

September 02, 2024

**The National Stock Exchange of India Limited** Department of Corporate Services/Listing  
Exchange Plaza, 5<sup>th</sup> Floor, **BSE Limited**  
Plot No. C/1, G Block, Phiroze Jeejeebhoy Towers,  
Bandra-Kurla Complex, Bandra (East), Dalal Street, Fort,  
Mumbai – 400 051 Mumbai – 400 001

**NSE Symbol:** APOLLOPIPE

**SCRIP Code:** 531761

Dear Sir/Madam,

**Re: Business Responsibility and Sustainability Report**

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Company's Business Responsibility and Sustainability Report for the Financial Year 2023-24, which also forms part of the Annual Report of F.Y. 2023-24 of the Company in the format as specified by the Securities and Exchange Board of India.

This is for your kind reference and records.

Yours faithfully,

For Apollo Pipes Limited

**ANKIT** Digitally signed by  
ANKIT SHARMA  
**SHARMA** Date: 2024.09.02  
10:18:12 +05'30'

**Ankit Sharma**  
**Company Secretary & Compliance Officer**

Encl: A/a

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**APOLLO PIPES LIMITED**

Regd. Office : 37, Hargobind Enclave, Vikas Marg, Delhi-110092, India

Corporate Office : A-140, Sector 136, Noida (U.P.) - 201301

Manufacturing Unit : Dadri (U.P.), Sikandrabad (U.P.), Ahmedabad (Gujarat), Tumkur (Karnataka), Raipur (Chhattisgarh) India

**Toll Free No.: 1800-121-3737**

info@apollopipes.com | www.apollopipes.com | CIN : L65999DL1985PLC022723

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

## SECTION A General disclosures

### SECTION B Management and process disclosures

### SECTION C Principle-wise performance disclosure

- Principle 1** Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
- Principle 2** Businesses should provide goods and services in a manner that is sustainable and safe
- Principle 3** Businesses should respect and promote the well-being of all employees, including those in their value chains
- Principle 4** Businesses should respect the interests of and be responsive to all its stakeholders
- Principle 5** Businesses should respect and promote human rights
- Principle 6** Businesses should respect and make efforts to protect and restore the environment
- Principle 7** Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- Principle 8** Businesses should promote inclusive growth and equitable development
- Principle 9** Businesses should engage with and provide value to their consumers in a responsible manner

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

|     |   |  |
|-----|---|--|
| 1.  | <b>Corporate Identity Number (CIN)</b>  | L65999DL1985PLC022723  |
| 2.  | <b>Name of the Listed Entity</b>  | Apollo Pipes Limited   |
| 3.  | <b>Year of incorporation</b>  | 1985   |
| 4.  | <b>Registered office address</b>  | 37, Hargobind Enclave, Vikas Marg, Delhi – 110092                                |
| 5.  | <b>Corporate address</b>  | Plot No. A-140, Sector-136, Noida, Uttar Pradesh – 201301                        |
| 6.  | <b>E-mail</b>   | <a href="mailto:compliance@apollopipes.com">compliance@apollopipes.com</a>       |
| 7.  | <b>Telephone</b>  | 91-11-44457164   |
| 8.  | <b>Website</b>  | <a href="https://www.apollopipes.com/">https://www.apollopipes.com/</a>          |
| 9.  | <b>Financial year for which reporting is being done</b>   | FY 2023 - 2024   |
| 10. | <b>Name of the Stock Exchange(s) where shares are listed</b>  | BSE, NSE   |
| 11. | <b>Paid-up Capital</b>  | ₹ 39,35,32,060   |
| 12. | <b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report</b> | Mr. Ajay Kumar Jain,<br>Chief Financial Officer, Telephone No: 0120-658777       |
| 13. | <b>Reporting boundary -</b>   | This report is being prepared on Standalone basis for Apollo Pipes Limited only. |
| 14. | <b>Name of assurance provider</b>   | Not Applicable   |
| 15. | <b>Type of assurance obtained</b>   | Not Applicable   |

## II. Products/services

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

| S. No. | Description of Main Activity     | Description of Business Activity   | % of Turnover of the entity |
|--------|----------------------------------|--|-----------------------------|
| 1.     | Manufacturer of Plastic Products | Apollo Pipes manufactures a wide range of plastic products such as cPVC, uPVC, HDPE Pipes and Fittings | 94%                         |

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

| S. No. | Product/ Service                    | NIC Code | % of total Turnover contributed |
|--------|-------------------------------------|----------|---------------------------------|
| 1.     | cPVC, uPVC, HDPE Pipes and Fittings | 222      | 94%                             |

## III. Operations

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

| Location      | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National      | 5                | 2                 | 7     |
| International |                  | NIL               |       |

### 19. Markets served by the entity:

#### a. Number of locations

| Location                         | Number    |
|----------------------------------|-----------|
| National (No. of States)         | PAN India |
| International (No. of Countries) | 3         |

#### b. What is the contribution of exports as a percentage of the total turnover of the entity? : 0.002%

#### c. A brief on types of customers

Apollo Pipes Limited caters to a diverse clientele across various industries. Key customer segments for the company encompass:

- Agriculture Segment: Primarily offering products such as Casing pipes, Drip Irrigation System, Sprinkler System, and Bore well pipes.
- Water Management Segment: Mainly providing products for Hot & cold potable water distribution & transportation, Residential, and Commercial installations.
- Construction Segment: Majorly supplying Sanitation & Sewage Pipes, and Plumbing pipes.
- Oil & Gas Segment: Facilitating the conveyance of edible oils, chemicals, and corrosive fluids.
- Telecom Ducting: Serving the telecommunications industry with ducting solutions.

## 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)                  | 376        | 364        | 96.8%        | 12        | 3.2%        |
| 2                | Other than Permanent (E)       | 0          | 0          | 0            | 0         | 0           |
| <b>3</b>         | <b>Total Employees (D + E)</b> | <b>376</b> | <b>364</b> | <b>96.8%</b> | <b>12</b> | <b>3.2%</b> |

| S. No.         | Particulars                  | Total (A)  | Male       |              | Female   |             |
|----------------|------------------------------|------------|------------|--------------|----------|-------------|
|                |                              |            | No. (B)    | % (B / A)    | No. (C)  | % (C/A)     |
| <b>WORKERS</b> |                              |            |            |              |          |             |
| 4              | Permanent (F)                | 265        | 264        | 99.6%        | 1        | 0.4%        |
| 5              | Other than Permanent (G)     | 87         | 87         | 100%         | 0        | 0%          |
| <b>6</b>       | <b>Total Workers (F + G)</b> | <b>352</b> | <b>351</b> | <b>99.7%</b> | <b>1</b> | <b>0.3%</b> |

## 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        |
| 2                                  | Other than Permanent (E)                        | 0         | 0        | 0        | 0        | 0        |
| <b>3</b>                           | <b>Total differently abled employees (D+ E)</b> | <b>0</b>  | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| <b>DIFFERENTLY ABLED WORKERS</b>   |   |           |          |          |          |          |
| 4                                  | Permanent (F)                                   | 0         | 0        | 0        | 0        | 0        |
| 5                                  | Other than Permanent (G)                        | 0         | 0        | 0        | 0        | 0        |
| <b>6</b>                           | <b>Total Differently Abled Workers (F+G)</b>    | <b>0</b>  | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> |

\*Though Apollo Pipes does not have any differently abled employees or workers at present, all the facilities such as offices and warehouses have been made accessible for differently abled visitors.

## 21. Participation/Inclusion/Representation of Women

|                             | Total (A) | No. and Percentage of Females |           |
|-----------------------------|-----------|-------------------------------|-----------|
|                             |           | No. (B)                       | % (B / A) |
| Board of Directors          | 6         | 1                             | 16.7%     |
| Key Management Personnel(s) | 4         | 0                             | 0%        |

## 22. Turnover rate for Permanent Employees and Workers (Disclose trends for the past 3 years)

|                     | FY 2023-24<br>(Turnover rate in Current FY) |        |       | FY 2022-23<br>(Turnover rate in Previous FY) |        |       | FY 2020-22<br>(Turnover rate in the Year prior to the Previous FY) |        |       |
|---------------------|---|--------|-------|--|--------|-------|--|--------|-------|
|                     | Male  | Female | Total | Male   | Female | Total | Male   | Female | Total |
| Permanent Employees | 22.54%                                      | 1%     | 23%   | 19%  | 1%     | 20%   | 11%  | 1%     | 12%   |
| Permanent Workers   | 5%  | 0%     | 5%    | 6%   | 0%     | 6%    | 5%   | 0%     | 5%    |

## V. Holding, Subsidiary and Associate Companies (including Joint Ventures)

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

| S. No. | Name of the Holding/ Subsidiary/ Associate Companies/ Joint Ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|--|--|-----------------------------------|--|
| 1      | Kisan Mouldings Limited  | Subsidiary   | 53.57%                            | No   |

## VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No): Yes  
 (ii) Turnover for the year ended 31 March, 2024 (in ₹): 977,137,924  
 (iii) Net worth as at 31 March 2024 (in ₹): 5,738,470,455

## VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in place (Yes/No) (If Yes, then provide web link for grievance redress policy) | FY 2023-24 (Current Financial Year)        |  |  | FY 2022-23 (Previous Financial Year)       |  |                |
|---|--|--|--|--|--|--|----------------|
|   |  | Number of complaints filed during the year | Number of complaints pending for resolution at the close of the year | Remarks  | Number of complaints filed during the year | Number of complaints pending for resolution at the close of the year | Remarks        |
| Communities                                       | Yes  | 0  | 0  | Not Applicable   | 0  | 0  | Not Applicable |
| Investors (other than Shareholders)               | Yes  | 0  | 0  | Not Applicable   | 0  | 0  | Not Applicable |
| Shareholders                                      | Yes  | 0  | 0  | Not Applicable   | 0  | 0  | Not Applicable |
| Employees and Workers                             | Yes  | 0  | 0  | Not Applicable   | 0  | 0  | Not Applicable |
| Customers   | Yes  | 319  | 4  | There are still 4 open complaints that will be addressed promptly. | 295  | 0  | All Resolved   |
| Value Chain Partners                              | Yes  | 279  | 0  | Not Applicable   | 0  | 0  | Not Applicable |
| Other   | -  | -  | -  | -  | -  | -  | -              |

A Grievance Redressal Mechanism is in place. The web link for the same is:

<https://www.apollopipes.com/media/product/Whistle%20Blower%20or%20Vigil%20Mechanism%20Policy%20of%20Apollo%20Pipes%20Ltd.pdf>

26. Overview of the Entity’s Material Responsible Business Conduct Issues

| 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      | Customer Relationship Management | Opportunity                                | <b>Opportunity</b><br>Seizing the Opportunity: By prioritizing customer preferences, we can adeptly cultivate loyalty and enhance customer retention rates. Our engagement in customer satisfaction surveys allows us to gather feedback and glean invaluable insights from our esteemed clientele. | -   | <b>Positive</b><br>Satisfied customers tend to engage in repeat purchases and may even elevate their spending with a manufacturer. As a result, this can drive an upsurge in sales volumes and foster revenue growth. Establishing differentiation from competitors and providing compelling reasons for customers to select our products over alternatives are pivotal components of our business strategy." |
| 2      | Code of Conduct                  | Risk                                       | <b>Risk</b><br>Failing to adhere to business processes and regulatory requirements poses a significant risk, potentially harming both the company's reputation and the welfare of its employees.  | The company guarantees that its employees and value chain partners are thoroughly briefed on the code of conduct, with regular checks conducted to ensure compliance. The Vigilance Committee at Apollo Pipes consistently monitors and resolves all matters related to ethics and compliance, in accordance with various policies. | <b>Negative</b><br>This has a notable impact on the brand reputation within the industry, leading to financial losses.  |
| 3      | Investment in New Technologies   | Opportunity                                | <b>Opportunity</b><br>Allocation of resources towards green technologies offers numerous benefits, including market expansion, cost savings, regulatory compliance, and an improved brand reputation.   | -   | <b>Positive</b><br>Securing a competitive edge enables the company to position itself for enduring long-term success.   |
| 4      | Energy Management                | Opportunity                                | <b>Opportunity</b><br>Strategies for energy conservation frequently entail improving the efficiency of processes, equipment, and systems.   | -   | <b>Positive</b><br>Decreased utility costs and operational expenses result in improved profitability. Increased productivity, minimized downtime, and optimized operations contribute to an overall enhancement in corporate efficiency.  |

| 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      | Waste Management          | Opportunity                                | <p><b>Opportunity</b><br/>Through recycling and reusing plastic waste, businesses can efficiently decrease both waste disposal costs and expenses linked with acquiring new raw materials.</p>  | -  | <p><b>Positive</b><br/>Encouraging recycling initiatives can result in sustainable gains in resource utilization and economic efficiency over the long term.</p>  |
| 6      | Water Management          | Risk / Opportunity                         | <p><b>Risk</b><br/>Inadequate water supply or fluctuations in availability can have a significant impact on production schedules, resulting in delays, downtime, or decreased productivity.</p> <p><b>Opportunity</b><br/>Adopting water conservation techniques can result in significant cost savings by diminishing water usage and related expenses, including those associated with water supply and wastewater treatment.</p> | Apollo Pipes endeavors to adopt zero-waste water discharge practices. The goal of Apollo Pipes is to establish facilities with zero water discharge. | <p><b>Positive</b><br/>Enacting cost-saving measures for the long term can lead to enhanced financial performance.</p> <p><b>Negative</b><br/>Penalties and fines could be enforced for failure to comply with water pollution regulations.</p> |

**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. These are briefly as under:

- P1 Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
- P2 Businesses should provide goods and services in a manner that is sustainable and safe
- P3 Businesses should respect and promote the well-being of all employees, including those in their value chains
- P4 Businesses should respect the interests of and be responsive to all its stakeholders
- P5 Businesses should respect and promote human rights
- P6 Businesses should respect and make efforts to protect and restore the environment
- P7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- P8 Businesses should promote inclusive growth and equitable development
- P9 Businesses should engage with and provide value to their consumers in a responsible manner

**Policy and Management processes**

| Disclosure Questions  | P1   | P2  | P3  | P4  | P5  | P6  | P7  | P8  | P9  |
|---|--|-----|-----|-----|-----|-----|-----|-----|-----|
| 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   | <a href="https://www.apollopipes.com/brsr-policies#investor">https://www.apollopipes.com/brsr-policies#investor</a>  |     |     |     |     |     |     |     |     |
| 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, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | ISO 9001 (Quality Management System)   |     |     |     |     |     |     |     |     |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any.  | <p><b>P1:</b> Zero case of fines / penalties / punishment from any regulatory/ enforcing agency in reporting year.</p> <p><b>P3:</b> Zero fatalities for employees</p> <p><b>P4:</b> 100% concerns raised by stakeholders to be addressed in a timely manner.</p> <p><b>P5:</b> Zero complaints on human rights related issues.</p> <p><b>P7:</b> Zero adverse orders from regulatory authorities for anti-competitive conduct</p> <p><b>P9:</b> Zero data privacy breach of customers</p> |     |     |     |     |     |     |     |     |
| 6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.  | All the targets mentioned above w.r.t. their principles have been achieved. Additionally, Apollo Pipes reports progress under each principle year-on-year.   |     |     |     |     |     |     |     |     |

**Governance, Leadership, and Oversight**

|   |  |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|
| 5. <b>Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)</b> | ESG will become the most critical business challenge in the coming years due to regulatory changes requiring strict monitoring and reporting of ESG data at the company level. To effectively tackle these challenges, Apollo Pipes will remain committed to monitoring and reporting on ESG data rigorously. Additionally, the company will actively plan reduction measures and decarbonization strategies to fulfill its long-term sustainability commitments.  |  |  |  |  |  |  |  |  |
| 8. <b>Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</b>  | Board of Directors   |  |  |  |  |  |  |  |  |
| 9. <b>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>  | <p>The Board of Directors of the Company has constituted a Risk Management Committee which looks after the Sustainability related issues comprising of following Directors:</p> <ol style="list-style-type: none"> <li>1. Mr. Sameer Gupta, Chairman</li> <li>2. Mr. Arun Agarwal, Member</li> <li>3. Mr. Abhilash Lal, Member</li> <li>4. Mr. Pradeep Kumar Jain, Member</li> <li>5. Ms. Neeru Abrol, Member</li> </ol> <p>Apollo Pipes diligently takes ESG initiatives and makes active decisions to address them, ensuring a robust approach to sustainability governance.</p> |  |  |  |  |  |  |  |  |



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

| Subject for Review  | a. Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee |     |     |     |     |     |     |     |     |
|---|---|-----|-----|-----|-----|-----|-----|-----|-----|
|   | P1  | P2  | P3  | P4  | P5  | P6  | P7  | P8  | P9  |
| 1. Performance against above policies and follow up action  | Yes   | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 2. Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances. | Yes   | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |

| Subject for Review  | b. Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify) |    |    |    |          |    |    |    |    |
|---|---|----|----|----|----------|----|----|----|----|
|   | P1  | P2 | P3 | P4 | P5       | P6 | P7 | P8 | P9 |
| 1. Performance against above policies and follow up action.   |   |    |    |    | Annually |    |    |    |    |
| 2. Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances. |   |    |    |    | Annually |    |    |    |    |

| 11. Has the entity carried out independent assessment/ evaluation of the working of Its policies by an external agency? (Yes/No).<br>If yes, provide the name of the agency. | P1   | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|--|----|----|----|----|----|----|----|----|
|  |  |    |    |    |    |    |    |    |    |
|  | External evaluation was not conducted. Nonetheless, processes and compliances undergo scrutiny by Internal Auditors and regulators where applicable. Policies are periodically assessed and updated by department heads and business leaders, with approval from the Management and/or Board.. |    |    |    |    |    |    |    |    |

**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 |
|--|---|----|----|----|----|----|----|----|----|
| 1. The entity does not consider the principles material to its business (Yes/No)   |   |    |    |    |    |    |    |    |    |
| 2. The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) |   |    |    |    |    |    |    |    |    |
| 3. The entity does not have the financial or/human and technical resources available for the task (Yes/No)                         |   |    |    |    |    |    |    |    |    |
| 4. It is planned to be done in the next financial year (Yes/No)  |   |    |    |    |    |    |    |    |    |
| 5. Any other reason (please specify)   |   |    |    |    |    |    |    |    |    |
|  | Not applicable as all policies of the Company are in line with principles of NGRBCs |    |    |    |    |    |    |    |    |

**SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE**

This section is intended to assist demonstrating their ability to integrate the principles and core elements into essential processes and decisions. The information needed is divided into 'Essential' and 'Leadership' categories. While the essential indicators must be given by every institution required to file this report, the leadership indicators may be voluntarily disclosed by entities that desire to be leaders to advance in their drive to be more socially, ecologically, and ethically responsible.

