

**Date:** 12<sup>th</sup> July, 2024

The Bombay Stock Exchange Limited  
“P.J. Towers”  
Dalal Street  
Mumbai-400 001  
Stock Code: 500730

The National Stock Exchange of India Ltd.  
Exchange Plaza  
Bandra Kurla Complex, Bandra (East)  
Mumbai-400 051  
Symbol: NOCIL

Dear Sir,

**Sub: Business Responsibility and Sustainability Report for the Financial Year 2023-24**

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find attached the Business Responsibility and Sustainability Report (BRSR) of the Company for the financial year 2023-24.

The BRSR Report is also available on the Company’s website at [www.nocil.com](http://www.nocil.com) as a part of Annual Report.

We request you to take the same on your records.

Thanking you,

Yours truly,

For **NOCIL Limited**

**Amit K. Vyas**  
**Assistant Vice President (Legal) and Company Secretary**

Place: Mumbai

Encl: as above

**BUSINESS  
RESPONSIBILITY &  
SUSTAINABILITY  
REPORT**



**SECTION A GENERAL DISCLOSURES**
**I. Details of the Listed Entity**

| 1. Corporate Identity Number (CIN) of the Listed Entity  | L99999MH1961PLC012003  |                      |            |     |        |     |              |
|--|--|----------------------|------------|-----|--------|-----|--------------|
| 2. Name of the Listed Entity   | NOCIL Limited (Hereinafter referred to in this Report as 'NOCIL, the Company')   |                      |            |     |        |     |              |
| 3. Year of incorporation   | 1961   |                      |            |     |        |     |              |
| 4. Registered office address   | 3rd Floor, Mafatlal House, H. T. Parekh Marg, Backbay Reclamation, Churchgate, Mumbai 400020   |                      |            |     |        |     |              |
| 5. Corporate address   | 3rd Floor, Mafatlal House, H. T. Parekh Marg, Backbay Reclamation, Churchgate, Mumbai 400020   |                      |            |     |        |     |              |
| 6. E-mail  | investorcare@nocil.com   |                      |            |     |        |     |              |
| 7. Telephone   | 022 - 6636 4062  |                      |            |     |        |     |              |
| 8. Website   | <a href="http://www.nocil.com/">http://www.nocil.com/</a>  |                      |            |     |        |     |              |
| 9. Financial year for which reporting is being done  | 2023-24  |                      |            |     |        |     |              |
| 10. Name of the Stock Exchange(s) where shares are listed  | <table border="1"> <thead> <tr> <th>Name of the Exchange</th> <th>Stock Code</th> </tr> </thead> <tbody> <tr> <td>BSE</td> <td>500730</td> </tr> <tr> <td>NSE</td> <td>INE163A01018</td> </tr> </tbody> </table>                                   | Name of the Exchange | Stock Code | BSE | 500730 | NSE | INE163A01018 |
| Name of the Exchange   | Stock Code   |                      |            |     |        |     |              |
| BSE  | 500730   |                      |            |     |        |     |              |
| NSE  | INE163A01018   |                      |            |     |        |     |              |
| 11. Paid-up Capital  | ₹ 1,66,64,57,050/-   |                      |            |     |        |     |              |
| 12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report   | <p>Mr. Amit K. Vyas<br/>Company Secretary<br/>Email id: amit.vyas@nocil.com<br/>Tel No.: 022 - 6636 4054</p>   |                      |            |     |        |     |              |
| 13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only 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). | The disclosures are made on a standalone basis for NOCIL Limited   |                      |            |     |        |     |              |
| 14. Name of assurance provider-  | Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dt. July 12, 2023. <b>However the Company has voluntarily subjected its BRSR to "Limited Assurance" (Independent ) conducted by TUV SUD.</b> |                      |            |     |        |     |              |
| 15. Type of assurance obtained   | Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dt. July 12, 2023. <b>However the Company has voluntarily subjected its BRSR to "Limited Assurance" (Independent ) conducted by TUV SUD.</b> |                      |            |     |        |     |              |



## II. Products/services

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

| Description of Main Activity             | Description of Business Activity         | % of Turnover of the entity |
|--|--|-----------------------------|
| Manufacture and Sale of Rubber Chemicals | Manufacture and Sale of Rubber Chemicals | 100.00                      |

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

| Product/ Service                  | NIC Code | % of Turnover contributed |
|-----------------------------------|----------|---------------------------|
| Rubber Chemicals and Accelerators | 20119    | 100.00                    |

## 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       | 2                | 4                 | 6     |
| International* | Nil              | Nil               | Nil   |

\*Note- the Company serves markets in 40 countries worldwide but does not have any Plants, offices or operations in these locations.

### 19. Markets served by the entity:

#### a. Number of locations

| Locations                        | Number                            |
|----------------------------------|-----------------------------------|
| National (No. of States & UTs)   | ▶ 29 States & 9 Union territories |
| International (No. of Countries) | ▶ 40                              |

**b. What is the contribution of exports as a percentage of the total turnover of the entity?**

Total contribution of exports as a percentage of total turnover of the entity for the reporting period was 32.69%

**c. A brief on types of customers:**

The Company specialises in the production of rubber chemicals, catering primarily to the tire and other rubber product manufacturing industry. Distinguished by its comprehensive range of offerings, the Company stands out in chemical industry for its ability to tailor products to meet specific customer requirements. Drawing from a wealth of experience and positioning itself as a one-stop solution provider, the Company has earned a reputation as a trusted supplier of rubber chemicals. Recognised for its advanced technical capabilities, it maintains a competitive edge in the market.

Today, NOCIL stands as India's largest manufacturer of rubber chemicals, boasting state-of-the-art technology for production. Operating exclusively within the B2B segment, NOCIL's commitment to excellence underscores its leadership position in the industry.

## IV. Employees

**20. Details as at the end of Financial Year:**

**a. Employees and workers (including differently abled):**

| S. No.           | Particulars                    | Total (A)  | Male       |               | Female    |             |
|------------------|--------------------------------|------------|------------|---------------|-----------|-------------|
|                  |                                |            | No. (B)    | % (B / A)     | No. (C)   | % (C / A)   |
| <b>EMPLOYEES</b> |                                |            |            |               |           |             |
| 1.               | Permanent (D)                  | 621        | 590        | 95.01         | 31        | 4.99        |
| 2.               | Other than Permanent (E)       | 56         | 50         | 89.29         | 6         | 10.71       |
| 3.               | <b>Total employees (D + E)</b> | <b>677</b> | <b>640</b> | <b>94.53</b>  | <b>37</b> | <b>5.47</b> |
| <b>WORKERS</b>   |                                |            |            |               |           |             |
| 4.               | Permanent (F)                  | 73         | 73         | 100.00        | 0         | 0.00        |
| 5.               | Other than Permanent (G)       | 470        | 470        | 100.00        | 0         | 0.00        |
| 6.               | <b>Total workers (F + G)</b>   | <b>543</b> | <b>543</b> | <b>100.00</b> | <b>0</b>  | <b>0.00</b> |

**Note- The term Employee includes:**

- Permanent- Management Staff
- Other than Permanent- Retainers, Fixed Term Employees (FTE)

**The term Workers Includes:**

- Permanent- Bargainable (Unionised)
- Other than Permanent- Contract labour employed by contractors.

**b. Differently abled Employees and Workers:**

| S. No.                             | Particulars                                      | Total (A) | Male     |               | Female   |            |
|------------------------------------|--|-----------|----------|---------------|----------|------------|
|                                    |  |           | No. (B)  | % (B / A)     | No. (C)  | % (C / A)  |
| <b>DIFFERENTLY ABLED EMPLOYEES</b> |  |           |          |               |          |            |
| 1.                                 | Permanent (D)                                    | 0         | 0        | 0.0           | 0        | 0.0        |
| 2.                                 | Other than Permanent (E)                         | 0         | 0        | 0.0           | 0        | 0.0        |
| 3.                                 | <b>Total differently abled employees (D + E)</b> | <b>0</b>  | <b>0</b> | <b>0.0</b>    | <b>0</b> | <b>0.0</b> |
| <b>DIFFERENTLY ABLED WORKERS</b>   |  |           |          |               |          |            |
| 4.                                 | Permanent (F)                                    | 1         | 1        | 100.00        | 0        | 0.0        |
| 5.                                 | Other than permanent (G)                         | 0         | 0        | 0.0           | 0        | 0.0        |
| 6.                                 | <b>Total differently abled workers (F + G)</b>   | <b>1</b>  | <b>1</b> | <b>100.00</b> | <b>0</b> | <b>0.0</b> |

**21. Participation/Inclusion/Representation of women**

|                          | Total (A) | No. and percentage of Females |           |
|--------------------------|-----------|-------------------------------|-----------|
|                          |           | No. (B)                       | % (B / A) |
| Board of Directors       | 13        | 2                             | 15.38     |
| Key Management Personnel | 4         | 0                             | 0.00      |

Note:

- (i) The Board of Directors consists of the Executive Chairman, Managing Director, Non- Executive Non Independent Director & Independent Directors.
- (ii) "KMPs" comprise of the Executive Chairman, Managing Director, Chief Financial Officer (CFO) and the Company Secretary (CS), During the F.Y. 2022-23, the number of Key Managerial Personnel (KMPs) was five. However, for the 2023-24, this number has decreased to four consequent to the superannuation of Mr. S.R. Deo , Managing Director on July 31,2023.

**22. Turnover rate for Permanent Employees and Workers (in percent)**

|                     | 2023-24 |        |       | 2022-23 |        |       | 2021-22 |        |       |
|---------------------|---------|--------|-------|---------|--------|-------|---------|--------|-------|
|                     | Male    | Female | Total | Male    | Female | Total | Male    | Female | Total |
| Permanent Employees | 26.73   | 1.41   | 28.14 | 24.36   | 1.27   | 25.63 | 23.38   | 0.35   | 23.73 |
| Permanent Workers   | 13.70   | 0.00   | 13.70 | 16.87   | 0.00   | 16.87 | 8.49    | 0.00   | 8.49  |

Note: Superannuated Employees and Workmen are not included.

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

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

| Name of the holding/<br>subsidiary/ associate<br>companies/ joint ventures<br>(A) | Indicate whether<br>holding/ Subsidiary/<br>Associate/ Joint<br>Venture | % of shares held<br>by listed entity | Does the entity indicated at column<br>A, participate in the Business<br>Responsibility initiatives of the listed<br>entity? (Yes/No) |
|---|---|--------------------------------------|---|
| PIL Chemicals Limited   | Subsidiary  | 100.00                               | No  |

### 24. CSR Details

- i. Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No): Yes
- ii. Turnover (in ₹) (FY 2023-24): ₹ 1,444.66 Crores
- iii. Net worth (in ₹) (FY 2023-24): ₹ 1,695.70 Crores



## VI. Transparency and Disclosures Compliances

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

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/ No)<br><br>(If Yes, then provide web-link for grievance redress policy)  | 2023-24                                    |  |   | 2022-23                                    |  |   |
|---|---|--|--|---|--|--|---|
|   |   | 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   |
| Communities                                       | NOCIL does not have a distinct mechanism for addressing community grievances. Instead, it relies on a comprehensive CSR policy and actively participates in various CSR activities, ensuring that community concerns are addressed and fostering a positive social impact.<br><br>(URL - <a href="https://www.nocil.com/wp-content/uploads/2023/11/CSR-Policy-NOCIL.pdf">https://www.nocil.com/wp-content/uploads/2023/11/CSR-Policy-NOCIL.pdf</a> )                                  | Nil  | Nil  | NA  | Nil  | Nil  | NA  |
| Investors<br>(other than shareholders)            | NA  | Nil  | Nil  | NA  | Nil  | Nil  | NA  |
| Shareholders                                      | To address shareholder grievances the Company has implemented an Investor Grievance Redressal Policy. This policy ensures that all investor concerns are promptly and efficiently managed, fostering transparency and trust between the Company and its shareholders.<br><br>(URL - <a href="https://www.nocil.com/wp-content/uploads/2024/04/Investor-grievance-redressal-policy.pdf">https://www.nocil.com/wp-content/uploads/2024/04/Investor-grievance-redressal-policy.pdf</a> ) | 13   | 0  | All the Complaints were resolved satisfactorily | 6  | 0  | All the complaints were resolved satisfactorily |



| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/ No)<br>(If Yes, then provide web-link for grievance redress policy)   | 2023-24                                    |  |  | 2022-23                                    |  |  |
|---|--|--|--|--|--|--|--|
|   |  | 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                                  |
| Employees and workers                             | <p>Yes- The following Policies have provided a Grievance Redressal Mechanism for Employees &amp; Members</p> <p>(i) Human Rights Policy</p> <p>(ii) Policy on prevention of sexual Harassment</p> <p>(iii) Vigil Mechanism Policy</p> <p><a href="https://www.nocil.com/wp-content/uploads/2023/11/Humans-Rights-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Humans-Rights-Policy.pdf</a></p> <p><a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Prevention-of-Sexual-Harrasment.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Prevention-of-Sexual-Harrasment.pdf</a></p> <p><a href="https://www.nocil.com/wp-content/uploads/2024/01/Vigil_Mechanism_Whistle_Blower_Policy-2.pdf">https://www.nocil.com/wp-content/uploads/2024/01/Vigil_Mechanism_Whistle_Blower_Policy-2.pdf</a></p> | Nil  | Nil  | NA                                       | Nil  | Nil  | NA                                       |
| Customers   | A robust procedure for handling Customer complaint has been put in place.  | 15   | Nil  | All complaints are satisfactory resolved | 11   | Nil  | All complaints are satisfactory resolved |
| Value Chain Partners                              | <p>Yes</p> <p>The Grievance Redressal Mechanism is contained in the "Sustainable Procurement Policy."</p> <p><a href="https://www.nocil.com/wp-content/uploads/2024/04/Sustainable-Procurement-Policy.pdf">https://www.nocil.com/wp-content/uploads/2024/04/Sustainable-Procurement-Policy.pdf</a></p>   | Nil  | Nil  | NA                                       | Nil  | Nil  | NA                                       |



