumption (D) GJ	1,387,013	1,526,041
Total Fuel Consumption (E) GJ	3,102,802	3,114,706
Energy consumption through Other Sources (F) GJ (Steam purchased through	1,051,566	985,695
GAIL, generated through waste heat recovery)		
Total Energy Consumption from non-renewable sources (D+E+F) GJ	5,541,381	5,626,443
Energy intensity per rupee of turnover (GJ/ INR Lakh) (Total energy consumption	3.60	3.71
(GJ)/turnover in Lakh rupees)		
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity	805.53	824.09
(GJ/ Million USD) (Total energy consumed (GJ)/ Revenue from operations adjusted		
for PPP in Million USD)*		
Energy intensity in terms of physical output	10.47	10.55
Energy intensity- the relevant metric may be selected by the entity		
(GJ/Tonne of products)		

<sup>\*</sup>The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year by IMF, which is 22.167 and 22.401 for the FY 24 and FY 23 respectively.

**Note:** Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/No). If "Yes", name the external agency- Yes, Independent assurance has been carried out by TUV India Pvt Ltd.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

None of the facilities of Apollo Tyres Ltd are identified as 'Designated Consumer' under the PAT scheme.

3. Provide details of the following disclosures related to water, in the following format:

Parameter	Current Financial Year 2023- 24	Previous Financial Year 2022- 23	
Water withdrawal by source (in kilo li	tres)		
(i) Surface water	1,383,358	1,623,129	
(ii) Groundwater	34,868	14,674	
(iii) Third party water	336297	404,368	
(iv) Seawater / desalinated water	0	=	
(v) Other (Rain water)	169,913	23,573	
Total volume of water withdrawal (in kilolitres)	1,924,436	2,065,744	
Total volume of water consumption (in kilolitres)	1,924,436	2,065,744	
Water intensity per rupee of turnover (Water consumed (KL) / Revenue from	1.10	1.22	
operations (INR Lakh)) (KL per INR Lakh)			
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	245.75	271.12	
(KL/ Million USD) (Total water consumption (KL) / Revenue from operations			
adjusted for PPP (Million USD))*			
Water intensity in terms of physical output	3.19	3.47	
Water intensity – the relevant metric may be selected by the entity			
(KL/MT of product)			

<sup>\*</sup>The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year by IMF, which is 22.167 and 22.401 for the FY 24 and FY 23 respectively.

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency- Yes, Independent assurance has been carried out by TUV India Pvt Ltd.

## 4. Provide the following details related to water discharged:

Parameter	Current Financial Year 2023- 24	Previous Financial Year 2022- 23			
Water discharge by destination and level of treatment (in kiloliters)					
(i). To Surface Water					
- No treatment	0	0			
- With treatment- please specify level of treatment	0	0			
(ii). To Ground Water					
- No treatment	0	0			
- With treatment- please specify level of treatment	0	0			
(iii). To Seawater					
- No treatment	0	0			
- With treatment- please specify level of treatment	0	0			
(iv). Sent to Third Parties					
- No treatment	0	0			
- With treatment- please specify level of treatment	0	0			
(v). Others					
- No treatment	0	0			
- With treatment- please specify level of treatment	0	0			
Total water discharged (in kilo-litres)	0	0			

**Note:** Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/No). If "Yes", name the external agency.

## 5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

At all manufacturing sites of Apollo Tyres Ltd, all process and domestic wastewater undergo treatment either through effluent treatment plants (ETP) or sewage treatment plants (STP), followed by tertiary treatment, in accordance with relevant requirements or norms, and subsequently reused within the system. Andhra Pradesh & Chennai manufacturing facilities implemented 100% zero liquid discharge.

### 6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Please specify unit	FY 2023-24	FY 2022-23*
NOx	mg/nm3	67.01	65.78
SOx	mg/nm3	80.12	45.00
Particulate matter (PM) (PPM)	mg/nm3	63.68	66.24
Persistent organic pollutants (POP)	mg/Nm3	-	57.00
Volatile organic compounds (VOC)	tons	-	NA
Hazardous air pollutants (HAP)	tons	-	NA
Others	tons	-	NA

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. - Yes, Independent assurance has been carried out by TUV India Pvt Ltd.