**PRINCIPLE 1: Business should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.**

**ESSENTIAL INDICATORS****1. Percentage during coverage by training and awareness programmes on any of the principles 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                  | 1  | Health & safety, Code of Conduct, Cyber-security, Human Rights | 100%   |
| Key Managerial Personnel(s)         | 1  | Health & safety, Code of Conduct, Cyber-security, Human Rights | 100%   |
| Employees other than Board and KMPs | 20   | Health & safety, Skill upgradation, Human Rights               | 100%   |
| Workers                             | 35   | Health & safety, Skill upgradation, Human Rights               | 100%   |

**2. Details of fines / penalties / punishment / award / compounding fees / settlement amount paid in proceedings (by the entity or by its directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions in FY 2024**

| 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    | Not Applicable  | Not Applicable  | 0             | Not Applicable    | Not Applicable                          |
| Settlement      | Not Applicable  | Not Applicable  | 0             | Not Applicable    | Not Applicable                          |
| Compounding fee | Not Applicable  | Not Applicable  | 0             | Not Applicable    | Not Applicable                          |

| Non-Monetary |                 |   |                |                   |   |
|--------------|-----------------|---|----------------|-------------------|---|
|              | NGRBC Principle | Name of the regulatory/ enforcement agencies/ Judicial institutions | Amount (In ₹)  | Brief of the Case | Has an appeal been preferred? (Yes/ No) |
| Imprisonment | Not Applicable  | Not Applicable  | Not Applicable | Not Applicable    | Not Applicable                          |
| Punishment   | Not Applicable  | Not Applicable  | Not Applicable | Not Applicable    | Not Applicable                          |

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

| Case Details   | Name of the regulatory/ enforcement agencies/ judicial institutions |
|----------------|---|
| Not Applicable |   |

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.

At Apollo Pipes, we uphold a steadfast stance against bribery and corruption across all facets of our operations. Our company rigorously abides by an Anti-Bribery and Anti-Corruption policy, rooted in our unwavering commitment to conducting business with integrity and transparency. We strive to cultivate an environment of trust and fairness, ensuring that ethical practices underscore every interaction. This commitment guarantees that our customers, employees, and partners can place their trust in us to maintain the highest standards of business conduct, free from any semblance of bribery and corruption.

Refer to our Anti-Bribery and Anti-Corruption Policy for more information:

<https://www.apollopipes.com/media/product/Anti-Bribery%20Policy%20of%20Apollo%20Pipes%20Ltd..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:

|           | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|-----------|--|---|
| Directors | 0                                      | 0                                       |
| KMPs      | 0                                      | 0                                       |
| Employees | 0                                      | 0                                       |
| Workers   | 0                                      | 0                                       |

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

|  | FY 2023-24<br>(Current Financial Year) |                | FY 2022-23<br>(Previous Financial Year) |                |
|--|--|----------------|---|----------------|
|  | Number                                 | Remarks        | Number                                  | Remarks        |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | 0                                      | Not Applicable | 0                                       | Not Applicable |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | 0                                      | Not Applicable | 0                                       | Not Applicable |

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.

There were zero cases of corruption and conflict of interest. Hence, this question is not applicable.

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

|                                     | FY 24 | FY23 |
|-------------------------------------|-------|------|
| Number of days of accounts payables | 44    | 45   |

**9. Open-ness 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  | FY 24<br>(Current Financial Year) | FY 23<br>(Previous Financial Year) |
|----------------------------|--|-----------------------------------|------------------------------------|
| Concentration of Purchases | a) Purchases from trading houses as % of total purchases                                 | 0%                                | 0%                                 |
|                            | b) Number of trading houses where purchases are made from                                | 0                                 | 0                                  |
|                            | c) Purchases from top 10 trading houses as % of total purchases from trading houses      | 0%                                | 0%                                 |
| Concentration of Sales     | a) Sales to dealers / distributors as % of total sales                                   | 73.51%                            | 78.45%                             |
|                            | b) Number of dealers / distributors to whom sales are made                               | 820                               | 883                                |
|                            | c) Sales of top 10 dealers / distributors as % of total sales to dealers / distributors  | 28.26%                            | 26.08%                             |
| Share of RPTs in           | a) Purchases (Purchases with related parties / Total Purchases)                          | 0.268%                            | 0.744%                             |
|                            | b) Sales (Sales to related parties / Total Sales)  | 0.209%                            | 0.242%                             |
|                            | c) Loans & advances (Loans & advances given to related parties / Total loans & advances) | 0%                                | 0%                                 |
|                            | d) Investments in related parties / Total Investments made)                              | 99.24%                            | 96.79%                             |

**LEADERSHIP INDICATORS**

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

Nil

| Total number of awareness programmes held | Topics / principles covered under the training                              | % of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|---|---|
| 2   | Company Policies, Purchase Procedures, Purchase SOPs, and Quality awareness | 50%   |

**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.**

Apollo Pipes implements stringent measures to prevent and manage conflicts of interest involving Board Members. Directors and Executives are required to exercise utmost caution to mitigate any potential conflicts of interest with the Company. Should a conflict of interest arise, they are obligated to disclose all relevant facts and circumstances to the Chairman & Managing Director and obtain prior written consent. Full disclosures are necessary under the following circumstances:

- o When a director or Executive's actions or interests compromise their ability to perform their duties objectively and effectively.
- o In cases where inappropriate personal benefits are received by a family member because one's position in the Company.
- o Any external business activities that impede an individual's capacity to dedicate sufficient time and attention to their responsibilities within the Company.
- o Possession of a significant ownership stake in a supplier, customer, or competitor of the Company.
- o Any consulting or employment engagements with entities connected to the Company's suppliers, customers, business associates, or competitors.

**PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe.**

**ESSENTIAL INDICATORS**

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

|   | Current Financial Year<br>(2023-24) | Previous Financial Year<br>(2022-23) | Details of improvements in environmental and social impacts |
|---|-------------------------------------|--------------------------------------|---|
| 1 | R&D                                 | 0%                                   | Not measured separately                                     |
| 2 | Capex                               | 0%                                   |   |

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

While our current practices are focused on ensuring quality and reliability, we are actively exploring opportunities to enhance our sourcing procedures to incorporate sustainability principles. We recognize the importance of sustainable sourcing and are committed to developing robust measures in the near future.

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

Not Applicable.

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.**

|                                       | FY24  |          |                 |
|---------------------------------------|---|----------|-----------------|
|                                       | Re-Used   | Recycled | Safely Disposed |
| <b>Plastics (including packaging)</b> | Plastic materials are reused in compliance with the State/Country's regulatory and standard criteria. In some cases, garbage is sold to registered vendors or transferred to authorized recyclers. Furthermore, Apollo Pipes has agreements in place with authorized organizations at all locations to assist the pickup, recycling, reuse, or safe disposal of these products. |          |                 |
| <b>E-Waste</b>                        |   |          |                 |
| <b>Hazardous Waste</b>                |   |          |                 |
| <b>Other Waste</b>                    |   |          |                 |

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.**

Yes, our activities related to plastic packaging production fall under the scope of Extended Producer Responsibility (EPR). Apollo Pipes has synchronized its waste collection plan with EPR guidelines, encompassing the following components:

- a) Establishing collection infrastructure.
- b) Conducting awareness programs.
- c) Forming partnerships with waste management agencies; and
- d) Ensuring reporting and compliance.

**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. |
|----------------|--------------------------|---------------------------------|---|---|--|
| Not Applicable |                          |                                 |   |   |  |

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 | Description of the risk / concern Action Taken |
|-------------------------|--|--|
| Not Applicable          |  |  |

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 |
|-------------------------|--|
| FY 2024                 | FY 2023  |
| Not Applicable          |  |

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:

|                                | FY 2024 |          |                 | FY 2023 |          |                 |
|--------------------------------|---------|----------|-----------------|---------|----------|-----------------|
|                                | Re-Used | Recycled | Safely Disposed | Re-Used | Recycled | Safely Disposed |
| Plastics (including packaging) |         |          |                 |         |          |                 |
| E-waste                        |         |          |                 |         |          |                 |
| Hazardous waste                |         |          |                 |         |          |                 |
| Other Waste                    |         |          |                 |         |          |                 |
| Not Applicable                 |         |          |                 |         |          |                 |

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 as % of total products sold in respective category |
|---------------------------|---|
| Not Applicable            |   |