**26. Overview of the entity's material responsible business conduct 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 along-with its financial implications**

| 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      | <b>GHG Emissions</b>      | <b>Risk</b>                                | Chemical manufacturing operations produce direct greenhouse gas (GHG) emissions through two primary sources: the combustion of fossil fuels in manufacturing & co-generation processes and the chemical transformation of feedstock's, which generates process emissions. These emissions not only contribute to environmental impacts but also pose regulatory compliance challenges and operational risks for companies in the chemical sector. The financial implications of these emissions can vary widely, depending on factors such as emission levels and the stringency of regulations in place. As countries worldwide intensify efforts to curb emissions, the chemical industry may face increasingly stringent regulatory measures aimed at limiting or reducing GHG emissions. | To reduce greenhouse gas (GHG) emissions, the Company has adopted a range of impactful initiatives. Usage of eco-friendly fuel sources & power sources has been one of our key initiatives to combat GHG emissions generated through our activities. Our both Navi Mumbai and Dahej units have acquired ISO 14001 (Environmental Management System) and ISO 50001 (Energy Management System) certifications, demonstrating our commitment to environmental management and energy efficiency. | Negative<br><br>(There were no negative financial implications for the 2023-24)                |

| 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) |
|--------|---------------------------|--|--|---|--|
| 2      | <b>Air Quality</b>        | <b>Risk</b>                                | <p>Apart from greenhouse gases (GHGs), chemical manufacturing operations can also generate air emissions such as sulfur dioxides (SOx), nitrogen oxides (NOx), and Hazardous Air Pollutants (HAPs). Similar to GHGs, these emissions primarily originate from fuel combustion and feedstock processing activities within chemical production processes. Compared to other sectors, the chemical industry tends to be a notable contributor to some of these emissions. The combustion of fuels and chemical transformation processes inherent to chemical manufacturing can release these pollutants into the atmosphere, contributing to environmental concerns and potential health hazards. Given the significant impact of these emissions, chemical companies must prioritise implementing measures to mitigate their release, ensuring compliance with environmental regulations and safeguarding public health and the environment.</p> | <p>To improve air quality, the Company has implemented several robust initiatives to control the emissions of particulate matter significantly reducing airborne pollutants. Additionally, constant camera surveillance of the stacks ensures real-time monitoring, while regular inspections by a Ministry of Environment, Forest and Climate Change (MoEF) certified lab further ensure compliance with environmental standards. The Company's commitment to air quality management is also demonstrated by its acquisition of the ISO 14001 certificate for environmental management, underscoring its dedication to maintaining high environmental and operational standards.</p> | <p>Negative</p> <p>(There were no negative financial implications for the 2023-24)</p>         |



| 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) |
|--------|---------------------------|--|---|--|--|
| 3      | <b>Energy Management</b>  | <b>Risk</b>                                | The chemical manufacturing industry is known for its high energy consumption, which is essential for powering various processes, co-generation plants, machinery and auxiliary facilities. The specific energy sources utilised, the amount consumed, and the strategies employed for energy management are contingent upon the nature of the products being manufactured. Typically, fossil fuels such as natural gas and natural gas liquids serve as the primary non-feedstock energy sources, while purchased electricity may also constitute a significant portion of the energy mix. Consequently, expenditures on energy procurement often constitute a substantial portion of overall production costs. Given the industry's reliance on energy-intensive processes, optimising energy utilisation and exploring alternative energy sources are critical endeavours for enhancing operational efficiency, reducing costs, and minimising environmental impacts. | The Company has adopted a multifaceted approach for energy management, integrating paralleled R&D initiatives to innovate and improve energy efficiency. By implementing the ISO -50001 Energy Management System standards, the Company has systematically reduced energy consumption across its operations. These efforts are part of a broader strategy to formulate environmental policies that promote sustainable growth. Additionally, the Company is focused on reducing carbon emission intensity, thereby minimising its environmental footprint and contributing to global sustainability goals. Through these comprehensive initiatives, the Company not only enhances operational efficiency but also demonstrates a strong commitment to environmental stewardship. | Negative<br><br>(There were no negative financial implications for the 2023-24)                |

| 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) |
|--------|---|--|---|---|--|
| 4      | <b>Water and Waste-Water Management</b> | <b>Risk</b>                                | Water plays a crucial role as a process input in the production of chemicals, primarily serving functions such as cooling, steam generation, and feedstock processing. Historical trends underscore a sustained rise in water scarcity and associated costs, with expectations pointing towards continued increases. The drivers behind this trend include factors like excessive consumption, limited supplies due to population growth and shifts, pollution and the impacts of climate change. These circumstances emphasise the escalating significance of effective water management practices within the chemical manufacturing industry. | The Company has adopted various initiatives for water and wastewater management, recognising water's critical role in its processes. This need is underscored by historical increase in water scarcity and costs, driven by overconsumption, constrained supplies, pollution and climate change. NOCIL strictly adheres to rigorous environmental regulations, ensuring proper wastewater handling and disposal. The Company actively seeks to minimise waste through reducing, reusing, and recycling strategies, aligning with circular economy principles to optimise resource efficiency and minimise environmental impact. These efforts safeguard ecosystems and contribute to a sustainable future by reducing landfill waste. | Negative<br><br>(There were no negative financial implications for the 2023-24)                |



| 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) |
|--------|---------------------------------------|--|--|--|--|
| 5      | <b>Hazardous Materials Management</b> | <b>Risk</b>                                | Chemical manufacturing has the potential to produce hazardous process waste, encompassing substances such as heavy metals, spent acids, catalysts, and sludge from wastewater treatment. Corporations encounter both regulatory and operational complexities in handling such waste, given that specific regulations govern its transportation, treatment, storage and disposal. Strategies for waste management involve minimising waste generation, implementing efficient treatment and disposal methods, and exploring opportunities for recycling and recovery whenever feasible. | The Company is committed to integrating cutting-edge technologies, including <b>'Green Chemistry'</b> , into its operations. Its research Centre boasts an experienced team dedicated to advanced environmental research and <b>'Green Chemistry'</b> , thereby promoting Sustainable business practices. As a responsible corporate citizen, the Company has adopted and implemented the <b>'5S Workplace' Organisation Method</b> to promote productivity, safety, and waste reduction. On the pollution prevention and waste management front, it has implemented a <b>'3Rs' strategy - 'Reduce, Reuse and Recycle'</b> - to maintain a Sustainable environment | Negative<br><br>(There were no negative financial implications for the 2023-24)                |

| 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      | <b>Human Rights and Community Relations</b> | <b>Risk</b>                                | <p>Chemical companies play a vital role in contributing to the economic prosperity of community by generating employment opportunities and fostering community development through tax contributions and capital generation. Simultaneously, issues related to environmental policy, community health, and process safety carry significant regulatory, operational, financial and reputational implications for these Companies.</p> <p>Environmental externalities, such as air emissions and water usage can have long-term impacts on health of individuals residing in proximity to chemical facilities. Additionally, process safety incidents pose a direct threat to community health and safety, potentially resulting in regulatory penalties, legal proceedings and associated mitigation costs.</p> | <p>Through its efforts to reduce greenhouse gas emissions &amp; other industrial emissions and effluents, NOCIL has been ensuring that its community residing around its plant is not impacted adversely. Further, there is constant review of safety &amp; health processes in order to prevent any kind of mishap.</p>   | <p>Negative</p> <p>(There were no negative financial implications for the 2023-24)</p>         |
| 7      | <b>Employee Health and Safety</b>           | <b>Risk</b>                                | <p>Workers within chemical manufacturing facilities are exposed to various health and safety risks arising from factors such as interaction with heavy machinery, exposure to hazardous substances, working in conditions involving elevated temperatures and pressure, and potential electrical hazards, among other occupational perils. The diverse nature of these risks underscores the importance of implementing robust safety protocols and ensuring a vigilant adherence to workplace safety standards to safeguard the well-being of employees. Comprehensive training programs, the use of protective equipment, and the continuous monitoring of workplace conditions are essential components of maintaining a secure working environment within chemical manufacturing facilities.</p>            | <p>For NOCIL, its human resources matter the most. Considering the occupational hazards that our processes have, NOCIL has extended the health insurance coverage and other facilities to its employees and workers. Addressing these risks not only protects the health and safety of employees but also contributes to the overall efficiency, morale and resilience of the workforce.</p> | <p>Negative</p> <p>(There were no negative financial implications for the 2023-24)</p>         |



| 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) |
|--------|---|--|---|--|--|
| 8      | <b>Product Lifecycle Management</b>                       | <b>Opportunity</b>                         | As the demand for improved materials efficiency and reduced energy consumption and emissions intensifies due to escalating resource scarcity and tightening regulations, the Chemical industry is poised to gain by focusing on the development of products that enhance customer efficiency. This shift encompasses a broad spectrum of opportunities, ranging from optimising materials to decrease automobile emissions to enhancing the performance of building insulation materials. Through innovative chemical solutions, the industry can significantly contribute to efficiency improvements across various applications and sectors. By aligning product development efforts with the evolving needs of customers and societal demands for sustainability, chemical companies can not only drive market growth but also position themselves as key enablers of a more resource-efficient and environmentally friendly future. | Not Applicable                                 | Positive   |
| 9      | <b>Management of the Legal and Regulatory Environment</b> | <b>Opportunity</b>                         | The chemicals sector operates under stringent regulations that oversee various aspects, including air emissions, water discharge, chemical safety and process safety. The ability to foresee and adjust to regulatory changes, both in the immediate and distant future, is a crucial concern for the industry. These regulatory shifts hold substantial influence over product demand, manufacturing expenses, and the overall brand value of companies within the sector. Navigating and staying ahead of evolving regulations is imperative for chemical companies to maintain compliance, adapt their operations effectively, and sustain a positive standing in the market. NOCIL has been able to manage, monitor and adhere to relevant applicable regulatory requirements, which is evident from the fact that there has been no any material instances of fines/penalties due to non-compliance.                               | Not Applicable                                 | Negative   |



| 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) |
|--------|--|--|---|--|--|
| 10     | <b>Critical Incident Risk Management</b> | <b>Risk</b>                                | Ensuring health, safety, and effective emergency management remains a paramount concern for companies operating within the Chemicals industry. Incidents such as technical malfunctions, human errors, or external factors like adverse weather conditions can trigger accidental releases of chemical substances into the surrounding environment, whether during processing, storage, or transportation activities. Moreover, given the combustible nature of these substances and the rigorous conditions involved in manufacturing processes—including high temperatures and pressures—the risk of explosions, hazardous spills, or other emergency scenarios is heightened. Such occurrences not only pose immediate threats to the safety of workers and nearby communities but also have the potential to release harmful air emissions and chemicals into the environment, resulting in adverse ecological impacts. | To overcome the risk posed by critical risk incidents, NOCIL follows stringent safety & security protocols and any deviation observed is immediately addressed to. | Negative<br><br>(There were no negative financial implications for the 2023-24)                |

- 1 Material issues identified are referred from the Sustainability Accounting Standards Board (SASB) 2023-24 version. SASB Standards are maintained and enhanced by the International Sustainability Standards Board (ISSB); this follows the SASB's merger with the International Integrated Reporting Council (IIRC) into the Value Reporting Foundation (VRF) and subsequent consolidation into the IFRS® Foundation in 2022.



## SECTION B MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

| Disclosure Questions  | P1   | P2  | P3  | P4  | P5  | P6  | P7  | P8  | P9  |
|---|--|-----|-----|-----|-----|-----|-----|-----|-----|
| <b>Policy and management processes</b>  |  |     |     |     |     |     |     |     |     |
| 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   | Please see the list of policies below for Policies available on the website: |     |     |     |     |     |     |     |     |

| Sr. No | Name of policy  | Link to Policy  | Which Principles each policy goes into |
|--------|---|---|--|
| 1.     | Business Ethics Policy  | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Business-Ethics-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Business-Ethics-Policy.pdf</a>   | P1                                     |
| 2.     | Code of Conduct for Directors and Senior Management Personnel | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Code-of-Conduct.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Code-of-Conduct.pdf</a>   | P1                                     |
| 3.     | Conflict of Interest Policy                                   | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Conflict-of-Interest-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Conflict-of-Interest-Policy.pdf</a>                               | P1                                     |
| 4.     | Corporate Gifting Policy                                      | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Corporate-Gifting-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Corporate-Gifting-Policy.pdf</a>                                     | P1, 7                                  |
| 5.     | Corporate Sustainability Policy                               | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Corporate-Sustainability-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Corporate-Sustainability-Policy.pdf</a>                       | P2, P6                                 |
| 6.     | Corporate Social Responsibility (CSR) Policy                  | <a href="https://www.nocil.com/wp-content/uploads/2023/11/CSR-Policy-NOCIL.pdf">https://www.nocil.com/wp-content/uploads/2023/11/CSR-Policy-NOCIL.pdf</a>   | P4, P8                                 |
| 7.     | Dividend Distribution Policy                                  | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Dividend-Distribution-Policy-2018.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Dividend-Distribution-Policy-2018.pdf</a>                   | P1                                     |
| 8.     | Fair Competition Policy                                       | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Fair-Competition-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Fair-Competition-Policy.pdf</a>                                       | P1                                     |
| 9.     | Familiarisation Programme for Independent Directors           | <a href="https://www.nocil.com/wp-content/uploads/2024/06/Familiarization-Programme-for-IDS.pdf">https://www.nocil.com/wp-content/uploads/2024/06/Familiarization-Programme-for-IDS.pdf</a>                   | P1                                     |
| 10.    | Grievance Policy for external stakeholders                    | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Grievance-Policy-for-external-stakeholders.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Grievance-Policy-for-external-stakeholders.pdf</a> | P3                                     |

| Sr. No | Name of policy   | Link to Policy  | Which Principles each policy goes into |
|--------|--|---|--|
| 11.    | Human Rights Policy                                      | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Humans-Rights-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Humans-Rights-Policy.pdf</a>   | P5                                     |
| 12.    | Investor Grievances Redressal Policy                     | <a href="https://www.nocil.com/wp-content/uploads/2024/04/Investor-grievance-redressal-policy.pdf">https://www.nocil.com/wp-content/uploads/2024/04/Investor-grievance-redressal-policy.pdf</a>   | P3                                     |
| 13.    | Policy for Determining Material Subsidiaries             | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Material-Subsidiaries.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Material-Subsidiaries.pdf</a>   | P1                                     |
| 14.    | Policy on appointment of Directors & Board Diversity     | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-appointment-of-directors-Board-diversity.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-appointment-of-directors-Board-diversity.pdf</a>             | P1                                     |
| 15.    | Policy on Diversity, Equality & Inclusion                | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-diversity-equity-and-inclusion.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-diversity-equity-and-inclusion.pdf</a>                                 | P4, P5, P8                             |
| 16.    | Policy on Materiality of Events                          | <a href="https://www.nocil.com/wp-content/uploads/2024/04/Materiality-Policy.pdf">https://www.nocil.com/wp-content/uploads/2024/04/Materiality-Policy.pdf</a>   | P1, P7                                 |
| 17.    | Policy on Preservation and Archival of Documents/Records | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Preservation-and-Archival-of-Documents-records.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Preservation-and-Archival-of-Documents-records.pdf</a> | P1                                     |
| 18.    | Policy on Prevention of Sexual Harassment                | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Prevention-of-Sexual-Harrasment.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Prevention-of-Sexual-Harrasment.pdf</a>                               | P5                                     |
| 19.    | Policy on Related Party Transaction                      | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Related-Party-Transaction.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-Related-Party-Transaction.pdf</a>   | P1                                     |
| 20.    | Policy on Remuneration                                   | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Remuneration-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Remuneration-Policy.pdf</a>   | P5                                     |
| 21.    | Privacy Policy   | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Privacy-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Privacy-Policy.pdf</a>   | P9                                     |
| 22.    | Risk Management Policy                                   | <a href="https://www.nocil.com/wp-content/uploads/2023/11/NOCIL-RISK-MANAGEMENT-POLICY.pdf">https://www.nocil.com/wp-content/uploads/2023/11/NOCIL-RISK-MANAGEMENT-POLICY.pdf</a>   | P1                                     |
| 23.    | Social Media Policy                                      | <a href="https://www.nocil.com/wp-content/uploads/2023/11/Social-Media-Policy.pdf">https://www.nocil.com/wp-content/uploads/2023/11/Social-Media-Policy.pdf</a>   | P9                                     |
| 24.    | Vigil Mechanism and Whistle Blower Policy                | <a href="https://www.nocil.com/wp-content/uploads/2024/01/Vigil_Mechanism_Whistle_Blower_Policy-2.pdf">https://www.nocil.com/wp-content/uploads/2024/01/Vigil_Mechanism_Whistle_Blower_Policy-2.pdf</a>                                   | P1                                     |
| 25.    | HIV Policy   | <a href="https://www.nocil.com/wp-content/uploads/2024/04/HIV-Policy.pdf">https://www.nocil.com/wp-content/uploads/2024/04/HIV-Policy.pdf</a>   | P3                                     |
| 26.    | Sustainable Procurement Policy                           | <a href="https://www.nocil.com/wp-content/uploads/2024/04/Sustainable-Procurement-Policy.pdf">https://www.nocil.com/wp-content/uploads/2024/04/Sustainable-Procurement-Policy.pdf</a>   | P1, P6                                 |

