



# DWARIKESH SUGAR INDUSTRIES LIMITED

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E Mail: dsilbom@dwarikesh.com Website: www.dwarikesh.com, CIN: L15421UP1993PLC018642

REF: DSIL/2024-25/071

June 04, 2024

Corporate Relationship Department  
BSE Ltd.  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort, Mumbai - 400 001  
Fax: 22723 2082 /3132

National Stock Exchange of India Limited  
“Exchange Plaza”  
Bandra – Kurla Complex,  
Bandra [E], Mumbai - 400 051

**Scrip Code - 532610**

**Scrip Code - DWARKESH**

**Sub: Regulation 34(2)(f) - Business Responsibility and Sustainability Report**

Dear Sir/ Madam,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements), 2015, *enclosed* please find Business Responsibility and Sustainability Report for the Financial Year 2023-2024, which forms an integral part of the Integrated Annual Report FY 2023-24, submitted to the Exchanges vide letter dated June 04, 2024.

You are requested to acknowledge receipt of the same.

Thanking you,

Yours Sincerely

**B J Maheshwari**

Managing Director & CS Cum CCO  
(DIN: 00002075)

Encl: As above



ANNEXURE – VII

# Business Responsibility and Sustainability Report (BRSR)

Index	
Section A	General Disclosures
Section B	Management and Process Disclosures
Section C	Principle wise Performance Disclosures
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

## Delivering Excellence with Sustainability and Transparency

Dwarikesh Sugar Industries Limited is committed to sustainable and responsible business practices that create value for our stakeholders, while also minimizing our environmental impact and contributing to the well-being of the communities in which we operate.

As a leading player in the sugar industry, we recognize the importance of adopting sustainable practices that support the long-term growth and success of our business and are committed to work towards Environmental, Social and Governance aspects.

### Environmental :

Dwarikesh Sugar Industries Limited is committed to minimizing its environmental impact through sustainable practices. The Company has implemented various measures to conserve water, recycle waste, reduce greenhouse gas emissions, switching to renewable energy and reducing overall environmental footprint.

**a. Renewable Energy :** As part of the company’s efforts towards circular economy, the bagasse generated after extraction of sugar cane juice is used for power generation through the co-generation plant. We have used renewable energy generated from co-generation plant in sugar plant operations and sold excess power to electricity department. And also, the company has conserved energy through tapping and utilization of waste heat from co-generation plant for various industrial applications. We have transformed our operations into circular economy and

achieved the goal of UN SDG 7 ensuring affordable and clean energy for sustainable business operations.

- b. Flue Gases :** Emission of carbon dioxide happens as part of flue gas during the distillery process. In order to utilize the carbon dioxide for industrial applications, the company has installed scrubber for cleaning and storage of the carbon dioxide into the cylinders. The stored carbon dioxide is sold for various industrial applications such as cooling substance in food processing industry etc. Further, this practice is also helping to reduce the carbon footprint of the company minimizing the global warming.
- c. Waste Management :** The company has taken several measures for recycling and safe disposal of residual plastic waste inline with the fulfilment of Extended Producer Responsibility (EPR) rules and guidelines. The recycling of plastic waste is carried out to produce value added products such as plastic granules which are reused in a circular loop for producing new plastic packaging material.
- d. Water Management :** We ensure 100% treatment of wastewater through installation of Zero Liquid Discharge (ZLD) systems and Condensation Polishing Unit (CPU). The treated wastewater is reused in utilities and agriculture applications to reduce the dependency on freshwater consumption. The parameters of treated wastewater are under the permissible limits prescribed by the pollution control boards.

**e. Carbon Emission :**To ensure the sustainable business operations with minimum environmental footprint; we track, monitor and maintain the inventory for Scope 1 and Scope 2 carbon emission. Aligning with the short term and long-term sustainability strategy of the company, the company has taken several measures to reduce carbon footprint by switching of clean fuels, waste heat recovery, energy conservation and controlling fugitive emissions etc.

#### **Social :**

Dwarikesh Sugar Industries Limited has a strong commitment towards social responsibility and community development. The Company has undertaken various initiatives to support education, healthcare, and infrastructure development in the communities where it operates. In FY 2023-2024, the Company provided education support and livelihood for orphan children, contributed to healthcare facilities, and supported the community by various initiatives like Blood donation camps, celebration of festivals with the community to strengthen bonds, programs for farmers, vocational training for women empowerment, medical checkup camps among many others. Our dedicated approach for the upliftment of marginalized and vulnerable groups through CSR initiatives and projects has created positive impact in many lives.

Dwarikesh Sugar Industries Limited values its employees and recognizes their crucial role in the Company's success. The Company is committed to their well-being and provides a safe and healthy work environment. Implementation of various health & safety measures have been practiced across all business operations of the company. Additionally, the Company also ensures the professional growth of employees by conducting training and development programs to enhance their skills and capabilities.

The long term of association of employees with the company attributed to the strong roots, culture of high values and a people-centric approach driven from the company's promoters and the leadership team.

#### **Governance :**

Dwarikesh Sugar Industries Limited is committed to maintaining high standards of corporate governance and ethical business practices. The Company has a comprehensive code of conduct that guides

its business activities, and it has established various committees to oversee governance-related matters. The Company has a diverse and independent board of directors, and it regularly engages with its stakeholders to ensure transparency and accountability.

Overall, Dwarikesh Sugar Industries Limited has made significant strides in its ESG performance and initiatives, demonstrating a strong commitment to sustainability and responsible business practices.

At Dwarikesh Sugar Industries Limited (DSIL), we decided to disclose our sustainability performance through our first BRSR for FY 2023-2024. We are committed to strengthening our relationships with our stakeholders as we work towards creating a positive environmental and social footprint. Our BRSR contains our responses about our policies and performance in relation to the principles covered by the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015's Regulation 34(2)(f), which span the ESG dimensions. We are also in alignment with United Nations Sustainable Development Goals (UNSDGs) which have been adopted universally to ensure a balance of social, environmental and economic sustainability and have been mapped under relevant sections of this report. In this Business Responsibility and Sustainability Report, we share our progress and achievements in the areas of environmental impact, social responsibility, corporate governance, ethical business practices and innovation.

"This BRSR report envisages our commitment, efforts, and performance on various ESG Key Performance Indicators (KPIs) protecting the stakeholders' interests and accountability towards sustainability and inclusive growth. We disclose our sustainability data with integrity, fairness and transparency maintaining highest ethical standards in a timely manner to all stakeholders for better information and decision making. Our disclosures under essential indicators and leadership indicators across 9 principles of National Guidelines on Responsible Business Conduct (NGRBC) are made in line with the requirements of Securities and Exchange Board of India (SEBI) guidelines for BRSR.

- **Vijay S Banka**, Managing Director



At **Dwarikesh Sugar Industries Limited**, we are committed to continuous improvement and will continue to invest in sustainable practices that benefit our stakeholders and the environment. We invite you to read this report and learn more about our approach towards sustainability and responsible business practices.

## Section A : General Disclosures



### I. Details of the listed entity

Dwarikesh Sugar Industries Limited is an Indian Company that is one of the key players in the sugar industry. It was founded in 1993, commissioned in 1995 and is headquartered in Dwarikesh Nagar, Bijnor, Uttar Pradesh, India and its corporate office is at Nariman Point, Mumbai. The Company is engaged in the manufacturing and sale of sugar, industrial alcohol, as well as the generation and sale of power from bagasse, a by-product of sugar manufacturing process.

Dwarikesh Sugar Industries has 3 sugar mills with 2 distillery units located in the state of Uttar Pradesh, with a total crushing capacity of 21,500 tons of sugarcane per day. The Company also has a co-generation capacity of 94 MW, which is used to generate electricity from bagasse, a byproduct of the sugar manufacturing process.

Dwarikesh Sugar Industries Limited has diversified its operations and expanded its product portfolio to include the production of ethanol and industrial alcohol. These products are in high demand and are used as biofuel under the Ethanol Blending Programme (EBP) initiated by the Government of India. This initiative not only helps to reduce the dependence on fossil fuels but also provides a boost to the agriculture sector by utilizing sugarcane molasses and other feedstocks for biofuel production. By producing these products, the Company has also contributed towards the promotion of sustainable development and reducing greenhouse gas emissions.

1.	<b>Corporate Identity Number (CIN) of the Company</b>	L15421UP1993PLC018642
2.	<b>Name of the Company</b>	Dwarikesh Sugar Industries Limited
3.	<b>Year of Incorporation</b>	1993
4.	<b>Registered office address</b>	Dwarikesh Nagar, Bijnor, Uttar Pradesh- 246762
5.	<b>Corporate office address</b>	511, Maker Chambers - V, 221, Nariman Point, Mumbai - 400021
6.	<b>E-mail</b>	investors@dwarikesh.com
7.	<b>Telephone</b>	022-22832468
8.	<b>Website</b>	www.dwarikesh.com
9.	<b>Financial year for which reporting is being done</b>	1 <sup>st</sup> April 2023 to 31 <sup>st</sup> March 2024
10.	<b>Name of the Stock Exchange(s) where shares are listed</b>	National Stock Exchange of India Limited (NSE) and Bombay Stock Exchange Limited (BSE)
11.	<b>Paid-up Capital</b>	INR 1,883.01 Lakhs
12.	<b>Name and contact details (telephone, email address) of the person for BRSR Reporting</b>	Shri B. J. Maheshwari (Managing Director and Company Secretary-cum-Chief Compliance Officer) Tel: 022 22042945 email: bjmaheshwari@dwarikesh.com
13.	<b>Reporting boundary</b>	The disclosures made under this report are on a Standalone basis for Dwarikesh Sugar Industries Limited.
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.	Sugar Production & Power Generation	Manufacturing sugar by processing sugarcane through a highly controlled process & Generation of Power through a Co-generation model.	65.54%
2.	Distillery and allied products	Manufacturing of Industrial Alcohol, Sanitizer, liquid CO2 etc.	34.46%

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

S. No.	Description of Main Activity	Description of Business Activity	% Of Turnover of the entity
1.	Sugar Production & Power Generation	10721	65.54%
2.	Distillery and allied products	11019	34.46%

## III. Operations

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

S. No.	Location	Number of plants	Number of offices	Total
1.	National	3	3	6
2.	International <sup>1</sup>	Nil	Nil	Nil

<sup>1</sup>Currently, Dwarikesh do not have any international operations.

### 19. Markets served by the entity

#### a. Number of locations

S. No.	Description of Main Activity	Number
1.	National (Number of states)	As of March 31, 2024, the Company has its presence across all states and union territories of India
2.	International (Number of countries)	We export sugar to various countries by engaging through merchant exporters. We do not export our products directly to other countries.

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

Nil

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

At **Dwarikesh Sugar Industries Limited**, we have a diverse range of customers for various products produced by us. We sell our sugar products through agents and e-commerce platforms to various customers across India, while our molasses is sold to distilleries within Uttar Pradesh. Our co-generated power is sold under a long-term Power Purchase Agreement with the Uttar Pradesh Power Corporation Limited (UPPCL). In addition, we supply our ethanol to Oil Marketing Companies (OMCs), which is used as a blend with petrol, and liquid CO2 to authorized third party agencies. The brief of our customers is as follows:

1. Our sugar is channeled through agents and E-commerce platforms to various customers across India.
2. Molasses is sold to various distilleries within Uttar Pradesh (UP) which is used by them for manufacturing country liquor.
3. Co-generation of Power: we have long-term Power Purchase Agreement (PPA) with Uttar Pradesh Power Corporation Limited (UPPCL).