#### 7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:

Parameter	Please specify unit	FY 2023-24	FY 2022-23
Total Scope 1 Emissions (Break-up of the GHG into CO <sub>2</sub> , CH4, N <sub>2</sub> O,	Metric tonnes of	294261	292,368
HFCs, PFCs, SF <sub>6</sub> , NF3, if available)	CO <sub>2</sub> equivalent		
Total Scope 2 Emissions (Break-up of the GHG into CO <sub>2</sub> , CH4, N <sub>2</sub> O,	Metric tonnes of	275,861	303,089
HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	CO <sub>2</sub> equivalent		
Total Scope 1 and Scope 2 emissions per rupee of turnover	tCO <sub>2</sub> eq/ INR	0.33	0.35
	Lakh		
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for	tCO <sub>2</sub> eq/ Million	72.82	78.15
Purchasing Power Parity (PPP)* (Total Scope 1 & 2 emissions/ Revenue	USD		
from operations adjusted for PPP)			
Total Scope 1 and Scope 2 emission intensity in terms of physical output	tCO <sub>2</sub> eq/MT of	0.95	1.00
Total Scope 1 and Scope 2 emission intensity - the relevant metric may	product		
be selected by the entity			

<sup>\*</sup>The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year by IMF, which is 22.167 and 22.401 for the FY 24 and FY 23 respectively.

**Note:** Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/No). If "Yes", name the external agency. Yes, Independent assurance has been carried out by TUV India Pvt Ltd.

#### 8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

Apollo Tyres has a company-wide climate change strategy and has also formed an Environment Working Group. The goal of the group is to keep the Company updated and compliant with relevant legislations and identify areas where emissions can be reduced. The group has identified 3 areas where improvements can be made.:

Improving energy efficiency: The Company have been making efforts to make its operations more energy efficient through improvements in process design, retrofitting, and using energy efficient equipment which has led to the savings of around 74,000 GJ of energy.

Using green fuels: The Company is using 100% biomass for its manufacturing facilities in Andhra Pradesh. The Limda plant procures steam from waste heat recovery boiler. Furthermore, the manufacturing facilities in Chennai have started using 5% biomass in the reporting year FY24.

Renewable energy use: The Company has invested in renewable energy to reduce its reliance on grid electricity. In FY24, the Company procured 24.59% of its electricity requirements through renewable sources.



#### 9. Provide details related to waste management by the entity, in the following format:

Parameter	Current Financial Year 2023- 24	Previous Financial Year 2022- 23	
Total Waste Generated (in Metric Ton		2022-23	
Plastic Waste (A)	1,310	1.449	
E-Waste (B)	45	60	
Bio-medical Waste (C)	0.15	0.12	
Construction and Demolition Waste (C&D) (D)	0	0	
Battery Waste (E)	76	20	
Radioactive Waste (F)	0	0	
Other Hazardous Waste generated (G) (Please specify, if any)	1,224	877	
Other Non-Hazardous Waste generated (H) (Please specify, if any)	24,283	24,883	
Total Waste Generated (A+B+C+D+E+F+G+H)	26,938	27,289	
Waste intensity per rupee of turnover (MT/ INR Lakhs) (Total waste generated/	0.015	0.016	
Revenue from operations)			
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	3.44	3.58	
(MT/ Million USD) (Total waste generated (MT)/ Revenue from operations adjusted			
for PPP (Million USD))			
Waste intensity in terms of physical output	0.04	0.05	
Waste intensity - the relevant metric may be selected by the entity (MT of waste/			
MT of product)			
For each category of waste generated, total waste recovered through recyc	ling, re-using or other rec	overy operations	
(in metric tonnes)			
Category Waste			
(i). Recycled	25,694	25,764	
(ii). Re-used	428	995	
(iii). Other recovery operations	22	4	
Total	26,144	26,763	
For each category of waste generated, total waste disposed by nature	of disposal method (in me	etric tonnes)	
Category Waste			
(i). Incineration	93	175	
(ii). Landfilling	701	351	
(iii). Other disposal operations	0	0	
Total	794	526	

<sup>\*</sup>The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year by IMF, which is 22.167 and 22.401 for the FY 24 and FY 23 respectively.

**Note:** Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/No). If "Yes", name the external agency. No, an independent assurance has not been carried out.

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

Apollo Tyres has implemented a range of measures to effectively manage the waste generated during its business operations:

The company follows the 4Rs strategy (Recycle, Reuse, Reduce, Recover) to minimize waste generation and limit the use of hazardous and toxic chemicals in its products and processes.

All generated waste is gathered and stored in designated areas within the Value yard, following applicable regulatory guidelines for disposal. The quantity of waste produced and disposed of is carefully monitored, with detailed records maintained. Periodic reviews of this data are conducted, and initiatives aimed at waste reduction are closely monitored and implemented.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

S. No.	Location of operations/ offices	Type of operations	Whether the conditions of environmental approval/ clearance are being complied with? (Yes/No) If "No", the reasons thereof and corrective action taken, if any.			
None of Apollo Tyres Ltd manufacturing units nor offices are in and/or around ecologically sensitive areas where environmental approvals/ clearance is required or mandatory.						