HR-related policies have been uploaded on the intranet and hence are accessible to all the employees.



| Disclosure Questions   | P1   | P2  | P3  | P4  | P5  | P6  | P7  | P8  | P9  |
|--|--|-----|-----|-----|-----|-----|-----|-----|-----|
| 2. Whether the entity has translated the policy into procedures. (Yes / No)  | Yes  | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No)  | Yes  | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | <p><b>ISO 17025: 2017:</b> Quality Assurance and Marketing Technical Services Lab- (Navi Mumbai Plant)</p> <p><b>ISO 14001: 2015:</b> Environment Management System. (Head Office (HO) and all manufacturing plants and regional offices)</p> <p><b>ISO 45001: 2018:</b> Occupational Health &amp; Safety Management System. (Head Office (HO) and all manufacturing plants and regional offices)</p> <p><b>ISO 50001: 2018:</b> Energy Management System. (Navi Mumbai Plant)</p> <p><b>ISO 9001:2015:</b> Quality Management System. (Head Office (HO) and all manufacturing plants and regional offices)</p> <p><b>IATF 16949:2016:</b> Automotive Quality Management System. (Head Office (HO) and all manufacturing plants and regional offices )</p> <p><b>Responsible Care (RC):</b> NOCIL is one of the only 86 companies in India that holds certification for '<b>Responsible Care</b>' – the Global Chemical Industry's initiative, focussed on Environmental, Health, and Safety (EHS) improvements since 2018 (<b>Navi Mumbai and Dahej Plant</b>)</p> <p><b>BIS Registration for Pilflex -13.</b><br/>(For the Navi Mumbai plant )</p> |     |     |     |     |     |     |     |     |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any.   | <p>The Company has a steadfast commitment to uphold rigorous environmental standards across its operations, placing special emphasis on areas such as energy management, waste reduction and water conservation. Additionally, it has established clear workplace safety targets to ensure the well-being of its employees. While complying with regulatory mandates, the Company actively seeks ways to enhance the efficiency of its research and development processes, recognising the dual benefits of such endeavours for both its customers and the environment.</p> <p>The Company considers contributing to India's ambitious goal of reaching a USD 5 trillion economy by 2025 and attaining a net-zero emission target by 2070 as its prime responsibility. NOCIL has committed a Science Based near term Target Initiative and it is in the process of developing its target &amp; strategy</p>  |     |     |     |     |     |     |     |     |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  |  |     |     |     |     |     |     |     |     |

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|----------------------|----|----|----|----|----|----|----|----|----|
|----------------------|----|----|----|----|----|----|----|----|----|

**Governance, leadership and oversight**

**7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements**

The Company is not only committed to meeting environmental regulations but also strives to incorporate state-of-the-art technologies, including Green Chemistry, into its operations. To this end, the Company’s Research Centre boasts a seasoned team dedicated to conducting advanced environmental research and promoting the principles of Green Chemistry, thus advancing sustainable business practices. Demonstrating its commitment to responsible corporate citizenship, the Company has embraced and put into action the **‘5S Workplace Organisation Method’** to enhance productivity, ensure safety, and minimise waste generation.

Furthermore, the Company has taken proactive steps in pollution prevention and waste management by implementing a **‘3Rs’ strategy**, which focuses on reducing, reusing, and recycling materials. By adopting these sustainable practices, the Company not only fulfils its environmental stewardship responsibilities but also contributes to the creation of a greener and more sustainable future for generations to come.

|  |  |
|--|--|
| <b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b> | Mr. Anand V.S. (Managing Director)<br>DIN:07918665<br>Email id: investorcare@nocil.com |
|--|--|

|  |  |
|--|--|
| <b>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.</b> | Yes. The Company has formed Core Committee on Sustainability that comprises of key leadership figures, including the Managing Director, Group Heads and the Company Secretary. This Committee is tasked with supervising and evaluating the Company’s advancements in meeting Environmental, Social and Governance (ESG) criteria. Additionally, the Core Committee plays a pivotal role in endorsing the adoption of new policies and adjustments to existing ones as part of the Company’s commitment to sustainability efforts. |
|--|--|



**10. Details of Review of NGRBCs by the Company:**

| Subject for Review  | Indicate whether review was under taken by Director / Committee of the Board/ Any other Committee   |    |    |    |    |    |    |    |    | Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)  |    |    |    |    |    |    |    |    |
|---|---|----|----|----|----|----|----|----|----|---|----|----|----|----|----|----|----|----|
|   | P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| <b>Performance against above policies and follow up action</b>  | The Company's policies undergo periodic reviews either quarterly or when the need arises, conducted by Heads of Departments (HoDs), and the Managing Director (MD). These reviews assess the effectiveness of the policies and incorporate any necessary revisions. |    |    |    |    |    |    |    |    | On a periodic basis -by the <b>Core Committee on Sustainability</b> .   |    |    |    |    |    |    |    |    |
| <b>Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances</b> | No significant instances of material non-compliance have been reported, and operational concerns are continuously addressed as they arise. The Company has implemented a systematic compliance program to monitor and ensure adherence to regulations in real-time. |    |    |    |    |    |    |    |    | On a Quarterly basis - Legal Compliance review by the <b>Board of Directors</b> .<br>On a Quarterly basis - Reviewed by the <b>Safety Committee</b> . |    |    |    |    |    |    |    |    |

|  | P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|---|----|----|----|----|----|----|----|----|
| <b>11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.</b> | Yes, the Company has carried out independent assessments and evaluations of its policies by external agencies. The Company undergoes the 'EcoVadis Sustainability survey' annually. Dhir and Dhir Associates, an eminent law firm have been retained to aid in the formulation of necessary policies related to Environmental, Social, and Governance (ESG) matters, as well as to address social and governance issues. Additionally, TUV SUD was engaged to conduct an independent assurance of the non-financial parameters of the Company's Business Responsibility & Sustainability Report (BRSR) for F.Y. 2023-24, and <b>TUV SUD has submitted its Independent Assurance Statement</b> . |    |    |    |    |    |    |    |    |

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

| Questions  | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|----|----|----|----|----|----|----|----|----|
| <b>The entity does not consider the Principles material to its business (Yes/No)</b>   | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| <b>The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)</b> | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| <b>The entity does not have the financial or/human and technical resources available for the task (Yes/No)</b>                         | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| <b>It is planned to be done in the next financial year (Yes/No)</b>  | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| <b>Any other reason (please specify)</b>   | NA | NA | NA | NA | NA | NA | NA | NA | NA |

**SECTION C PRINCIPLE WISE PERFORMANCE DISCLOSURE**
**PRINCIPLE**
**01**

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 Directors                            | 3  | Discussion on ESG initiatives towards complying with the SEBI directions for preparation of the Business Responsibility & Sustainability Reporting (BRSR) format and the GRI (Global Reporting Initiative) as per Customer Requirements | > 90.00 of targeted participants  |
| Key Managerial Personnel                      | 6  | Discussion on ESG initiatives towards complying with the SEBI directions for preparation of the Business Responsibility & Sustainability Reporting (BRSR) format and the GRI (Global Reporting Initiative) as per Customer Requirements | > 90.00 of targeted participants  |
| Employees other than BoD and KMPs and Workers | 99   | Health Safety and Environment<br>Leadership development, Skill Development<br>Capacity Building Programs  | 100   |
|   | 3  | Code of conduct,<br>Business Ethics,  |   |
|   | 3  | POSH  |   |
|   | 8  | Compliance Management   |   |



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 (basis the materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website)**

*Note- The Company, its Directors and/or KMPs have not been subjected to any thresholds of the materiality policy to pay any fines, penalties, punishments, awards, compounding fees, or settlement amounts in the financial year*

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

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 |
|--|---|
| Not Applicable as there are no instances of any appeals or revisions |   |

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.**

Bribery and corruption pose significant threats to business operations, tarnishing an organisation's reputation and jeopardizing its market viability. To address these risks, the Company has implemented a comprehensive Business Ethics Policy that encompasses Anti-Bribery and Anti-Corruption measures. Robust internal controls have been established to prevent employees from engaging in unethical behaviour. The Business Ethics Policy has been disseminated to all Group Heads and Senior Management personnel, with clear instructions to cascade it down to all employees within each department for rigorous compliance. All employees have been sensitised on the imperative need to comply with the said Ethical Code of Conduct by way of deployment of impactful e-learning modules in the form of short films based on the real-life scenarios and backed by the NOCIL 's core Policies. The said e-learning modules also have an in-built mechanism for mandatory online testing to ensure that the Code is understood and complied in letter and spirit by all the employees. The said e-learning modules cover the Policies on Anti-corruption/Anti-Bribery, Vigil mechanism/Whistle blower, social media, Gift prohibition, Conflict of interest, Diversity, Equity & Inclusion, and anti- Discrimination etc)

For reference, the Policy can be accessed through the provided URL. <https://www.nocil.com/wp-content/uploads/2023/11/Business-Ethics-Policy.pdf>



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

|           | 2023-24 | 2022-23 |
|-----------|---------|---------|
| Directors | Nil     |         |
| KMPs      |         |         |
| Employees |         |         |
| Workers   |         |         |

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

|  | 2023-24 |         | 2022-23 |         |
|--|---------|---------|---------|---------|
|  | Number  | Remarks | Number  | Remarks |
| Number of complaints received in relation to issues of conflict of interest of the Directors | 0       |         | 0       |         |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      |         |         |         |         |

There have been no instances of conflict of interest involving any directors or key management personnel within our organisation. Our commitment to transparency and ethical conduct ensures that decisions are made with utmost integrity, fostering trust and accountability.

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

Throughout the reporting year, there were no instances of corruption or conflicts of interest that necessitated intervention from regulators, law enforcement agencies, or judicial institutions.

**8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured) in the following format:**

|                                     | 2023-24 | 2022-23 |
|-------------------------------------|---------|---------|
| Number of days of accounts payables | 37      | 47      |



## 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, in the following format:

| Parameter                         | Metrics   | 2023-24 | 2022-23 |
|-----------------------------------|---|---------|---------|
| <b>Concentration of Purchases</b> | Purchases from Trading houses as % of total purchases                               | 45.20   | 51.80   |
|                                   | Number of trading houses where purchases are made from                              | 75      | 79      |
|                                   | Purchases from top 10 trading houses as % of total purchases from trading houses    | 77.70   | 73.80   |
| <b>Concentration of Sales</b>     | Sales to dealers/distributors as % of total sales                                   | 23 %    | 22%     |
|                                   | Number of dealers/distributors to whom sales are made                               | 39%     | 37%     |
|                                   | Sales to top 10 dealers/distributors as % of total sales to dealers/distributors    | 54%     | 55%     |
| <b>Share of RPTs in</b>           | Purchases (Purchases with related parties/Total Purchases)                          | 0.0     | 0.0     |
|                                   | Sales (Sales to related parties/Total Sales)  | 0.0     | 0.0     |
|                                   | Loans & advances (Loans & advances given to related parties/Total loans & advances) | 0.0     | 0.0     |
|                                   | Investments (Investments in related parties/Total Investments made)                 | 33%     | 28%     |

## Leadership Indicators /

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

| Total number of awareness programmes held | Topic/principles covered under the training  | % age of value chain partners covered (by value of business done with such partners) that were assessed |
|---|--|---|
| 100                                       | Sustainable procurement & ESG, Health, Safety & Environment trainings Capacity Building Programs | >90.00 of targeted participants   |

### 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, the Company has processes in place to avoid and manage conflicts of interest involving members of the Board. The Company has adopted a Conflict of Interest Policy and a Related Party Transactions Policy in compliance with Section 188 of the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended. Although there have been no incidents of conflict of interest to date, the Company has stringent processes in place to handle such situations should they arise. These practices are meticulously recorded in the meeting minutes, ensuring transparency and accountability in the decision-making process.



PRINCIPLE

02

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.**

|       | 2023-24 | 2022-23 | Details of Improvements in environmental and social impacts |
|-------|---------|---------|---|
| R&D   | 96.67%  | 88.42%  | Current process improvements and new molecule development.  |
| Capex | 3.33%   | 11.58%  |   |

2. **a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes. We've established a Sustainable Procurement Policy along with corresponding procedures.

- b. If yes, what percentage of inputs were sourced sustainably?**

The Company remains committed to ongoing enhancements in Environmental Protection, Health, Safety, and the Secure Transportation of both raw materials and finished products. We consistently invest in the adoption of innovative environmental technologies to ensure long-term sustainability. Additionally, over 44.94% of our raw materials are sourced in a sustainable manner, underlining our dedication to responsible procurement practices.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

The Company uses distillation/extraction methods for purification purposes. Our Research and Development team consistently focuses on waste reduction efforts to enhance process yields, thereby contributing to pollution mitigation. Additionally, the Company prioritises compliance with the Environment (Protection) Act, 1986, and the Plastic Waste Management Rules, 2024, alongside the Manufacture, Storage & Import of Hazardous Chemicals Rules, 1989.

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.**

The Company has taken the required measures to do the registration for the Extended Producer Responsibility (EPR) provisions under Plastic Waste Management Rules, 2016.