4. Ethanol is supplied to Oil Marketing Companies (OMCs) – Dwarikesh also contributes to the reduction of environmental footprint by supplying ethanol, an eco-friendly and renewable source of energy to Oil Marketing Companies (OMCs) which is blended with petrol. This helps to reduce harmful emissions and improve air quality, making it a crucial component in India's efforts to transition towards a more sustainable future. The production and supply of ethanol also supports the country's energy security goals by reducing its reliance on fossil fuels. By promoting the use of biofuels like ethanol, Dwarikesh is playing an active role in promoting a greener and more sustainable economy.
5. Liquid Carbon Dioxide- During our distillery operations, we capture the CO<sub>2</sub> emissions in the due process and manufacture Liquid Carbon Dioxide after cleaning through our installed CO<sub>2</sub> scrubbers. The liquid CO<sub>2</sub> is sold to an authorized third-party agency.

#### IV. Employees

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

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

S. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
	<b>Employees</b>					
1.	Permanent (D)	475	460	97%	15	3%
2.	Other than permanent (E)	-	-	-	-	-
3.	Total employees (D+E)	475	460	97%	15	3%
	<b>Workers</b>					
4.	Permanent (F)	969	968	99.9%	1	0.1%
5.	Other than permanent (G)	1469	1469	100%	-	-
6.	<b>Total workers (F+G)</b>	<b>2,438</b>	<b>2,437</b>	<b>99.9%</b>	<b>1</b>	<b>0.1%</b>

###### b. Differently abled Employees and workers :

S. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
	<b>Differently abled Employees</b>					
1.	Permanent (D)	-	-	-	-	-
2.	Other than permanent (E)	-	-	-	-	-
3.	Total Differently abled employees (D+E)	-	-	-	-	-
	<b>Differently abled Workers</b>					
4.	Permanent (F)	-	-	-	-	-
5.	Other than permanent (G)	-	-	-	-	-
6.	<b>Total Differently abled workers (F+G)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

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

	Total	No. and percentage of Females	
	No. (A)	No. (B)	% (B/A)
Board of Directors	7	1	14.29%
Key Management Personnel	1	0	0%

##### 22. Turnover rate for permanent employees and workers

Category	FY 2024			FY 2023			FY 2022		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	12%	-	12%	9.24%	26.66%	9.79%	8.29%	7.14%	8.26%
Permanent workers	7.6%	-	7.6%	5.62%	-	5.62%	2.55%	-	2.55%

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

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
We do not have a subsidiary/associate/joint venture companies as of now.				

## VI. CSR details

### 24. i. Whether CSR is applicable as per section 135 of Companies Act, 2013 : Yes

CSR is applicable to Dwarikesh Sugar Industries Limited as per the criteria defined under Section 135 of Companies Act, 2013. We have implemented several initiatives & projects under CSR such as providing education, women empowerment and skill development in local communities for enhancing their quality of life and to create livelihood opportunities.

ii. If yes, Turnover – (in ₹) INR 17,093.01 million

iii. Net worth - (in ₹) INR 8,214.83 million

## 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 (NGBRC) :

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 2024			FY 2023		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes, the grievances from the communities can be raised through CSR committee or grievance redressal procedure adopted by the company.	Nil	NA	NA	Nil	NA	NA
Investors	Yes, the Company has an effective investor redressal mechanism. Investors with concerns can contact  Shri B J Maheshwari (Managing Director and Company Secretary-and-Chief Compliance Officer) at Tel: 022 - 22832468/ 22042945 Fax:022-22047288 Email: investors@dwarikesh.com	Nil	NA	NA	Nil	NA	NA
Shareholders	Yes, concerned shareholders can contact Shri B J Maheshwari. (Managing Director and Company Secretary-and-Chief Compliance Officer) at Tel: 022 - 22832468/ 22042945 Fax: 022 -22047288 Email: investors@dwarikesh.com Or  M/s. Link Intime India Pvt. Ltd. (Registrar & Share Transfer Agents - RTA) at Tel: 022 49186000 - 79 Fax: 022 - 4918 6060 Email: rnt.helpdesk@linkintime.co.in	1	0	NA	Nil	NA	NA



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 2024			FY 2023		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Employees and workers	Yes, the Company has an effective Whistleblower policy that covers all its employees and directors, providing them with a channel to raise concerns to maintain the highest possible standards of ethical, morale, and legal business conduct, as well as the Company's commitment to open, fearless, and genuine communication. The policy's primary goal is to provide necessary safeguards to protect employees from retaliation or victimization. For safety of women at workplace, we also have set up an Internal Complaints Committee at all our units under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act led by Ms. Priyanka G. Morarka.	Nil	NA	NA	Nil	NA	NA
Customers	Yes, we act in a way that adds value to our customers and contributes to the development of a trusting relationship. For many years, the Company and its employees have provided services and built its significant goodwill. This goodwill is one of our most valuable assets, and all Company personnel are always reminded to work hard and maintain our reputation. Any grievance from the customers can be raised through sales team or customer care number available on the packaging of our products.	Nil	NA	NA	Nil	NA	NA
Value Chain Partners	Yes, we believe in investing in people and processes to foster an outperformance culture and increase value through optimal resource integration. We currently have vendor relationships with over 1.50 lakh farmers and are committed to addressing issues raised by our value chain partners through one-on-one counselling with immediate and satisfactory resolutions.	Nil	NA	NA	Nil	NA	NA
Other (please specify)	Any other grievance form other stakeholder can be sent via email to the company secretary for immediate response and resolution.	Nil	NA	NA	Nil	NA	NA



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.	Ethical Business Practices and Disclosures	Risk & Opportunity	<p><b>Risk :</b></p> <p>a. Violation of Code of Conduct, corruption &amp; bribery compromises business relations and erodes customer trust &amp; confidence.</p> <p>b. Non-adherence to local laws may lead to legal action by the law enforcement agencies.</p> <p><b>Opportunity :</b></p> <p>a. Running the operations in an ethical &amp; transparent manner creates brand value of the company.</p> <p>b. Protects stakeholder interests' and builds confidence to customers and investors.</p>	<p>a. Conduct training programs on Code of Conduct for all employees and workers across all business operations.</p> <p>b. Ensure integrity, fairness, transparency and accountability across all operations and communicate to internal and external stakeholders.</p> <p>c. Disclosure of weekly sugar stocks, submission of compliance reports, publish financial reports and annual reports as per the scheduled timeline.</p>	<p><b>Negative :</b></p> <p>a. Non-compliance to code of conduct negatively affects the long-term growth &amp; expansion of the company.</p> <p><b>Positive :</b></p> <p>a. Ensuring integrity, fairness, transparency &amp; accountability across all business operations builds trust and confidence to all stakeholders.</p>
2.	Employee Well Being & Safety	Risk & Opportunity	<p><b>Risk :</b></p> <p>a. Lack of adequate safety systems, process controls, practices &amp; Standard Operating Procedures (SOPs) as per health &amp; safety management system and Material Safety Data Sheets (MSDS) leads to accidents and injuries.</p> <p><b>Opportunity :</b></p> <p>a. Strict adherence to safety measures and safety related legal obligations ensures employee well being and improves the productivity</p>	<p>a. Conduct regular training programs on safety at workplace, permit to work &amp; incident reporting mechanisms.</p> <p>b. Identification of near miss incidents, workplace hazards &amp; implementation of mitigation measures.</p> <p>c. Conduct safety audits, risk assessment to protect health &amp; well being of all employees and workers.</p> <p>d. Provide necessary Personal Protective Equipment (PPE) considering the nature and location of work and associated risks.</p>	<p><b>Negative :</b></p> <p>a. Inadequate safety systems, practices &amp; SOPs may cause accidents &amp; injuries to employees and workers.</p> <p>b. Failure to comply with health and safety laws &amp; regulations results in imposition of fines, legal risks, and reputational damage.</p> <p><b>Positive :</b></p> <p>a. Strict adherence to safety guidelines avoids workplace accidents which in turn reduces associated medical costs &amp; claims.</p> <p>b. Reduces production downtime &amp; improves overall productivity.</p> <p>c. Enhance employee satisfaction and retention.</p>



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3 (a)	Water Management	Opportunity & Risk	<p><b>Opportunity :</b></p> <p>a. Water conservation through implementation of Zero Liquid Discharge (ZLD) and practicing rainwater harvesting reduces water related costs and associated basin level and operational water risks.</p> <p><b>Risk :</b></p> <p>a. As a water-intensive industry, the Company is vulnerable to water scarcity and quality issues, which can disrupt its operations and increase costs.</p> <p>b. Shortage of water may cause potential conflict with nearby communities and farmers.</p>	<p>a. Implemented water conservation measures &amp; optimized water consumption across all processes and operations of the company to improve water utilization efficiency.</p> <p>b. Practice reuse of treated wastewater and rainwater harvesting.</p> <p>c. Conduct water audit, water risk assessment and implement appropriate mitigation strategy.</p> <p>d. Assist our farmers to use drip irrigation system minimizing water consumption and maximizing crop yield.</p> <p>e. Dwarikesh Sugar Industries has partnered with various organizations and stakeholders to promote water stewardship initiatives and sustainable water management practices including installation of ZLD mechanism at plant locations.</p> <p>f. We monitor the water consumption, wastewater discharge on daily basis and maintain water inventory.</p> <p>g. Submit the compliance reports to the respective regulatory agencies.</p> <p>h. These measures help the Company to minimize the risks associated with water scarcity, water quality, and regulatory compliance, while also improving its operational efficiency and reducing its environmental impact.</p>	<p><b>Positive :</b></p> <p>a. Avoids disruptions of operations by reducing the dependency on freshwater consumption.</p> <p>b. Utilizing treated wastewater in operations reduces water withdrawal and procurement costs.</p> <p>c. Prevents conflict with local communities and farmers on shortage of groundwater resources.</p> <p><b>Negative :</b></p> <p>a. Non-adherence to laws and regulations may lead to imposition of fines and legal action by the ground water departments</p>
3 (b)	Waste Management	Opportunity & Risk	<p><b>Risk :</b></p> <p>a. Improper handling, storage, processing &amp; disposal of hazardous and non-hazardous waste may pollute the environment.</p>	<p>a. Implementation of 3R (Reduce, Reuse &amp; Recycle) waste management hierarchy to promote circular economy.</p> <p>b. Compliance to Extended Producer Responsibility (EPR) rules and guidelines published by Central Pollution Control Board (CPCB).</p> <p>c. Periodic review of waste management policies and procedures to ensure alignment with best practices and regulatory requirements.</p>	<p><b>Negative :</b></p> <p>a. Pollution of the environment due to waste disposal may lead to several legal and financial risks to the company.</p> <p>b. Improper waste management practices causes reputational damage and affects brand value of the company.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
					<p><b>Positive :</b></p> <ul style="list-style-type: none"> <li>a. Reduces waste disposal costs and environmental pollution related risks.</li> <li>b. Generation of additional revenue for the company through sale of waste byproducts.</li> </ul>
4.	Regulatory Compliance	Risk	<p><b>Risk :</b></p> <ul style="list-style-type: none"> <li>a. Non-adherence to local laws and guidelines such as Consent to Operate (CTO), CPCB norms and labor laws may lead to legal action by the law enforcement agency.</li> </ul>	<ul style="list-style-type: none"> <li>a. Regularly monitor the regulatory requirements and ensure fulfilment of all compliance conditions.</li> <li>b. Conduct awareness session on regulatory requirements for sugar industry by industry experts.</li> <li>c. Adopt regulatory compliance framework &amp; monitor the compliance requirements.</li> <li>d. Maintain compliance register and update on regular basis.</li> </ul>	<p><b>Negative :</b></p> <ul style="list-style-type: none"> <li>a. Violation of local laws &amp; guidelines may attract legal action by law enforcement agency and also affects the brand reputation.</li> </ul>
5.	Sustainable Agriculture and Land use	Risk & Opportunity	<p><b>Risk :</b></p> <ul style="list-style-type: none"> <li>a. Degradation of land, deforestation may have signification negative impact on biodiversity.</li> </ul> <p><b>Opportunity :</b></p> <ul style="list-style-type: none"> <li>a. Practicing sustainable agriculture and land use leads higher productivity.</li> <li>b. Reduces operational costs and also mitigates water related risks.</li> </ul>	<ul style="list-style-type: none"> <li>a. Improve soil health by use of organic fertilizers such as enriched press mud compost may increase the yield of sugarcane.</li> <li>b. Promote drought resistant and disease resistant varieties of sugarcane plants.</li> </ul>	<p><b>Negative :</b></p> <ul style="list-style-type: none"> <li>a. Adverse impact on biodiversity may affect the reputation &amp; brand value of the company.</li> </ul> <p><b>Positive :</b></p> <ul style="list-style-type: none"> <li>a. Practicing sustainable agriculture gives higher yield and reduces agriculture costs.</li> </ul>
6.	Human Rights	Risk	<p><b>Risk :</b></p> <p>Non-compliance to human rights related laws and regulations leads to stringent action by the law enforcement agencies.</p>	<ul style="list-style-type: none"> <li>a. Conduct human rights due diligence.</li> <li>b. Identification and mitigation of human rights related risks.</li> <li>c. Conduct training programs to employees and workers on human rights related laws and regulations across all business operations.</li> <li>d. Adhere to International Labour Organization (ILO) guidelines and conventions prohibiting any kind of discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity, religion, disability, family status, social origin, and so on.</li> </ul>	<p><b>Negative :</b></p> <ul style="list-style-type: none"> <li>a. Non-compliance to human rights laws &amp; regulations affects the reputation &amp; brand value of the company.</li> </ul>