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief of the	<b>EIA Notification</b>	Date	Whether conducted by	Results communicated in	Relevant
project	No.	Date	independent agency (Yes/No)	public domain (Yes/No)	Web-link
N					1 11 1

No new projects undertaken in the reporting periods which requires Environmental Impact Assessment (EIA) based on applicable law.

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

S. No.	Specify the law/ regulation/ guidelines which is not compliant	Provide details of the non-compliance	Any fines/ penalties/ action taken by regulatory agencies such as pollution control board or by courts	Corrective action taken, if any
	All the manufacturing			

## Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

Each facility/ plant located in areas of water stress, provide the following information:

None of the plants are located in areas of water stress.

- i. Name of area NA
- ii. Nature of operations NA
- iii. Water withdrawal, consumption, and discharge in the following format:

Parameter	Current Financial Year 2023-24	Previous Financial Year 2022- 23
Water withdrawal by source (in kilo lit	res)	
(i). Surface Water	0	0
(ii). Ground Water	0	0
(iii). Third Party Water	0	0
(iv). Seawater/ Desalinated Water	0	0
(v). Others	0	0
Total volume of water withdrawal (in KL)	0	0
Total volume of water consumption (in KL)	0	0
Water intensity per rupee of turnover (water consumed/ turnover)	0	0
Water intensity (optional) – the relevant metric may be selected by the entity	0	0

Parameter	Current Financial Year 2023-24	Previous Financial Year 2022- 23
Water discharge by destination and le	evel of treatment (in Kilo litres)	
(i). To Surface Water		
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(ii). To Ground Water		
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(iii). Sent to Third Party Water		
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(iv). Into Seawater		
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
(v). Others		
- No treatment	0	0
- With treatment- please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

Note: Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/No). If "Yes", name the external agency. Yes, Independent assurance has been carried out by TUV India Pvt Ltd.

## 2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Please specify unit	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Total Scope 3 Emissions (Break-up of the GHG into CO <sub>2</sub> , CH4, N <sub>2</sub> O,	Metric tonnes of	169,788	162,351
HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	CO <sub>2</sub> equivalent		
Total Scope 3 emissions per rupee of turnover	tCO <sub>2</sub> eq/INR	0.10	0.10
	LAKH		
Total Scope 3 emission intensity (optional)- the relevant metric may be	tCO <sub>2</sub> eq/MT of	0.28	0.27
selected by the entity	product		

**Note:** Indicate if any independent assessment/ evaluation/ assurance has been carried out by an external agency? (Yes/No). If "Yes", name the external agency. Yes, Independent assurance has been carried out by TUV India Pvt Ltd.

With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details
of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation
activities.

None of Apollo Tyres plants fall in ecologically sensitive areas.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

S. No.	Initiative undertaken FY 2023-24	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative Energy Saved (kWh)	
1.	Energy Conservation	Enhancing energy preservation via process revamping, equipment conversion, retrofitting, and adopting energy-efficient appliances.	Total energy saved: around 74,000 GJ Emissions avoided: around , 13,000 MtCO2e	
2.	Water conservation	<ol> <li>Hot water curing process replaced with nitrogen</li> <li>Harvested rainwater used in manufacturing processes</li> <li>Use of recycled water in manufacturing processes</li> </ol>	Recycled water used: 49%	
3.	Use of Biofuels and Renewable Energy	The Company has increased the use of renewable energy across the organisation, along with use of biofuels in the Chennai plant.	Direct reduction of scope 1 and scope 2 emissions.	

#### 5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

The Company ensures swift recognition of the of risks, leading to the development and periodic monitoring of appropriate mitigation action plans to foster sustainable growth through a comprehensive risk management framework. As a conscientious Company, we have developed the business continuity and emergency plan as part of crucial risk management strategies, details of which are given below.

Business Continuity Plan-The Business Continuity Plan which includes all facets of the operations has been developed. Apollo Tyres firmly believes in establishing robust processes and plans including prevention and recovery systems to address potential threats in order to enable the company to maintain product or service delivery at acceptable levels even after disruptive incidents. The objective of the plan is to restore Information Technology (IT) systems at an alternative location and provide user access within a response time of 48 hours. The procedures outlined in this document serve as guidance for responding to incidents, ensuring that business operations can continue in a limited capacity until IT systems are fully restored. Information security controls remain in place to safeguard classified information. The plan is periodically tested based on contingency test plan and audited periodically by internal and external audit agencies.