## 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 | % 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. |
|----------|-------------------------|---------------------------------|--|---|--|
| 20119    | Antioxidant             | 58%                             | Cradle to Grave  | Yes   | No   |

2. 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 |
|--|----------------------------------|--------------|
| No significant risk / hazard identified in LCA .The Company adheres rigorously to the regulatory framework governing business operations, ensuring that there are no substantial social or environmental issues or risks associated with our production processes. |                                  |              |

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 input material    | Recycled or re-used input material to total material |         |
|----------------------------|--|---------|
|                            | 2023-24  | 2022-23 |
| Raw Materials and Solvents | 10.00  | 10.00   |



4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

|                                     | 2023-24 |          |                                       | 2022-23 |          |                                       |
|-------------------------------------|---------|----------|---------------------------------------|---------|----------|---------------------------------------|
|                                     | Re-Used | Recycled | Safely Disposed<br>(In Metric Tonnes) | Re-Used | Recycled | Safely Disposed<br>(In Metric Tonnes) |
| Plastics<br>(including packaging)   | Nil     | Nil      | 22.00                                 | Nil     | Nil      | 11.28                                 |
| E-waste                             | Nil     | Nil      | 0.86                                  | Nil     | Nil      | 0.34                                  |
| Hazardous Waste                     | 42.8    | 3,837.88 | 2,565.23                              | Nil     | Nil      | 2,756.13                              |
| Other waste<br>(Paper, Wood, Metal) | Nil     | Nil      | 5,838.31                              | Nil     | Nil      | 2,144.07                              |

Note- The Company has appointed a third party, TUV SUD, to assess the products and packaging reclaimed at the end of their life cycle. TUV SUD conducted a thorough assessment by visiting its plants at Navi Mumbai and Dahej, where they collected necessary samples. Based on their evaluation, they have issued an assurance statement regarding the amount of products and packaging that have been safely disposed of, measured in metric tonnes.

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category

| Indicate product category | Reclaimed products and their packaging materials<br>(as percentage of products sold) for each product category |
|---------------------------|--|
|                           | Nil  |

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 employees covered by             |           |                  |         |                    |         |                    |         |                    |         |                     |         |
|---------------------------------------|-----------|------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                                       | Total (A) | Health Insurance |         | Accident Insurance |         | Maternity Benefits |         | Paternity Benefits |         | Day Care facilities |         |
|                                       |           | Number (B)       | % (B/A) | Number (C)         | % (C/A) | Number (D)         | % (D/A) | Number (E)         | % (E/A) | Number (F)          | % (F/A) |
| <b>Permanent Employees</b>            |           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                  | 590       | 590              | 100.00  | 590                | 100.00  | 0                  | 0.00    | 0                  | 0.00    | 0                   | 0.00    |
| Female                                | 31        | 31               | 100.00  | 31                 | 100.00  | 31                 | 100.00  | 0                  | 0.00    | 0                   | 0.00    |
| Total                                 | 621       | 621              | 100.00  | 621                | 100.00  | 31                 | 4.99    | 0                  | 0.00    | 0                   | 0.00    |
| <b>Other than Permanent Employees</b> |           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                  | 50        | 0                | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                  | 0.00    | 0                   | 0.00    |
| Female                                | 6         | 0                | 0.00    | 0                  | 0.00    | 6                  | 100.00  | 0                  | 0.00    | 0                   | 0.00    |
| Total                                 | 56        | 0                | 0.00    | 0                  | 0.00    | 6                  | 10.71   | 0                  | 0.00    | 0                   | 0.00    |

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

| % of employees covered by           |           |                  |         |                    |         |                    |         |                    |         |                     |         |
|-------------------------------------|-----------|------------------|---------|--------------------|---------|--------------------|---------|--------------------|---------|---------------------|---------|
|                                     | Total (A) | Health Insurance |         | Accident Insurance |         | Maternity Benefits |         | Paternity Benefits |         | Day Care facilities |         |
|                                     |           | Number (B)       | % (B/A) | Number (C)         | % (C/A) | Number (D)         | % (D/A) | Number (E)         | % (E/A) | Number (F)          | % (F/A) |
| <b>Permanent Workers</b>            |           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                | 73        | 73               | 100.00  | 73                 | 100.00  | 0                  | 0.0     | 0                  | 0.0     | 0                   | 0.0     |
| Female                              | 0         | 0                | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                   | 0.0     |
| Total                               | 73        | 73               | 100.00  | 73                 | 100.00  | 0                  | 0.0     | 0                  | 0.0     | 0                   | 0.0     |
| <b>Other than Permanent Workers</b> |           |                  |         |                    |         |                    |         |                    |         |                     |         |
| Male                                | 470       | 0                | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                   | 0.0     |
| Female                              | 0         | 0                | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                   | 0.0     |
| Total                               | 470       | 0                | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                  | 0.0     | 0                   | 0.0     |



**c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:**

|   | 2023-24 | 2022-23 |
|---|---------|---------|
| Cost incurred on well-being measures as a % of total revenue of the Company | 0.57%   | 0.45%   |

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

| 2023-24  |  |  | Benefits | 2022-23  |  |  |   |
|--|--|--|----------|--|--|--|---|
| 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.) |   |
| 100.00   | 100.00   | Y  |          | PF   | 100.00   | 100.00   | Y |
| 100.00   | 100.00   | Y  |          | Gratuity   | 100.00   | 100.00   | Y |
| 11.01  | 58.93  | Y  | ESI      | 9.78   | 60.96  | Y  |   |

**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.**

Yes. The Company's premises and offices are designed to be accessible for employees and workers with disabilities. We uphold compliance with the Rights of Persons with Disabilities Act, 2016, ensuring inclusivity and accommodation for all individuals.



**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.**

The Company provides equal employment opportunities, devoid of any discrimination based on any criteria. Our Diversity, Equity, and Inclusion (D, E & I) Policy serve as a robust framework to ensure not only economic growth but also sustainable competitive advantage and societal progress. We firmly believe that any form of discrimination carries significant negative implications, challenging an individual's will and merit without cause. Adherence to this policy is mandatory, and any violation will result in legal consequences as per applicable laws.

(Reference URL: <https://www.nocil.com/wp-content/uploads/2023/11/Policy-on-diversity-equity-and-inclusion.pdf>)



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

| <br>Permanent Employees |                | Gender | <br>Permanent workers |                |
|--|----------------|--------|--|----------------|
| Return to work rate  | Retention rate |        | Return to work rate  | Retention rate |
| NA   | NA             | Male   | NA   | NA             |
| 100.00   | 100.00         | Female | NA   | NA             |
| 100.00   | 100.00         | Total  | NA   | NA             |

**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)    |  |   |
|---|--|---|
| <b>Permanent Workers</b><br><b>Other than Permanent Workers</b> | <p>The Company has established a system for receiving and addressing grievances from employees and workers. In alignment with ESG requirements, we are currently developing a structured mechanism to enhance this process. Additionally, the Company upholds a comprehensive Code of Conduct and adheres to Policies on Diversity, Equity, and Inclusion (DEI), human rights, fair competition, risk management, Prevention of Sexual Harassment (POSH), and a Whistle-blower Policy to effectively redress grievances.</p> | <b>Permanent Employees</b><br><b>Other than Permanent Employees</b> |

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

| Category                  | 2023-24  |   |           | 2022-23  |   |           |
|---------------------------|--|---|-----------|--|---|-----------|
|                           | 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 Employees | 621  | 0   | 0.00      | 587  | 0   | 0.00      |
| Male                      | 590  | 0   | 0.00      | 564  | 0   | 0.00      |
| Female                    | 31   | 0   | 0.00      | 23   | 0   | 0.00      |
| Total Permanent Worker    | 73   | 73  | 100.00    | 83   | 83  | 100.00    |
| Male                      | 73   | 73  | 100.00    | 83   | 83  | 100.00    |
| Female                    | 0  | 0   | 0.0       | 0  | 0   | 0.0       |

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

|                  | 2023-24   |                               |         |                      |         | 2022-23   |                               |         |                      |         |
|------------------|-----------|-------------------------------|---------|----------------------|---------|-----------|-------------------------------|---------|----------------------|---------|
|                  | Total (A) | On Health and Safety measures |         | On Skill upgradation |         | Total (D) | On Health and Safety measures |         | On Skill upgradation |         |
|                  |           | No. (B)                       | % (B/A) | No. (C)              | % (C/A) |           | No. (E)                       | % (E/D) | No. (F)              | % (F/D) |
| <b>Employees</b> |           |                               |         |                      |         |           |                               |         |                      |         |
| Male             | 640       | 640                           | 100.00  | 599                  | 93.59   | 608       | 399                           | 65.62   | 282                  | 46.38   |
| Female           | 37        | 37                            | 100.00  | 30                   | 81.08   | 26        | 3                             | 11.50   | 4                    | 15.38   |
| Total            | 677       | 677                           | 100.00  | 629                  | 92.91   | 634       | 402                           | 63.40   | 286                  | 45.11   |
| <b>Workers</b>   |           |                               |         |                      |         |           |                               |         |                      |         |
| Male             | 543       | 543                           | 100.00  | 0                    | 0.0     | 648       | 648                           | 100.00  | 0                    | 0.00    |
| Female           | 0         | 0                             | 0.0     | 0                    | 0.0     | 0         | 0                             | 0.0     | 0                    | 0.0     |
| Total            | 543       | 543                           | 100.00  | 0                    | 0.0     | 648       | 648                           | 100.00  | 0                    | 0.00    |

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

| Category         | 2023-24   |         |         | 2022-23   |         |         |
|------------------|-----------|---------|---------|-----------|---------|---------|
|                  | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) |
| <b>Employees</b> |           |         |         |           |         |         |
| Male             | 640       | 419     | 65.47   | 608       | 406     | 66.77   |
| Female           | 37        | 24      | 64.86   | 26        | 17      | 65.38   |
| Total            | 677       | 443     | 65.44   | 634       | 423     | 66.71   |
| <b>Workers</b>   |           |         |         |           |         |         |
| Male             | 543       | 0       | 0.0     | 648       | 0       | 0.0     |
| Female           | 0         | 0       | 0.0     | 0         | 0       | 0.0     |
| Total            | 543       | 0       | 0.0     | 648       | 0       | 0.0     |

Note- Since this count includes contractor and unionised workers, we do not have a performance review system for them. The performance review system is only applicable to regular employees.

**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?**

Yes, The Company has implemented a comprehensive Occupational Health and Safety Management system. We are dedicated to ensuring a secure and healthy workplace, minimising the risks associated with accidents, injuries, and health-related concerns pertinent to our industry. Additionally, the Company holds certification under ISO 45001:2018 for its Occupational Health and Safety Management System, encompassing activities at both the Navy Mumbai and Dahej Plants. Our operations include the manufacturing, marketing, and sales of rubber chemicals, their intermediates and allied chemicals for the rubber processing industries. Notably, the Company has earned the 'Responsible Care' certification from the Indian Chemical Council (ICC). We strongly believe that maintaining a safe and healthy workplace not only benefits the immediate surroundings but also contributes to environmental well-being and economic stability.

**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 utilises HIRA (Hazard Identification and Risk Assessment) and HAZOP (Hazard and Operability Study) processes, which are systematic approaches aimed at identifying potential deviations in process parameters such as temperature, pressure, composition, and flow direction. These assessments enable us to pinpoint work-related hazards and evaluate risks as necessary.



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

Yes, the Company holds both departmental and central safety committee meetings, ensuring participation from all workers. During these meetings, queries and concerns regarding work-related hazards are addressed. The Company carefully considers all raised issues and works towards resolving them promptly. Additionally, regular fire safety drills are conducted for employees at both the Plants and the Head Office. Furthermore, we have a comprehensive safety manual in place to guide our procedures

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

Yes, Employees and workers are provided with non-occupational medical and health services. The Company ensures the disbursement of medical allowances to eligible individuals based on the specified criteria.

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

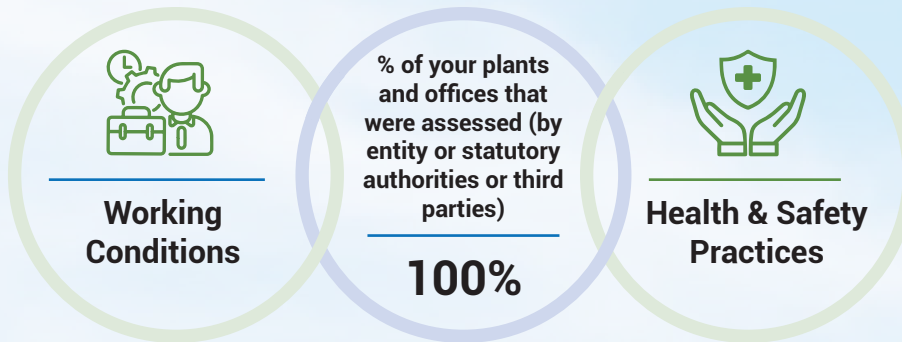
| Safety Incident/Number   | Category  | 2023-24   | 2022-23 |
|--|-----------|---|---------|
| Lost Time Injury Frequency Rate (LTIFR)<br>(per one million-person hours worked) | Employees | No safety related incidents happened for both the reporting years |         |
|  | Workers   |   |         |
| Total recordable work-related injuries   | Employees |   |         |
|  | Workers   |   |         |
| No. of fatalities  | Employees |   |         |
|  | Workers   |   |         |
| High consequence work-related injury or ill-health<br>(excluding fatalities)     | Employees |   |         |
|  | Workers   |   |         |

**12. Describe the measures taken by the entity to ensure a safe and healthy work place.**

The Company continues its efforts in providing employee induction and refresher training sessions across various departments, focusing on the health and safety of workers as well as environmental concerns. HAZOP studies, risk assessments, and pre-start up safety reviews are conducted as needed for plant or process modifications. Encouragement of a safety-oriented attitude is emphasised through regular safety awareness sessions to instil behaviour-based safety practices throughout the organisation. Periodic inspections and audits are carried out to verify the effectiveness of safety systems. A safe and healthy work environment is maintained through ongoing monitoring of noise levels, illumination, and ventilation. All non-routine maintenance tasks are managed through a permit-to-work system. Scheduled preventive maintenance of emergency equipment is routinely performed. Emergency preparedness is reinforced through weekly drills simulating various emergency scenarios to ensure swift response and mitigation in case of any unforeseen events.

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

| Category           | 2023-24  |                                       |         | 2022-23               |                                       |         |
|--------------------|--|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
|                    | Filed during the year  | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | No complaints of this nature were identified for both reporting years. |                                       |         |                       |                                       |         |
| Health & Safety    |  |                                       |         |                       |                                       |         |

**14. Assessments for the year\*:**


Note: \*the assessment for Health & Safety Practices and Working Conditions were carried out by DISH (Directorate of Industrial Safety and Health) & Govt. approved auditors

**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.**

Not Applicable, as there were no incidents of this nature identified throughout the year.

## Leadership Indicators /

**1. 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)?**

Yes, The Company extends a "Group Accident Policy" to all its employees and workers.

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

The Company maintains records of payment in the form of Challans, confirming that statutory dues have been deducted and remitted by our value-chain partners. The Company's Internal Auditors conduct quarterly verification of this status, presenting a comprehensive report on the matter during Audit Committee Meetings.