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)
7.	Innovation Management	Opportunity	<p>a. By investing in R&amp;D, we can develop new and innovative products, improve manufacturing processes, and enhance overall competitiveness in the market. This can lead to increased revenue streams, improved product quality, and stronger customer relationships. Moreover, R&amp;D can help us stay ahead of our competitors by continuously improving our products and processes, which can lead to increased market share and brand recognition. This can also help the Company to explore new market opportunities and expand its business in new geographies. Additionally</p>	<p>a. We are investing in research and development to tap into the opportunities of developing new products and improving existing ones. The Company has a dedicated R&amp;D team that focuses on enhancing sugar recovery rates, developing new sugarcane varieties, and exploring opportunities for diversification into other areas such as biofuels and renewable energy. Additionally, the Company is collaborating with academic and research institutions to leverage its expertise and stay up to date on the latest technologies and trends in the industry. Dwarikesh Sugar Industries is also exploring new markets for its products through R&amp;D efforts. R&amp;D can also help the Company to explore new and sustainable sources of raw materials, which can help to reduce its environmental impact and improve its reputation among customers and stakeholders.</p>	<p><b>Positive :</b> Ensures cost saving and enhanced revenue generation through innovation.</p>
8.	Climate Change (Energy Management Emissions)	Opportunity	<p><b>Opportunity :</b> a. Reduce its operational costs, improve its environmental impact, and potentially benefit from incentives and carbon credits. Additionally, the Company's commitment to sustainability can enhance its brand reputation and potentially attract environmentally conscious customers and investors.</p>	<p>a. We have implemented various measures to reduce our greenhouse gas emissions, such as increasing the use of renewable energy sources like bagasse and investing in energy-efficient equipment. Additionally, we have also explored the possibility of generating revenue by selling excess energy back to the grid. Through these efforts, we aim to not only minimize our environmental impact but also create value for our stakeholders.</p>	<p><b>Positive :</b> a. These initiatives not only help us to mitigate the risks associated with climate change and also reduces operational costs through energy conservation.</p>
9.	Community Engagement and Social Responsibility	Opportunity	<p><b>Opportunity :</b> a. Identify the areas for improvement of local communities and create positive impact on their lives through CSR programs. b. Uplift the marginalized/ vulnerable groups through CSR initiatives and projects. c. Maintain harmonious relations with local communities to avoid conflict</p>	<p>a. Company has been carrying out its various CSR activities through its trust R.R. Morarka Charitable Trust, which is a registered trust. b. Implement CSR projects in the areas of health, education and other environmental projects.</p>	<p><b>Positive :</b> a. Prevents conflict with the local communities through implementation of CSR projects. b. Uplifts the marginalized/ vulnerable groups and improves their quality of life.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
10.	Sustainable Packaging	Opportunity	<p><b>Opportunity :</b></p> <p>a. Adopting sustainable packaging initiatives promoting circular economy reduces the waste disposal costs.</p> <p>b. Ensures compliance to Extended Producer Responsibility (EPR)</p>	<p>a. Identify and adopt the innovative eco-friendly packaging solutions.</p> <p>b. Ensure that the waste generated from the packaging material shall be recycled and reused.</p> <p>c. Achieve zero waste to landfill by diversion of waste to produce value added products from empty plastic bags such as plastic granules.</p> <p>d. Replace non-biodegradable bags with bio-degradable and compostable plastic bags.</p>	<p><b>Positive :</b></p> <p>a. Reduces waste disposal costs and promotes circular economy.</p> <p>b. Adheres to EPR compliance.</p>
11.	Privacy and Cyber Security	Risk	<p><b>Risk :</b></p> <p>a. Disruption of business and loss of confidential data due to cyber-attacks.</p> <p>b. Inadequate systems, processes, controls for prevention, detection, and remediation of data security threats can affect the company's reputation.</p> <p>c. Erodes customer trust and negatively influence customer acquisition &amp; retention resulting in decreased market share.</p>	<p>a. Implementation of IT management system with multiple controls.</p> <p>b. Ensure appropriate protection systems are in place such as anti-virus and fire-walls to ensure data protection and security.</p> <p>c. Conduct training and awareness programs, end point and network security controls.</p> <p>d. Proactive monitoring and analysis of any new vulnerabilities and threats. Accordingly, adopt &amp; implement appropriate mitigation strategy.</p>	<p><b>Negative :</b></p> <p>a. Breach of confidential information erodes customer trust and business relations.</p>
12.	Customer Relationship Management	Opportunity and Risk	<p><b>Opportunity :</b></p> <p>Regular interaction and addressing the product related concerns of customers helps in business expansion and increase revenue generation</p>	<p>a. Deploy adequate systems and practices for customer feedback.</p> <p>b. Address the concerns of the customers related to product quality, warranty and other features.</p> <p>c. Develop and supply the products with best quality meeting the customers' expectations to gain trust and confidence.</p>	<p><b>Positive :</b></p> <p>Business expansion, increase in revenue generation and promotes brand value of the company.</p> <p><b>Negative :</b></p> <p>Decrease in sales of products and revenue generation due to negative feedback of customers.</p>



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
13.	Product Quality & Safety	Opportunity & Risk	<p><b>Opportunity :</b></p> <p>a. Delivering the products with better quality gains customer trust and helps in increase of sales and revenue generation.</p> <p><b>Negative :</b></p> <p>a. Non-adherence to sugar industry quality standards may deteriorate product quality leading to complaints from the customers which in turn impacts the sales, revenue generation and business expansion.</p>	<p>a. Deployed rigorous testing mechanism for testing the quality of each batch of sugar prior to dispatch.</p> <p>b. Maintain the sugar qualities as per the prescribed grades and standards of sugar sector</p>	<p><b>Positive :</b></p> <p>a. Supply of good quality products helps in business expansion.</p>
14.	Sustainable Supply Chain Management	Opportunity & Risk	<p><b>Opportunity :</b></p> <p>a. Assessment of suppliers on ESG criteria avoids supply chain disruptions.</p> <p>b. Sustainable Supply Chain Management helps in sourcing of materials even in adverse situations and conditions.</p> <p><b>Risk :</b></p> <p>a. Lack of appropriate mechanism for screening &amp; selection of suppliers on ESG criteria may lead to business disruptions.</p>	<p>a. Deploy sustainable supply chain management framework across all business operations of the company.</p> <p>b. Diversify the supply chain for sustainable procurement.</p> <p>c. Conduct regular assessment of suppliers on ESG criteria.</p>	<p><b>Positive :</b></p> <p>a. Avoids supply chain disruptions and ensure business resilience.</p> <p><b>Negative :</b></p> <p>a. Lack of adequate systems &amp; processes for sustainable procurement may hamper the operations of the company.</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

### Policy and Management processes

	Points	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	<p>Policy on Related Party Transactions - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Related-Party-Transactions-Policy.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Related-Party-Transactions-Policy.pdf</a></p> <p>Familiarisation Programme for Independent Directors - <a href="https://dwarikesh.com/wp-content/uploads/2023/03/Familiarisation-Programme-for-Independent-Directors-amended-20.03.2023.pdf">https://dwarikesh.com/wp-content/uploads/2023/03/Familiarisation-Programme-for-Independent-Directors-amended-20.03.2023.pdf</a></p> <p>Terms of Appointments of Independent Directors - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/04/Familiarisation-Programme-for-Independent-Directors-amended-20.03.2023.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/04/Familiarisation-Programme-for-Independent-Directors-amended-20.03.2023.pdf</a></p> <p>Corporate Social Responsibility (CSR) Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Corporate-Social-Responsibility.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Corporate-Social-Responsibility.pdf</a></p> <p>Policy on Preservation of Documents - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Preservation-of-Documents.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Preservation-of-Documents.pdf</a></p> <p>Policy on Material Subsidiaries - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Material-Subsidiaries.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Material-Subsidiaries.pdf</a></p> <p>Policy on Directors' Appointment and Remuneration - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Directors-Appointment-and-Remuneration.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Directors-Appointment-and-Remuneration.pdf</a></p> <p>Health, Safety &amp; Environment Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Human-Rights.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Human-Rights.pdf</a></p> <p>Policy on Determination of Materiality of Events and Information - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/07/Policy-on-Determination-of-Materiality-of-Events-amended.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/07/Policy-on-Determination-of-Materiality-of-Events-amended.pdf</a></p> <p>Dividend Distribution Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Dividend-Distribution-Policy.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Dividend-Distribution-Policy.pdf</a></p> <p>Vigil Mechanism / Whistle Blower Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Whistle-Blower-Policy.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Whistle-Blower-Policy.pdf</a></p> <p>Archival Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Archival-Policy.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Archival-Policy.pdf</a></p> <p>Insider Trading Code of Conduct - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Insider-Trading-Code-of-Conduct.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Insider-Trading-Code-of-Conduct.pdf</a></p>								



