



GRAPHITE INDIA LIMITED

REGD. & H.O. : 31, CHOWRINGHEE ROAD, KOLKATA - 700 016, W.B., INDIA
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WEBSITE : www.graphiteindia.com, CIN : L10101WB1974PLC094602

GIL/SEC/SM/24-25/21

July 4, 2024

BSE Limited
The Corporate
Relationship Department,
1st Floor, New Trading Ring,
Rotunda Bldg., P.J. Towers,
Dalal Street, Mumbai 400 001.
Scrip Code – 509488

The Manager
Listing Department,
National Stock Exchange
Exchange Plaza, 5th Floor,
Plot No –C/1,G Block,
Bandra-Kurla Complex,
Bandra (E) Mumbai 400 051
Symbol: GRAPHITE

Dear Sirs,

Subject: Business Responsibility and Sustainability Report for FY 2022-23

Dear Sir/Madam,

We are submitting herewith the Business Responsibility and Sustainability Report (BRSR) of the Company for the financial year 2023-24 which forms an integral part of the Annual Report 2023-24 submitted to the Exchanges.

This is for your information and record.

Thanking You,

Yours faithfully,
For Graphite India Limited

S. Marda
Company Secretary

Encl. : As above.

Annexure 10

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT**SECTION A: GENERAL DISCLOSURES****I. Details of the listed entity**

1. Corporate Identity Number (CIN) of the Listed Entity: **L10101WB1974PLC094602**
2. Name of the Listed Entity: **GRAPHITE INDIA LIMITED**
3. Year of incorporation: **1974**
4. Registered office address: **31, Chowringhee Road, Kolkata - 700 016**
5. Corporate address: **31, Chowringhee Road, Kolkata - 700 016**
6. E-mail: **gilro@graphiteindia.com**
7. Telephone: **033-40029600**
8. Website: **www.graphiteindia.com**
9. Financial year for which reporting is being done: **2023-24**
10. Name of the Stock Exchange(s) where shares are listed: **NSE and BSE**
11. Paid-up Capital: **Rs. 39.08 Crore**
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report: **B Shiva, Designation- Company Secretary, Telephone No:022-22886418, Email Id: bshiva@graphiteindia.com**
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).: **Standalone**
14. Name of assurance provider: **NA**
15. Type of assurance obtained: **NA**

II. Products/services

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

| Sl. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|---------|------------------------------|---|-----------------------------|
| 1 | Manufacturing & Selling | Graphite Electrodes & Miscellaneous Graphite products | 74.02% |
| 2 | Manufacturing & Selling | Calcined Petroleum Coke | 8.06% |
| 3 | Manufacturing & Selling | Impervious Graphite Equipment & Spares | 8.25% |
| 4 | Manufacturing & Selling | High Speed Steel | 6.85% |
| | Total | | 97.18% |

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

| Sl. No. | Product/Services | NIC Code | % of total Turnover Contributed |
|---------|--|----------|---------------------------------|
| 1 | Graphite Electrodes, Miscellaneous Graphite Products, Impervious Graphite Equipment and Spares | 23994 | 82.27% |
| 2 | Calcined Petroleum Coke | 19209 | 8.06% |
| 3 | High Speed Steel | 24105 | 6.85% |
| | Total | | 97.18% |

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 | 7 | 3 | 10 |
| International | 2 | 1 | 3 |

19. **Markets served by the entity:**

a. Number of locations

| Location | Number |
|----------------------------------|--------|
| National (No. of States) | 22 |
| International (No. of Countries) | 27 |

b. What is the contribution of exports as a percentage of the total turnover of the entity: **35.0%**

c. A brief on types of customers :

The company is engaged in the business of manufacturing graphite electrodes and specialties, calcined petroleum coke, impervious graphite equipment, glass reinforced plastic pipes, steel and generation of renewable energy. Thus, the company caters to a wide range of customers, engaged in manufacturing steel, cutting tool industry, chemicals, fertilizers, polymers, drug intermediaries, metal pressing, effluent treatment, irrigation etc.

IV. **Employees**

20. Details as at the end of Financial Year: 31.03.2024

a. Employees and workers (including differently abled):

| Sl. No. | Particulars | Total (A) | Male | | Female | |
|------------------|--------------------------------|--------------|-------------|--------------|-----------|-------------|
| | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| EMPLOYEES | | | | | | |
| 1. | Permanent (D) | 797 | 775 | 97.24 | 22 | 2.76 |
| 2. | Other than Permanent (E) | 42 | 40 | 95.24 | 2 | 4.76 |
| 3. | Total employees (D + E) | 839 | 815 | 97.14 | 24 | 2.86 |
| WORKERS | | | | | | |
| 4. | Permanent (F) | 906 | 901 | 99.4 | 5 | 0.6 |
| 5. | Other than Permanent (G) | 1357 | 1353 | 99.7 | 4 | 0.3 |
| 6. | Total workers (F + G) | 2263 | 2254 | 99.6 | 9 | 0.4 |

b. Differently abled Employees and workers:

| Sl. No. | Particulars | Total (A) | Male | | Female | |
|------------------------------------|--|--------------|----------|-------------|----------|-----------|
| | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| DIFFERENTLY ABLED EMPLOYEES | | | | | | |
| 1. | Permanent (D) | 2 | 2 | 100% | 0 | 0% |
| 2. | Other than Permanent (E) | 0 | 0 | 0% | 0 | 0% |
| 3. | Total differently abled employees (D + E) | 2 | 2 | 100% | 0 | 0% |
| DIFFERENTLY ABLED WORKERS | | | | | | |
| 4. | Permanent (F) | 4 | 4 | 100% | 0 | 0% |
| 5. | Other than Permanent (G) | 1 | 1 | 100% | 0 | 0% |
| 6. | Total differently abled workers (F + G) | 5 | 5 | 100% | 0 | 0% |