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

**ESSENTIAL INDICATORS**

**1. a. Details of measures for the well-being of Employees:**

| Category                              | Total (A)  | % of Employees covered by |            |                    |            |                    |              |                    |          |                     |          |
|---------------------------------------|------------|---------------------------|------------|--------------------|------------|--------------------|--------------|--------------------|----------|---------------------|----------|
|                                       |            | 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                                  | 364        | 330                       | 91%        | 40                 | 11%        | 0                  | 0            | 0                  | 0        | 0                   | 0        |
| Female                                | 12         | 11                        | 92%        | 0                  | 0          | 12                 | 100%         | 0                  | 0        | 0                   | 0        |
| <b>Total</b>                          | <b>376</b> | <b>341</b>                | <b>91%</b> | <b>40</b>          | <b>11%</b> | <b>12</b>          | <b>3.19%</b> | <b>0</b>           | <b>0</b> | <b>0</b>            | <b>0</b> |
| <b>Other than Permanent Employees</b> |            |                           |            |                    |            |                    |              |                    |          |                     |          |
| Male                                  | 0          | 0                         | 0          | 0                  | 0          | 0                  | 0            | 0                  | 0        | 0                   | 0        |
| Female                                | 0          | 0                         | 0          | 0                  | 0          | 0                  | 0            | 0                  | 0        | 0                   | 0        |
| <b>Total</b>                          | <b>0</b>   | <b>0</b>                  | <b>0</b>   | <b>0</b>           | <b>0</b>   | <b>0</b>           | <b>0</b>     | <b>0</b>           | <b>0</b> | <b>0</b>            | <b>0</b> |

Note: 35 permanent employees have voluntarily opted out of the group health insurance coverage provided by Apollo Pipes

**b. Details of measures for the well-being of Workers:**

| Category                            | Total (A)  | % of workers covered by |              |                    |            |                    |              |                    |          |                     |          |
|-------------------------------------|------------|-------------------------|--------------|--------------------|------------|--------------------|--------------|--------------------|----------|---------------------|----------|
|                                     |            | 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                                | 264        | 263                     | 99.6%        | 199                | 75%        | 0                  | 0            | 0                  | 0        | 0                   | 0        |
| Female                              | 1          | 1                       | 100%         | 1                  | 100%       | 1                  | 100%         | 0                  | 0        | 0                   | 0        |
| <b>Total</b>                        | <b>265</b> | <b>264</b>              | <b>99.6%</b> | <b>200</b>         | <b>75%</b> | <b>1</b>           | <b>0.38%</b> | <b>0</b>           | <b>0</b> | <b>0</b>            | <b>0</b> |
| <b>Other than Permanent Workers</b> |            |                         |              |                    |            |                    |              |                    |          |                     |          |
| Male                                | 87         | 87                      | 100%         | 0                  | 0          | 0                  | 0            | 0                  | 0        | 0                   | 0        |
| Female                              | 0          | 0                       | 0%           | 0                  | 0          | 0                  | 0            | 0                  | 0        | 0                   | 0        |
| <b>Total</b>                        | <b>87</b>  | <b>87</b>               | <b>100%</b>  | <b>0</b>           | <b>0</b>   | <b>0</b>           | <b>0</b>     | <b>0</b>           | <b>0</b> | <b>0</b>            | <b>0</b> |

Note: One permanent worker has voluntarily opted out of the group health insurance coverage provided by Apollo Pipes.

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

|   | FY 24  | FY23 |
|---|--|------|
| Cost incurred on well-being measures as a % of total revenue of the company | At Apollo Pipes, we provide regular, complimentary medical screenings for our employees and workers. These health check-ups are organized at our facilities in collaboration with local hospitals. |      |

**2. Details of Retirement Benefits for Current Financial Year and Previous Financial Year.**

| Benefits                       | FY 2023-24<br>(Current Financial Year)             |  |  | FY 2022-23<br>(Previous Financial Year)            |  |  |
|--------------------------------|--|--|--|--|--|--|
|                                | 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/NA) | 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/NA) |
| 1. PF                          | 88%  | 98 %   | Yes  | 59%  | 32%  | Yes  |
| 2. Gratuity                    | 17%  | 75%  | Yes  | 18%  | 25%  | Yes  |
| 3. ESI                         | 11%  | 75%  | Yes  | 12%  | 32%  | Yes  |
| 4. Superannuation              | -  | -  | -  | -  | -  | -  |
| 5. After Retirement Medi-Claim | -  | -  | -  | -  | -  | -  |

**3. Accessibility of workplaces - Are the premises / offices of the entity accessible to differently abled employees, 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.**

Inclusivity lies at the heart of Apollo Pipes' company ethos. We are committed to fostering a workplace environment that caters to the needs of all individuals, including those with disabilities. Our premises are designed to be accessible, and we provide assistive devices such as ramps, wheelchairs, or walking sticks to support employees with disabilities.

**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.**

At Apollo Pipes, we strongly advocate for equal opportunities for all individuals, devoid of discrimination. Our dedication lies in establishing a workplace culture that champions diversity and inclusivity, appreciating each employee for their distinct skills, experiences, and perspectives. Our recruitment, advancement, and growth procedures are merit-based, guaranteeing equal opportunities for every individual to thrive and excel within our organization. Additionally, our Business Responsibility Policy encompasses the rights of individuals with disabilities.

For more information please refer to our Diversity & Inclusion (Equal Opportunity) Policy: <https://www.apollopipes.com/media/product/Policy%20on%20Diversity%20and%20Inclusion%20of%20Apollo%20Pipes%20Ltd..pdf>

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

| Gender       | Permanent Employees   |                       | Permanent Workers     |                       |
|--------------|-----------------------|-----------------------|-----------------------|-----------------------|
|              | Return to Work rate   | Retention Rate        | Return to Work rate   | Retention Rate        |
| Male         | Not Applicable        | Not Applicable        | Not Applicable        | Not Applicable        |
| Female       | Not Applicable        | Not Applicable        | Not Applicable        | Not Applicable        |
| <b>Total</b> | <b>Not Applicable</b> | <b>Not Applicable</b> | <b>Not Applicable</b> | <b>Not Applicable</b> |



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

|                                | Yes/No (If Yes, then give details of the mechanism in brief)  |
|--------------------------------|---|
| Permanent Workers              | <p>The company has established a Grievance Redressal Policy to address any conflicts or complaints, emphasizing a corrective action approach. According to this policy, upon receiving a Protected Disclosure, the Chairman of the Audit Committee forwards it to the Vigilance Officer for necessary action. The Vigilance Officer conducts a preliminary investigation to determine the authenticity of the disclosure. If the Vigilance Officer finds the disclosure genuine, they proceed with a thorough investigation. However, if they find it otherwise, they may dispose of the complaint with the Chairman of the Audit Committee's permission, without further investigation.</p> <p>The Vigilance Officer conducts the investigation themselves or involves another company officer, a designated committee, or an external agency. The investigation is to be completed within 60 days of receiving the complaint, with the option to seek an extension from the Chairman of the Audit Committee if necessary. The findings of the investigation are then submitted to the Audit Committee.</p> <p>The Audit Committee may request additional information from the complainant if deemed necessary and may involve other company officers, committees, or external agencies in the investigation process at its discretion. It's important to note that the investigation is a neutral fact-finding process and does not imply any accusation.</p> <p>If the investigation concludes that an improper or unethical act has occurred, the Audit Committee will recommend appropriate disciplinary or corrective action to the Board of Directors.</p> |
| Other than Permanent Workers   |   |
| Permanent Employees            |   |
| Other than Permanent Employees |   |

**7. Membership of Employees and Workers in association(s) or Unions recognized by the listed entity:**

| Category                         | FY 2023 - 2024 (Current Financial Year)              |  |         | FY 2022 - 2023 (Previous Financial Year)             |  |         |
|----------------------------------|--|--|---------|--|--|---------|
|                                  | 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) |
| <b>Total Permanent Employees</b> | Nil  | Nil  | Nil     | Nil  | Nil  | Nil     |
| Male                             | Nil  | Nil  | Nil     | Nil  | Nil  | Nil     |
| Female                           | Nil  | Nil  | Nil     | Nil  | Nil  | Nil     |
| <b>Total Permanent Workers</b>   | Nil  | Nil  | Nil     | Nil  | Nil  | Nil     |
| Male                             | Nil  | Nil  | Nil     | Nil  | Nil  | Nil     |
| Female                           | Nil  | Nil  | Nil     | Nil  | Nil  | Nil     |