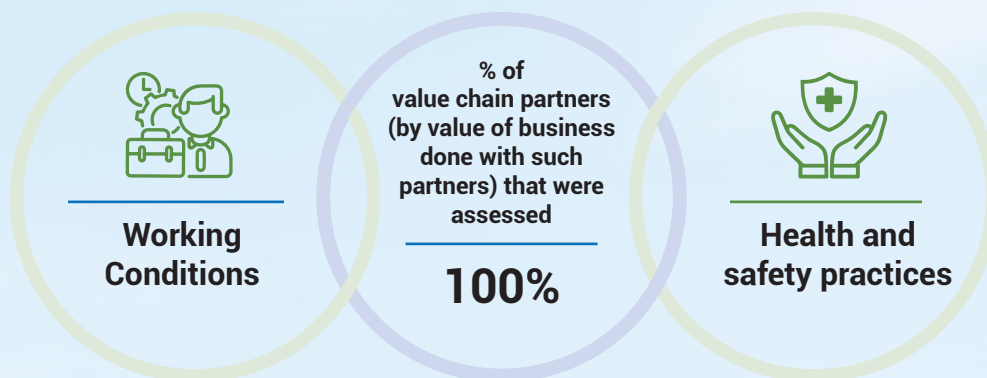
3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

|           | Total no. of affected employees/<br>workers |         | No. of employees/workers that are rehabilitated<br>and placed in suitable employment or whose family<br>members have been placed in suitable employment |         |
|-----------|---|---------|---|---------|
|           | 2023-24                                     | 2022-23 | 2023-24   | 2022-23 |
| Employees | Nil   |         |   |         |
| Workers   |   |         |   |         |

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)

The Company did not implement any such program during the reporting period. However, we look forward to implementing the same in case need arises in future.

5. Details on assessment of value chain partners:



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.

No corrective actions taken as no concerns were identified in the assessment.

## Essential Indicators

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

Considerable effort is invested in identifying stakeholders, prioritising them based on interests and influence. This involves evaluating Political, Economic, Sociological, Technological, Legal and Environmental factors. Collaborative brainstorming sessions among teams enrich this process, fostering innovation and understanding. By comprehensively analysing these factors, we anticipate stakeholder expectations and external pressures. Through meticulous stakeholder identification, we aim to cultivate meaningful relationships, driving sustainable growth and value creation.

### 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 & Marginalised 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           | No   | Email / Meetings   | As and when required  | Product Specification, Customer Specifications, Product Planning   |
| Regulatory Bodies   | No   | Email, Meetings  | As and when required  | Regulatory Performance   |
| Shareholders        | No   | Meetings, Website, Newspaper Advertisement   | Annually  | Company Performance  |
| Employees           | No   | Meetings/ Notice Board   | Annually/Half yearly/ Quarterly   | QEHS&R (Quality, Environment, Health, safety & Responsible care) Policy, IMS (Integrated Management System) Objectives, Policies, Procedures |
| Suppliers           | No   | Emails, Meetings   | As and when required  | Services and Product Requirements  |
| Investors & funders | No   | Meetings, Website, Advertisement, Newspaper  | Quarterly   | Company Performance  |
| Communities         | Yes  | Notice Board, Meetings   | Annually/Half Yearly  | Emergency Preparedness, through Company's CSR activities   |
| Analysts            | No   | Email, Meetings  | As and when required  | Company Performance  |



## 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 Risk Management Committee, the Core Committee on Sustainability and the CSR Committee of the Company play integral role in evaluating and guiding the Company's progress in various domains where economic, environmental and social engagements intersect with stakeholders. These Committees serve as crucial platforms for strategic planning and decision-making, ensuring that the Company's activities are aligned with its broader objectives of sustainability and corporate responsibility. Through regular assessments and analysis, these Committees identify potential risks, opportunities, and areas for improvement within the Company's operations and engagements with stakeholders.

- 2. 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, the Company places a high priority on environmental and social responsibility, recognising the importance of integrating these factors into its risk management framework. To achieve this, we actively seek and review inputs from various stakeholders, including communities, customers, employees, and environmental organisations, to identify potential environmental and social risks associated with our operations. These inputs provide valuable insights into the potential impacts of our activities on the environment, local communities, and broader society.

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

The Company places a strong emphasis on identifying and supporting vulnerable and marginalised stakeholders through its comprehensive Corporate Social Responsibility (CSR) activities and programs. Recognising the importance of giving back to society, the Company's initiatives extend across a spectrum of critical areas including healthcare, education, and livelihood enhancement projects. Moreover, the Company remains dedicated to addressing societal gaps by focusing on the rehabilitation of deserted and parentless children, providing them with essential support and opportunities for a brighter future.



## 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:

| Category               | 2023-24    |   |               | 2022-23    |   |               |
|------------------------|------------|---|---------------|------------|---|---------------|
|                        | Total (A)  | No. of employees/<br>workers covered<br>(B) | % (B/A)       | Total (C)  | No. of employees/<br>workers covered<br>(D) | % (D/C)       |
| <b>Employees</b>       |            |   |               |            |   |               |
| Permanent              | 621        | 442   | 71.18         | 587        | 259   | 44.12         |
| Other than permanent   | 56         | 24  | 42.86         | 47         | 18  | 38.30         |
| <b>Total Employees</b> | <b>677</b> | <b>466</b>                                  | <b>68.83</b>  | <b>634</b> | <b>277</b>                                  | <b>43.70</b>  |
| <b>Workers</b>         |            |   |               |            |   |               |
| Permanent              | 73         | 73  | 100.00        | 83         | 83  | 100.00        |
| Other than permanent   | 470        | 470   | 100.00        | 565        | 565   | 100.00        |
| <b>Total Workers</b>   | <b>543</b> | <b>543</b>                                  | <b>100.00</b> | <b>648</b> | <b>648</b>                                  | <b>100.00</b> |

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

| Category             | 2023-24      |                          |         |                           |         | 2022-23      |                          |         |                           |         |
|----------------------|--------------|--------------------------|---------|---------------------------|---------|--------------|--------------------------|---------|---------------------------|---------|
|                      | Total<br>(A) | Equal to Minimum<br>Wage |         | More than<br>Minimum Wage |         | Total<br>(D) | Equal to Minimum<br>Wage |         | More than<br>Minimum Wage |         |
|                      |              | No. (B)                  | % (B/A) | No. (C)                   | % (C/A) |              | No. (E)                  | % (E/D) | No. (F)                   | % (F/D) |
| <b>Employees</b>     |              |                          |         |                           |         |              |                          |         |                           |         |
| Permanent            | 621          | 0                        | 0.00    | 621                       | 100.00  | 587          | 0                        | 0.0     | 587                       | 100.00  |
| Male                 | 590          | 0                        | 0.00    | 590                       | 100.00  | 564          | 0                        | 0.0     | 564                       | 100.00  |
| Female               | 31           | 0                        | 0.00    | 31                        | 100.00  | 23           | 0                        | 0.0     | 23                        | 100.00  |
| Other than Permanent | 56           | 0                        | 0.00    | 56                        | 100.00  | 47           | 0                        | 0.0     | 47                        | 100.00  |
| Male                 | 50           | 0                        | 0.00    | 50                        | 100.00  | 44           | 0                        | 0.0     | 44                        | 100.00  |
| Female               | 6            | 0                        | 0.00    | 6                         | 100.00  | 3            | 0                        | 0.0     | 3                         | 100.00  |



| Category             | 2023-24      |                          |         |                           |         | 2022-23      |                          |         |                           |         |
|----------------------|--------------|--------------------------|---------|---------------------------|---------|--------------|--------------------------|---------|---------------------------|---------|
|                      | Total<br>(A) | Equal to Minimum<br>Wage |         | More than<br>Minimum Wage |         | Total<br>(D) | Equal to Minimum<br>Wage |         | More than<br>Minimum Wage |         |
|                      |              | No. (B)                  | % (B/A) | No. (C)                   | % (C/A) |              | No. (E)                  | % (E/D) | No. (F)                   | % (F/D) |
| <b>Workers</b>       |              |                          |         |                           |         |              |                          |         |                           |         |
| Permanent            | 73           | 0                        | 0.00    | 73                        | 100.00  | 83           | 0                        | 0.0     | 83                        | 100.00  |
| Male                 | 73           | 0                        | 0.00    | 73                        | 100.00  | 83           | 0                        | 0.0     | 83                        | 100.00  |
| Female               | 0            | 0                        | 0.00    | 0                         | 0.0     | 0            | 0                        | 0.0     | 0                         | 0.0     |
| Other than Permanent | 470          | 470                      | 100.00  | 0                         | 0.0     | 503          | 503                      | 100.00  | 0                         | 0.0     |
| Male                 | 470          | 470                      | 100.00  | 0                         | 0.0     | 503          | 503                      | 100.00  | 0                         | 0.0     |
| Female               | 0            | 0                        | 0.00    | 0                         | 0.0     | 0            | 0                        | 0.0     | 0                         | 0.0     |

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

#### a. Median remuneration/wages:

|                                  | Male   |   | Female |   |
|----------------------------------|--------|---|--------|---|
|                                  | Number | Median remuneration/<br>Salary/ Wages of<br>respective category | Number | Median remuneration/<br>Salary/ Wages of<br>respective category |
| Board of Directors (BoD)         | 11     | 0.18 Crores   | 2      | 0.18 Crores   |
| Key Managerial Personnel         | 4      | 2.66 Crores   | -      | -   |
| Employees other than BoD and KMP | 627    | 0.04 Crores   | 33     | 0.06 Crores   |
| Workers                          | 73     | 0.12 Crores   | -      | -   |

#### b. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

|   | 2023-24 | 2022-23 |
|---|---------|---------|
| Gross wages paid to females as % of total wages | 4.07%   | 3.05%   |

**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, the Company has a focal point responsible for addressing human rights impacts or issues caused or contributed to by the business. The Company has implemented a robust Whistle-blower Policy aimed at fostering transparency and accountability within its operations. This policy serves as a crucial mechanism for employees and stakeholders to report any potential human rights impacts or issues arising from the Company's activities. By providing a safe and confidential avenue for individuals to raise concerns, the Whistleblower Policy empowers employees to speak up without fear of retaliation. Additionally, the Company has a dedicated Human Rights Policy and an HR team that individuals can approach for addressing these issues.

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

The Company has committedly embraced and implemented robust policies aimed at addressing grievances and upholding human rights within its operations. These policies underscore our commitment to fostering a fair and inclusive workplace environment where every individual's rights are respected and protected. Through the establishment of a comprehensive framework, we actively conduct training programs and awareness campaigns dedicated to promoting the well-being of all employees.

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

|                                   | 2023-24               |   |   | 2022-23               |   |         |
|-----------------------------------|-----------------------|---|---|-----------------------|---|---------|
|                                   | Filed during the year | Pending resolution at the end of the year | Remarks   | Filed during the year | Pending resolution at the end of the year | Remarks |
| Sexual harassment                 |                       |   | Nil. There have been no grievances raised by employees or workers concerning the human rights issues mentioned. |                       |   |         |
| Discrimination at workplace       |                       |   |   |                       |   |         |
| Child Labour                      |                       |   |   |                       |   |         |
| Forced Labour/ Involuntary Labour |                       |   |   |                       |   |         |
| Wages                             |                       |   |   |                       |   |         |
| Other Human Rights related issues |                       |   |   |                       |   |         |

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

|   | 2023-24 | 2022-23 |
|---|---------|---------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) |         | Nil     |
| Complaints on POSH as a % of female employees / workers   |         |         |
| Complaints on POSH upheld   |         |         |



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

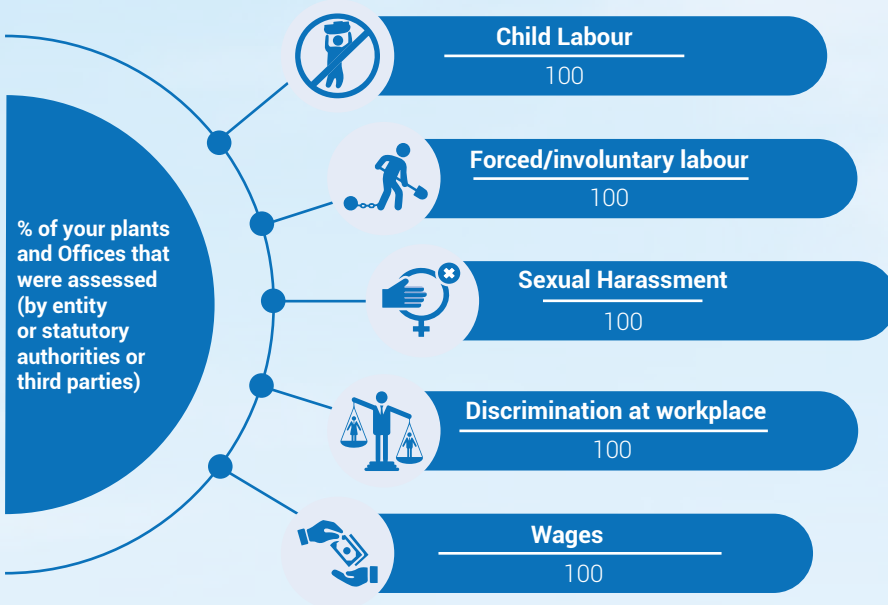
According to the relevant policy, a Complainant or Whistleblower is not subjected to unfair treatment as a result of making a reported disclosure under this Policy. The Company guarantees that no discrimination, harassment, victimisation, or any other unjust employment practice is employed against Whistleblowers. The confidentiality of the Complainant or Whistleblower is maintained to the extent allowed by law.

**9. Do human rights requirements form part of your business agreements and contracts?**

Yes, The Supplier Code of Conduct incorporates a clause outlining Human Rights requirements. This clause is integrated into our agreements with suppliers, aiming to facilitate seamless business operations and prevent potential issues related to Human Rights matters within the supply chain.

URL- <https://www.nocil.com/wp-content/uploads/2024/04/Supplier-Code-of-Conduct-Policy.pdf>

**10. Assessments for the year:**



Note- The aforementioned human rights issues are evaluated by factory audit officers.

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.**

Not relevant, as no risks of this nature have been identified.

## Leadership Indicators

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

There were no human rights grievances or complaints raised; therefore, no business process modifications or introductions were necessary.

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

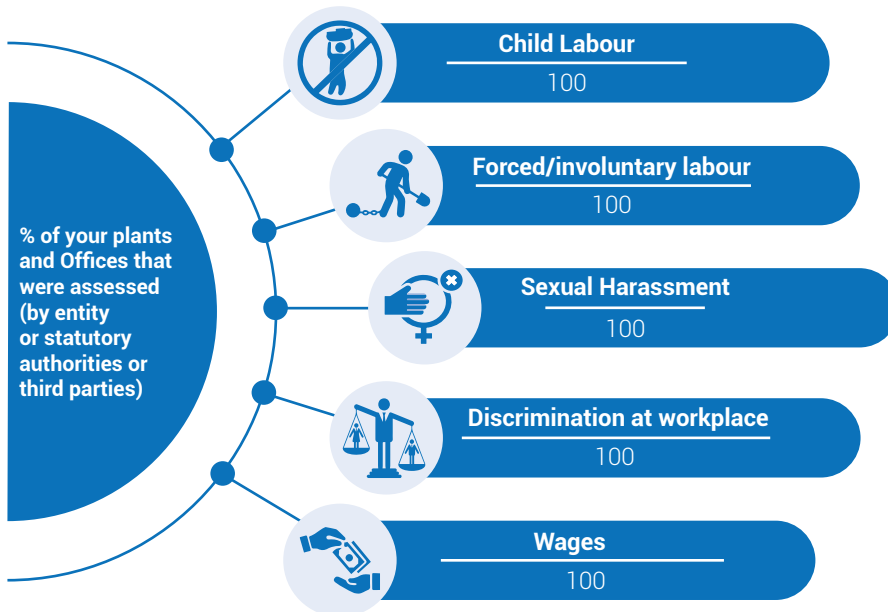
The Company has established and enacted a comprehensive Human Rights Policy and has provided awareness and guidance to various group heads and Heads of Departments (HoDs) regarding the compliance obligations outlined in this policy.