Points		P1	P2	P3	P4	P5	P6	P7	P8	P9
		<p>Code for Fair Disclosure (Prohibition Of Insider Trading) - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/prohibition_of_insider_trading.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/prohibition_of_insider_trading.pdf</a></p> <p>Code of Conduct for Senior Management and Directors - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Code_of_Conduct_for_Senior_Management_and_Director.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Code_of_Conduct_for_Senior_Management_and_Director.pdf</a></p> <p>Media Agreement - <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Media-Agreement.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Media-Agreement.pdf</a></p> <p>Cyber Security Data Privacy &amp; Protection Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Cyber-Security-Data-Privacy-Protection.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Cyber-Security-Data-Privacy-Protection.pdf</a></p> <p>Human Rights Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Human-Rights.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Human-Rights.pdf</a></p> <p>Supplier Code of Conduct - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Supplier-Code-of-Conduct.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Supplier-Code-of-Conduct.pdf</a></p> <p>Sustainable Sourcing Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Sustainable-Sourcing.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Sustainable-Sourcing.pdf</a></p> <p>Anti Bribery Anti-Corruption Policy - <a href="https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Anti-Bribery-Anti-Corruption-ABAC.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Anti-Bribery-Anti-Corruption-ABAC.pdf</a></p>								
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.	<p>Principle 1 : Code of Conduct to ensure highest standards of Corporate Governance</p> <p>Principle 2 : Adopted sugar grading standards as mandated by National Sugar Institute, based on which we produce L-31, M-31, S-31, L-30, and M-30 grades of sugar.</p> <p>Principle 3 : Implemented Health, Safety &amp; Environment Policy safeguarding the health and wellbeing of our employees, and workers ensuring a safe workplace.</p> <p>Principle 4 : Our stakeholder identification &amp; engagement plan helps in continuous dialogue with all our stakeholders protecting their interest, better decision making and value creation.</p> <p>Principle 5 : Whistle blower policy uphold the highest standards of moral and ethical business conduct through transparent and trustworthy communication.</p> <p>Principle 6 : Adhere environmental laws &amp; regulations and comply to pollution control board norms.</p> <p>Principle 7 : Compliant with all legal regulations and ensure ethical business and regulatory conduct.</p> <p>Principle 8 : Implemented CSR policy for upliftment of marginalized/vulnerable groups by conducting education, women empowerment and skill development projects.</p> <p>Principle 9 : As a responsible corporate, we deliver the best quality products through sustainable operations in a timely manner.</p>								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>Our ESG related goals, targets and commits for sustainable business operations are provided below :</p> <p><b>Environmental :</b></p> <ul style="list-style-type: none"> <li>➤ 100% renewable energy is sourced for plant operations.</li> <li>➤ Achieve Zero Liquid Discharge (ZLD) by 100% treatment and reuse of wastewater in distillery plant and ETP.</li> <li>➤ Mitigate the short term and long term water related risks through implementation of water conservation.</li> </ul>								



	Points	P1	P2	P3	P4	P5	P6	P7	P8	P9
		<ul style="list-style-type: none"> <li>➤ Ensure recycling and reuse of waste inline with the Extended Producer Responsibility (EPR) rules and guidelines.</li> </ul> <p><b>Social :</b></p> <ul style="list-style-type: none"> <li>➤ Create positive impact &amp; improve the quality of life of local communities by promoting social and economic development.</li> <li>➤ Ensure a safe workplace for employees and workers.</li> <li>➤ Conduct training and development programs for skill development and professional growth of employees and workers.</li> <li>➤ Assist and support sugarcane farmers for getting higher yield and productivity of sugarcane crops.</li> </ul> <p><b>Governance :</b></p> <ul style="list-style-type: none"> <li>➤ Ensure 9 principles of NGRBCs are covered by the relevant policies across business operations of the company.</li> <li>➤ Implementation of robust corporate governance and risk management framework ensuring transparency, integrity and accountability to run the business in a sustainable manner.</li> </ul>								
6	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	<p><b>Environment :</b></p> <ul style="list-style-type: none"> <li>➤ 100% renewable energy consumption.</li> <li>➤ Achieved Zero Liquid Discharge (ZLD) by 100% utilization of treated wastewater in distillery plants.</li> <li>➤ Achieved targets of recycling, reuse and safe disposal in line with the requirements of Extended Producer Responsibility (EPR).</li> </ul> <p><b>Social :</b></p> <ul style="list-style-type: none"> <li>➤ Achieved Zero LTIFR, Zero Fatalities and Zero High consequence work related injuries or ill health ensure safe workplace.</li> <li>➤ Created positive impact in more than 20,000 lives through implementation of CSR programs by upliftment of marginalized and vulnerable groups in local communities.</li> <li>➤ Organized the suitable training &amp; development programs for professional growth and well being of employees and workers.</li> <li>➤ Assisted farmers in development of better varieties of sugarcane crops, improving the productivity and yield of the crops.</li> </ul> <p><b>Governance :</b></p> <ul style="list-style-type: none"> <li>➤ Deployed appropriate systems and practices for ensuring transparency, integrity and accountability in business operations.</li> <li>➤ All types of business risks, operational risks, financial risks, market risks, legal risks are assessed and implemented an appropriate mitigation strategy.</li> </ul>								



Points	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Governance, leadership, and oversight</b>									
7	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)	As a responsible corporate, we focus on achieving the business excellence in sustainable manner minimizing our environmental footprint. We ensure sustainability is embedded across all our business operations through switching of operations to 100% renewable energy, achieving zero liquid discharge and zero waste to landfill. Further, optimization of systems & processes for complete transformation of our operations into circular economy. We ensure compliance to applicable environmental laws & regulations in India at adhere to best sustainable practices globally.							
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Shri B. J. Maheshwari w(Managing Director and Company Secretary-and-Chief Compliance Officer) Tel: 022 22042945 email: bjmaheshwari@dwarikesh.com							
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.	Yes. We have formulated “ESG Committee”, which oversees matters related to sustainability. It is responsible for providing direction to the management on formulation of ESG initiatives and monitoring the Company’s progress and performance on its long-term ESG commitments and targets.							

Subject for Review	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>10 Details of Review of NGRBCs by the Company</b>									
<b>a. Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee</b>									
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
<b>b. Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)</b>									
1. Performance against above policies and follow up action	Quarterly	Quarterly	Quarterly	Quarterly	Quarterly	Quarterly	Quarterly	Quarterly	Quarterly

Subject for Review	P1	P2	P3	P4	P5	P6	P7	P8	P9
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.								
The Company conducts periodic review of the charters, policies internally by the Senior Management and Board Committees. Independent assessment / evaluation of the working of its policies by an external agency will be done on need basis.									
12.	If answer to question (1) above is “No” i.e., not all Principles are covered by a policy, reasons to be stated :								
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									
Not applicable									

## Section C : Principle-wise performance disclosure

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



Upholding the principles of excellence, transparency and accountability, we strive to protect the best interests of our stakeholders and bolster our commitment to operate in an ethical manner. Our Governance processes are deeply embedded in our board's policies, terms of reference and overall procedures to ensure that an ethical conduct is upheld at all levels.

**Name : B. J Maheshwari**

*Designation : Managing Director and CS cum CCO*

We ensure trust, transparency, accountability, and business integrity across all business operations to achieve business resilience and sustainability. All employees of the company shall strictly adhere to the code of conduct, policies and guidelines. We always strive for nurturing our relationships with all stakeholders. And also, the company proactively implements Environment, Social and Governance initiatives and projects in line with the sustainability strategy and vision of the company.

## ESSENTIAL INDICATORS

### 1. Percentage coverage by training and awareness programmes on any of the principles during the FY 2024

Segment	Total number of training & 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	12	Code of Conduct, Impact of Covid-19 on Financial & Operational Performance of the Company, financial results & performance, internal audit plans, internal financial controls and risk management systems, employee health & safety, compliances with applicable laws, amendments in the statutory requirements to the company, exemptions and relaxations for sugar industry as per the statutory guidelines	100%
Key Managerial Personnel			
Employees other than BoD and KMPs	15	Code of Conduct, Quality control, Sustainable operations, Health & Safety, Statutory Compliance, Prevention of Sexual Harassment (PoSH), sugarcane quality testing procedures, boiler operations, flue gas management systems, effluent treatment plants, energy conservation, optimization and improvement of resource efficiency.	58.94 %
Workers			36.20%

### 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

	NGRBC Principle	Name of the regulatory/ enforcement agencies/ Judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/ No)
<b>Monetary</b>					
Penalty/Fine	Principle 1	UP Legal Metrology Department	25,000	Non-disclosure of customer care number on 5 KG packaging of sugar bags	No



	NGRBC Principle	Name of the regulatory/ enforcement agencies/ Judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/ No)
Penalty/Fine	Principle 1	State Excise Department	20,000	Low recovery of molasses	No
Penalty/Fine	Principle 1	UP Pollution Control Board	60,000	Environmental compensation at Dwarikesh Nagar Unit	No
Settlement	NA	NA	NA	NA	NA
Compounding fee	Principle 1	Cane Inspector	1,15,500	Minor irregularities were found at Cane centers by the weighment inspector.	No
<b>Non – Monetary</b>					
Imprisonment	Nil	NA	NA	NA	NA
Punishment	Nil	NA	NA	NA	NA

\*These cases pertain to and are a part of our daily business operation with minor penalties. Hence, these have not been uploaded on the website.

**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
NA	NA

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

Yes, we have Anti-bribery and Anti-corruption (AB&AC) policy committed to implement and enforce adequate procedures to prevent, deter, detect, and counter bribery and corruption in any form or manner. All employees, workers including value chain partners and third-party agencies should strictly adhere to AB&AC policy and applicable laws such as Prevention of Corruption Act, 1988 across all business operations. Any violation on AB&AC policy or applicable laws shall be reported as to ABAC officer/ competent authority/ chairman of the audit committee per the guidelines provided in the whistle blower policy. After investigation on the complaint, the competent authority may direct the concerned authority to take disciplinary action under applicable statutory provisions. The disciplinary action may involve any of the following based on the severity of the case:

- » Issuance of a formal apology.
- » Counseling sessions aimed at addressing and rectifying the behavior.
- » Issuance of a written warning, with a copy retained in the employee's personnel file for record-keeping purposes.
- » Reassignment of work duties or transfer to a different role.
- » Suspension or termination of employment for employees found guilty of the offense.

If business partners, including value chain partners and third party agencies, found to be in breach of this Policy may face significant fines or penalties, or the immediate termination of all business relationships with the Company. Such decisions will be made in consultation with the respective Business Heads.

To ensure compliance with AB&AC policy, the company may conduct confidential audits either by internal auditors or external auditors to identify any potential violations of AB&AC policy. These audit activities cover the following:

- » Identification of any deviation of AB&AC policy.
- » Review of existing practices around AB&AC monitoring mechanisms.
- » Random sampling of existing business agreements for any deviation from the company standard practices.
- » Due diligence reports conducted prior to execution of contracts with value chain partners or any third parties.

We protect the complainant from any kind of retaliation for reporting the violation against the company policies by maintaining confidentiality and ensuring protected disclosures. And also, the company does not tolerate any retaliation against the Whistle Blower for reporting in good faith any inquiry or concern.

The AB&AC Policy, Whistle Blower Policy and Code of Business Conduct and Ethics policies are available at

- » AB&AC Policy - <https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Anti-Bribery-Anti-Corruption-ABAC.pdf>
- » Whistle Blower Policy - <https://www.dwarikesh.com/wp-content/uploads/2023/03/Whistle-Blower-Policy.pdf>
- » Code of Business Conduct and Ethics - [https://www.dwarikesh.com/wp-content/uploads/2023/03/Code\\_of\\_Conduct\\_for\\_Senior\\_Management\\_and\\_Director.pdf](https://www.dwarikesh.com/wp-content/uploads/2023/03/Code_of_Conduct_for_Senior_Management_and_Director.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**

	Segment	FY 2024	FY 2023
1	Directors	Nil	Nil
2	Key Managerial Personnel	Nil	Nil
3	Employees	Nil	Nil
4	Workers	Nil	Nil

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

	Segment	FY 2024		FY 2023	
		Number	Remarks	Number	Remarks
1.	Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
2.	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.**

Not Applicable, as there are no corruption and conflict of interest cases.

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

Segment	FY 2024	FY 2023
Number of days of accounts payables	12.60	19.46

**Note :** We have considered average accounts payable figure to estimate the number of days of accounts payables for the respective financial years.

**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 2024	FY 2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases*	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	59.68%	69.97%
	b. Number of dealers / distributors to whom sales are made	10	10
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	100%	100%



Parameter	Metrics	FY 2024	FY 2023
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)**	-	-
	b. Sales (Sales to related parties / Total Sales)	-	-
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	-	-
	d. Investments (Investments in related parties / Total Investments made)	62.24%	100%

Note :

\*\*The percentage of purchases from RPTs is negligible. Hence, we have not disclosed in the above table.