**Emergency Management Plan-** An emergency management plan has been established across all the Plants of Apollo Tyres, considering a range of emergency scenarios related to both operational incidents and natural disasters. We have assigned dedicated teams at all the plants to respond in emergency scenarios and they undergo recurrent training on the Emergency Plan. The plan is subject to regular testing and review, including frequent emergency mock drills, to guarantee readiness.

Moreover, the Company has established a robust risk management framework to identify and evaluate business risks and opportunities promptly. This framework ensures that risks are promptly identified, and appropriate mitigation action plans are developed and periodically monitored to drive sustainable growth.

## 6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

No significant impacts have been identified as of now in our value chain. Apollo Tyres is a member of the Global Platform for Sustainable Natural Rubber (GPSNR), initiated by the Tyre Industry Project under the World Business Council for Sustainable Development (WBCSD). This platform is dedicated to advancing sustainable practices within the natural rubber supply chain, focusing on socio-economic, environmental, and governance issues. GPSNR operates as a multi-stakeholder platform, counting among its members OEMs, tyre manufacturers, natural rubber producers and traders, smallholders, and civil society organisations.

To address environmental concerns effectively, Apollo Tyres has introduced its Sustainable Natural Rubber Policy, known as the Apollo Tyres Sustainable Natural Rubber Policy (ASNRP). This policy is aligned with the framework set forth by GPSNR and encompasses commitments to identify and mitigate risks associated with adverse environmental impacts. It specifically addresses concerns such as deforestation, the preservation of High Conservation Value and High Carbon Stock areas, and biodiversity conservation. ASNRP has been communicated to all our natural rubber supplier partners, who have acknowledged and accepted its terms.

## 7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

100% suppliers are assessed for environmental impacts during the periodic audits. During these audits, the suppliers undergo assessment for environmental impacts using a predefined and standardized audit checklist, criteria, and frequency. Our supplier audit questionnaire includes a dedicated section on Health, Safety, and Environment (HSE), where we verify requirements related to environmental management systems.

We scrutinize efficiency of energy and water, also the waste management processes, including initiatives for waste reduction, reuse, and recycling, as well as systems for waste collection, segregation, and disposal across both plant and office premises at the supplier's manufacturing facilities. These measures are implemented to minimize environmental impact.



#### PRINCIPLE 7:

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

#### **Essential Indicators**

1. a. Number of affiliations with trade and industry chambers/ associations.

The Company has an active affiliation with 6 trade and industry chambers/ associations.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry [CII]	National
2	Federation of Indian Chamber of Commerce and Industry [FICCI]	National
3	PHD Chamber of Commerce and Industry	National
4	Society of Indian Automobile Manufacturers	National
5	Automotive Tyre Manufacturers' Association	National
6	World Economic Forum	International

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of authority	Brief of the Case	Corrective action taken
Competition Commission of India (CCI)	The Competition Commission of India (CCI) issued an order on February 2, 2022 mentioning that it has held five tyre manufacturers and Automotive Tyre Manufactures Association (ATMA) guilty of contravention of the provisions of Section 3 of the Competition Act, 2002 and imposed a penalty of ₹ 425.53 Crores on the Company.  The Company filed an appeal against the aforesaid order before the National Company Law Appellate Tribunal, New Delhi ('NCLAT"). NCLAT through its judgement dated December 1, 2022 disposed off the appeals by remanding back the case to CCI for review. CCI has filed an appeal in the Supreme Court against the Order passed by the NCLAT. Hearing to consider admission of appeal is likely to come in July 2024.	The Company filed an appeal against the aforesaid order before the National Company Law Appellate Tribunal, New Delhi ('NCLAT"). NCLAT through its judgement dated December 1, 2022 disposed off the appeals by remanding back the case to CCI for review. CCI has filed an appeal in the Supreme Court against the Order passed by the NCLAT. Hearing to consider admission of appeal is likely to come in July 2024.

#### **Leadership Indicators**

1. Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such	Whether information available	Frequency of	Web Link, if
		advocacy	in public domain (Yes/No)	Review by Board	available

The present and upcoming regulation compliance has been managed by Global regulatory compliance manager. He prepares and present the regulations potential impact on the business/product to management. He develops the strategy to draw the opportunity study or minimisation of risk working with the cross-functional team (CFT).

We are constantly monitoring all the development of regulations directly working/interacting with Govt. officials, NGOs, Testing labs, Autonomous bodies, Trader bodies such as ATMA, ACMA, CII, AIRTRA, CII etc.