URL- <https://www.nocil.com/wp-content/uploads/2023/11/Humans-Rights-Policy.pdf>

**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?**

The Company is in process of making all the required premises accessible for the differently abled visitors.

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



Note: The Company conducts supplier audit in their Navi Mumbai & Dahej units

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

Not relevant, as the Company has not identified any risks of this nature.



## PRINCIPLE

## 06

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   | 2023-24<br>(In Gigajoules)                         | 2022-23<br>(In Gigajoules)                         |
|---|--|--|
| <b>FROM RENEWABLE SOURCES</b>   |  |  |
| Total electricity consumption (A)   | 30,498.88  | 0.0  |
| Total fuel consumption (B)  | 0.0  | 0.0  |
| Energy consumption through other sources (C)  | 1,656.68   | 1,816.71   |
| Total Energy consumption from renewable sources (A+B+C)   | 32,155.56  | 1,816.71   |
| <b>FROM NON-RENEWABLE SOURCES</b>   |  |  |
| Total electricity consumption (D)   | 1,36,157.85  | 1,79,895.44  |
| Total fuel consumption (E)  | 12,32,045.27                                       | 13,13,819.60                                       |
| Energy consumption through other sources (F)  | 0.0  | 0.0  |
| Total Energy consumption from non-renewable sources (D+E+F)   | 13,68,203.11                                       | 14,93,715.04                                       |
| Total energy consumed (A+B+C+D+E+F)   | 14,00,358.67                                       | 14,95,531.75                                       |
| Energy intensity per rupee of turnover<br>(Total energy consumption/ Revenue from Operations)   | 0.00009693 GJ per rupee of turnover                | 0.00009289 GJ per rupee of turnover                |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)<br>(Total energy consumed / Revenue from operations adjusted for PPP) | 0.002171 GJ per rupee of turnover adjusted for PPP | 0.002051 GJ per rupee of turnover adjusted for PPP |
| Energy intensity in terms of physical output  | 20.98 GJ/MT  | 24.89 GJ/MT  |

**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, the Company hired a third party, TUV SUD, to conduct this comprehensive evaluation. TUV SUD conducted a detailed three-day assessment of our units located at Dahej and Navi Mumbai. The assessment included sample collection and thorough evaluation of our processes and standards. Following this assessment, TUV SUD will provide us with an assurance certificate, which will further validate our commitment to maintaining high standards and operational excellence.

**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**

Not Applicable, None of our sites are included in the Perform, Achieve, and Trade (PAT) Scheme of the Government of India.

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

| Parameter   | 2023-24  | 2022-23  |
|---|--|--|
| Water withdrawal by source (in kilolitres)  |  |  |
| (i) Surface water   | Nil  | Nil  |
| (ii) Groundwater  | Nil  | Nil  |
| (iii) Third party water   | 11,80,447  | 11,82,755  |
| (iv) Seawater / desalinated water   | Nil  | Nil  |
| (v) Others  | Nil  | Nil  |
| <i>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</i>   | 11,80,447  | 11,82,755  |
| Total volume of water consumption (in kilolitres)   | 11,80,447  | 11,82,755  |
| Water intensity per rupee of turnover (Water consumed / Revenue from operations)  | 0.00008171 KL per rupee of turnover                | 0.00007316 KL per rupee of turnover                |
| <b>Water Intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total water consumption / Revenue from operations adjusted for PPP) | 0.001830 KL per rupee of turnover adjusted for PPP | 0.001622 KL per rupee of turnover adjusted for PPP |
| <b>Water intensity in terms of physical output</b>  | 17.68 KL per MT of production                      | 19.69 KL per MT of production                      |

**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, conducted by TUV SUD

**4. Provide the following details related to water discharged**

| Parameter   | 2023-24   | 2022-23  |
|---|---|--|
| Water discharge by destination and level of treatment (in kilolitres) |   |  |
| (i) To Surface water  | Nil   | Nil  |
| - No treatment  |   |  |
| - With treatment – please specify level of treatment                  |   |  |
| (ii) To Groundwater   |   |  |
| - No treatment  |   |  |
| - With treatment – please specify level of treatment                  |   |  |
| (iii) To Seawater   | 603,617 KL (Trade Effluent primary, secondary aerobic biodegradation followed by Tertiary treatment.)<br>10230 KL Sewage Effluent treatment by SBT. | 5,95,557 KL (Trade Effluent Primary, Secondary Aerobic biodegradation followed by Tertiary treatment.)<br>12870 KL Sewage effluent treatment by SBT. |
| - No treatment  |   |  |
| - With treatment – please specify level of treatment                  |   |  |
| (iv) Sent to third-parties  |   |  |
| - No treatment  |   |  |
| - With treatment – please specify level of treatment                  |   |  |
| (v) Others  | Nil   | Nil  |
| - No treatment  |   |  |
| - With treatment – please specify level of treatment                  |   |  |
| Total water discharged (in kilolitres)                                | 6,13,847 KL   | 6,08,427 KL  |

**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, conducted by TUV SUD

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

As of now, the Company has not yet implemented Zero Liquid Discharge. Nevertheless, efforts are underway to progress towards achieving this objective.



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

| Parameter                               | Please specify unit                        | 2023-24   | 2022-23          |
|---|--|---|------------------|
| NOx                                     | Kg./Day                                    | 164.994   | 291.05           |
| SOx                                     | Kg./Day                                    | 623.31  | 718.71           |
| Particulate matter (PM)                 | Kg./Day                                    | 244.909   | 422.85           |
| Persistent organic pollutants (POP)     |  | Nil   | Nil              |
| <b>Volatile organic compounds (VOC)</b> |  | <p>VOCs are monitored at workplace with self-detection tubes.</p> <p>Therefore, it is not quantifiable.</p> |                  |
| 1. Acetone                              |  |   |                  |
| 2. Ammonia                              |  |   |                  |
| 3. n-Butanol                            |  |   |                  |
| 4. Chlorine                             |  |   |                  |
| 5. HCl                                  |  |   |                  |
| 6. H2S                                  |  |   |                  |
| 7. Sulphur Dioxide                      |  |   |                  |
| 8. Toluene                              |  |   |                  |
| 9. MIBK                                 |  |   |                  |
| 10. Aniline                             |  |   |                  |
| 11. Carbon Disulphide                   |  |   |                  |
| 12. Sodium Hydroxide                    |  |   |                  |
| 13. Sulphuric Acid                      |  |   |                  |
| <b>Hazardous air pollutants (HAP)</b>   |  |   |                  |
| Chlorine                                | Mentioned alongside the quantified numbers | 0.0830 Kg. /Day   | 0.0490 Kg. /Day  |
| Hydrochloric Acid                       |  | 0.0768 Kg. /Day   | 0.0016 Kg. /Day  |
| Hydrogen Sulphide                       |  | 0.0036 Kg. / Day  | 0.0020 Kg. / Day |
| CS2                                     |  | 0.1640 Kg. / Day  | Nil              |
| Others – please specify                 |  | Nil   |                  |

**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, conducted by TUV SUD**

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**

| Parameter   | Unit   | 2023-24  | 2022-23   |
|---|--|--|---|
| Total Scope 1 emissions<br>(Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)                  | Metric tonnes of CO <sub>2</sub> equivalent                                | 1,11,356.74  | 1,36,210.72   |
| Total Scope 2 emissions<br>(Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)                  | Metric tonnes of CO <sub>2</sub> equivalent                                | 27,294.17  | 39,976.76   |
| Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)   | Metric tonnes of CO <sub>2</sub> equivalent                                | Total Emission = 138650.91<br><br>0.00000960 MTCO <sub>2</sub> e Per rupee of turnover | Total Emission = 176187.48<br><br>0.000010943 MTCO <sub>2</sub> e Per rupee of turnover |
| Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) |  | 0.000215 MTCO <sub>2</sub> e Per rupee of turnover adjusted for PPP                    | 0.000242 MTCO <sub>2</sub> e Per rupee of turnover adjusted for PPP                     |
| Total Scope 1 and Scope 2 emissions intensity in terms of physical output   | Metric tonnes of CO <sub>2</sub> equivalent per metric tonne of production | 2.08 MTCO <sub>2</sub> e per MT production   | 2.93 MTCO <sub>2</sub> e per MT production  |

**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, conducted by TUV SUD

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

The Company aims to decrease carbon emissions through the adoption of innovative methods. It is taking proactive steps to implement strategies that are both commercially feasible and economically viable, thereby reducing dependence on carbon-intensive energy sources.

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

| Parameter   | 2023-24  | 2022-23   |
|---|--|---|
| <b>Total Waste generated (in metric tonnes)</b>   |  |   |
| Plastic waste (A)   | 38.753   | 11.281  |
| E-waste (B)   | 0.8657   | 0.335   |
| Bio-medical waste (C)   | 0.009354   | 0.016851  |
| Construction and demolition waste (D)   | 679  | 444.5   |
| Battery waste (E) (Buy Back)  | 6.593  | 0.478   |
| Radioactive waste (F)   | Nil  | Nil   |
| Other Hazardous waste. Please Specify, if any. (G)  | 2,575.49   | 2.756.18  |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)                 | Metal: 293.041<br>Wood: 58.64<br>Glass: 2.990<br>Coal boiler ash: 5,399.74<br>Garbage: 87.18<br>Total: 5,841.591 | Metal –179.057<br>Wood – 67.31<br>Glass-2.960<br>Coal Boiler Ash: 7095<br>Garbage: 87.84<br>Total: 7,432.17 |
| Total (A+B + C + D + E + F + G + H)   | 9142.3   | 10,644.64   |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)   | 0.00000063 MT per rupee of turnover  | 0.00000066 MT per rupee of turnover   |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) | 0.000014 MT per rupee of turnover adjusted for PPP   | 0.000015 MT per rupee of turnover adjusted for PPP  |
| Waste intensity in terms of physical output   | 0.137 MT / MT of Production  | 0.177 MT / MT of Production   |
| Waste intensity (optional) - the relevant metric may be selected by the entity  | Nil  | Nil   |
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>      |  |   |
| Category of waste   |  |   |
| (i) Recycled  | 3,837.88   | 3,965.32  |
| (ii) Re-used  | 42.8   | Nil   |
| (iii) Other recovery operations   | Nil  | Nil   |
| Total   | 3,880.68   | 3,965.32  |



| Parameter  | 2023-24  | 2022-23  |
|--|----------|----------|
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) |          |          |
| Category of waste  |          |          |
| (i) Incineration   | 102.3    | 512.05   |
| (ii) Landfilling   | 1,248.18 | 1,482.00 |
| (iii) Other disposal operations<br>(KCB)+Used Oil (Sale) + Pre-Processing                                  | 486.73   | 20.57    |
| Total  | 1,837.21 | 2,014.62 |

**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, conducted by, TUV SUD

**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**

The Company holds the title of the largest manufacturer of rubber chemicals in India and meticulously manages environmental controls over liquid, gaseous, and solid streams. It operates a comprehensive Effluent Treatment Plant and has implemented innovative technologies such as Soil Biotechnology, Hydrodynamic Cavitation, and Multiple Effect Evaporator. Treated effluent meeting regulatory standards is discharged into underground MIDC/GIDC drainage pipelines, with online monitoring of pH, flow and COD. Hazardous waste is stored in designated areas and disposed of periodically to authorised Treatment, Storage, and Disposal Facilities (TSDFs). Process stacks feature scrubber systems, with drains connected to chemical sewers leading to the ETP for further treatment. An Electrostatic Precipitator (ESP) is installed for particulate matter emission control from coal-fired boilers, monitored via camera surveillance. To reduce pollution, the Company has transitioned to PNG eco-friendly fuel for boilers and laboratory use, replacing liquid fuels. All process and boiler stacks undergo regular monitoring by MOEF-approved labs, ensuring compliance with prescribed norms. The Company holds certifications for ISO 9001 (Quality Management System), ISO 14001 (Environmental Management System), ISO 45001 (Occupational Health and Safety Assessment System), IATF 16949 (Quality Automotive Supply Chain), and ISO 50001 (Energy Management System). Upholding high standards in Health, Safety, and Environmental practices is a fundamental aspect of the Company's organisational philosophy, underscored by a continuous commitment to improvement in environmental, safety and energy standards.

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 | Types of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|--------|--------------------------------|---------------------|---|
|--------|--------------------------------|---------------------|---|

The Company does not conduct its operations in any environmentally sensitive regions.

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

| Name and brief details of project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|-----------------------------------|----------------------|------|---|--|-------------------|
|-----------------------------------|----------------------|------|---|--|-------------------|

Not applicable

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, and Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

| Serial Number | Specify the law / regulation / guidelines which was not complied with | Provide details of the non-compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Results communicated in public domain (Yes / No) |
|---------------|---|---------------------------------------|---|--|
|---------------|---|---------------------------------------|---|--|

Yes, the Company adheres to all relevant environmental laws and regulations.\*

\*The Company has implemented a specialised Compliance Software Tool to manage and track compliance status with all relevant laws, including the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, and Environment Protection Act, along with associated rules. This software not only monitors compliance but also provides guidance to employees responsible for compliance, informing them of specific requirements and any updates or amendments.



## Leadership Indicators /

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

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

(i) Name of the area – Not Applicable

(ii) Nature of operations – Not Applicable

(iii) Water withdrawal, consumption and discharge in the following format:

| Parameter  | 2023-24   | 2022-23 |
|--|---|---------|
| <b>Water withdrawal by source (in kilolitres)</b>                              |   |         |
| (i) Surface water  | None of our plants operate in water stress area |         |
| (ii) Groundwater   |   |         |
| (iii) Third party water  |   |         |
| (iv) Seawater / desalinated water  |   |         |
| (v) Others   |   |         |
| Total volume of water withdrawal (in kilolitres)                               |   |         |
| Total volume of water consumption (in kilolitres)                              |   |         |
| Water intensity per rupee of turnover (Water consumed / turnover)              |   |         |
| Water intensity (optional) – the relevant metric may be selected by the entity |   |         |

| Parameter  | 2023-24   | 2022-23 |
|--|---|---------|
| <b>Water discharge by destination and level of treatment (in kilolitres)</b> |   |         |
| (i) Into Surface water   | None of our plants operate in water stress area |         |
| - No treatment   |   |         |
| - With treatment – please specify level of treatment                         |   |         |
| (ii) Into Groundwater  |   |         |
| - No treatment   |   |         |
| - With treatment – please specify level of treatment                         |   |         |
| (iii) Into Seawater  |   |         |
| - No treatment   |   |         |
| - With treatment – please specify level of treatment                         |   |         |
| (iv) Sent to third-parties   |   |         |
| - No treatment   |   |         |
| - With treatment – please specify level of treatment                         |   |         |
| (v) Others   |   |         |
| - No treatment   |   |         |
| - With treatment – please specify level of treatment                         |   |         |
| Total water discharged (in kilolitres)                                       |   |         |

**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, conducted by TUV SUD



- 2. 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.**

Not Applicable. The Company's offices and plants are not situated in close proximity to ecologically sensitive areas.