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

| Particulars | Total (A) | No. and percentage of Females | |
|--------------------------|--------------|-------------------------------|-----------|
| | | No. (B) | % (B / A) |
| Board of Directors | 9 | 1 | 11.12% |
| Key Management Personnel | 2 | 0 | 0% |

22. Turnover rate for permanent employees and workers

| | FY 2023-24 (%) | | | FY 2022-23 (%) | | | FY 2021-22 (%) | | |
|----------------------------|----------------|--------|-------|----------------|--------|-------|----------------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 10.6 | 0.7 | 11.3 | 6.18 | 0.43 | 6.61 | 12.60 | 0.43 | 13.03 |
| Permanent Workers | 4.14 | 0 | 4.14 | 10.53 | 9 | 19.53 | 11.14 | 0 | 11.14 |

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 | Emerald Company Private Limited | Holding | NA | No |
| 2 | Carbon Finance Limited, India | Subsidiary | 100% | No |
| 3 | Graphite International BV(GIBV) | Subsidiary | 100% | No |
| 4 | Graphite Cova GmbH | Subsidiary of GIBV | 100% | No |
| 5 | Bavaria Electrodes GmbH # | Subsidiary of GIBV | 100% | No |
| 6 | Bavaria Carbon Specialities GmbH | Subsidiary of GIBV | 100% | No |
| 7 | Bavaria Carbon Holdings GmbH | Subsidiary of GIBV | 100% | No |
| 8 | General Graphene Corporation | Subsidiary of GIBV | 60.927% | No |
| 9 | Godi India Private Limited* | Associate of GIL | 31% | No |

In liquidation

* Became Associate of Graphite India Limited, India w.e.f 8th December, 2023.

VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**
(ii) Turnover (in Rs.) : **28,94,38,28,028.82**
(iii) Net worth (in Rs.) : **53,46,34,48,125.64**

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 | | | FY 2022-23 | | |
|---|--|--|--|---------|--|--|---------|
| | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | YES | NIL | NIL | | NIL | NIL | |
| Investors (other than shareholders) | YES | NIL | NIL | | NIL | NIL | |
| Shareholders | YES | 21 | NIL | | 28 | NIL | |
| Employees and workers | YES | NIL | NIL | | NIL | NIL | |

| 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 | | | FY 2022-23 | | |
|---|--|--|--|---------|--|--|---------|
| | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Customers | YES | 15 | 1 | | 23 | 2 | |
| Value Chain Partners | We do not have a formal GRM. We have an email id on our website where all grievances can be recorded and these are addressed by competent leadership | NIL | NIL | | NIL | NIL | |
| Other (please specify) | | | | | | | |

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

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

| Sl.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 | Natural Resource availability | Risk and Opportunity | Natural resources are relevant part of our product manufacturing process. Minimizing use of natural resources to meet our business needs by developing sustainable products and processes | <ul style="list-style-type: none"> Company is investing in wind power and solar power. Company is further investing in hydel power Location wise water balance has been carried out. Maximum recycling is being carried out. Waste water recycling after appropriate treatment is a focus. Rain water harvesting is being practised. While in certain plants we have achieved ZLD status, approach of Zero liquid discharge is being followed by all plants. Our main raw materials are wastes (petroleum refinery residue) and our main energy usage is from CBM which is from capture of methane from coal mines that would have been a waste if not used. We have carried our LCA for our main product (Graphite Electrodes) and trying to reduce the negative environmental impact through resource efficiency. | <p>Positive : Reduction in fresh water usage. Scope to increase usage of renewable energy.</p> <p>Negative : unavailability or shortage of natural resources can impact service to customer.</p> |

| Sl.No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---|--|---|--|--|
| 2 | GHG emission, Energy management | Risk | Climate change is the biggest threat to humanity. GHG management can mitigate climate change. Energy management helps in GHG management while reducing operational cost | <ul style="list-style-type: none"> Replacement of fossilfuel with CBM/ PNG Monitoring GHG emission and taking corrective measure to reduce carbon foot print Improving energy efficiency by replacing in efficient motor & pumps, using variable frequency drives, optimizing energy usage by improving load factor and power factor. We have got our largest plants audited by leading global agency for energy saving and we are implementing the recommendations. In the very first year of disclosure (2023) we got a score of B in CDP Climate – appreciating our GHG management efforts https://www.cdp.net/en/responses?queries%5Bname%5D=graphite+india | Positive : Reduction in carbon foot print and energy consumption/ cost reduction |
| 3 | Environmental Risk | Risk | Changes in existing regulations/ Emerging regulations | <ul style="list-style-type: none"> The company continues to monitor all emerging regulations and plan for compliance Proactively work on emerging regulations and implement ahead of statute | Negative : Increased expenses in transiting towards meeting new regulations |
| 4 | Handling hazardous wastes/ non hazardous wastes | Risk and Opportunity | Handling hazardous and other wastes with care to avoid any threats posed to the health and well being of our employees and to our surrounding environment | <ul style="list-style-type: none"> We continue to monitor quantity of different kind of wastes and implement waste management plan focusing on waste reduction, reuse and recycle All hazardous wastes are handled as per the procedure set by the regulations and disposed off as per Hazardous Waste Management Rules-2016 | Positive : Reduction in waste generation, reuse and recyclability of waste Negative: Impact on health of employees and community nearby. |
| 5 | Health and Safety risk | Risk and Opportunity | The manufacturing operations of the company requires employees to work with plant, machineries, material handling equipment, all of which carry risk of injury | <ul style="list-style-type: none"> Adherence to safety standards, company's Environment policy and Health and safety policy Continuous training to employees Hazard identification, risk assessment, incident investigation Occupational health and safety management programs in all plants All plants have ISO 45001 certification | Positive : Adoption of safety related protocols and measures to create a safe work environment. Negative : Impact on health and well being of employees |