**8. Details of training given to Employees and Workers:**

| Category         | FY 2023-24 (Current Financial Year) |                               |            |                      |            | FY 2022-23 (Previous Financial Year) |                               |            |                      |            |
|------------------|-------------------------------------|-------------------------------|------------|----------------------|------------|--------------------------------------|-------------------------------|------------|----------------------|------------|
|                  | Total (A)                           | On Health and Safety measures |            | On Skill Upgradation |            | Total (D)                            | On Health and Safety measures |            | On Skill Upgradation |            |
|                  |                                     | Number (B)                    | % (B/A)    | Number (C)           | % (C/A)    |                                      | Number (E)                    | % (E/A)    | Number (F)           | % (F/A)    |
| <b>Employees</b> |                                     |                               |            |                      |            |                                      |                               |            |                      |            |
| Male             | 364                                 | 150                           | 41%        | 148                  | 41%        | 421                                  | 55                            | 13%        | 223                  | 53%        |
| Female           | 12                                  | 0                             | 0%         | 0                    | 0%         | 13                                   | 0                             | 0          | 0                    | 0%         |
| <b>Total</b>     | <b>376</b>                          | <b>150</b>                    | <b>40%</b> | <b>148</b>           | <b>41%</b> | <b>434</b>                           | <b>55</b>                     | <b>13%</b> | <b>223</b>           | <b>51%</b> |

| Category       | FY 2023-24 (Current Financial Year) |                               |              |                      |            | FY 2022-23 (Previous Financial Year) |                               |            |                      |            |
|----------------|-------------------------------------|-------------------------------|--------------|----------------------|------------|--------------------------------------|-------------------------------|------------|----------------------|------------|
|                | Total (A)                           | On Health and Safety measures |              | On Skill Upgradation |            | Total (D)                            | On Health and Safety measures |            | On Skill Upgradation |            |
|                |                                     | Number (B)                    | % (B/A)      | Number (C)           | % (C/A)    |                                      | Number (E)                    | % (E/A)    | Number (F)           | % (F/A)    |
| <b>Workers</b> |                                     |                               |              |                      |            |                                      |                               |            |                      |            |
| Male           | 264                                 | 264                           | 100%         | 174                  | 66%        | 209                                  | 127                           | 61%        | 112                  | 54%        |
| Female         | 1                                   | 0                             | 0            | 0                    | 0%         | 1                                    | 0                             | 0          | 0                    | 0%         |
| <b>Total</b>   | <b>265</b>                          | <b>264</b>                    | <b>99.6%</b> | <b>174</b>           | <b>66%</b> | <b>210</b>                           | <b>127</b>                    | <b>60%</b> | <b>112</b>           | <b>53%</b> |

**9. Details of performance and career development reviews of Employees and Workers:**

| Category         | FY 2023-2024 (Current Financial Year) |            |            | FY 2022 - 2023 (Previous Financial Year) |            |            |
|------------------|---------------------------------------|------------|------------|--|------------|------------|
|                  | Total (A)                             | No. (B)    | % (B / A)  | Total (C)                                | No. (D)    | % (D / C)  |
| <b>Employees</b> |                                       |            |            |  |            |            |
| Male             | 364                                   | 304        | 84%        | 421                                      | 348        | 83%        |
| Female           | 12                                    | 10         | 83%        | 13                                       | 9          | 69%        |
| <b>Total</b>     | <b>376</b>                            | <b>314</b> | <b>84%</b> | <b>434</b>                               | <b>357</b> | <b>82%</b> |
| <b>Workers</b>   |                                       |            |            |  |            |            |
| Male             | 264                                   | 257        | 97%        | 209                                      | 189        | 90%        |
| Female           | 1                                     | 1          | 100%       | 1  | 1          | 100%       |
| <b>Total</b>     | <b>265</b>                            | <b>258</b> | <b>97%</b> | <b>210</b>                               | <b>190</b> | <b>90%</b> |

**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?**

The Company recognizes the value of a robust and thriving human resource. Our primary focus is on safeguarding the well-being of all our employees. We have implemented a comprehensive health and safety framework across all our offices nationwide. Each office building is equipped with essential safety systems including fire detection, firefighting equipment, secure evacuation routes, designated assembly points, and emergency evacuation plans. Moreover, we regularly conduct safety training sessions for our employees to promote a culture of safety throughout the organization.

**b. What are the processes used to identify work related hazards and assess risks on a routine and non-routine basis by the entity?**

In order to identify and assess the risks linked to work-related hazards, we conducted an extensive Hazard Identification and Risk Assessment (HIRA) study. This involved identifying work-related hazards for both routine and non-routine tasks using a hazard identification and risk assessment methodology. Based on the severity of these hazards, we implement various risk mitigation measures, including engineering controls, administrative controls, personal protective equipment (PPE), and other applicable methods.

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

Yes, the Company has established procedures for employees to report work-related risks and to remove themselves from such hazards when necessary. Several processes facilitate workers in reporting work-related hazards, including:

- i. Participation in safety committee meetings.
- ii. Engagement in daily shop floor meetings.
- iii. Interacting with plant supervisors during their regular rounds on the shop floor.
- iv. Authorization for workers to halt machine operations and report any observed work-related hazards to their immediate supervisors.

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

Yes, Apollo Pipes is committed to fostering an environment where employees' financial needs are addressed alongside their remuneration. We provide access to non-occupational medical and healthcare services through company-organized medical camps. These camps feature reputable doctors from various disciplines and hospitals who offer health checkups, consultations, including online consultations, and awareness workshops. Additionally, every employee and their designated dependents are covered by either medical insurance or the Employee State Insurance (ESI) scheme.

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

| Safety Incident/Number  | Category  | FY 2023-2024<br>(Current Financial Year) | FY 2022 - 2023<br>(Previous Financial Year) |
|---|-----------|--|---|
| 1. Lost Time Injury Frequency Rate (LTIFR)<br>(per one million-person hours worked) | Employees | 2.8                                      | Not available                               |
|   | Workers   | 16.9                                     | Not available                               |
| 2. Total recordable work-related injuries   | Employees | 4  | Not available                               |
|   | Workers   | 24                                       | Not available                               |
| 3. No. of fatalities  | Employees | 0  | Not available                               |
|   | Workers   | 0  | Not available                               |
| 4. High consequence work-related injury or<br>ill-health (excluding fatalities)     | Employees | 0  | Not available                               |
|   | Workers   | 0  | Not available                               |

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

An Internal Safety Committee, consisting of one safety in-charge and four supporting members from various departments, conducts safety and health inspections at all Apollo Pipes premises. The responsibilities of the Internal Safety Committee include:

- i. Conducting daily safety rounds throughout the company.
- ii. Documenting all unsafe conditions observed.
- iii. Providing regular in-house safety training and awareness programs for all employees.
- iv. Planning and executing mock drills at regular intervals.
- v. Regularly inspecting all firefighting equipment.
- vi. Holding weekly meetings with unit heads to review the safety standards of the unit.

**13. Number of Complaints on the following made by Employees and Workers:**

|                    | FY 2023-2024 (Current Financial Year) |                                       |                | FY 2022 - 2023 (Previous Financial Year) |                                       |                |
|--------------------|---------------------------------------|---------------------------------------|----------------|--|---------------------------------------|----------------|
|                    | 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 | 0                                     | 0                                     | Not Applicable | 0  | 0                                     | Not Applicable |
| Health & Safety    | 0                                     | 0                                     | Not Applicable | 0  | 0                                     | Not Applicable |

**14. Assessments for the year:**

|                             | % of your Plants and Offices that were assessed (by entity or statutory authorities or third parties)   |
|-----------------------------|---|
| Health and safety practices | All our processes are fully aligned with ISO 45001 requirements. We also actively seek feedback from our employees and workers on working conditions, making improvements based on their suggestions. |
| Working Conditions          |   |

**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.**

Regular safety training is conducted at all our locations, focusing on shop floor machine handling and safety requirements.

**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)?**

"No, only a Worker's Compensation Policy is available in Ahmedabad, as the ESI facility is not available at the Bavla Plant".

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

Yes, Apollo Pipes consistently invests in the development of its human capital, focusing on enhancing both current skills and competencies while offering a variety of experiences to employees. This approach not only improves worker employability but also facilitates smoother transitions to other opportunities if desired.

In line with regulatory requirements, the Company provides a gratuity plan, an unfunded defined benefit retirement scheme, to eligible employees. This plan ensures that vested employees receive a lump sum payment upon retirement, death while on the job, or termination of employment. The payment amount is equivalent to 15 days/one month salary, as applicable, for each completed year of service or part thereof exceeding six months, as per the Company's Gratuity scheme or the Gratuity Act, whichever is higher. Vesting occurs after five years of service.

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

|           | Total no. of affected employees/ workers |         | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |         |
|-----------|--|---------|---|---------|
|           | FY 2024                                  | FY 2023 | FY 2024   | FY 2023 |
| Employees | 0  | 0       | 0   | 0       |
| Workers   | 0  | 0       | 0   | 0       |

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

Yes, the entity provides transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

- 5. Details on assessment of value chain partners:**

|                             | % Of value chain partners (by value of business done with such partners) that were assessed   |
|-----------------------------|---|
| Health and safety practices | Apollo Pipes ensures that its value chain partners are compliant with the company's policies on Health & Safety and Human Rights. Furthermore, the company seeks periodic compliance checks from its suppliers. |
| Working Conditions          |   |

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

All our value chain partners are compliant with regulatory requirements and uphold strong compliance with Apollo Pipes' policies. In FY 24, there were no significant risks arising from health & safety or working conditions practices within our value chain.

**PRINCIPLE 4: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS.**

**ESSENTIAL INDICATORS**

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

Through a materiality review, the corporation sought the perspectives of both internal and external stakeholders via online and offline questionnaires. The process commenced by identifying internal stakeholders as workers and external stakeholders as investors, shareholders, suppliers/partners, and customers/dealers. Additionally, the company selected community groups to allocate resources towards CSR programs, ensuring the welfare of the community.