## LEADERSHIP INDICATORS

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
38	Code of Conduct, Quality control, Sustainable operations, Health & Safety, Statutory Compliance, Prevention of Sexual Harassment (PoSH), sugarcane quality testing procedures, boiler operations, flue gas management systems, effluent treatment plants, energy conservation, optimization and improvement of resource efficiency.	43.80%

### 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.

The Company has internal control systems and policies in place to manage conflict of interest involving members of the board. We also have a code of conduct for senior management and directors in place to manage conflict of interests among them which can be accessed through the weblink [https://www.dwarikesh.com/wp-content/uploads/2023/03/Code\\_of\\_Conduct\\_for\\_Senior\\_Management\\_and\\_Director.pdf](https://www.dwarikesh.com/wp-content/uploads/2023/03/Code_of_Conduct_for_Senior_Management_and_Director.pdf)

**Principle 2 :** Businesses should provide goods and services in a manner that is sustainable and safex



We prioritise the responsible management of our products ensuring the delivery of good quality and long life products. We strive to maximise the value of our products while minimising their ecological footprint in line with the sustainability strategy of the company.

**Name : Vijay S. Banka**

*Designation : Managing Director*

The company prioritizes sustainable sourcing and consumption of materials leading to sustainable production of products reducing the dependency, protecting & preservation of natural resources. The suppliers are also evaluated on the ESG parameters to ensure all materials are sourced sustainably to reduce the environmental footprint of products and mitigating ESG related risks. All suppliers need to comply with the regulatory standards and should comply with the DSIL's Sustainable Sourcing Policy and Supplier Code of Conduct (SCoC).

## 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.

Segment	FY 2024	FY 2023	Details of improvements in environmental and social impacts
R&D	-	-	Capacity enhancement and upgradation of effluent treatment plant and S.T.P to treat and reuse the wastewater in the utilities and irrigation purposes. Several environmental and social impacts created from this project include :  1. Reduce the consumption of freshwater, by reuse of treated wastewater in utilities which in turn reduced water withdrawal costs and associated risks.
Capex	INR 29.83 million	INR 97.02 million	

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

Yes, we have Sustainable Sourcing Policy and Supplier Code of Conduct (SCoC) with detailed guidelines and procedures for sustainable sourcing of various raw materials, products and services.

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

Yes, 100% of input raw materials were sourced 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

We have standard operating procedures, systems and practices to safely reclaim products for reusing, recycling and disposing residual fraction of waste in line with the pollution control board norms.

- » Bagasse used as feed stock to produce renewable power through co-generation.
- » Plastic waste is recycled to produce value added products such as plastic granules by engaging authorized third-party recycling agency by Central Pollution Control Board (CPCB).



- » Hazardous waste oil is handed over to an authorized hazardous waste management agency by CPCB to recycle and reuse.
- » Boiler ash is used as soil enricher due to presence of high organic carbon and potash.
- » Press mud is used as organic fertilizer by farmers which also increases sugarcane crop yield.

**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, DSIL falls under the Brand Owners category as per the Plastic Waste Management Rules 2016, EPR rules and guidelines published by the CPCB. We have taken EPR authorization from the CPCB and filing periodic returns in the EPR portal as per the timeline defined by the CPCB. We have a waste collection plan in line with the EPR targets and action plan provided by the CPCB for fulfilments of EPR obligations through sourcing of category II plastic credits from an authorized plastic waste recycling agency by the CPCB.

### 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. Life Cycle Assessment (LCA) was not conducted for our products.					

**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
Not Applicable, as there is no LCA conducted for our products.		

**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).**

Name of Product / Service	Recycled or re-used input material to total material	
	FY 2024	FY 2023
Not Applicable. Sourcing of recycled or re-used input material is not relevant to our business.		

**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)	-	132 MT	564 MT	-	863.9 MT	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	7.8 MT	-	-	0.6 MT	-
Other Waste	-	-	-	-	-	-

**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
Plastic Waste	50%







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

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)
<b>Permanent Employees</b>											
Male	968	968	100%	968	100%	NA	NA	NA	NA	NA	NA
Female	1	1	100%	1	100%	1	100%	NA	NA	NA	NA
<b>Total</b>	<b>969</b>	<b>969</b>	<b>100%</b>	<b>969</b>	<b>100%</b>	<b>1</b>		<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>
<b>Other than Permanent Employees</b>											
Male	1469	11	0.75%	182	12.39%	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Total</b>	<b>1469</b>	<b>11</b>	<b>0.75%</b>	<b>182</b>	<b>12.39%</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>

\*Accident insurance is only provided to workers and employees operating heavy machinery and who are exposed to risks related to work.

\*\* There are no paternity leave benefits

\*\*\*None amongst the workforce took maternity leave during the financial year 2023-24.

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

	FY 2024	FY 2023
Cost incurred on wellbeing measures as a % of total revenue of the company	0.10%	0.08%

2. Details of retirement benefits for Current and Previous Financial Years

S. no.	Benefits	FY 2024			FY 2023		
		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%	NA
	Gratuity*	100%	100%	Yes	100%	100%	NA
	ESI	NA	NA	NA	NA	NA	NA
	Others – please specify	NA	NA	NA	NA	NA	NA

\* Gratuity is a terminal benefit which is paid the Company to the employee and the same is over and above the CTC as contractually agreed.

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.

Yes, all our premises and offices are accessible to differently abled employees.

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.

Yes, we have covered the equal opportunity under our human rights policy. We ensure equal opportunities for all employees including differently abled for career progression and professional growth. We are committed to providing fair remuneration to all employees, ensuring that compensation packages are equitable, competitive, and commensurate with the nature of the work performed, as well as the skills, qualifications, and experience of the individual. Human rights related policy is available at <https://www.dwariKesh.com/wp-content/uploads/2024/05/Policy-on-Human-Rights.pdf>

We adhere to applicable laws and regulations governing wages and benefits, and we strive to maintain transparency in our compensation practices.

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

Gender	Permanent Employees		Permanent Workers	
	Return to work Rate (%)	Retention Rate (%)	Return to work Rate (%)	Retention Rate (%)
Male	NA	NA	NA	NA
Female	NA	NA	NA	NA
<b>Total</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>

**Note :** Not applicable, as in the current financial year none of the personnel have taken parental leave.

## 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)
1 Permanent workers	<ul style="list-style-type: none"> <li>Yes, The Company's has a Whistle Blower Policy applicable to all directors and employees to report concerns or misconduct on violation of the code of the conduct through a vigil mechanism, a secured reporting mechanism administered by the Chairman of the Audit Committee.</li> </ul>
2 Other than Permanent Workers	
3 Permanent Employees	<ul style="list-style-type: none"> <li>If the Whistle Blower believes that there is a conflict of interest between the Competent Authority and the Whistle Blower, he/she may send his/her protected disclosure directly to the Chairman of the Audit Committee, DSIL.</li> <li>The Company ensures confidentiality in the entire process of grievance redressal protecting the identity and grievance related information. The grievance will be routed and redressed through site head at plant locations and through human resources department at respective sites and corporate office. The Company's Whistle Blower policy is available at <a href="https://www.dwarikesh.com/wp-content/uploads/2023/03/Whistle-Blower-Policy.pdf">https://www.dwarikesh.com/wp-content/uploads/2023/03/Whistle-Blower-Policy.pdf</a></li> </ul>
4 Other than Permanent Employees	

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

Category	FY 2024			FY 2023		
	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)	% (B/A)
<b>Total Permanent Employees</b>	475	206	43.46%	480	205	42.7%
Male	460	206	44.78%	465	205	44%
Female	15	-	-	15	-	-
<b>Total Permanent Workers</b>	969	765	78.94%	924	750	81.1%
Male	968	765	78.94%	924	750	81.1%
Female	1	-	-	-	-	-



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

Category	FY 2024					FY 2023				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
<b>Employees</b>										
Male	460	460	100%	299	65%	465	224	48.17%	29	4.73%
Female	15	15*	100%	2	13.33%	15	3	20%	-	-
<b>Total</b>	<b>475</b>	<b>475</b>	<b>100%</b>	<b>301</b>	<b>63.37%</b>	<b>480</b>	<b>227</b>	<b>47.29%</b>	<b>29</b>	<b>4.73%</b>
<b>Workers</b>										
Male	968	968	100%	752	77.69%	923	923	100%	-	-
Female	1	1	100%	1	100%	1	1	100%	-	-
<b>Total</b>	<b>969</b>	<b>969</b>	<b>100%</b>	<b>753</b>	<b>77.71%</b>	<b>924</b>	<b>924</b>	<b>100%</b>	<b>-</b>	<b>-</b>

\*Training given only to female employees at Dwarikesh Nagar unit on health and safety measures.

\*\*Trainings in skill upgradation include certified masterclass for expertise on POSH, Certificate Masterclass on Effective HR Audit by CII, Training Proram on Managing High Performance Teams & Conflict through Transactional Analysis, Masterclass on GST, Modelling of Indian sugar industry in diversification era.

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

Category	FY 2024			FY 2023		
	Total (A)	No (B)	% (B/A)	Total (C)	No (D)	% (D/C)
<b>Employees</b>						
Male	460	460	100%	465	465	100%
Female	15	15	100%	15	15	100%
<b>Total</b>	<b>475</b>	<b>475</b>	<b>100%</b>	<b>480</b>	<b>480</b>	<b>100%</b>
<b>Workers</b>						
Male	968	968	100%	923	923	100%
Female	1	1	100%	1	1	100%
<b>Total</b>	<b>969</b>	<b>969</b>	<b>100%</b>	<b>924</b>	<b>924</b>	<b>100%</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?

Yes, we have implemented an occupational health & safety management system across all business operations which ensures safety of all employees and workers. We have an appropriate governance structure to track and monitor organization wide initiatives on health & safety. The company assess the effectiveness of the health & safety initiatives and projects by conducting periodic audits.

Further, we display workplace dangers, including health hazards and the remedial measures to be undertaken overcoming such hazards during exposure to such situations. We have displayed emergency contact numbers, exit plans, emergency siren indicators, fire alarms, signboards, safety precaution, safety instructions, PPE matrix, firefighting techniques, evacuation plan, etc. as a precautionary measure against the workplace hazards.

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

The workplace hazards are assessed by conducting Risk Assessment (RA), Hazard Identification and Risk Assessment (HIRA), plant safety inspection, Job Safety Analysis (JSA), Process Hazard Analysis (PHA), Hazards and Operability Analysis (HAZOP) study etc. HIRA framework implemented across the organization helps in thorough review of the processes for potential hazards, their causes, consequences and impacts.

In the case of non-routine tasks, the company has internal guidelines and should ensure 100% compliance to Permit to Work (PTW) Which are subject to a thorough risk assessment. The risk assessment considers various factors, including the severity and likelihood of potential hazards, the nature of the task, and the surrounding environment. We encourage all employees and workers to report unsafe acts, unsafe conditions, incident, accident or near-miss

incidents as per the DSIL safety policy & procedures. Based on the identified risks, an appropriate mitigation strategy shall be implemented to prevent workplace hazards. Further, the adopted controls are evaluated based on the risk priority and severity.

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

Yes, we have a well established systems and practices to identify potential hazards at the workplace which include the following:

- » All project facilities are equipped with a process to recognize workplace hazards. Awareness programs are conducted to all employees and workers on process hazards and suitable control system to mitigate the risk.
- » All employees are encouraged to detect and report workplace hazards in a proactive and timely manner.
- » Behavior Based Safety (BBS) programs are conducted facilitating identification and isolation of employees and workers from process hazards at workplace.
- » Environment, Health & Safety (EHS) department conducts joint inspections with the respective departments of operations to prepare the list of unsafe conditions/situations and provide necessary corrective and preventive measures to the respective departments.
- » Internal safety audit as well as the external safety audit from government approved auditors enhances the effectiveness to identify and mitigate process safety hazards.
- » Our "Work Stop Safety Policy" gives the responsibility and authority to the employees/workers to stop the work when they believe that a situation exists that places himself/herself, coworker(s), contractors, or the public at risk or in danger.