| Sl.No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|--|--|---|---|
| 6 | Reputation | Risk and Opportunity | Bad publicity arising out of any act/ inaction by company on any platform. Customer complaints not resolved satisfactorily. | <ul style="list-style-type: none"> Actively monitor voices on all platforms and address those positively and timely. Actively and satisfactorily resolving customer complaints Ensuring product delivery in time Strengthening corporate governance norms, including adherence to code of conduct by all Timely compliance with all regulations. | <p>Positive : Opportunity to improve brand presence and reputation.</p> <p>Negative: Negative effect on brand image and company reputation, loss of customers</p> |
| 7 | Climate Change | Risk and Opportunity | Climate Risks (both physical and transition) are real. Opportunities are there to develop climate resilience and move ahead of competition | We have carried out study as per TCFD https://graphiteindia.com/investors/documents/64b65bef98cb4TCFD%20Report%20FY%2022-23.pdf and identified the risks and opportunities. We have started mitigation/adaptation measures in a structured manner as a part of our Enterprise Risk Management framework | There are both positive and negative financial impacts of the identified risks and opportunities, details of which are disclosed in our TCFD report https://graphiteindia.com/investors/documents/64b65bef98cb4TCFD%20Report%20FY%2022-23.pdf |

SECTION B : MANAGEMENT AND PROCESS DISCLOSURES

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

| Disclosure | | P | P | P | P | P | P | P | P | P |
|--|---|---|---|---|---|---|---|---|---|---|
| Questions | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| Policy and management processes | | | | | | | | | | |
| 1. | a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes / No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| | b. Has the policy been approved by the Board? (Yes/No) | Principles 1 & 8 approved by Board / Rest by Management signed by Executive Director | | | | | | | | |

| | | | | | | | | | | | | | | | | | | |
|---|---|----------------|-----------------|----------------------------------|---|-----------------|---|---|---|--|---|---|---|---|---|---|---|---|
| c. Web Link of the Policies, if available | <p>Code of Conduct and CSR are available on our website: www.graphiteindia.com as per the law. The other Policies are made available to respective stakeholders.</p> <p>Code of Conduct: https://graphiteindia.com/investors/documents/081646600_1649777196.pdf</p> <p>Vigil mechanism and Whistleblower Policy: https://graphiteindia.com/investors/documents/023261300_1649777163.pdf</p> | | | | | | | | | | | | | | | | | |
| 2. Whether the entity has translated the policy into procedures. (Yes/No) | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | - | ISO 9001: 2015 | ISO 45001: 2018 | ISO 14001: 2015, ISO 45001: 2018 | - | ISO 14001: 2015 | - | - | - | - | - | - | - | - | - | - | - | - |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any. | <p>All plants are ISO 9001& ISO 45001 certified. Both electrode plants are ISO 14001 certified. For the rest of the plants, they will be certified ISO 14001 by the end of June 24</p> | | | | | | | | | | | | | | | | | |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | | NA | | | | NA | | | | | | | | | | | | |
| Governance, leadership and oversight | | | | | | | | | | | | | | | | | | |
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (<i>listed entity has flexibility regarding the placement of this disclosure</i>) | | | | | | | | | | | | | | | | | | |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies). | <p>Ashutosh Dixit Executive Director</p> | | | | | | | | | | | | | | | | | |
| 9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details. | <p>Ashutosh Dixit Executive Director</p> | | | | | | | | | | | | | | | | | |
| 10. Details of Review of NGRBCs by the Company: | | | | | | | | | | | | | | | | | | |
| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee | | | | | | | | | Frequency (Annually / Half yearly / Quarterly / Any other – please specify) | | | | | | | | |
| Performance against above policies and follow up action | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| 11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency. | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P | P |
| 12. If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated: N.A. | N | N | N | N | N | N | N | N | N | N | N | N | N | N | N | N | N | N |

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

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

Essential Indicators

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

| Segment | Total no. of training and awareness programmes held | Topics/principles covered under the training and its impact | % of persons in respective category covered by the awareness programmes |
|------------------------------------|---|---|---|
| Board of Directors | 4 - As part of Board Meetings | During the year the Board engaged in various updates pertaining to business, regulatory, safety, ESG matters, etc. These topics provided insights on all the 9 Principles. | 100 |
| Key Managerial Personnel | 1 | Toxic thinking | 100 |
| Employees other than BoDs and KMPs | 155 | Health, Safety, EMS, QS, OHS, LOTO, General awareness, Effective Communication, Human Rights, etc. | 60 |
| Workers | 192 | Health, Safety, EMS, QS, OHS, LOTO, General awareness, Discipline etc | 70 |