#### **PRINCIPLE 8:**

Businesses should promote inclusive growth and equitable development

#### **Essential Indicators**

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief detail of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/No)	Relevant web-link
			Not Applicable		

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

S. No.	Name of the project for which R&R is ongoing	State	District	No. of project affected families (PAFs)	%of PAFs covered by R&R	Amounts paid to PAFs in the FY (in ₹)
Not Applicable						

#### 3. Describe the mechanisms to receive and redress grievances of the community.

At Apollo Tyres Ltd, the company has established a robust mechanism for engaging with the community to address grievances and improve programs as part of its Corporate Social Responsibility (CSR) initiatives. Details of this engagement plan are outlined below:

- a. Field Visits: Physical field visit plays an important role in assessing the real time progress of any project. The local team visits the field programme on a weekly basis and ensures that all the deliverables are met as per the plan. The team individually meets the stakeholder to know whether they have received the benefits of the programme or not. During the field visit ATF representatives engage with the community on a one-to-one basis by conducting meetings, interactions etc.
- b. Involvement of Community Resource Persons (CRP): Include or engage local beneficiaries to implement the programme as they have a strong local connection with the community. For instance, Peer Educators (PEs) deliver awareness sessions at the Transhipment Hub. Community Resource Person (CRPs), where in each village one woman from the SHG is identified and trained on documentation and programme monitoring. CRP and PEs are the face of the community, they help in resolving the issues with active community participation.
- c. Formation of Village Development Committee (VDC): Community plays an important role in the success of any community initiatives. The programme has developed a process of regular stakeholder dialogue, consultation, and feedback through SHG and Village Development Committee (VDC) meetings. This also ensures that stakeholder's feedback is captured and the same is implemented. Remedial measures are arrived at through these forums to resolve the issues and enhance stakeholder participation.
- d. Midline and Impact Assessment: To evaluate the overall performance of the project midline assessment is conducted at 3<sup>rd</sup> year of the implementation of project and impact assessment study is conducted after completion of 5 years. Focused Group Discussions are conducted with the different stakeholder groups to identify and problem and improvement areas. Based on the community recommendation and study findings mid-course correction is conducted.

#### 4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

Parameter	Current FY 2023-24	Previous FY 2022-23
Directly sourced from MSMEs/ small producers	21.68%	16.84%
Directly from within India	64.78%	61.82%

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Location	Current Financial Year 2023- 24	Previous Financial Year 2022- 23
Rural	46%	44%
Semi-Urban	6%	7%
Urban	2%	2%
Metropolitan	46%	47%

Note: Categorisation as per RBI Classification - Rural/ Semi-Urban/ Urban/ Metropolitan

**Leadership Indicators** 

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Not Applicable	

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

S. No.	State	Aspirational District	Amount spent (In Lakh)
1	Gujarat	Dahod	23,85,151
2	Farakka Healthcare Centre West Bengal	Murshidabad	1,024,109

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

No, we do not have a preferential procurement policy. However, Apollo Tyres are encouraging and enabling its supply chain partners to run centers i.e., 11 centers for Natural Rubber (sheet rubber) grading, currently over 50% of the workforce in these grading centers are women. The procured raw rubbers are processed manually for improvement and inspection purposes to ensure the right quality for the product.

(b) From which marginalized /vulnerable groups do you procure?

Not ascertained, however, the Natural Rubber grading centres have employed women for grading of sheet rubber, from neighboring areas which provides them with employment opportunity and skill development prospects.

(c) What percentage of total procurement (by value) does it constitute?

Apollo Tyres do not track the percentage of total procurement from vulnerable and marginalized communities. However, Apollo Tyres procures 5.83% of its total procurement value from natural rubber grading centres, which employ women from neighbouring districts.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit Shared (Yes/ No)	Basis of calculating benefit share
Not Applicable				

100%

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority		Brief of Case Cor		rrective action taken	
	Not Applicable				
6.	Details of beneficiaries of CSR Projects:				
S. No.	CSR Project		No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups	

Healthcare for the Trucking Community: Due to their nomadic lifestyle and limited access to
healthcare facilities, truck drivers face various healthcare challenges. This is why the company has
identified the trucking community as its primary beneficiaries, who are also its key customers. The
company has established 32 Healthcare Centres in transhipment hubs across 19 Indian states,
providing healthcare services directly to this community.

The programme offers a range of healthcare services, including prevention and awareness of HIV-AIDS, vision care, integration awareness of tuberculosis and other communicable diseases such as diabetes, high blood pressure, and general treatment facilities, as well as COVID testing and vaccination support.