Thus, the employees of DSIL feels a duty of due diligence and takes the responsibility and opt for the suggested hazard control methods ensuring safety at workplace.

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

The Company has established 2 medical hospitals which are accessible to all employees and workers. These hospitals operate throughout the year and have an emergency, first aid, general OPD facilities along with ambulance for the patients.

We also conduct various health awareness and medical camps annually wherein specialist doctors are invited for medical diagnosis and treatment for all employees and workers:

1. Annual Vision test is conducted for the employees in collaboration with the CL Gupta Institute, Moradabad.
2. We also conduct vaccination camp for the children of employees.
3. We collaborate with Max Hospital and Metro Hospital regularly to organize a heart, lung, and Orthopedic medical camp.
4. Dental & oral hygiene camp is also organized through dental hospitals
5. Physiotherapy camp is organized by engaging physiotherapists.
6. Yoga camps are organized regularly.
7. Blood Donation camp is organized regularly, and participation by employees and workers is on voluntary basis.
8. Vaccination camp for Hepatitis-B was conducted.
9. Immunization of children is being organized under universal immunization program introduced by the government.
10. Frequent medical checkup of Employees is also taken care, especially those who are working in sensitive areas like Bio-composting site, Distillery plant, Hazardous prone stations, and employees in the sugar plants.



### 11. Details of Safety related incidents

		Category	FY 2024	FY 2023
1.	Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0*	0*
		Workers	-	-
2.	Total recordable work-related injuries	Employees	-	2
		Workers	1	5
3.	No. of fatalities	Employees	-	-
		Workers	-	-
4.	High consequence work-related injury or ill-health (excluding fatalities)	Employees	-	-
		Workers	-	-

\*Total lost Time Injury Frequency Rate (LTIFR) is negligible

\*\* Contract workforce was also considered for estimation of safety related incidents.

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

The following safety measures have been taken by the EHS department to ensure the safe and healthy workplace :

- » Conduct safety inspection at regular intervals across all operations of the company.
- » Submission of fortnightly closure report on the health & safety issues from the respective departments.
- » Safety measures are displayed using posters and banners across all facilities.
- » Organize safety training & awareness programs, toolbox training, BBS and safety meetings etc. at periodic intervals.
- » Reporting & disclosure of incident/near miss/accident with the Corrective and Preventive Actions (CAPA) mitigating the future risks.
- » Appointed safety champion in each section of operations to identify & isolate the workplace hazards under the supervision of health & safety department on an immediate basis.
- » Conducted monthly mock drills on EHS on fire emergency, chemical spillage and chemical hazards etc.
- » Safety Committee meetings are held on quarterly basis and the identified risks are mitigated through an appropriate action plan with defined timelines.
- » Works Committee joint meeting held for workmen and management before the commencement of sugarcane crushing and after closing of operations post completion of sugarcane crushing season to isolate the employees and workers from the identified workplace hazards.
- » Ensured remedial actions are communicated to all employees and workers to isolate themselves from the workplace hazards.
- » Organized safety audits by government approved third party agency as well as internal audits to identify unsafe act/unsafe condition at workplace.
- » Celebrated Safety week & Fire day within the plant premises for creating awareness to employees and workers.
- » Ensure 100% compliance to Permit to Work (PTW) system.
- » Health & safety related instructions are provided at entry and exit points of the plant premises.
- » Induction programs are conducted on health & safety to all newly joined employees and workers.
- » Conducted safety awareness programs through competitions on safety related slogans and paintings.
- » Organized nukkat natak programs within the plant premises to create awareness on various health & safety initiatives.

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

Category	FY 2024			FY 2023		
	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	Nil	NA	NA	Nil	NA	NA
Health & Safety	Nil	NA	NA	Nil	NA	NA

**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.**

We have a robust incident investigation procedure in place to investigate safety related incidents. For the identified root causes against safety incidents, Corrective and Preventive Action (CAPA) will be taken on priority basis. HIRA, JSA and HAZOP outputs were considered for remedial measures against the identified health & safety related risks. Currently, there is no such incident for which corrective and preventive action is pending or required.

**LEADERSHIP INDICATORS**

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

Yes, we provide Medclaim Policy as recommended by UP Sugar Mills Association (UPSMA) to our wage workers, senior and junior executive grade workers covering them for critical illness.

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

100% compliance assessment is carried out for value chain partners to ensure deduction and payment of statutory dues. Monthly compliance check is performed along with proof of remittance PF and ESI etc.

**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 :**

Category	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	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

**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, we provide transition assistance programs to our workers and employees to ensure continued employability and management of career endings due to retirement.





**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	Not Applicable
Working Conditions	Not Applicable

**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.**

Since we do not carry out any assessment for our value chain partners, corrective actions are not applicable.

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



We have an open and constructive dialogue with all stakeholders which endeavors continuous interaction and collaboration to leverage collective growth and development of the company. We protect the interests of our stakeholders and bolster our commitment to operate the company in an ethical, transparent and sustainable manner.

**Name : Vijay S. Banka**  
*Designation : Managing Director*

We have identified all key stakeholders important to our business and developed an ecosystem for actively engaging all stakeholders for cordial relationship addressing the concerns and developing a sustainable business. The company has identified communities, farmers, employees, community health centers, technology vendors, customers and regulators as key stakeholders.

We make sure that the interests of all parties, especially those who might be weak or marginalized, are safeguarded. In order to uplift the marginalized and vulnerable groups, the company has implemented CSR projects by addressing their needs. We also recognize the importance to protect the interests of our stakeholders’ across all business operations.

**ESSENTIAL INDICATORS**

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

Dwarikesh has a robust stakeholder identification process developed considering the type of business operations. The identification and mapping of various stakeholders have been carried out by assessing their substantial influence, impact & importance of each stakeholder for sustainable business growth of the company. The prioritization of key stakeholders was carried out by developing matrix. We continuously engage with each stakeholder, identify, and address their concerns fostering good relationship. Our stakeholder identification includes 4 steps i.e. identification, prioritization, review process and engagement.

- a. **Stakeholder Identification :** The stakeholder identification is based on the impact & influence on the business expansion and revenue generation. The importance of respective stakeholder for long term sustainable growth of the company.
- b. **Prioritization :** We have prioritized the stakeholders by developing matrix from most important to least important stakeholders. Based on the importance and relevance, an appropriate stakeholder engagement plan has been developed understanding the concerns, needs and expectations of the respective stakeholders.
- c. **Review Process :** We periodically review our stakeholder identification process for prioritization of most critical & important stakeholders. Several factors considered in this process includes changes regulatory guidelines, business operations, products and services.



- d. **Engagement** : We have a continuous stakeholder engagement process through various modes of channels such as surveys, direct & indirect meetings, emails, site visits, feedback, phone calls, email communication and focused group discussion etc. The frequency of stakeholder engagement may include daily, weekly, quarterly, half-yearly and annually considering the requirement, needs, priorities and actions required.

Our stakeholders identified through the stakeholder identification process are provided below :

- i. **Communities** : In order to achieve the long-term growth strategy of the company, preventing local conflict and maintaining harmonious relation plays a critical role. We have implemented several CSR projects focusing on areas of education, women empowerment, agriculture, skill development, environment, health care & social awareness programs for upliftment of marginalized/vulnerable groups.
- ii. **Farmers** : The continuous supply of sugarcane from farmers plays an important role in running the operations of sugar plant as sugarcane is the major feedstock for sugar production. We continuously engage with farmers to ensure the long-term sustainable operations of the company.
- iii. **Employees** : Continuous support and running the operations in a sustainable manner helps in improving the overall productivity, performance and to achieve sustainable vision of the company.
- iv. **Community Health Centers** : Helps in implementation of various healthcare initiatives and projects in local communities as part of CSR initiatives and projects.
- v. **Technology Vendors** : To understand the requirement of upgradation of existing technology, deployment of innovative technologies & solution considering the change in the business environment.
- vi. **Customers** : Plays an important role for the company in sales of products, revenue generation and business growth of the company.
- vii. **Regulators** : An alignment with local laws, guidelines and fulfilment of compliance requirement as per the scheduled timelines ensures in mitigating the non-compliance related business risks.

## 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
Communities	Yes	Community meetings	As required	Improving infrastructure, bringing Quality education within reach, providing relief to the needy
Farmers	No	E-Mitra app, IVR calling, messages	As required	Training on agricultural practices, distribution of pesticides at subsidized prices, Provision of Soil testing etc.
Employees	No	Notice Board, WhatsApp, Verbal communication	As required	Training and Development, General Discussions, and briefings.
Community health centers (CHC)	No	Phone/WhatsApp /Face to Face meeting	As required	Current vaccination, Investigation and health care
Technology Vendors	No	Email	As required	System upgradation/ routine check up
Customers	No	Physical meetings	As required	Redressal of grievances
Regulators	No	As per the necessary means		Compliance check



## 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.**

We have consulted various stakeholders identified through stakeholder engagement plan on economic, environmental and social topics. Consultation with respective stakeholders is carried out on need basis. The feedback from such consultation is taken via physical meetings, virtual calls, emails, surveys, phone calls and other modes of communication.

The Board is updated about the requirements of various stakeholders on economic, environmental and social topics through CSR committees for further proceedings and decision making.

### **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. We have identified Environment Social and Governance related material issues relevant to the Company by conducting material assessment considering the results obtained from survey conducted with various stakeholders, sustainability frameworks and priorities of peer companies on ESG material issues.

Internal and external stakeholder consultations were carried out through surveys with customized questionnaire of the respective stakeholder. Our ESG material issues identification is carried out in a holistic manner taking into account the expectations and priorities of our stakeholders. Based on the survey results, the prioritization of ESG material issues were carried out and incorporated into company's sustainability related business strategy, goals & targets.

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

We have a dedicated team and committees for implementation of CSR related initiatives and projects. We regularly interact with vulnerable and marginalized groups in local communities maintain cordial relationships with them. An appropriate grievance redressal mechanism is in place to resolve the grievances. As sugarcane is the major raw material for our industry, we have conducted the following activities/ actions considering the sugarcane farmers as top priority.

- » Seminar and awareness programs to educate the farmers of the latest techniques to improve the yield per hectare.
- » Distribution of free and subsidized pesticides and fertilizers
- » Assessment of sugarcane crop using satellite information.
- » Fiscal assistance through distribution of credit cards to farmers under the aegis of banks
- » Installation of deep submersible pumps for facilitating irrigation of sugarcane crops
- » Timely payment to sugarcane farmers for procured quantities of sugarcane.
- » Supply of agrochemicals at subsidized rates through the Kisan Sewa Kendras of our plants.
- » Tie-up with various banks for arranging loans to our sugarcane farmers at an attractive interest rate.

Our unique way of promoting and nurturing farmer relations built strong relationship with all our sugarcane farmers. It has helped us to build reputation for credibility, integrity, loyalty, and goodwill. And together, these values have helped drive our sustainability journey through excellence that spans the entire gamut of our business.

**Principle 5:** Businesses should respect and promote human rights



We strictly adhere to the human rights principles and practices across the organization and with business partners and other stakeholders with whom we engage in business activities. We always strive to build more inclusive environment by treating everyone with dignity, respect, equality and fairness.

**Name :** Priyanka G. Morarka  
*Designation :* President (Corporate Affairs)

Human rights are intrinsic freedoms that every person has the right to exercise individually or collectively, without hindrance. The company strictly adheres to human rights of all employees and workers regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Implementation of human rights policies and principles carried out across all business operations along with suppliers and other stakeholders with whom we operate. We regularly conduct human rights related training programs to all employees and workers.