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity’s website): **No substantial fines or penalties have been levied on GIL in the year 2023-24.**
3. Of the instances disclosed in Question 2 above, details of the Appeal / Revision preferred in cases where monetary or non-monetary action has been appealed. **NA**
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. **The Company has policies like Code of Conduct for Directors and Management Personnel, Vigil Mechanism and Whistle Blower Policy for all employees which are in conformity with the legal and statutory framework on anti-bribery and anticorruption legislation prevalent in India. The Policies reflect the commitment of the Company and its management for maintaining highest ethical standards while undertaking open and fair business practices and culture, and implementing and enforcing effective systems to detect, counter and prevent bribery and other corrupt business practices. The policies are available on our website www.graphiteindia.com.**
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 (Current Financial Year) | FY 2022-23 (Previous Financial Year) |
|-----------|--|---|
| Directors | NIL | NIL |
| KMPs | NIL | NIL |
| Employees | NIL | NIL |
| Workers | NIL | NIL |

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

| | FY 2023-24 | | FY 2022-23 | |
|--|------------|---------|------------|---------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | NIL | NA | NIL | NA |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | NIL | NA | NIL | NA |

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: **N/A**

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

| | FY 2023-24 | FY 2022-23 |
|--------------------------------|------------|------------|
| No of days of accounts payable | 29.98 | 39.50 |

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 2023-24 | FY 2022-23 |
|----------------------------|----|--|------------|------------|
| Concentration of Purchases | a. | Purchases from trading Houses as % of total purchases | 19.02 | 6.08 |
| | b. | Number of trading houses where purchases are made from | 718 | 618 |
| | c. | Purchases from top 10 trading houses as % of total purchases from trading houses | 70.63 | 67.46 |
| Concentration of Sales | a. | Salestodealers/distributors as % of total sales | 7.83 | 5.84 |
| | b. | Number of dealers/distributors to whom sales are made | 59 | 52 |
| | c. | Sales to top 10 dealers/distributors as % of total sales to dealers/distributors | 78.87 | 77.29 |
| Share of RPTs in | a. | Purchases (Purchases with related parties /Total Purchases) | 0.83% | 0.16% |
| | b. | Sales (Sales to related parties / Total Sales) | 2.33% | 1.54% |
| | c. | Loans & advances (Loans & advances given to related parties/ Total loans & advances) | NIL | NIL |
| | d. | Investments (Investments in related parties / Total Investments made) | 3.66% | 3.48% |

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.

| | FY 2023-24 | FY 2022-23 | Details of improvements in environmental and social aspects |
|-------|------------|------------|---|
| R&D | 0.44% | 1.28% | Satpur- Starting of RH 24-II furnace, Dust collector system improvement, PNG startup in place of oil, Wind power project . |
| Capex | 37.55% | 31.57% | Ambad: PNG line project, battery operated fork truck installation for Dust Collector. Durgapur: Dust collector for old extrusion charging, effluent treatment and recycling plant, ETP for PI3, RH24 automation etc. |

2. a. Does the entity have procedures in place for sustainable sourcing? **Yes. We have sustainable sourcing policies and procedures in place. Our supplier code of conduct covers all aspects of the 9 principles of NGRBC and responsible business. All suppliers are contractually bound to honour this code of conduct. We carry out periodic assessments of our suppliers to check compliance / progress.**
- b. If yes, what percentage of inputs were sourced sustainably? **We sourced 80% of our inputs sustainably.**
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. **Whenever possible, products, treated water & waste are recycled back into the production line. Wherever required, we have ETP and STP for treatment and reuse. We dispose hazardous waste as per HWM Rules 2016.**
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, we have submitted the same to Pollution Control Boards.**

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 | % of employees covered by | | | | | | | | | | |
|---------------------------------------|---------------------------|------------------|------------|--------------------|------------|--------------------|------------|--------------------|-----------|---------------------|-----------|
| | Total (A) | Health Insurance | | Accident Insurance | | Maternity Benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| Permanent employees | | | | | | | | | | | |
| Male | 775 | 775 | 100 | 775 | 100 | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 22 | 22 | 100 | 22 | 100 | 22 | 100 | 0 | 0 | 0 | 0 |
| Total | 797 | 797 | 100 | 797 | 100 | 22 | 100 | 0 | 0 | 0 | 0 |
| Other than Permanent employees | | | | | | | | | | | |
| Male | 40 | 40 | 100 | 40 | 100 | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 2 | 2 | 100 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 |
| Total | 42 | 42 | 100 | 42 | 100 | 2 | 100 | 0 | 0 | 0 | 0 |

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

| Category | % of workers covered by | | | | | | | | | | |
|-------------------------------------|-------------------------|------------------|------------|--------------------|------------|--------------------|------------|--------------------|-----------|---------------------|-----------|
| | Total (A) | Health Insurance | | Accident Insurance | | Maternity Benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| Permanent workers | | | | | | | | | | | |
| Male | 901 | 901 | 100 | 901 | 100 | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 5 | 5 | 100 | 5 | 100 | 5 | 100 | 0 | 0 | 0 | 0 |
| Total | 906 | 906 | 100 | 906 | 100 | 5 | 0.6 | 0 | 0 | 0 | 0 |
| Other than Permanent workers | | | | | | | | | | | |
| Male | 1353 | 1036 | 77 | 1097 | 81 | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 4 | 4 | 100 | 4 | 100 | 4 | 100 | 0 | 0 | 0 | 0 |
| Total | 1357 | 1040 | 77 | 1101 | 81 | 4 | 0.3 | 0 | 0 | 0 | 0 |