**Key Services:** 

- 1. HIV-AIDS Awareness and Prevention: The programme includes Behaviour Change Communication (BCC), diagnosis and treatment of sexually transmitted infections (STI), counselling, condom promotion, support for Integrated Counselling Testing Centre (ICTC), and awareness campaigns conducted by Peer Educators (PE) or volunteers. Currently, there are approximately 1072 active PEs mobilized across various locations. In the reporting year, the programme also integrated the involvement of the LGBTQIA+ community, with a total of 54 transgender individuals participating as peer volunteers. Additionally, one transgender outreach worker has been employed at a healthcare centre.
- 2. Vision Care: Vision impairment is prevalent among the trucking community, so the company has partnered with Essilor India Pvt Ltd to provide regular and affordable vision check-ups. Eye check-up camps, distribution of spectacles, and cataract treatment at linked government hospitals are also facilitated at transhipment hubs.
- 3. Awareness on Tuberculosis (TB): The company initiated a TB awareness programme in 2017, considering its co-infection with HIV. It established 17 Designated Microscopy Centres at transhipment hubs to provide TB testing and treatment facilities. Positive TB patients are linked with Directly Observed Treatment (DOTs) services. Partnerships with organisations like The Union, USAID, and Central TB Division support the implementation of this initiative.
- **4. Other Non-Communicable Diseases (NCDs):** Diabetes and high blood pressure are emerging as significant health issues among truck drivers. The company offers testing facilities for these conditions, resulting in early detection and proper treatment.
- 5. Mobile Medical Units (Apollo Tyres Healthcare Express): In addition to static Healthcare Centres, mobile medical units provide services at highways, district borders, and trucking halt points. These units are currently operational at Delhi, Namakkal (Tamil Nadu), Cuttack (Odisha), and Chhindwara (Madhya Pradesh).

The Company also organizes regular health camps (Sakushal Saarthi) for the employees of its fleet owners, further extending its healthcare support.



S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
2.	Solid Waste Management and Sanitation:	77,893	100%
	Apollo Tyres, in line with the national development agenda and in support of the 'Swachh Bharat Abhiyan', has been actively engaged in various projects concerning solid waste management and sanitation under the SPARSH initiative. These endeavors aim to foster a healthy and sustainable lifestyle within local communities.		
	SPARSH embodies the following principles:		
	S: Segregate Waste		
	P: Practice Composting		
	A: Awareness Generation		
	R: Reduce, Reuse & Recycle		
	S: Safe Sanitation		
	H: Hygiene for All		
	Under this overarching theme, Apollo Tyres has launched four key initiatives:		
	<ol> <li>Clean My Transport Nagar (CMTN): Focused on transhipment hubs, CMTN endeavors to enhance waste management and cleanliness. It offers services such as door-to-door waste collection, road/lanes cleaning, waste segregation, composting of wet waste, and community awareness programs.</li> </ol>		
	<ol> <li>Clean My Village (CMV): Similar to CMTN, CMV targets communities around Apollo Tyres' manufacturing locations. Through structured educational programs and hands-on training, waste management best practices are introduced, leading to noticeable improvements in both the environment and community health.</li> </ol>		
	3. Sanitation Management: Recognizing hygiene and sanitation as fundamental rights, Apollo Tyres has undertaken various sanitation management projects aligned with the Clean India campaign. This includes the construction of toilet cum bathing spaces for underprivileged communities near manufacturing plants in Chennai, Baroda, and Chinnapanduru, as well as community toilets in transhipment hubs in Delhi and Agra.		
	4. End of Life Tyres Playground (ELT): As part of its commitment to sustainability, Apollo Tyres focuses on recycling used tires, with ELT being a notable application. Through this initiative, waste tires are transformed into engaging play structures, educating children on the importance of recycling and contributing to greening the product life cycle.		
3.	Biodiversity Conservation: Conserving biodiversity is a global priority for Apollo Tyres, with	57,542	100%
	projects spanning across India, Hungary, and the Netherlands. In India, particular emphasis is placed on Mangrove conservation, with a dedicated project underway in the Kannur district of		
	Kerala.		
	This initiative includes conducting awareness sessions for the local community on mangrove conservation, as well as organizing periodic plantation activities across different panchayats in Kannur district to restore and conserve mangroves.		
	Recognizing climate change as a significant threat to ecosystems, species, and livelihoods, Apollo Tyres has initiated afforestation projects in Tamil Nadu and Gujarat to address climate change mitigation. These projects also involve collaborating with farmers to implement agriculture interventions aimed at enhancing soil productivity.		
	In Tamil Nadu, the afforestation initiative involves the maintenance of 3.5 lakh teak trees, while in Gujarat, the Miyawaki project focuses on maintaining a total of 10,000 planted trees as part of the afforestation efforts.		