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

| Stakeholder group                   | Whether identified as Vulnerable & Marginalized Group (Yes/ No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other  | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement  |
|-------------------------------------|---|--|--|--|
| Employee & Workers                  | No  | i. E-mail<br>ii. Intranet portal<br>iii. Newsletters<br>iv. Employee engagement activities and Surveys<br>v. Rewards and recognitions  | Continuous   | Employees represent the most vital assets of the company and are indispensable for its long-term success. Their role is pivotal in enhancing the company's competitiveness and consolidating its market leadership position. |
| Stakeholder & Investors             | No  | i. Annual General Meeting<br>ii. Investor Relations Web Page<br>iii. Quarterly condensed financial statements<br>iv. Annual Report<br>v. Investor conference calls<br>vi. Television Interviews<br>vii. Press Releases | Quarterly, Half yearly & Annually and as and when required                           | Informing stakeholders about financial results, dividend updates, annual reports, and communicating with physical shareholders regarding dispute resolution mechanisms.  |
| Customers                           | No  | i. Engagement through website, social media, in-store promotions<br>ii. Brand campaigns conducted regularly, during festive seasons and sales promotions   | Continuous   | End consumers play a critical role as primary stakeholders, as their satisfaction and delight are fundamental elements of our success strategy.  |
| Supply Chain Partners               | No  | i. One to-one meetings<br>ii. Regular operational reviews  | Continuous   | The company partners with suppliers to uphold smooth business operations through effective and efficient procurement practices.  |
| Communities                         | Yes   | i. CSR initiatives<br>ii. Volunteering initiatives   | Continuous   | Responsible corporate citizenship involves developing CSR projects in collaboration with the community, tailored to meet its specific needs.   |
| Government & Regulatory Authorities | No  | i. Disclosures and filings for compliance reporting<br>ii. Meeting authorities for permissions/ approvals  | Audits conducted periodically/ monthly/ quarterly/ annually and on need basis        | Compliance-Tax Payments<br>Policy Advocacy   |

**LEADERSHIP INDICATORS**

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

The company regularly engages with its stakeholders to discuss any significant feedback received, which is then communicated to the Board continuously.

- 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, Apollo Pipes maintains ongoing interactions with its stakeholders and remains receptive to implementing and integrating any suggestions received from them. Throughout the reporting period, the company did not receive any substantial suggestions from any of its stakeholders.

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

Yes, Apollo Pipes maintains ongoing interactions with its stakeholders and remains receptive to implementing and integrating any suggestions received from them. Throughout the reporting period, the company did not receive any substantial suggestions from any of its stakeholders.

**PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS**

**ESSENTIAL INDICATORS**

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

| Category               | FY 2023-24<br>(Current Financial Year) |  |            | FY 2022-23<br>(Previous Financial Year) |  |            |
|------------------------|--|--|------------|---|--|------------|
|                        | Total (A)                              | No. of Employees/<br>Workers covered (B) | % (B/A)    | Total (C)                               | No. of Employees/<br>Workers covered (D) | % (D/C)    |
| <b>Employees</b>       |  |  |            |   |  |            |
| Permanent              | 376                                    | 150                                      | 40%        | 434                                     | 57                                       | 13%        |
| Other than Permanent   | 0                                      | 0  | 0          | 0                                       | 0  | 0          |
| <b>Total Employees</b> | <b>376</b>                             | <b>150</b>                               | <b>40%</b> | <b>434</b>                              | <b>57</b>                                | <b>13%</b> |
| <b>Workers</b>         |  |  |            |   |  |            |
| Permanent              | 265                                    | 264                                      | 99.62%     | 210                                     | 125                                      | 60%        |
| Other than Permanent   | 87                                     | 0  | 0          | 65                                      | 0  | 0%         |
| <b>Total Workers</b>   | <b>352</b>                             | <b>264</b>                               | <b>75%</b> | <b>275</b>                              | <b>125</b>                               | <b>45%</b> |

- 2. Details of minimum wages paid to Employees and Workers, in the following format:**

| Category         | FY 2023-24<br>(Current Financial Year) |                       |         |                        |         | FY 2022-23<br>(Previous Financial Year) |                       |         |                        |         |
|------------------|--|-----------------------|---------|------------------------|---------|---|-----------------------|---------|------------------------|---------|
|                  | Total (A)                              | Equal to Minimum Wage |         | More than Minimum Wage |         | Total (D)                               | Equal to Minimum Wage |         | More than Minimum Wage |         |
|                  |  | No. (B)               | % (B/A) | No. (C)                | % (C/A) |   | No. (E)               | % (E/D) | No. (F)                | % (F/D) |
| <b>Employees</b> |  |                       |         |                        |         |   |                       |         |                        |         |
| <b>Permanent</b> |  |                       |         |                        |         |   |                       |         |                        |         |
| Male             | 364                                    | 4                     | 1%      | 360                    | 99%     | 421                                     | 1                     | 0.2%    | 420                    | 99.8%   |
| Female           | 12                                     | 0                     | 0%      | 12                     | 100%    | 13                                      | 0                     | 0%      | 13                     | 100%    |

| Category                    | FY 2023-24<br>(Current Financial Year) |                       |         |                        |         | FY 2022-23<br>(Previous Financial Year) |                       |         |                        |         |
|-----------------------------|--|-----------------------|---------|------------------------|---------|---|-----------------------|---------|------------------------|---------|
|                             | Total (A)                              | Equal to Minimum Wage |         | More than Minimum Wage |         | Total (D)                               | Equal to Minimum Wage |         | More than Minimum Wage |         |
|                             |  | No. (B)               | % (B/A) | No. (C)                | % (C/A) |   | No. (E)               | % (E/D) | No. (F)                | % (F/D) |
| <b>Other than Permanent</b> |  |                       |         |                        |         |   |                       |         |                        |         |
| Male                        | 0                                      | 0                     | 0       | 0                      | 0       | 0                                       | 0                     | 0       | 0                      | 0       |
| Female                      | 0                                      | 0                     | 0       | 0                      | 0       | 0                                       | 0                     | 0       | 0                      | 0       |
| <b>Workers</b>              |  |                       |         |                        |         |   |                       |         |                        |         |
| <b>Permanent</b>            |  |                       |         |                        |         |   |                       |         |                        |         |
| Male                        | 264                                    | 67                    | 25.4%   | 197                    | 74.6%   | 209                                     | 64                    | 30.6%   | 145                    | 69%     |
| Female                      | 1                                      | 1                     | 100     | 0                      | 0       | 1                                       | 1                     | 100%    | 0                      | 0%      |
| <b>Other than Permanent</b> |  |                       |         |                        |         |   |                       |         |                        |         |
| Male                        | 87                                     | 53                    | 60.9%   | 34                     | 39.1%   | 65                                      | 65                    | 100%    | 0                      | 0%      |
| Female                      | 0                                      | 0                     | 0%      | 0                      | 0%      | 0                                       | 0                     | 0%      | 0                      | 0%      |

**3. Details of remuneration/salary/wages**

**a) Median remuneration / wages:**

|                                  | Male   |   | Female |   |
|----------------------------------|--------|---|--------|---|
|                                  | Number | Median Remuneration/ Salary/ Wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| Board of Directors (BoD)         | 2      | 12,618,321  | -      | -   |
| Key Managerial Personnel         | 2      | 2,222,008   | -      | -   |
| Employees other than BoD and KMP | 360    | 336,654   | 12     | 461,898   |
| Workers                          | 264    | 432,597   | 1      | 181,923   |

**b. Gross wages paid to females as % of total wages paid by the entity, in the following format:**

|   | FY24   | FY23   |
|---|--------|--------|
| Gross wages paid to females as % of total wages | 1.98 % | 1.65 % |

**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, we have a committee dedicated to address and resolve human rights issues with appropriate measures.

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

The company has established a Grievance Redressal Policy to address any conflicts or complaints related to human rights, emphasizing a corrective action approach. According to this policy, upon receiving a Protected Disclosure, the Chairman of the Audit Committee forwards it to the Vigilance Officer for necessary action. The Vigilance Officer conducts a preliminary investigation to determine the authenticity of the disclosure. If the investigation concludes that an improper or unethical act has occurred, the Audit Committee will recommend appropriate disciplinary or corrective action to the Board of Directors.

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

|                                   | FY 2023-2024 (Current Financial Year) |                                       |         | FY 2022 - 2023 (Previous Financial Year) |                                       |         |
|-----------------------------------|---------------------------------------|---------------------------------------|---------|--|---------------------------------------|---------|
|                                   | Filed during the year                 | Pending resolution at the end of year | Remarks | Filed during the year                    | Pending resolution at the end of year | Remarks |
| Sexual Harassment                 | 0                                     | 0                                     | -       | 0  | 0                                     | -       |
| Discrimination at workplace       | 0                                     | 0                                     | -       | 0  | 0                                     | -       |
| Child Labour                      | 0                                     | 0                                     | -       | 0  | 0                                     | -       |
| Forced Labour/ Involuntary Labour | 0                                     | 0                                     | -       | 0  | 0                                     | -       |
| Wages                             | 0                                     | 0                                     | -       | 0  | 0                                     | -       |
| Other human rights related issues | 0                                     | 0                                     | -       | 0  | 0                                     | -       |

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

|  | FY24           | FY23           |
|--|----------------|----------------|
| Total complaints reported under Sexual Harassment on Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0              | 0              |
| Complaints on POSH as a % of female employees / workers  | 0              | 0              |
| Complaints on POSH upheld  | Not Applicable | Not Applicable |

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

The company is dedicated to safeguarding employees who raise concerns about harassment from facing any form of retaliation. Any reprisal will result in disciplinary action. Additionally, the company will ensure that individuals who report incidents of sexual harassment, as well as witnesses, are not subjected to victimization or discrimination. However, disciplinary action will be taken against anyone who abuses the reporting procedure, such as making false allegations maliciously.