We ensure that basic human rights and freedom at workplace to all employees and workers by providing dignity, fairness, respect and equality at workplace. The company has extended its human rights policies and principles to value chain partners to ensure zero human rights violations across all business operations of the company.

The Company has taken several initiatives for skill development, strengthen behavioral and inter-personal capabilities for professional growth and well being of our employees and workers.

## ESSENTIAL INDICATORS

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

Category	FY 2024			FY 2023		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	475	-	-	480	29	4.73%
Other than permanent	-	-	-	-	-	-
<b>Total employees</b>	<b>475</b>	<b>-</b>	<b>-</b>	<b>480</b>	<b>29</b>	<b>4.73%</b>
<b>Workers</b>						
Permanent	969	-	-	924	-	-
Other than permanent	1,469	-	-	1,563	-	-
<b>Total workers</b>	<b>2,438</b>	<b>-</b>	<b>-</b>	<b>2,487</b>	<b>-</b>	<b>-</b>



## 2. Details of minimum wages paid to employees and workers

Category	FY 2024					FY 2023				
	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	460	-	-	460	100%	465	-	-	465	100%
Female	15	-	-	15	100%	15	-	-	15	100%
<b>Other than Permanent</b>										
Male	-	-	-	-	-	-	-	-	-	-
Female	-	-	-	-	-	-	-	-	-	-
<b>Workers</b>										
<b>Permanent</b>										
Male	968	-	-	968	100%	923	-	-	923	100%
Female	1	-	-	1	100%	1	-	-	1	100%
<b>Other than Permanent</b>										
Male	1,469	1,123	76%	346	23%	1,563	1,137	72%	426	28%
Female	-	-	-	-	-	-	-	-	-	-

## 3. Details of remuneration/salary/wages

### a. Median remuneration/wages :

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (INR lakhs)	Number	Median remuneration/ salary/ wages of respective category (INR lakhs)
<b>Board of Directors (BoD)</b>	6	447.25	1	-
<b>Key Managerial Personnel</b>	1	53.77		
Employees other than BoD and KMP	456	39.86	15	30.74
Workers	309	5.45		

- The median remuneration herein above is derived as a simple average annual salary of the remuneration paid to the lowest & highest paid employees in each group
- Remuneration figures of all the employees include salary, taxable allowances, Bonus, Ex-gratia, Leave encashment, commission & value of perquisites as per Income tax rules.
- Sitting fees paid to Independent Directors are not considered in the above table.
- The above table does not include seasonal employees as they are employed for part of the year only

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

	FY 2024	FY 2023
Gross wages paid to females as % of total wages	0.08%	0.06%

**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, our human resources department acts as a focal point for addressing human rights related issues or impacts attributed from the business operations. The complaints pertaining to non-adherence to code of conduct can be reported to human resources department through whistle blower policy. For women safety at workplace, we have an Internal Complaints Committee (ICC) at all of our units and offices as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act. ICC across all business operations of the company is led by Ms. Priyanka G. Morarka. No complaints have been received by the ICC in the last two consecutive financial years.

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

Yes, the Company has a grievance redressal committee comprising of senior management, where the grievances related to human rights are evaluated and necessary action will be taken depending on the nature and severity of the grievance. All employees and workers are encouraged to report human rights related violations on issues relating to injustice, criticism, unfairness or violation of dignity.

We also have the Works Committee, Estate Committee, Safety Committee, Canteen Committee and Anti Sexual Harassment Committee etc to address human rights related grievances in their departments.

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

Category	FY 2024			FY 2023		
	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	NA	NA	Nil	NA	NA
Discrimination at workplace	Nil	NA	NA	Nil	NA	NA
Child Labour	Nil	NA	NA	Nil	NA	NA
Forced Labour/ Involuntary Labour	Nil	NA	NA	Nil	NA	NA
Wages	Nil	NA	NA	Nil	NA	NA
Other human rights related issues	Nil	NA	NA	Nil	NA	NA

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

	FY 2024	FY 2023
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**

We have an established Whistle Blower policy to ensure transparency and ethical business conduct wherein all employees and management can voice their concerns. We have taken appropriate measures to prevent any adverse consequences to the complainant in discrimination and harassment cases.

Retaliation against any employee who report or provide information on discrimination and harassment is strictly prohibited. We ensure complete protection of Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour. The Company has taken several steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure.



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

Yes. Our suppliers, vendors and contractors should maintain high standards of ethical conduct that we uphold internally. We expect our suppliers, vendors and contractors to adhere to human rights principles, including the prohibition of child labor, forced labor, and discrimination. We engage in transparent and fair procurement practices and actively monitor the human rights performance of our suppliers, vendors and contractors.

**10. Assessments for the year**

Section	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	100%
Forced Labour/ Involuntary Labour	100%
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	100%

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

We have not found significant risks/concerns arising from the human rights related assessments.

**LEADERSHIP INDICATORS**

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

Not applicable. As there are no grievances related to human rights, there is no requirement to modify or change business processes.

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

We have not conducted human rights related due diligence.

**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, our premises and offices are accessible to differently abled visitors.

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

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Nil
Discrimination at workplace	Nil
Child Labour	Nil
Forced Labour/Involuntary Labour	Nil
Wages	Nil
Others – please specify	Nil

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

No significant risks/ concerns have been reported in the financial year FY 2023-24. Hence, no corrective actions are required.

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



We conduct business in sustainable manner by developing conscious products with minimum environmental footprint by improving resource utilization efficiency, conservation energy & water and carbon emission reduction. Our key focus areas include development of best quality products with long-life through sustainable innovations & advanced technologies transforming linear economy into circular economy.

**Name : Salil Swaroop Arya**

*Designation : Senior Executive Vice President (Corporate)*

Dwarikesh has a sustainability strategy to reduce environmental footprint through its operations and products. The company has already achieved the ambitious target to completely run the operations on 100% renewable energy. Several other measures taken by the company as part of ESG strategy includes energy conservation, reducing scope 1 and scope 2 carbon emission, water conservation through recycle and reuse, implementation of waste management hierarchy to prioritize reduce, reuse and recycle of waste. We promote circular economy through transformation of our operations and services into a safe, sustainable and responsible manner.

## ESSENTIAL INDICATORS

### 1. Details of total energy consumption (in GJ) and energy intensity

Parameter	FY 2024	FY 2023
<b>From renewable sources</b>		
Total electricity consumption (A) (GJ)	6,15,204	5,31,770
Total fuel consumption (B) (GJ)	85,31,117	91,29,122
Energy consumption through other sources (C) (GJ)		
<b>Total energy consumed from renewable sources (A+B+C) (GJ)</b>	<b>91,46,321</b>	<b>96,60,892</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	249	432
Total fuel consumption (E)	4,660	68
Energy consumption through other sources (F)		
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>4,909</b>	<b>500</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>91,51,229</b>	<b>96,61,392</b>
Energy intensity per lakh of turnover (Total energy consumed/ Revenue in INR lakhs from operations)	53.54	45.94
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)</b>		
<b>Energy intensity in terms of physical output</b>		
Energy intensity (optional) – the relevant metric may be selected by the entity		

**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 assessment/evaluation/assurance has been carried out by an external agency.





**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. Our sites do not fall under the designated consumers category under the Performance, Achieve and Trade (PAT) scheme of the Government of India.

**3. Provide details of the following disclosures related to water**

Parameter	FY 2024	FY 2023
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	-	-
(ii) Groundwater	10,28,769	12,43,064
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)</b>	<b>10,28,769</b>	<b>12,43,064</b>
<b>Total volume of water consumption (in kiloliters)</b>	<b>10,28,769</b>	<b>12,43,064</b>
<b>Water intensity per lakh of turnover</b> (Total water consumption / Revenue in INR lakhs from operations)	6.02	5.91
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption/ Revenue from operations adjusted for PPP)		
<b>Water intensity in terms of physical output</b>		
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity		

**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, there are no assessments currently being done by any third party. However, an internal assessment is carried out through installed water meters. These water meters are sealed and certified by meteorological department of state.

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

Parameter	FY 2024	FY 2023
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) To Surface water</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	5,90,966*	5,74,469
<b>(ii) To Groundwater</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>(iii) To Seawater</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>(iv) Sent to third-parties</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>(v) Others</b>		
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	<b>5,90,966</b>	<b>5,74,469</b>

\*As the Zero Liquid Discharge (ZLD) mechanism established at all distillery facilities, we have considered only the sugar plants to estimate the total water discharged. The increase in water discharge is due to the increase in sugarcane crushing quantities compared to previous financial year.

**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, Water audit and assessment has been carried out by an external agency i.e. IIT Roorkee.



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

Yes, we have installed Condensate Polishing Unit (CPU) plant and Multi Effect Evaporator (MEE) slop fired boiler to improve the parameters of treated wastewater at our distillery facilities located at Dwarikesh Nagar and Dwarikesh Dham making them Zero Liquid Discharge (ZLD). 100% of the treated wastewater from effluent treatment plants at these facilities is reused within plant operations and other activities.

**6. Provide details of air emissions (other than GHG emissions) by the entity**

Parameter	Please specify unit	FY 2024	FY 2023
<b>1. Sugar Unit, Dwarikesh Nagar</b>			
NOx	mg/nm3	-	7.1
SOx	mg/nm3	-	3.2
Particulate matter (PM)	mg/nm3	67.2	73.26
Persistent organic pollutants (POP)	mg/nm3	-	-
Volatile organic compounds (VOC)	mg/nm3	-	-
Hazardous air pollutants (HAP)	mg/nm3	-	-
Others – Carbon monoxide	mg/nm3	0.15	0.20
<b>2. Sugar Unit, Dwarikesh Dham</b>			
NOx	Mg/nm3	-	-
SOx	Mg/nm3	-	-
Particulate Matter (PM)	Mg/nm3	67.3	54.2
Others- Carbon Mono oxide (CO)	Mg/nm3	0.14	0.16
<b>3. Sugar unit, Dwarikesh Puram</b>			
NOx	Mg/nm3	-	-
SOx	Mg/nm3	-	-
Particulate Matter (PM)**	Mg/nm3	66.2	73.9
Others- Carbon Mono oxide (CO)	Mg/nm3	0.16	0.18
<b>4. Distillery unit, Dwarikesh Nagar</b>			
NOx	Mg/nm3	77.4	69.7
SOx	Mg/nm3	29	32.6
Particulate Matter (PM)	Mg/nm3	41.3	45.8
Others- Carbon Mono oxide (CO)	Mg/nm3	0.24	0.21
<b>5. Distillery unit, Dwarikesh Dham</b>			
NOx	Mg/nm3	86.6	84.6
SOx	Mg/nm3	46.1	52.4
Particulate Matter (PM)	Mg/nm3	46.7	46.1
Others- Carbon Mono oxide (CO)	Mg/nm3	0.29	0.22

**Note:** There are no Persistent Organic Pollutants (POP), Volatile organic pollutants (VOC) and Hazardous Air Pollutants (HAP) emitted.

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

Yes, the above-mentioned data has been evaluated by Enviro-Tech Services.



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

Parameter	Unit	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> eq/Mwh	856	11.07
<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> eq/Mwh	50	96.20
<b>Total Scope 1 and Scope 2 emission intensity per lakh of turnover</b> (Total Scope 1 and Scope 2 GHG emissions/ Revenue in INR lakhs from operations)	(tCO <sub>2</sub> eq/Mwh/ Rupee)	0.0053	0.0005
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)			
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>			
<b>Total Scope 1 and Scope 2 emission intensity (optional)</b> – the relevant metric may be selected by the entity			

\*Scope 1 Emissions are from Dwarikesh Nagar, Dwarikesh Dham, Dwarikesh Puram which depicts the extent of greenhouse gas emissions that are emitted through the Company owned assets. We have considered all sources of stationary, mobile and fugitive sources of carbon emission in FY 2023-24. Hence, increase in carbon emission was observed.