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
4.	Local Initiatives: In addition to the aforementioned core themes, various local initiatives are implemented within a 25–30-kilometer radius of our manufacturing locations, tailored to meet the specific requirements of local stakeholders. Details of such initiatives include:	85,897	100%
	1. Provision of Purified Drinking Water: Apollo Tyres has established RO drinking water plants in Orgadam village, Chennai, Tamil Nadu, and Chinnapanduru village, Chittoor, Andhra Pradesh. This initiative ensures that beneficiaries have access to purified drinking water.		
	2. Eco-Restoration of Ponds: Through comprehensive research studies conducted in communities surrounding manufacturing locations, Apollo Tyres has assessed the condition of water bodies. Based on these findings, the organisation has undertaken the restoration of several ponds in Chennai, Limda, and Perambra. The primary objective is to improve the condition of water bodies and enhance aquatic biodiversity. A total of 14 ponds, covering an area of 3 lakh square feet, have been restored through activities such as pond deepening, desilting, bunding, and maintenance.		
	3. Support for Government Initiatives: In Baroda, the organisation actively supports the government's pond deepening initiative under the Sujalam Sufalam Jal Sanchay Abhiyan (SSJA). SSJA is a water conservation program by the Gujarat state government aimed at deepening water bodies before the monsoon season. This scheme emphasizes the deepening of lakes, ponds, check dams, and rivers through silt removal, utilizing public participation and the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA).		
5.	Philanthropic Initiatives: Apollo Tyres extends support to underprivileged and marginalized communities through philanthropic endeavors facilitated by the Taru Foundation. These initiatives encompass a spectrum of activities, including providing healthcare facilities for the underserved, distributing blankets to the homeless, and supplying food items to combat hunger and poverty.	2,615	100%
6.	Livelihood Empowerment for Rural Women: Navya, Apollo Tyres' flagship initiative, is dedicated to empowering economically, socially, and emotionally disadvantaged rural women. It addresses their livelihood needs by offering doorstep income generation opportunities while also undertaking efforts to combat gender discrimination and educate on gender rights.	1,816	100%
	Key Initiatives: <ol> <li>Self-Help Groups (SHGs): Recognized as a potent instrument for women's empowerment, SHGs unite women and foster financial independence. Through Navya, Apollo Tyres adopts a dual approach to SHGs, strengthening existing groups and forming new ones. These groups cultivate a culture of savings among members, and women receive training in financial literacy, bookkeeping, documentation, and addressing social issues such as domestic violence and gender rights.</li> </ol>		
	2. Livelihood Training and Income Generation: Navya provides skill development and training aimed at increasing earning potential, fostering economic autonomy, and creating diverse livelihood opportunities. Training covers both farm-based and non-farm-based activities, including livestock care and management, to broaden income-generating prospects.		
	3. Linkages with Government Programs and Markets: The Navya program not only offers livelihood opportunities but also facilitates connections with government schemes and relevant markets to amplify the socio-economic impact for rural women. Government schemes provide financial support, while partnerships with markets and the service sector stimulate entrepreneurship and economic growth.		

#### **PRINCIPLE 9:**

Businesses should engage with and provide value to their consumers in a responsible manner

#### **Essential Indicators**

#### 1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

Apollo Tyres has established a robust mechanism which involves multiple channels through which the customers can report their complaints. The received complaints are addressed promptly in an effective and transparent manner. The mechanism is elaborated through the following steps:

- a. Channels for Complaints: Customers can raise their complaints through various channels, including the Customer Care number (1800-212-7070), the Apollo Samadhan Application, direct visits to Apollo Tyres Offices, or via social media and the website. For product related complaints, customers can either contact Apollo Tyres Customer Care or approach any authorized ATL business partner. Alternatively, they can directly reach out to Apollo Tyres area business units to register their complaints.
- b. Allotment of the tickets: Customers receive relevant ticket numbers when registering complaints through the call center or business partners. For those registering at Apollo Tyres area business units, a receipt number and accompanying documentation are provided.
- c. Inspection Process: Following complaint registration, authorized inspectors assess the customer's tire. Subsequently, an inspection document or award letter is issued, detailing the reason for failure—whether it's related to manufacturing or operational factors. The resolution time varies between 2-4 days. Additionally, on social media and the website, any comments or inquiries are promptly relayed to the Customer Service team, which diligently responds and closes requests.
- d. Feedback Collection- After the complaint resolution process concludes, Apollo Tyres Customer Care reaches out to customers to collect feedback on their satisfaction with the resolution.