- 3. 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:**

| Sr. No. | Initiative undertaken | Details of the initiative ( <i>Web-link, if any, may be provided along-with summary</i> ) | Outcome of the initiative |
|---------|-----------------------|---|---------------------------|
|---------|-----------------------|---|---------------------------|

The Company consistently refines parameters to minimise raw material consumption and enhance yields. Utilising innovative technologies such as liquid-liquid extraction and carbon columns, the Company recovers raw materials from waste streams, thereby minimising waste generation.

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

Yes, the Company emphasises the need for effective engineering controls to manage all risks associated with operational activities. Risk mappings are conducted and an on-site emergency plan is in place, encompassing various measures to mitigate associated risks. The plan is implemented for the following purposes:

- Preventing an emergency from escalating into a major incident or disaster.
- Defining resources and procedures for the efficient control of emergencies.
- Assigning specific activities and responsibilities to key personnel and agencies to eliminate delays in emergency mitigation/control.
- Minimising damage to people, property and the environment.
- Conducting effective rescue operations and providing treatment to casualties.
- Identifying casualties and informing their relatives.
- Alerting relevant external agencies and supplying pertinent information on the incident.
- Facilitating rehabilitation and restoring normalcy.

- 5. 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 such adverse impact to the environment is identified from the value-chain partners of the entity.

- 6. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

About 40% value-chain partners were assessed for environmental impacts, through supplier audit.



**PRINCIPLE**

# 07

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 is associated with six industry chambers or 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 | Indian Chemical Council               | <b>National</b> |
| 2 | All India Rubber Industry Association |                 |
| 3 | Indian Rubber Institute               |                 |
| 4 | Indian Merchants Chamber              |                 |
| 5 | Thane-Belapur Industries Association  | <b>State</b>    |
| 6 | Dahej Industry Association            |                 |

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 active taken |
|---|-------------------|-------------------------|
| Not Applicable. No adverse orders issued by any Regulatory Authority against the Company. |                   |                         |

## Leadership Indicators

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

| Sr. No | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify) | Web Link, If available |
|--------|-------------------------|-----------------------------------|--|---|------------------------|
|--------|-------------------------|-----------------------------------|--|---|------------------------|

The Company actively engages with various industry associations to advocate for the advancement of the industry and public welfare. It adheres to a Code of Conduct Policy to ensure the highest standards of business conduct are maintained during interactions with these trade associations and industry bodies.



## PRINCIPLE

## 08

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 details 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. The Company has not conducted any Social Impact Assessments during the current financial year.

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 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 (in ₹) |
|-------|--|-------|----------|---|--------------------------|------------------------------------|
|-------|--|-------|----------|---|--------------------------|------------------------------------|

Not Applicable

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

The Company does not have a separate mechanism to receive and redress grievances of communities but has taken a leading role in engaging with communities through its CSR initiatives and implementing them, which are aimed at promoting healthcare, particularly preventive healthcare, and delivering Community Health Programs to underprivileged communities residing in rural and tribal areas. Additionally, efforts have been directed towards rural community development and women empowerment, with the aim of fostering equitable and sustainable development and reducing overall poverty levels. We have provided financial assistance to reputable NGOs such as The Cancer Patients Aid Association, which offer affordable or free treatment to economically disadvantaged patients suffering from serious illnesses like cancer, as well as equipment for the early detection of breast cancer in impoverished women.

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

|  | 2023-24 | 2022-23 |
|--|---------|---------|
| Directly sourced from MSMEs/ small producers | 6.00    | 1.59    |
| Sourced directly from within India           | 63.00   | 70.00   |

**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**

| 2023-24 | Location     | 2022-23 |
|---------|--------------|---------|
| 0%      | Rural        | 0%      |
| 36%     | Semi-Urban   | 37%     |
| 0%      | Urban        | 0%      |
| 64%     | Metropolitan | 63%     |

## 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 Crores ) |
|-------|----------------------|-----------------------|---------------------------|
| 1     | Punjab and Jharkhand | Moga and Ranchi       | 0.01                      |
| 2     | Maharashtra          | Nabdurbar             | 0.01                      |
| 3     | Gujarat              | Dahod                 | 0.04                      |

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

The Company operates without a preferential procurement policy due to the fluctuating nature of supply and demand. Instead, it focuses on supporting marginalised and vulnerable groups primarily through CSR initiatives. This approach ensures that resources are directed towards those who needs them the most, aligning with the Company's commitment to social responsibility. By prioritising CSR activities, the Company contributes positively to society while adapting to the complexities of the market environment.

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

Not Applicable, as no procurement has been made.

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

Not Applicable, as no procurement has been made.

**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, as no benefits derived or shared from IP owned or acquired by the Company based on traditional knowledge

**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 the case | Corrective Action taken |
|--|-------------------|-------------------------|
| Not Applicable, as there are no such instances of any disputes |                   |                         |

**6. Details of beneficiaries of CSR Projects:**

| S. No | CSR Project  | No. of persons benefitted from CSR projects | % of beneficiaries from vulnerable and marginalised groups |
|-------|--|---|--|
| 1     | CPAA: Elimination of Cervical Cancer through HPV Vaccination   | 250   | 100.00   |
| 2     | CPAA: Access to cancer treatment for walk in patients  | 38  | 100.00   |
| 3     | CPAA: Supporting breast cancer patients with prostheses  | 166   | 100.00   |
| 4     | Nityanand Educational Trust: DRT (Diploma in Basic Rural Technology) Training Course Sponsorship<br>For the benefit of rural / tribal students and youth of villages.  | 12  | 100.00   |
| 5     | Nityanand Educational Trust :3D Printing, Technology Workshops<br>For the benefit of rural / tribal students and youth of villages.  | 760   | 100.00   |
| 6     | N.M. Sadguru water and Development and Foundation : Nabard Supported TDF Wadi Project Limkheda Block of Dahod District (Project - VI)<br>For water resources projects, Horticulture, Agriculture & wadi Development projects and Training.   | 500   | 100.00   |
| 7     | N.M. Sadguru water and Development and Foundation : Nabard Supported TDF Wadi Project Dhanpur Block of Dahod District (Project - VI)<br>For water resources projects, Horticulture, Agriculture & wadi Development projects and Training.  | 300   | 100.00   |
| 8     | Foundation for promotion of sports and games (OGQ): To assist potential athletes and para athletes to achieve their dreams and win Olympic and Paralympic Gold medals. To scout for potential medal talent, to help identify areas of support, to work with all stakeholders to aid deserving talents.<br>For promotion, training, coaching, sports science and equipment of athletes. | 81  | 90.00  |
| 9     | Vayam: Padopadi Swarajya<br>It is the system where people can make choice of their own. Vayam firmly believes in the right of backward communities about making development choices. Vayam facilitates and not dictate the process of empowerment. We want communities to reach at a point where they wouldn't be dependent on anyone.   | 3600  | 100.00   |
| 10    | Vayam: Suposhan<br>(Providing Nutritional support to farmers in remote areas )   | 240   | 100.00   |



| S. No | CSR Project  | No. of persons benefitted from CSR projects   | % of beneficiaries from vulnerable and marginalised groups              |
|-------|--|---|---|
| 11    | <p>Seva Sahyog Foundation: Samutkarsh (Study Centre &amp; Adolescent Girls Development)</p> <p>(Initiatives to enhance students' educational journey, focusing on key stakeholders such as students, community adolescent girls)</p> <p>The interventions primary focus is providing the students with a conducive learning environment and addressing certain infrastructure needs for education.</p> <p><b>Objectives</b></p> <ul style="list-style-type: none"> <li>- Providing a conducive environment for education for socio-economically challenged students by setting up study centres.</li> <li>- Addressing the needs and challenges faced by the adolescent girls</li> </ul> | 184   | 100.00  |
| 12    | <p>Seva Sahyog Foundation:</p> <p>School Kit</p> <p>Supporting the underprivileged school students with a kit of stationery supplies including notebooks, pencil pouch, geometry box, and other supplementary material as per the age group. (Contents: The kit shall be categorised into classes: 1st and 2nd   3rd and 4th   5th to 7th   8th to 10th)</p>   | 1013  | 100.00  |
| 13    | <p>Shri Chaitanya Health and Care Trust – (Formerly known as Sri Chaitanya Seva Trust)</p> <p>Healthcare , Rural Development and Rural Education Initiatives</p>   | <p>1425 cataract surgeries were performed.</p> <p>432 farmers were benefitted with 10500 Floriculture saplings &amp; 9485 Horticulture saplings</p> <p>Seed for life -1428 beneficiaries</p> <p>Water resource development – 410 beneficiaries</p> <p>9200 students from 25 schools have benefited through VENU, Vidyavan and other Programs</p> <p>Under Women empowerment about 50 beneficiaries got benefitted</p> | 86.00 of the beneficiaries were from vulnerable and marginalised groups |
| 14    | <p>Adruta children home</p> <p>Providing holistic nurture (physical, educational, and spiritual) to the children in deprivation and distress</p>   | More than 600 children residing at our Adruta Children Home in 10 different location  | 100.00  |

## Essential Indicators

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

Customer complaints are channelled through our Marketing and Regional Sales Managers, ensuring a streamlined process for resolution. Timeliness is paramount, reflecting our commitment to customer satisfaction. Furthermore, we proactively gather feedback via biennial Customer Satisfaction Surveys (CSS). Each comment and suggestion is meticulously reviewed, serving as a catalyst for improvement initiatives. We prioritise transparency and responsiveness, swiftly implementing corrective actions where necessary. This customer-centric approach underscores our dedication to continuous enhancement and fosters enduring relationships with our valued clientele.

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

|  |   |
|--|---|
| <b>Environmental and social parameters relevant to the product</b><br><hr/> <b>Safe and responsible usage</b><br><hr/> <b>Recycling and/or safe disposal</b> | <b>As a percentage to total turnover</b><br><hr/> <h1>100.00</h1> |
|--|---|

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

|                                    | 2023-24                  |                                   | Remarks                                | 2022-23                  |                                   | Remarks                                |
|------------------------------------|--------------------------|-----------------------------------|--|--------------------------|-----------------------------------|--|
|                                    | Received during the Year | Pending resolution at end of year |  | Received during the Year | Pending resolution at end of year |  |
| Data Privacy                       |                          |                                   | Nil                                    |                          |                                   |  |
| Advertising                        |                          |                                   |  |                          |                                   |  |
| Cyber-security                     |                          |                                   |  |                          |                                   |  |
| Delivery of essential services     |                          |                                   |  |                          |                                   |  |
| Restrictive Trade Practices        |                          |                                   |  |                          |                                   |  |
| Unfair Trade Practices             |                          |                                   |  |                          |                                   |  |
| Other- Services related complaints | 15                       | Nil                               | All complaints resolved satisfactorily | 11                       | Nil                               | All complaints resolved satisfactorily |

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

|                   | Number  | Reasons for recall |
|-------------------|---|--------------------|
| Voluntary recalls | No such incidents of product recalls happened |                    |
| Forced recalls    |   |                    |

**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**

We prioritise the security and confidentiality of all internal online data, sensitive information, and customer details. To uphold this commitment, we have diligently implemented a comprehensive Privacy Policy. This policy serves as a safeguard, protecting against any unauthorised access and ensuring the security of all data under our purview.

Our Privacy Policy outlines strict protocols and procedures designed to mitigate risks and uphold confidentiality standards. It encompasses measures such as encryption, access controls, and regular audits to maintain the integrity of our systems and data.

URL: [Link to Privacy Policy]

<https://www.nocil.com/wp-content/uploads/2023/11/Privacy-Policy.pdf>

**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.**

Not applicable, as no such instances occurred during the year.

**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- None
- c. Impact, if any, of the data breaches- Not Applicable



## Leadership Indicators /

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

We offer multiple channels for accessing our products and services, primarily through our website:

- For an overview of our products: [Products Overview]  
(<https://www.nocil.com/products-industries/>)
- For technical information: [Technical Notes]  
(<https://www.nocil.com/technical-services/>)
- Information on product safety handling and disposal can be found in the Material Safety Data Sheets (MSDS) provided with our product packaging.

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

Details about our products and their safety measures are accessible on our Company website. This includes:

- Providing of Material Safety Data Sheets (MSDS) with each delivery, offering comprehensive information.
- Safety guidelines for product handling and disposal on the product packaging.
- MSDS containing information on safe handling, storage, and disposal of the products.
- Customer awareness actively promoting through meetings and interactions.

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

We prioritise transparent communication with our valued consumers, which extends to addressing any potential risks or disruptions associated with our products. In addition to proactive measures taken to ensure product safety, we maintain open channels of communication through mailings and telephone calls.

Our dedicated team is committed to promptly notify consumers of any identified risks or disruptions that may impact the use or safety of our products. Through targeted mailings and personalised telephone calls, we aim to reach our consumers directly, providing clear and concise information regarding the nature of the concern and any recommended actions.

### 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)

Yes, accessibility and customer satisfaction are at the forefront of our initiatives. Product details are readily available on both our product packaging and our corporate website, ensuring transparency and ease of access for our customers. This dual approach allows customers to quickly access relevant information whether they're at a retail store or browsing online.

Moreover, we are committed to fostering strong relationships with our customers through various customer-centric initiatives. One such initiative is our Customer Satisfaction Survey, which serves as a vital communication channel. This survey enables us to actively listen to our customers, understand their needs, and address any concerns or conflicts promptly and effectively. By actively engaging with our customers, we strive to continuously improve our products and services, ultimately enhancing the overall customer experience.



# UN SDGs INITIATIVES



# UNITED NATION'S SUSTAINABLE DEVELOPMENT GOALS (UNSDGs) & ESG INITIATIVES

## ENVIRONMENT

- 6** CLEAN WATER AND SANITATION 
- 7** AFFORDABLE AND CLEAN ENERGY 
- 11** SUSTAINABLE CITIES AND COMMUNITIES 
- 12** RESPONSIBLE CONSUMPTION AND PRODUCTION 
- 13** CLIMATE ACTION 

## SOCIAL

- 1** NO POVERTY 
- 3** GOOD HEALTH AND WELL-BEING 
- 4** QUALITY EDUCATION 
- 5** GENDER EQUALITY 
- 2** ZERO HUNGER 

## GOVERNANCE

- 8** DECENT WORK AND ECONOMIC GROWTH 
- 9** INDUSTRY, INNOVATION AND INFRASTRUCTURE 
- 16** PEACE, JUSTICE AND STRONG INSTITUTIONS 
- 17** PARTNERSHIPS FOR THE GOALS 
- 15** LIFE ON LAND 



## SDG INITIATIVES



### NO POVERTY

- The Company prioritises social responsibility by supporting *RAWA Academy (Adruta Homes)* offering shelter to parentless children. This provides a safe haven, ensuring these vulnerable children have access to basic necessities and a supportive environment for their well-being.
- The Company through partnership with *Seva Sahyog Foundation* enables them to implement impactful initiatives aimed at improving the lives of those in need.
- The collaboration between the Company and the NGO '*Vayam*' has positively benefitted 250 tribal communities living in the northern Western Ghats area. These communities have received invaluable assistance from the Company, encompassing essential resources, opportunities, and skill development, all of which have played a crucial role in their overall empowerment.