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

Yes, human rights are integrated into the company's commercial agreements and contracts. The company is committed to safeguarding and promoting the human rights of its employees, communities, and all individuals directly or indirectly affected by its commercial activities.

**10. Assessments for the year:**

|                             | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)  |
|-----------------------------|--|
| Child labour                | 100% of our plants were assessed by our internal team and none of our plants were found noncompliant with the company's policies of preventing Sexual Harassment, Discrimination at workplace, Child Labour, Forced Labour/ Involuntary Labour, and ensuring fair Wages. |
| Forced/involuntary labour   |  |
| Sexual harassment           |  |
| Discrimination at workplace |  |
| Wages                       |  |
| Others – please specify     |  |

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

100% compliance to applicable laws.



**LEADERSHIP INDICATORS**

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

At Apollo Pipes, we periodically review and modify our policies to effectively address and resolve human rights related issues.

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

We are planning to conduct human rights due diligence; however, to date, we ensure that no human rights are violated across our business operations.

**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?**

Yes, Apollo Pipes' facilities are equipped with necessary features to enable accessibility for people with disabilities.

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

|                                  | <b>% Of value chain partners (by value of business done with such partners) that were assessed</b>   |
|----------------------------------|--|
| Sexual Harassment                | Apollo Pipes ensures that its value chain partners are compliant with the company's policies on Human Rights. Furthermore, the company seeks regular compliance checks from its suppliers. |
| Discrimination at workplace      |  |
| Child Labour                     |  |
| Forced Labour/Involuntary Labour |  |
| Wages                            |  |

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

All of our suppliers are compliant to company policies and uphold human rights.

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.**

**ESSENTIAL INDICATORS**

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

| <b>Parameter</b>  | <b>FY24</b>    | <b>FY23</b>    |
|---|----------------|----------------|
| <b>From renewable sources</b>   |                |                |
| Total electricity consumption (A) (GJ)                                | 28,057         | 4,074          |
| Total fuel consumption (B) (GJ)                                       | -              | -              |
| Energy consumption through other sources (c) (GJ)                     | -              | -              |
| <b>Total energy consumed from renewable sources (A+B+C) (GJ)</b>      | <b>28,057</b>  | <b>4,074</b>   |
| <b>From non-renewable sources</b>                                     |                |                |
| Total electricity consumption (D) (GJ)                                | 101,967        | 100,578        |
| Total fuel consumption (E) (GJ)                                       | 220,534        | 207,302        |
| Energy consumption through other sources (F) (GJ)                     | -              | -              |
| <b>Total energy consumed from non-.renewable sources (D+E+F) (GJ)</b> | <b>322,501</b> | <b>307,880</b> |

| Parameter  | FY24           | FY23           |
|--|----------------|----------------|
| <b>Total energy consumed (A+B+C+D+E+F) (GJ)</b>  | <b>350,558</b> | <b>311,954</b> |
| <b>Energy intensity per rupee of turnover</b><br>(Total energy consumed / Revenue from operations)<br>(GJ/INR Lakhs)   | 4              | 3              |
| <b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total energy consumed / Revenue from operations adjusted for PPP)<br>(GJ/USD Million) | 804            | 756            |
| <b>Energy intensity in terms of physical Output</b><br>(GJ/MT)   | 4              | 5              |
| Energy intensity (optional) – the relevant metric may be selected by the entity  |                |                |

Note: We have restated the figures of FY23 due to a change in calculation methodology.

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.

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

| Parameter   | FY24           | FY23           |
|---|----------------|----------------|
| <b>Water withdrawal by source (in kiloliters)</b>   |                |                |
| (i) Surface water   | -              | -              |
| (ii) Groundwater  | 145,195        | 134,534        |
| (iii) Third party water   | 3,680          | 2,732          |
| (iv) Seawater / desalinated water   | -              | -              |
| (v) Others  | -              | -              |
| <b>Total volume of water withdrawal (In kiloliters) (i + ii + iii + iv + v)</b>   | <b>148,875</b> | <b>137,266</b> |
| <b>Total volume of water consumption (In kiloliters)</b>  | <b>74,438</b>  | <b>58,752</b>  |
| <b>Water intensity per rupee of turnover</b><br>(Total water consumption / Revenue from operations)<br>(KL/INR Lakhs)   | 0.76           | 0.64           |
| <b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total water consumption / Revenue from operations adjusted for PPP)<br>(KL/USD Million) | 34.1           | 14.1           |
| <b>Water intensity in terms of physical Output</b><br>(KL/MT)   | 0.9            | 0.9            |
| <b>Water intensity (optional)</b> – the relevant metric may be selected by the entity   |                |                |

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. –

**4. Provide the following details related to water discharge:**

| Parameter   | FY24          | FY23          |
|---|---------------|---------------|
| Water discharge by destination and level of treatment (in kiloliters) |               |               |
| (i) To Surface water  |               |               |
| - No treatment  | -             | -             |
| - With treatment – please specify level of treatment                  | -             | -             |
| (ii) To Groundwater   |               |               |
| - No treatment  | -             | -             |
| - With treatment – please specify level of treatment                  | -             | -             |
| (iii) To 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  | 74,437        | 78,514        |
| - With treatment – please specify level of treatment                  | -             | -             |
| <b>Total water discharged (in kiloliters)</b>                         | <b>74,437</b> | <b>78,514</b> |

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

Currently, Apollo Pipes does not have facilities in place for zero liquid discharge however, we ensure to use water judiciously in our manufacturing operations.

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

| Parameter                           | Please specify unit | FY 2023-24<br>(Current Financial Year) | FY 2022-23<br>(Previous Financial Year) |
|-------------------------------------|---------------------|--|---|
| NOx                                 | µg/m <sup>3</sup>   | 52.1                                   | 20.3                                    |
| Sox                                 | µg/m <sup>3</sup>   | 15                                     | 14.2                                    |
| Particulate matter (PM)             | µg/m <sup>3</sup>   | 45.6                                   | 60.3                                    |
| Persistent organic pollutants (POP) | -                   | -                                      | -                                       |
| Volatile organic compounds (VOC)    | -                   | -                                      | -                                       |
| Hazardous air pollutants (HAP)      | -                   | -                                      | -                                       |
| Others- please specify              | -                   | -                                      | -                                       |

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

| Parameter   | Please specify units           | FY 2024 | FY 2023 |
|---|--------------------------------|---------|---------|
| <b>Total Scope 1 emissions</b> (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)                              | tCO <sub>2</sub> e             | 12,492  | 11,742  |
| <b>Total Scope 2 emissions</b> (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)                              | tCO <sub>2</sub> e             | 20,280  | 19,832  |
| <b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)   | tCO <sub>2</sub> e/INR Lakhs   | 0.34    | 0.35    |
| <b>Total Scope 1 and Scope 2 emission intensity per rupee turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total scope 1 and scope 2 GHG emissions / revenue from operations adjusted for PPP) | tCO <sub>2</sub> e/USD Million | 75      | 77      |
| <b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>   | tCO <sub>2</sub> e/MT          | 0.41    | 0.47    |
| <b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity  |                                |         |         |

Note: We have restated the figures of FY23 due to change in calculation methodology.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency

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

About 20% of our energy consumption comes from renewable sources, primarily solar energy. This choice not only helps reduce our carbon footprint but also reflects our commitment to sustainability and environmental responsibility. By utilizing solar power, we actively contribute to lowering greenhouse gas emissions and promoting a cleaner energy future.

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

| Parameter   | FY24  | FY23  |
|---|-------|-------|
| Total Waste generated (in metric tonnes)  |       |       |
| Plastic waste (A)   | 738   | 3984  |
| E-waste (B)   | 0.064 | -     |
| Bio-medical waste (C)   | -     | -     |
| Construction and demolition waste (D)   | -     | -     |
| Battery waste (E)   | 9.52  | 7.1   |
| Radioactive waste (F)   | -     | -     |
| Other Hazardous waste. Please specify, if any. (G)  | -     | 2.9   |
| Other Non-hazardous waste generated (H). Please specify, if any.<br>(Break-up by composition i.e., by materials relevant to the sector)   | 5,854 | 686   |
| <b>Total (A+B + C + D + E + F + G + H)</b>  | 6,601 | 4,680 |
| <b>Waste intensity per rupee of turnover</b><br>(Total waste generated / Revenue from operations)<br>(MT/INR Lakhs)   | 0.07  | 0.05  |
| <b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total waste generated / Revenue from operations adjusted for PPP)<br>(MT/USD Million) | 1.5   | 1.1   |
| <b>Waste intensity in terms of physical output</b><br>(MT/MT)   | 0.08  | 0.07  |
| <b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity   |       |       |

| Parameter  | FY24         | FY23         |
|--|--------------|--------------|
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b> |              |              |
| <b>Category of waste</b>   |              |              |
| (i) Recycled   | -            | -            |
| (ii) Re-used   | 5,284        | 3,221        |
| (iii) Other recovery operations  | -            | -            |
| <b>Total</b>   | <b>5,284</b> | <b>3,221</b> |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>                              |              |              |
| <b>Category of waste</b>   |              |              |
| (i) Incineration   | -            | -            |
| (ii) Landfilling   | -            | -            |
| (iii) Other disposal operations  | 1,317        | 1,459        |
| <b>Total</b>   | <b>1,317</b> | <b>1,459</b> |

Note: We send the waste to authorized vendors for disposal.