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

| | FY 2023-24 | FY 2022-23 |
|---|--------------|--------------|
| Cost incurred on well-being measures as a % of total revenue of the company | 0.08% | 0.07% |

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

| Benefits | FY 2023-24 | | | FY 2022-23 | | |
|-------------------------|--|--|--|--|--|--|
| | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF | 100% | 100% | Yes | 100% | 100% | Yes |
| Gratuity | 100% | 100% | Yes | 100% | 100% | Yes |
| ESI | 100% | 100% | N/A | 100% | 100% | N/A |
| Others – please Specify | NA | NA | NA | NA | NA | NA |

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard. **The company is engaged in this issue and wherever possible the management is aiming to make the infrastructure disabled person friendly**

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. **No**5. Return to work and Retention rates of permanent employees and workers that took parental leave. **N/A**

| | Permanent employees | | Permanent workers | |
|--------|---------------------|----------------|---------------------|----------------|
| | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male | - | - | - | - |
| Female | - | - | - | - |
| Total | - | - | - | - |

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

| | Yes/No (If Yes, then give details of the mechanism in brief) |
|--------------------------------|---|
| Permanent Workers | The HR department at the head office and the plants through standing orders attend to grievances of all employees and workers through regular meeting, suggestion box, joint committee, safety committee, notice board and email, etc. |
| Other than Permanent Workers | |
| Permanent Employees | |
| Other than Permanent Employees | |

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

| Category | FY 2023-24 | | | FY 2022-23 | | |
|----------------------------------|--|---|---------|--|--|-------|
| | Total employees / workers in respective category (A) | No. of workers in respective category who are part of association / union (B) | % B / A | Total employee / workers n respective category (A) | No of workers in respective category who are part of association / union (B) | % B/A |
| Total Permanent Employees | 815 | 0 | 0% | 798 | 45 | 6% |
| - Male | 775 | 0 | 0% | 779 | 45 | 6% |
| - Female | 40 | 0 | 0% | 19 | 0 | 0% |
| Total Permanent Workers | 906 | 889 | 98% | 894 | 886 | 99% |
| - Male | 901 | 884 | 98% | 891 | 883 | 99% |
| - Female | 5 | 5 | 100% | 3 | 3 | 100% |

8. Details of training given to employees and workers:

| Category | FY 2022-23 | | | | | FY 2022-23 | | | | |
|------------------|------------|-------------------------------|------------|----------------------|-----------|------------|-------------------------------|------------|----------------------|-----------|
| | Total (A) | On Health and safety measures | | On Skill upgradation | | Total (A) | On Health and safety measures | | On Skill upgradation | |
| | | No. (B) | % B/A | No. (C) | % C/A | | No. (B) | % B/A | No. (C) | % C/A |
| Employees | | | | | | | | | | |
| Male | 775 | 608 | 78 | 613 | 79 | 779 | 600 | 77 | 595 | 76 |
| Female | 22 | 13 | 59 | 12 | 55 | 19 | 7 | 37 | 7 | 37 |
| Total | 797 | 621 | 78 | 625 | 78 | 798 | 607 | 76 | 602 | 75 |
| Workers | | | | | | | | | | |
| Male | 901 | 901 | 100 | 901 | 100 | 919 | 919 | 100 | 561 | 61 |
| Female | 5 | 5 | 100 | 0 | 0 | 3 | 3 | 100 | 0 | 0 |
| Total | 906 | 906 | 100 | 901 | 99 | 922 | 922 | 100 | 561 | 61 |

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

| Category | FY 2023-24 | | | FY 2022-23 | | |
|------------------|------------|------------|------------|------------|------------|------------|
| | Total (A) | No. (B) | % B/A | Total (C) | No. (D) | % D/C |
| Employees | | | | | | |
| Male | 775 | 775 | 100 | 779 | 779 | 100 |
| Female | 22 | 22 | 100 | 19 | 19 | 100 |
| Total | 797 | 797 | 100 | 798 | 798 | 100 |
| Workers | | | | | | |
| Male | 901 | 579 | 64 | 919 | 515 | 56 |
| Female | 5 | 5 | 100 | 3 | 3 | 100 |
| Total | 906 | 584 | 64 | 922 | 518 | 56 |

10. Health and safety management system:

- Whether an occupational health and safety management system has been implemented by the entity? **(Yes/ No)**. If yes, the coverage such system? **Yes, the occupational health and safety management system has been implemented in all our plants and offices.**
- What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?
Hazard identification and risk assessment (HIRA) is carried out on a regular basis.
- Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N) **Yes**
- Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? **(Yes/ No)**
Yes

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

| Safety Incident/Number | Category* | FY 2023-24 | FY 2022-23 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 1 | 1 |
| | Workers | 1 | 3 |
| Total recordable work-related injuries | Employees | 2 | 0 |
| | Workers | 9 | 9 |
| No. of Fatalities | Employees | 0 | 0 |
| | Workers | 1 | 0 |
| High consequences work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | Workers | 1 | 0 |

*Including in the contract workforce

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

The company ensures a safe and healthy workplace as per the health and safety policy of the company and compliance of legal requirements.