### ZERO HUNGER

- The Company's partnership with *Seva Sahyog Foundation* helped provide nutritional support to girls from underprivileged sections of slum areas through a dedicated program titled "*Kishori Vikas*". The Company also played an important role in supporting nutritional support to farmers in remote and tribal areas under programs titled "*Padopadi Swarajya*" and "*Suposhan*" conducted by *Vayam*.



### GOOD HEALTH AND WELL-BEING

- The Company, in collaboration with *Shri Chaitanya Health and Care Trust (formerly known as Sri Chaitanya Seva Trust)*, is dedicated to making a meaningful impact on healthcare, rural development, and education initiatives. Through this partnership, the Company supports a variety of community health programs aimed at benefiting the underprivileged and marginalised segments of society residing in rural and tribal areas. These programs are designed to address the unique healthcare needs of these communities, providing essential medical services, health education, and preventive care. In addition to healthcare, the collaboration emphasizes the importance of rural development by facilitating infrastructure improvements, access to clean water, and sustainable agricultural practices.



## QUALITY EDUCATION

- The Company's CSR initiatives near the Dahej Plant have made a significant impact on *Padriya School* by facilitating the construction of classrooms and providing essential resources like school uniforms and bag kits. This assistance is pivotal as it directly addresses the educational needs of the local community, ensuring that students have access to proper learning environments and necessary supplies.
- Through its CSR initiatives, the Company actively supports the *Sri Nityanand Education Trust*, focusing on promoting education, particularly for children, women, and the elderly, and differently-abled individuals. This commitment extends beyond traditional education to include special education and vocational skills enhancement, thereby empowering marginalised groups to access educational opportunities and gain employment skills.



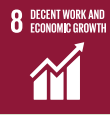
## CLEAN WATER AND SANITATION

- The Company has provided financial assistance to the *NM Sadguru Water & Development Foundation* through their CSR activities that focus on implementing sustainable land and water resource management programs, thereby enhancing agricultural ecosystems and positively impacting the overall living standards of these marginalised populations.



## AFFORDABLE AND CLEAN ENERGY

- The Company has procured **ISO 50001:2018** certification for Energy Management System. It helps the Company to continually improve Energy Management System (EnMS); it enhances the operational efficiency and facilitates better energy management practices.
- The Company has acquired a silver medal by **EcoVadis** Sustainability Rating Process. This certification is an acknowledgement for the Company's efficient and sustainable energy management system basis their environmental performances.



## DECENT WORK AND ECONOMIC GROWTH

- The Company's accreditation by prestigious certifications like '**Responsible Care**' and '**Excellence in Management of Environment**' from the Indian Chemical Council (ICC) underscores its dedication and commitment to environmental responsibility.
- The Company's **Sustainability Report 2022-23** won the coveted LACP (League of American Communications LLC) Award- Platinum as the best report in the Chemical Sector with the score of 99 out of 100.



## RESPONSIBLE CONSUMPTION AND PRODUCTION

- The Company's Energy Consumption and Water Consumption has significantly decreased in the year 2022-23 than that of 21-22. The Company's Energy Consumption and Water Consumption has significantly decreased in the year 2022-23 than that of 2021-22. Even the Company's other than GHG emissions such as Sox, NOx, and Particulate Matter (PM) and Hazardous Air Pollutants (HAP) have decreased. Company's Scope 1 & Scope 2 emission even reduced.
- The Company consistently refines criteria to decrease the consumption of raw materials and enhance yields. Innovative technologies such as liquid-liquid extraction and carbon columns are employed to reclaim raw materials from waste streams, thereby reducing waste generation.
- The Company has implemented various measures to conserve energy, including the installation of additional condensate recovery systems and energy-efficient drives. An Auto Blow down system has been installed at the PNG Boiler to optimise energy usage. Furthermore, energy-efficient LED lights have been installed, and power consumption has been reduced through the installation of VFDs for selected drives. Centralised ACs have been replaced with split ACs to save power, and older transformer is replaced with energy efficient transformer.



## CLIMATE ACTION

- The Company has prepared an ESG Charter to aid the Board and the Management in their oversight of matters concerning to Climate Change Crisis and related issues.
- The Company has procured an **ISO 14001:2015 certification** on Environment Management System.
- The Company focuses on pioneering on **Green Chemistry** and **Sustainable Growth**. Pioneering green chemistry and embracing sustainable growth are vital for addressing pressing environmental challenges and ensuring long-term prosperity. **Green chemistry** focuses on designing chemical processes and products that minimise environmental impact, reduce waste, and prioritise the use of renewable resources.



## LIFE ON LAND

In a significant stride towards environmental sustainability, the Company has joined hands with *Green Yatra* to bolster urban plantation and enhance green cover across urban landscapes. This collaboration signifies a dedicated commitment to addressing the pressing challenges of urbanisation and climate change. By integrating *Green Yatra's* expertise in ecological conservation with the Company's resources and outreach, the initiative aims to transform urban areas into greener, healthier, and more sustainable environments. The focus is on planting indigenous trees, creating urban forests, and promoting biodiversity within city limits.



## PEACE, JUSTICE, AND STRONG INSTITUTIONS

- The Company has also conducted transparency index exercise for all the value chain partners those who are set out in various countries. The Exercise taken place involves assessing the CPI (Corruption Perception Index) for all of their value chain companies (for the 2021-22 & 2022-23).
- The Company adheres to the **Global Reporting Initiatives (GRI)** guidelines, to direct its evaluation process and guarantee conformity with the global standards. The Company conducts a materiality assessment encompasses a comprehensive analysis of qualitative and quantitative data.



## PARTNERSHIPS FOR THE GOALS

The Company is a member of the following Bodies/ Institutions: -

- Indian Chemical Council.
- All India Rubber Industry Association.
- Indian Rubber Institute.
- Indian Merchants Chamber.
- Thane-Belapur Industries Association.
- Dahej Industry Association

The Company is also engaged with various NGOs/Academy/Trust as a part of their CSR activities:

- RAWA Academy
- Cancer Patients Aids Association
- Sri Chaitanya Health Care Trust
- NM Sadguru Water and Development Foundation
- Foundation for Promotion of Sports and Games
- Seva Sahyog Foundation
- Consumer & Education Research Centre
- Sri Nityanand Education Trust
- Ashray Social Welfare Foundation
- Swayam Rehabilitation Trust
- Rays of Hope Charitable Trust
- Vowels of the People Association
- Green Yatra
- Matoshree Sevadham Arogya Seva Trust (MAST)





# Assurance Statement on Third-party Verification of Sustainability Information

Unique identification number: 4153964099

TÜV SÜD South Asia Pvt Ltd. (hereinafter TÜV SÜD) has been engaged by NOCIL Limited, C-37, T.T.C. Industrial Area, Off. Thane-Belapur Road, Pawne Village, Post Turbhe, Navi Mumbai - 400 705 to perform a Limited Assurance and verification of sustainability information in the “BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT”, of NOCIL Limited (hereinafter “Company”) for the period from April 01, 2023 to March 31, 2024. The verification was carried out according to the steps and methods described below.

## Scope of the verification

The third-party verification was conducted to obtain limited assurance about whether the sustainability information is prepared in accordance with the reporting criteria of the Standard on International Standard on Assurance Engagements (ISAE) 3000 (hereinafter “Reporting Criteria”).

The following selected disclosures (“parts of the report”) are included in the scope of the assurance engagement for reporting year April 01, 2023 – March 31, 2024, along with comparative previous year information.

The following selective disclosures in the Report “BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT”, published at Annual Report 2023-24 <https://www.nocil.com/sustainability/>

| S.No. | BRSR indicator reference                          | Description of indicator   |
|-------|---|--|
| 1.    | Section A – 20-a                                  | Employees and workers (including differently abled)  |
| 2.    | Section A – 20-b                                  | Differently abled Employees and workers  |
| 3.    | Section A – 21                                    | Participation/Inclusion/Representation of women  |
| 4.    | Section A – 22                                    | Turnover rate for permanent employees and workers  |
| 5.    | Section A – 23                                    | Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct   |
| 6.    | Section C – Principle 1 – 1 (Essential Indicator) | Percentage coverage by training and awareness programmes on any of the Principles during the Financial Year  |
| 7.    | Section C – Principle 2 – 4 (Essential Indicator) | 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 |
| 8.    | Section C – Principle 3 – 1 (Essential Indicator) | Details of measures for the well-being of employees and workers  |
| 9.    | Section C – Principle 3 – 2 (Essential Indicator) | Details of retirement benefits, for Current Financial Year   |
| 10.   | Section C – Principle 3 – 3 (Essential Indicator) | Accessibility to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016   |
| 11.   | Section C – Principle 3 – 5 (Essential Indicator) | Return to work and Retention rates of permanent employees and workers that took parental leave   |
| 12.   | Section C – Principle 3 – 8 (Essential Indicator) | Details of training given to employees and workers   |
| 13.   | Section C – Principle 3 – 9 (Essential Indicator) | Details of performance and career development reviews of employees and worker  |



## Assurance Statement (Contd.)

| S.No. | BRSR indicator reference                              | Description of indicator  |
|-------|---|---|
| 14.   | Section C – Principle 3 – 11<br>(Essential Indicator) | Details of safety related incidents   |
| 15.   | Section C – Principle 3 – 13<br>(Essential Indicator) | Number of Complaints on working conditions & Health safety made by employees and workers                |
| 16.   | Section C – Principle 3 – 14<br>(Essential Indicator) | Assessments for the year (Health and safety practices, Working Conditions)                              |
| 17.   | Section C – Principle 5 – 1<br>(Essential Indicator)  | Employees and workers who have been provided training on human rights issues and policies of the entity |
| 18.   | Section C – Principle 5 – 2<br>(Essential Indicator)  | Details of minimum wages paid to employees and workers  |
| 19.   | Section C – Principle 5 – 6<br>(Essential Indicator)  | Number of Complaints made by employees and workers  |
| 20.   | Section C – Principle 6 – 1<br>(Essential Indicator)  | Details of total energy consumption and energy intensity  |
| 21.   | Section C – Principle 6 – 3<br>(Essential Indicator)  | Details of total water consumption and water intensity  |
| 22.   | Section C – Principle 6 – 4<br>(Essential Indicator)  | Details of Water discharge by destination and level of treatment  |
| 23.   | Section C – Principle 6 – 6<br>(Essential Indicator)  | Details of air emissions (other than GHG emissions)   |
| 24.   | Section C – Principle 6 – 7<br>(Essential Indicator)  | Details of greenhouse gas emissions (Scope 1 and Scope 2 emissions)                                     |
| 25.   | Section C – Principle 6 – 9<br>(Essential Indicator)  | Details of total waste generated  |
| 26.   | Section C – Principle 7 – 1<br>(Essential Indicator)  | Number of affiliations with trade and industry chambers/ associations                                   |
| 27.   | Section C – Principle 8 – 6<br>(Leadership Indicator) | Details of beneficiaries of CSR Projects  |
| 28.   | Section C – Principle 9 – 3<br>(Essential Indicator)  | Number of consumer complaints in respect of the reported category                                       |

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the sustainability reporting, and accordingly, we do not express a conclusion on this information. It was not part of our engagement to review product- or service-related information, references to external information sources, expert opinions and future-related statements in the Report.

### Responsibility of the Company

The legal representatives of the Company are responsible for the preparation of the sustainability information in accordance with the Reporting Criteria. This responsibility includes in particular the selection and use of appropriate methods for sustainability reporting, the collection and compilation of information and the making of appropriate assumptions or, where appropriate, the making of appropriate estimates. Furthermore, the legal representatives are responsible for necessary internal controls to enable the preparation of a sustainability report that is free of material intentional or unintentional - erroneous information.

## Assurance Statement (Contd.)

### **Verification methodology and procedures performed**

The verification engagement has been planned and performed in accordance with the verification methodology developed by the TÜV SÜD Group which is based upon the ISO 17029 and ISAE 3000.

The applied level of assurance was “limited assurance”. Because the level of assurance obtained in a limited assurance, the engagement is lower than in a reasonable assurance engagement, the procedures the verification team performs in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement.

The verification was based on a systematic and evidence-based assurance process limited as stated above. The selection of assurance procedures is subject to the auditor’s own judgment.

The procedures included amongst others:

- Inquiries of personnel who are responsible for the stakeholder engagement und materiality analysis to understand the reporting boundaries
- Evaluation of the design and implementation of the systems and processes for compiling, analysing, and aggregating sustainability information as well as for internal controls
- Inquiries of company’s representatives responsible for collecting, preparing and consolidating sustainability information and performing internal controls
- Analytical procedures and inspection of sustainability information as reported at group level by all locations
- Assessment of local data collection and management procedures and control mechanisms through a sample survey at Mumbai plant, Dahej Plant and for Corporate office in Mumbai

### **Conclusion**

On the basis of the assessment procedures carried out from May 07, 2024 to May 21, 2024, Nothing has come to our attention to suggest that the Report does not meet the completeness with respect the Reporting Criteria.

### **Limitations**

The assurance process was subject to the following limitations:

- The subject matter information covered by the engagement are described in the “scope of the engagement”. Assurance of further information included in the sustainability reporting was not performed. Accordingly, TÜV SÜD do not express a conclusion on this information.
- The assurance scope excluded forward-looking statements, product- or service-related information, external information sources and expert opinions.

### **Use of this Statement**

The Company must reproduce the TÜV SÜD statement and possible attachments in full and without omissions, changes, or additions.

This statement is by the scope of the engagement solely intended to inform the Company as to the results of the mandated assessment. TÜV SÜD has not considered the interest of any other party in the selected sustainability information, this assurance report or the conclusions TÜV SÜD has reached. Therefore, nothing in the engagement or this statement provides third parties with any rights or claims whatsoever.



## Assurance Statement (Contd.)

### Independence and competence of the verifier

TÜV SÜD South Asia Pvt Ltd. is an independent certification and testing organisation and member of the international TÜV SÜD Group, with accreditations also in the areas of social responsibility and environmental protection. The assurance team was assembled based on the knowledge, experience and qualification of the auditors. TÜV SÜD South Asia Pvt Ltd hereby declares that there is no conflict of interest with the Company.

Place, Date May 23, 2024

Gurugram (Haryana)

**Prosenjit Mitra**  
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(Business Line - Verification, Validation & Audit)

**Shashank Chaudhary**  
Manager - Sustainability Services