#### 2. Turnover of products and/services as a percentage of turnover from all products/service that carry information about:

	As a percentage to total turnover		
Environmental and social parameters relevant to the product	All essential information required by		
Safe and responsible usage	regulatory authorities is fully disclosed of		
Recycling and/or safe disposal	all our products.		

#### 3. Number of consumer complaints in respect of the following:

	Current Financial Year 2023-24			Previous Financial Year 2022-23		
	Received during the year	Pending resolution at end of year	Remark	Received during the year	Pending resolution at end of year	Remark
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-			
Customer Complaints	670,240	0	All complaints were	614,061	710	-
			resolved within the			
			Financial Year			

#### 4. Details of instances of product recalls on account of safety issues:

	Number	Reasons for recall
Voluntary recalls	Nil	Not Applicable
Forced recalls	Nil	Not Applicable

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

The company has an Information Security Policy and several supporting policies globally within the organisation. These policies are accessible on the Intranet portal for employees' convenience. Additionally, the company maintains a global data privacy policy and privacy notice, which are uploaded on the company's website and can be accessed using the provided link- <a href="https://www.apollotyres.com/en-in/privacy-notice/">https://www.apollotyres.com/en-in/privacy-notice/</a>

The Data Protection Policy established by the Company, available on the Intranet portal, is comprehensive and aims to safeguard personal data related to employees, contractors, vendors, interns, associates, customers, business partners, and any third parties associated with Apollo Tyres Limited (ATL) or its subsidiaries, affiliates, joint venture companies, and European entities. The Company introduce regular revisions to the policy to ensure its alignment with the Data Protection Laws and Regulations.

Additionally, the Policy seeks to outline the principles of data protection based on which Personally Identifiable Information (PII) and Sensitive Personally Identifiable Information (SPII) of individuals are protected. PII and SPII collectively constitute Personal Data in this document. The Policy serves as a comprehensive framework detailing ATL's measures to safeguard Personal Data, including the implementation of relevant policies, processes, and procedures to adhere to data privacy laws.

The partner firms and third parties collaborating with or working for ATL are required to familiarize themselves with this Policy and adhere to its guidelines. Access to Personal Data held by ATL is granted to any third party only after entering into a confidentiality, data privacy, and protection agreement with ATL.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

The Company has established effective systems to identify consumer issues promptly and ensure their timely resolution. Additionally, the Company is consistently working towards improving the quality assurance system and delivery timelines.

- 7. Provide the following information relating to data breaches:
  - a. Number of instances of data breaches

Nil

b. Percentage of data breaches involving personally identifiable information of customers

Nil

c. Impact, if any, of the data breaches

Not Applicable

## **Leadership Indicators**

 Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

Apollo Tyres strategically communicates product and service information through a diverse array of channels. These channels, provided below, serve as conduits for reaching our stakeholders effectively.

Website: www.apollotyres.com

Apollo Tyres Customer Care - 1800-212-7070



#### **Other Channels:**

https://shop.apollotyres.com/

https://www.apollotyres.com/en-in/

https://www.facebook.com/ApolloTyresLtd/

https://twitter.com/apollotyres

https://www.youtube.com/channel/UCQ89nQykQLTzw69wxZQSzg

https://www.instagram.com/apollotyresltd/

https://in.linkedin.com/company/apollo-tyres-ltd

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

Apollo Tyres firmly believes that its customers occupy a central position in all its endeavors. The Company has adopted various channels to diligently disseminates relevant information and effectively communicate with its customers. Further, customer engagement activities play a pivotal role, where they are educated and informed about product details, applications, and tyre care maintenance. Additionally, we also regularly educate our customers through social media posts, blogs on our websites, and videos on our YouTube Channel. We have also implemented training programs to OE Service Team and OE Franchisees which aim to enhance their understanding of product details and their practical applications, particularly in the context of fitment and tyre care maintenance.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

The Company has established comprehensive business continuity plans to mitigate the risk of disruptions. Despite these measures, in the rare event of an interruption, the company has implemented essential mechanisms to promptly communicate any major discontinuations to consumers, to ensure transparency.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

As a fundamental component of Apollo Tyres commitment to ensure customer satisfaction, the Company places an emphasis on providing transparent product information to enhance the customer engagement across its business and assist them in making an informed decision. As part of evaluating our product services, we collect customer feedback after the services have been provided. This helps us assess satisfaction with the resolution offered by Apollo Tyres customer care.