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

| | FY 2023-24 | | | FY 2022-23 | | |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | 0 | 0 | 0 | 18 | 0 | 0 |
| Health & Safety | 0 | 0 | 0 | 4 | 0 | 0 |

14. Assessments for the year:

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

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions. **For safety related incidents, root cause analysis is done by a team which is monitored and reviewed by the safety committee. Corrective measures in various forms based on the root causes are taken (like elimination of man machine interaction, adequate guarding, providing safety tools and tackles, training etc.).**

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

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

Stakeholders play an integral role in our journey and we recognise the need to partner with them and understand their concerns to deliver the targets which we have set for ourselves. Our process of stakeholder engagement involves identifying key internal and external stakeholders followed by analysing the impact of each stakeholder groups on our business and vice versa.

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) | Channel of communication (Email, SMS, Newspaper, Pamphlets, Advertisements, Community meetings, Notice Board, Website) Others | Frequency of engagement (Annually/ Half yearly/ Quarterly/ others-please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagements |
|-----------------------|--|---|---|--|
| Communities | Yes | Physical meeting with people | Regular | CSR activities |
| Shareholders | No | Website, General Meetings, email | Quarterly | Company performance |
| Employees and workers | No | Notice Boards and physical meetings | Regular | EHS, Quality, productivity matters. |
| Customers | No | Marketing visit, emails | Regular | Product performance, technical and commercial discussions. |
| Suppliers | No | Physical/Virtual meetings and emails | Regular | Quality and timely delivery of material |

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 | | | FY 2022-23 | | |
|------------------------|------------|--------------------------------------|---------|------------|--------------------------------------|---------|
| | Total (A) | No. of employees/workers covered (B) | % (B/A) | Total (C) | No. of employees/workers covered (D) | % (D/C) |
| Employees | | | | | | |
| Permanent | 797 | 423 | 53 | 798 | 140 | 18 |
| Other than permanent | 42 | 6 | 14 | 52 | 3 | 6 |
| Total Employees | 839 | 429 | 51 | 850 | 143 | 17 |
| Workers | | | | | | |
| Permanent | 906 | 65 | 7 | 922 | 77 | 8 |
| Other than permanent | 1357 | 242 | 18 | 824 | 244 | 29 |
| Total Workers | 2263 | 307 | 14 | 1746 | 321 | 18 |

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

| Category | FY 2023-24 | | | | | FY 2022-23 | | | | |
|-----------------------------|------------|-----------------------|---------|------------------------|---------|------------|-----------------------|---------|------------------------|---------|
| | 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) |
| Employees | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 775 | 0 | 0 | 775 | 100 | 779 | 0 | 0 | 779 | 100 |
| Female | 22 | 0 | 0 | 22 | 100 | 19 | 0 | 0 | 19 | 100 |
| Other than Permanent | | | | | | | | | | |
| Male | 40 | 0 | 0 | 40 | 100 | 52 | 0 | 0 | 52 | 100 |
| Female | 2 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | N/A |
| Workers | | | | | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 901 | 0 | 0 | 901 | 100 | 919 | 0 | 0 | 919 | 100 |
| Female | 5 | 0 | 0 | 5 | 100 | 3 | 0 | 0 | 3 | 100 |
| Other than Permanent | | | | | | | | | | |
| Male | 1357 | 512 | 38 | 841 | 62 | 823 | 394 | 48 | 429 | 52 |
| Female | 4 | 0 | 0 | 4 | 100 | 1 | 0 | 0 | 1 | 100 |

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) | 8 | INR 4 Lakhs | 1 | INR 4.5 lakhs |
| Key Managerial Personnel | 2 | INR 53,90,335 | 0 | 0 |
| Employees other than BoD and KMP | 775 | INR 9,13,014 | 22 | INR 5,27,967 |
| Workers | 901 | INR 10,81,293 | 5 | INR 3,50,068 |

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

| | FY 2023-24 | FY 2022-23 |
|---|------------|------------|
| Gross wages paid to females as % of total wages | 1.22 | 0.86 |

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**
5. Describe the internal mechanisms in place to redress grievances related to human rights issues. **Procedure to redress grievance pertaining to human rights are in place and are attended to by the Plant Heads/Functional Heads/ Executive Director**
6. Number of Complaints on the following made by employees and workers

| | FY 2022-23 | | | FY 2021-22 | | |
|------------------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | 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 | NIL | NIL | NIL | NIL | NIL | NIL |
| Discrimination at workplace | NIL | NIL | NIL | NIL | NIL | NIL |
| Child Labour | NIL | NIL | NIL | NIL | NIL | NIL |
| Forced Labour / Involuntary Labour | NIL | NIL | NIL | NIL | NIL | NIL |
| Wages | NIL | NIL | NIL | NIL | NIL | NIL |
| Other human rights related issues | NIL | NIL | NIL | NIL | NIL | NIL |

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

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

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases. **Company has a Whistle Blower Policy.**
9. Do human rights requirements form part of your business agreements and contracts? **(Yes/No): NO**
10. Assessments for the year:

| | Percent of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Child labour | 100% |
| Forced/involuntary labour | 100% |
| Sexual harassment | 100% |
| Discrimination at workplace | 100% |
| Wages | 100% |

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above. **No significant risks / concerns arising from the assessments.**