**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.**

At our establishments, we prioritize sustainable waste management practices. We implement a comprehensive waste reduction strategy that includes recycling, reusing materials, and minimizing waste generation. Our company actively seeks to reduce the use of hazardous and toxic chemicals by adopting safer alternatives and continuously assessing our product formulations. Additionally, we conduct regular training for our employees on responsible chemical handling and disposal. For any hazardous waste that is generated, we ensure proper segregation and compliance with regulatory requirements, partnering with certified waste management facilities to ensure safe and responsible disposal. Overall, our commitment to sustainability drives our efforts in waste management and chemical safety.

**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, specify details in the following format.**

| S. No.         | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N)<br>If no, the reasons thereof and corrective action taken, if any. |
|----------------|--------------------------------|--------------------|--|
| Not Applicable |                                |                    |  |

**12. Details 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, Environment Protection Act, and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

| S. No.         | Specify the law / regulation / guidelines which 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 | Corrective action taken if any |
|----------------|---|---------------------------------------|---|--------------------------------|
| Not Applicable |   |                                       |   |                                |

**LEADERSHIP INDICATORS**

1. Water withdrawal, consumption, and discharge in areas of water stress (In Kiloliters): For each facility / plant located in areas of water stress, provide the following information:

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

| Parameter   | FY24 | FY23 |
|---|------|------|
| <b>Water withdrawal by source (in kiloliters)</b>                                     |      |      |
| (i) Surface water   |      |      |
| (ii) Groundwater  |      |      |
| (iii) Third party water   |      |      |
| (iv) Seawater / desalinated water   |      |      |
| (v) Others  |      |      |
| Total volume of water withdrawal (in kiloliters)                                      |      |      |
| <b>Total volume of water consumption (in kiloliters)</b>                              |      |      |
| <b>Water intensity per rupee of turnover</b> (Water consumed / turnover)              |      |      |
| <b>Water intensity (optional)</b> – the relevant metric may be selected by the entity |      |      |
| <b>Water discharge by destination and level of treatment</b> (in kiloliters)          |      |      |
| (i) Into Surface water  |      |      |
| - 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                                  |      |      |
| <b>Total water discharged (in kiloliters)</b>   |      |      |

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.

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

| Parameter  | Unit               | FY24   | FY23 |
|--|--------------------|--------|------|
| <b>Total Scope 3 emissions</b> (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) | tCO <sub>2</sub> e | 41,472 | -    |
| Total Scope 3 emissions per rupee of turnover  | tCO <sub>2</sub> e | 0.42   | -    |
| <b>Total Scope 3 emission intensity</b> ( <i>optional</i> ) – the relevant metric may be selected by the entity  |                    |        |      |

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

**3. With respect to the ecologically sensitive areas reported at Question 10 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

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

| Sr. No         | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|----------------|-----------------------|--|---------------------------|
| Not Applicable |                       |  |                           |

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

Yes, Apollo Pipes has a Business Continuity Plan in place which forms a part of the company's risk management policy.

Refer to this link for further details:

[https://www.apollopipes.com/media/product/1860375185\\_Risk\\_Management\\_Policy\\_of\\_Apollo\\_Pipes\\_Limited.pdf](https://www.apollopipes.com/media/product/1860375185_Risk_Management_Policy_of_Apollo_Pipes_Limited.pdf)

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

Not Applicable

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

Not Applicable

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

#### **ESSENTIAL INDICATORS**

1.

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

b. List the top 10 trade and industry chambers / associations (determined based on the total members of such a 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      | Delhi Chamber of Commerce                             | State   |

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

| Name of Authority | Brief of the case | Corrective action taken |
|-------------------|-------------------|-------------------------|
| Nil               |                   |                         |

#### **LEADERSHIP INDICATORS**

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

| S. 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 |
|--------|-------------------------|-----------------------------------|--|---|------------------------|
| NA     |                         |                                   |  |   |                        |

**PRINCIPLE 8: Businesses should promote inclusive growth and equitable development.**

#### **ESSENTIAL INDICATORS**

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current FY 24

| 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                    |                      |                      |   |  |                   |

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 FY (in ₹) |
|----------------|--|-------|----------|---|--------------------------|---------------------------------------|
| Not Applicable |  |       |          |   |                          |                                       |

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

Community members can raise complaints through the Helpline number and Email address provided on the Apollo Pipes website <https://www.apollopipes.com/> where a dedicated team is assigned to monitor the complaints raised.

Link to Grievance Redressal Policy –

<https://www.apollopipes.com/media/product/Whistle%20Blower%20or%20Vigil%20Mechanism%20Policy%20of%20Apollo%20Pipes%20Ltd.pdf>



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

| Category of waste                            | FY 2024 | FY 2023 |
|--|---------|---------|
| Directly sourced from MSMEs/ small producers | 12%     | 26%     |
| Directly sourced from India                  | 49%     | 13%     |

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

| Location     | FY24   | FY23   |
|--------------|--------|--------|
| Rural        | 22.82% | 22.79% |
| Semi-Urban   | 0.38%  | 0.22%  |
| Urban        | 29.56% | 28.13% |
| Metropolitan | 47.24% | 48.86% |

**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 ₹) |
|------|-----------------------------|------------------------------------|---------------------|
| 1    | Richmond Fellowship Society | Gautam Buddh nagar (Uttar Pradesh) | 4,00,000            |
| 2    | Nirantar Prayas NGO         | Gautam Buddh nagar (Uttar Pradesh) | 1,00,000            |

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

Currently, our company does not have a specific policy regarding preferential procurement from suppliers comprising marginalized or vulnerable groups. However, we are actively exploring opportunities to enhance inclusivity within our supply chain and remain committed to supporting initiatives that promote diversity and equity.

**b. From which marginalized /vulnerable groups do you procure?**

Not Applicable

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

Not Applicable

**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 |  |                          |                           |                                    |

**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    |                   |                         |

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

| S. No. | CSR Project                 | No. of persons benefitted from CSR Projects | % Of beneficiaries from vulnerable and marginalized groups |
|--------|-----------------------------|---|--|
| 1      | Richmond Fellowship Society | 25-35 persons (approx.)                     | 100%   |
| 2      | Nirantar Prayas NGO         | 32 Children                                 | 100%   |

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

**ESSENTIAL INDICATORS**

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

As the company is dedicated to delivering value to its clients, regular customer satisfaction surveys are conducted. These surveys provide vital feedback to the company, enabling it to deliver the highest level of service to its clients and consistently improve customer engagement.

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

| State   | As a percentage to total turnover |
|---|-----------------------------------|
| Environmental and social parameters relevant to the product |                                   |
| Safe and responsible usage                                  | 0%                                |
| Recycling and/or safe disposal                              |                                   |

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

|                                | FY 2024                  |                                   |   | FY 2023                  |                                   |                |
|--------------------------------|--------------------------|-----------------------------------|---|--------------------------|-----------------------------------|----------------|
|                                | Received during the year | Pending resolution at end of year | Remarks   | Received during the year | Pending resolution at end of year | Remarks        |
| Data privacy                   | 0                        | 0                                 | Not Applicable  | 0                        | 0                                 | Not Applicable |
| Cyber-security                 | 0                        | 0                                 | Not Applicable  | 0                        | 0                                 | Not Applicable |
| Delivery of essential services | 0                        | 0                                 | Not Applicable  | 0                        | 0                                 | Not Applicable |
| Restrictive trade practices    | 0                        | 0                                 | Not Applicable  | 0                        | 0                                 | Not Applicable |
| Unfair trade practices         | 0                        | 0                                 | Not Applicable  | 0                        | 0                                 | Not Applicable |
| Others                         | 319                      | 4                                 | There are still 4 open complaints that will be addressed promptly | 0                        | 0                                 | Not Applicable |

**4. Details of instances of product recalls on accounts of safety issues**

|                   | Number | Reason for recall |
|-------------------|--------|-------------------|
| Voluntary recalls | 0      | Not Applicable    |
| Forced recalls    | 0      | Not Applicable    |

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

The company has placed a high priority on Cyber Security. Firewalls have been set up at the gateway level to block unauthorized access. Endpoints are being secured through the deployment of antivirus software. Additionally, an automated data backup system has been implemented to ensure safe and secure data storage.

Link to the policy:

<https://www.apollopipes.com/media/product/Cyber%20Security%20Policy%20of%20Apollo%20Pipes%20Ltd..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

**7. Provide the following information relating to data breaches:**

a. Number of instances of data breaches: Nil

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

c. Impact, if any, of the data breaches: Not Applicable

**LEADERSHIP INDICATORS**

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

Details of our products and services can be found on this link <https://www.apollopipes.com/>

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

At Apollo Pipes, we proactively seek feedback and promptly address customer concerns, striving to keep our customers well-informed about the responsible use of our products.

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

At Apollo Pipes, we inform our customers about any disruptions or discontinuations via our website.

**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)**

We adhere to all laws and regulations regarding product information display. Additionally, we value customer feedback highly and strive to integrate it into our business operations.