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

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

| Parameter | FY 2023-24 | FY 2022-23 |
|--|-------------------------------------|------------------------------------|
| From renewable sources | | |
| Total electricity consumption (A) | Nil | Nil |
| Total fuel consumption (B) | Nil | Nil |
| Energy consumption through Other sources (C) | Nil | Nil |
| Total energy consumed from renewable sources (A+B+C) | Nil | Nil |
| From non-renewable sources | | |
| Total electricity consumption (D) | 1287271508 MJ | 3705968498 MJ |
| Total fuel consumption (E) | 1463733004 MJ | 3431821298 MJ |
| Energy consumption through Other sources (F) | 65070 MJ | 3157489 MJ |
| Total energy consumed from non-renewable sources (D+E+F) | 275,10,04,513 MJ | 7140947285 |
| Total energy consumed (A+B+C+D+E+F) | 275,10,04,513 MJ | 7140947285 |
| Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) | 0.095 MJ per Rupee of turnover | 0.2451002 MJ per Rupee of turnover |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP considering 1USD = INR 83) | 0.00114 MJ/USD | 0.00295 MJ/USD |
| Energy intensity in terms of physical output* | 22,336 MJ per metric ton of product | 50215 MJ per metric ton of product |

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. **No**

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. **No, we currently have no sites registered under the PAT Scheme.**
3. Provide details of the following disclosures related to water, in the following format:

| Parameter | FY 2023-24 | FY 2022-23 |
|--|--------------------------------------|--------------------------------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | 190602 KL | 271544 KL |
| (ii) Groundwater | 51769 KL | 73364 KL |
| (iii) Third party water | 0 | 0 |
| (iv) Seawater / desalinated water | 0 | 0 |
| (v) Others | 0 | 0 |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 242371 KL | 344908 KL |
| Total volume of water consumption (in kilolitres) | 242371 KL | 335795 KL |
| Water intensity per rupee of turnover (Total water consumption / Revenue from operations) | 83.74 KL per crore of Rupee turnover | 115.3 KL per crore of Rupee turnover |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP with 1USD = INR 83) | 0.10089 KL / Million USD | 0.13891KL/Million USD |
| Water intensity in terms of physical output | 1.97 KL per metric ton | 2.36 KL per metric ton |

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. **No**

During the year we have successfully reduced our specific water consumption significantly as the results indicate. We have also made the water related data recording process more robust.

4. Provide the following details related to water discharged:

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.

We have Zero Liquid Discharge (ZLD) in all factory locations. Hence water discharge is zero.

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

Yes, all our factories have ZLD

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

| Parameter | Unit | FY 2023-24 | FY 2022-23 |
|-------------------------------------|---------|------------|---|
| NOx | Kg/year | 230420 | 254940 |
| SOx | Kg/year | 234009 | 223090 |
| Particulate Matter (PM) | Kg/year | 377808 | 445678 |
| Persistent organic pollutants (POP) | Kg/year | NIL | NIL |
| Volatile organic compounds (VOC) | Kg/year | NIL | NIL |
| Hazardous air pollutants (HAP) | Kg/year | 39.6 | 41.5 |
| Others please specify | Kg/year | NIL | 536.84 Hydrocarbon in Steel Division, Titlagarh |

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

Testing agencies :

IGE Division Ambad: M/S Green Envirosafe, Pune

Coke Division Barauni: M/S Shiva Test House, Patna

GE Division Durgapur: M/S indicative Consultants, Durgapur, M/S EnviroCheck, Kolkata

GRP Division, Gonde: M/S Green Envirosafe, Pune

Steel division, Titlagarh: M/S Earth & Environment Lab, Bhubaneswar

GE Division, Satpur: M/S Accurate Analyser, Nasik

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

| Parameter | Unit | FY 2023-24 | FY 2022-23 |
|---|---|---|---|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ equivalent | 96,999 | 110968 |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ equivalent | 2,56,024 | 309494 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | tCO ₂ e/ Cr Rs of turnover | 121.97 | 144.3 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for PPP 1USD = INR 83 | tCO ₂ e/Million USD | 0.1469 | 0.1738 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | | 2.86 tCO ₂ e /MT of Production | 2.96 tCO ₂ e /MT of Production |

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

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details. **We have several identified projects for GHG emission reduction. Some of these are implemented, some under implementation and some to be initiated. We focus on energy efficiency as a continual endeavour and take support of reputed agencies like Veolia to help us identify energy saving opportunities. Several energy saving projects have been implemented and some are being implemented. We have started getting benefits of these initiatives and the results mentioned above justify our efforts. We have also finalized renewable energy (wind – solar hybrid) arrangements for our Satpur plant and from the year 2024-25 a significant portion of the grid electricity will be replaced with renewable energy. We are exploring this possibility for our other plants also. We, anyway, use CBM and PNG as our principal fuel and as such our GHG intensity is reasonable low. We have carried out LCA for our main product Graphite Electrode and the results are very encouraging. Our scope 3 emissions are also quite reasonable. Further, since our main product Graphite Electrode supports use of scrap in EAF to produce steel, our scope 4 emissions (avoided emissions) is also significant because our product replaces steel production using virgin natural resources in blast furnace route.**
9. Provide details related to waste management by the entity, in the following format:

| Parameter | FY 2023-24 | FY 2022-23 |
|---|--|---|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | 214.096 MT | 340.6 MT |
| E-waste (B) | 0.48 MT | 3.03 MT |
| Bio-medical waste (C) | 0.21 MT | 0.05004 MT |
| Construction and demolition waste (D) | 3.25 MT | 3.7 MT |
| Battery waste (E) | 117 No & 0.477 MT | 131 No |
| Radioactive waste (F) | Nil | Nil |
| Other Hazardous waste. Please specify, if any. (G) | 1193.075 MT (Used oil or waste oil, ESP tar, ETP Sludge, Paint sludge etc.) | 723.6 MT (Used oil or waste oil, ESP tar, ETP Sludge, Paint sludge etc.) |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) | 31084.703 MT (Mainly carbonaceous material, Graphite powder and broken pcs, scrap wood, steel scrap, etc.) | 45853 (Mainly carbonaceous material, Graphite powder and broken pcs, scrap wood, steel scrap, etc.) |
| Total (A+B + C + D + E + F + G + H) | 32501.5 MT | 46924.8 MT |
| Parameter | | |
| FY 2023-24 | | |
| FY 2022-23 | | |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) | 11.23 MT of waste per crore of Rupee Turnover | 16.10 MT of waste per crore of Rupee Turnover |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP 1USD = INR 83) | 0.0135 MT / Million USD | 0.0194 MT / Million USD |
| Waste intensity in terms of physical output (Total waste generated / Revenue from operations) | 0.26 metric tonnes of waste per metric ton of product | 0.32 metric tonnes of waste per metric ton of product |
| For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes) | | |
| Category of waste | | |
| (i) Recycled | 2904.561 MT | 4645.4 MT |
| (ii) Re-used | 8.92 MT | 7.9 MT |
| (iii) Other recovery operations | - | - |
| Total | 2913.481 MT | 4653.3 MT |
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) | | |
| Category of waste | | |
| (i) Incineration | 5141.6 MT | 4.17 MT |
| (ii) Landfilling | 48.53 MT | 34.63 MT |
| (iii) Other disposal operations | 29878.713 MT | 46273 MT |
| Total | 35068.843 MT | 46311 MT |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? No.

During the year we have made our waste data robust. We have started using SAP gate module in the weighbridges so that data on material entry and waste exit from our factories are directly entered into our ERP system from the weighbridges thus reducing possibility of error.

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. **Hazardous and non-hazardous wastes are segregated and kept at designated place/bins. Hazardous wastes are sent Pollution control board Authorised Hazardous waste handling agency for further disposal and non-hazardous waste is sold.**
11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format: **N/A**
12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

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

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: **Yes, we are compliant with all relevant acts.**

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. 9
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to

| Sl. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers / associations (State / National) |
|---------|---|--|
| 1. | CAPEXIL | National |
| 2. | EEPC India | National |
| 3. | Indian Chamber of Commerce | National |
| 4. | FICCI | National |
| 5. | Indo German Chamber of Commerce | National |
| 6. | Indian Carbon Society | National |
| 7. | Bombay Chamber of Commerce | State |
| 8. | FIEO | National |
| 9. | Delhi Chamber of Commerce | State |

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

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

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year. **Social Impact assessment of CSR Projects are done internally. During the year, impact assessment by external agency is done in respect of a project as required under CSR rules.**

| 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 |
|-----------------------------------|----------------------|----------------------|---|--|-------------------|
| NA | NA | NA | NA | NA | NA |

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

| Sl. 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 INR) |
|---------|--|-------|----------|---|--------------------------|---|
| NIL | NIL | NIL | NIL | NIL | NIL | NIL |

3. Describe the mechanisms to receive and redress grievances of the community. **We address grievances through meetings.**
4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

| | FY 2023-24 Current Financial Year | FY 2022-23 Previous Financial Year |
|---|--------------------------------------|---------------------------------------|
| Directly sourced from MSMEs / small producers | 22.57% | 16.02% |
| Directly from within India | 81.12% | 49.38% |

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 | FY 2023-24 Current Financial Year | FY 2022-23 Previous Financial Year |
|--------------|--------------------------------------|---------------------------------------|
| Rural | 1.608 | 1.607 |
| Semi Urban | N/A | N/A |
| Urban | 92.240 | 92.347 |
| Metropolitan | 6.152 | 6.046 |

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.

Complaints are handled by customer service department. Once an email or phone call is received from a customer about any complaint, customer service engineer gets in touch with customer to get more information. Complaint is investigated either by site visit or collection of data from the site and equipment are set right at customer's site or brought back to our works for rectification depending on the quantum of work involved. Action may also include call-back of the product already shipped / free replacement and/or monetary compensation as the case may demand. Corrective actions are taken to prevent the recurrence of the problem in future. Feedback received from the Customer is discussed internally and translated into action wherever necessary. Customer satisfaction survey is carried out on an annual basis.

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

| | As a percentage to total turnover |
|---|-----------------------------------|
| Environmental and social parameters relevant to the product | 0 |
| Safe & responsible usage | 100% |
| Recycling and/or safe disposal | 100% |

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

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

| | Number | Reasons for recall |
|-------------------|---------------|---------------------------|
| Voluntary recalls | N/A | N/A |
| Forced recalls | N/A | N/A |

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. **Yes. www.graphiteindia.com**

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. **N/A**

7. Provide the following information relating to data breaches:

- Number of instances of data breaches.
- Percentage of data breaches involving personally identifiable information of customers.
- Impact, if any, of the data breaches.

NIL