\*\*Scope 2 Emissions are from our corporate offices at various locations in Delhi, Maharashtra, and Uttar Pradesh which captures the greenhouse gas emissions through purchased electricity. In order to improve accuracy in Scope 2 carbon emission in FY 2023-24, we have considered an activity-based approach.

**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 independent assessment/ evaluation/assurance has been carried out by an external agency.

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

Yes, we have implemented several green house gas emission reduction projects.

- » Equipped flue gas treatment systems with bag and filters and electrostatic precipitator to reduce the green house gas pollutants from stack emissions.
- » 100% of our operations run on the renewable energy which in turn reducing our Scope 2 carbon emission.
- » In Distillery, DSIL installed improved CO<sub>2</sub> scrubber.

## 9. Provide details related to waste management by the entity

Parameter	FY 2024	FY 2023
	Total Waste generated (in MT)	
Plastic waste (A)	696	863.9
E-waste (B)	-	-
Bio-medical waste (C)	-	-
Construction and demolition waste (D)	-	-
Battery waste (E)	-	-
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	7.80	0.6

Parameter	FY 2024	FY 2023
	Total Waste generated (in MT)	
Other Non-hazardous waste generated (H). Please specify, if any.	-	-
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>703.80*</b>	<b>864.5</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue in INR lakhs from operations)	0.0041	0.0041
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	-	-
<b>Waste intensity in terms of physical output</b>	-	-
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity	-	-

\*The increase in plastic waste generation is due to higher quantum of sugar production and associated packaging requirements compared to the previous financial year

**For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)**

Category of waste	FY 2024	FY 2023
	Total Waste generated (in MT)	
(i) Recycled	139.80	864.5
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
<b>Total</b>	<b>139.80</b>	<b>864.5</b>

**For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)**

Category of waste	FY 2024	FY 2023
	Total Waste generated (in MT)	
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	564	-
<b>Total</b>	<b>564</b>	<b>-</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.

No independent assessment/ evaluation/assurance has been carried out by an external agency

**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.**

We do not use hazardous and toxic chemicals in our products and services. Oil waste is generated from the operations of the company which is categorized as hazardous waste as per the pollution control board norms. 100% of hazardous waste oil is recycled through authorized hazardous waste management agency by the pollution control board.

Apart from the above types of waste, we have implemented waste management plan and appropriate Standard Operating Procedures (SOPs), systems and practices to handle, store, transport, process and dispose non-hazardous waste and other types of waste in a safe and responsible manner. We strictly adhere to compliance requirements as per the pollution control board norms and follow the best practices in the sugar industry. Some of our waste management initiatives are mentioned below:

- » Bagasse waste is used for renewable energy generation through co-processing.
- » Plastic waste is recycled, reused and residual fraction is safely disposed in line with the requirements of Extended Producer Responsibility (EPR) rules and guidelines.
- » Utilization of the ash generated from co-generation plant in farm fields to increase soil porosity and retain more water is practiced.
- » Sludge generated from the operations of the company is dried and used as fertilizer in the farm fields as a substitute for organic fertilizers.
- » Press mud is used as biofertilizer by farmers which also improves the yield of sugarcane crop.



**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**

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N). If no, the reasons thereof and corrective action taken, if any.
No, we do not have offices/plants located in any of the ecologically sensitive areas			

**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
Expansion of DN sugar unit from 6500 TCD to 7500 TCD	EC22B025UP146670	13.12.2022	Yes	Yes	<a href="https://www.dwarikesh.com/wp-content/uploads/2024/04/Environment-Clearance-For-Dwarikesh-Nagar-Expansion-2022.pdf">https://www.dwarikesh.com/wp-content/uploads/2024/04/Environment-Clearance-For-Dwarikesh-Nagar-Expansion-2022.pdf</a>

**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 :**

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
Yes. The Company is compliant with the applicable laws pertaining to Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment Protection Act and rules thereunder.				

## 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 : Not Applicable
- (ii) Nature of operations : Not Applicable
- (iii) Water withdrawal, consumption, and discharge : Not Applicable

Parameter	FY 2024	FY 2023
<b>Water withdrawal by source (in kiloliters)</b>		
(i) To Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kiloliters)</b>	-	-
<b>Total volume of water consumption (in kiloliters)</b>	-	-
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>	-	-
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>	-	-

Parameter	FY 2024	FY 2023
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(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

No independent assessment/ evaluation/assurance has been carried out by an external agency.

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

Not Applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Installed Multi Effect Evaporator (MEE) plants at distillery facility to recycle and reuse spent wash as fuel in boilers	By processing of distillery spent wash through multiple stages of evaporation, a concentrated slop is generated.  Concentrated slop is utilized as fuke in the boiler to generate energy.	50% of the fuel replaced with the concentrated slop.  Reduce carbon footprint of the company.  Avoided wastewater disposal costs.
2.	Equipped flue gas treatment systems with bag and filters and electro static precipitator to reduce the air pollution	Installation of multi-stage effective flue gas treatment systems reduces the air pollution.	Reduces the environmental footprint and air pollution from the operations of the company.
3.	Treatment and reuse of wastewater generated from the operations of the sugar plant	Wastewater generated from the sugar plant operations is processed through effluent treatment plant to bring the parameters of treated wastewater under permissible limits.  The treated wastewater is being used for utility activities, horticulture development and agriculture related activities.	Reduced the dependency on fresh water.  Minimized wastewater disposal costs.  Achieved Zero Liquid Discharge (ZLD)



S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
4.	Sulphate removal from Spray Pond and cooling Tower water overflow	In Sugar units, for creating vacuum, cold water is required. Since sugar syrup is clarified by SO <sub>2</sub> gas, some sulphates dissolves in this water. During discharge of surplus water from these spray ponds/ cooling towers, it creates environmental concerns. We have deployed suitable treatment technology to treat this water and remove the sulphates effectively.	Water quality parameters are under the permissible limits mentioned by the pollution control boards.

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

We have a site level disaster management and onsite emergency plan for all business units of the company. In case of business disruption, an appropriate risk mitigation strategy with standard operating procedures, detailed guidelines on roles & responsibilities and action plans for timely response are in place. The action plans are designed for the common identified business disruption risks covering the aspects of “to respond to”, “to mitigate the effects of”, “and “to restore” the operations in safe and responsible manner. The action plan contains the appropriate measures to be taken for the identified risks to avoid or prevent casualties, injuries, migratory measures, conduct a swift and efficient relief and rescue operation on need basis, hasten the return of normalcy. We conduct regular training and awareness programs to all employees and workers on signaling mechanisms in case of emergency, roles & responsibilities, assembly points, medical arrangements, Material Safety Data Sheets (MSDS) to be followed.

We have an emergency preparedness plan and guidelines, mitigating the risks arising from the disasters. Our detailed procedures and guidelines comprise of action items during response phase, resumption phase and restoration phases of disaster for restoring the operations of the company in a timely, safe and responsible manner. Additionally, each unit has a manufacturing license and necessary approvals for smooth functioning of business operations.

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

No adverse impact to the environment observed from the value chain of the company. We provide handholding support to our value chain partners by creating them awareness on best practices to be followed for preventing environmental pollution and mitigating the associate risks.

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

None of our value chain partners were assessed for environmental impacts.

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



We actively engage with all industrial associations and regulatory agencies for addressing public policy and legal aspects with honesty and integrity in compliance with the applicable laws and also aligning with the sustainability strategy of the company.

**Name :** Salil Swaroop Arya

*Designation :* Senior Executive Vice President (Corporate)

We conduct our business in a responsible, ethical and transparent manner in compliance to national standards and regulatory guidelines. Appropriate system and practices have been implemented for strengthening governance framework & practices to ensure highest ethical standards, make responsible business decisions & financial management strategies, professional decision-making, and strictly adhere to all legal regulations across all business operations. The Company actively works with associations, institutions, and organizations, both Governmental and non-Governmental, that are involved in framing policies or influence policy-formulation done by the government and regulatory bodies.

## ESSENTIAL INDICATORS

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

We have an affiliation with 4 trade and industry associations in India. Out of which two are at national level and two are at state level.

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Federation of Indian Chambers of Commerce & Industry (FICCI)	National
2.	Indian Sugar & Bio-energy Manufactures Association	National
3.	UP Sugar Mill Association (UPSMA)	State
4.	UP Sugar Mill Co-Gen Association	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
Not Applicable. We have not received any adverse orders from regulatory authorities on anticompetitive conduct in the financial year FY 2023-24.		



## 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
Nil. However, we are instrumental in providing inputs for various policies formulated by regulatory agencies at state and national level.					

### Principle 8 : Businesses should promote inclusive growth and equitable development



Our sustainable business strategy ensures inclusive growth and equitable development by uplifting of marginalized and vulnerable groups in local communities. Our Corporate Social Responsibility (CSR) initiatives and projects in the areas of education, infrastructure development, skill development, women empowerment and health & wellbeing has created positive impact in local

**Name : Priyanka G. Morarka**  
*Designation : President (Corporate Affairs)*

As a responsible corporate, we ensure inclusive growth and equitable development by empowering the local communities through implementation of socio-economic development projects. Our CSR plays a significant role in helping us to achieve our goals and commitments towards betterment of the society.

We have a formal CSR policy and dedicated CSR committee working under the guidance of senior leadership team in implementation of various CSR initiatives and projects. Our focus areas include education, infrastructure development, skill development, women empowerment, health, and well-being of local communities, marginalized and vulnerable groups.

As a step towards providing quality education, we have made efforts towards infrastructure development of R.R Morarka Public School, Shree Radheshyam R. Morarka Govt. College and Radheyshyam Morarka Saraswati Vidhya Mandir. and also arranged scholarship programs for the best performing students. We build classrooms, toilets and provide furniture in various Government schools around our sugar mill's area. We also build ponds in villages for rain water harvesting.

Through the Mahila Vikas initiative, we have set up 222 women self-help groups (SHGs) as a step towards enhancing their livelihoods. We have provided various skill development training programs to SHGs for creating livelihood opportunities. We continuously work towards enhancing the lives of the communities and creating a positive impact on society.



## ESSENTIAL INDICATORS

### 1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in 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, as there is no requirement of SIA for the projects undertaken in the financial year FY 2023-24 as per the applicable laws.					

### 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity

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 24 (in INR)
Not Applicable, we do not have any projects that require rehabilitation and resettlement (R&R) in the financial year FY 2023-24 as per the applicable law						

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

Yes, we have a grievance redressal mechanism and helpline number in place for the grievances of the communities. And also, the CSR team periodically visits the local communities to understand their concerns and implement need-based CSR programs. If the grievance still not addressed, the local communities can write an email to CSR committee of the company for immediate response and resolution of their grievances.

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

	FY 2024	FY 2023
Directly sourced from MSMEs/ small producers*	49.84%	50.26%
Directly from within India	100%	100%

\*The procurement of entire sugarcane for the respective financial years is carried out from small producers (farmers) from within the district and neighboring districts.

### 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 following locations, as % of total wage cost

Location	FY 2024	FY 2023
Rural	88.98	88.41
Semi-urban	7.31	7.65
Urban	1.44	1.72
Metropolitan	2.27	2.22

## 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, as there is no requirement of social impact assessment in the financial year FY 2023-24.	



**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 INR)
Not Applicable. We have not conducted any CSR projects in the aspirational districts.			

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

Yes, we have a sustainable sourcing policy which promotes responsible sourcing and social equity by preferring procurement of materials and services from local communities. As our operations are mainly based on sugarcane as raw material, we source 100% of sugarcane from local communities which includes marginalized and vulnerable groups.

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

100% of sugarcane is sourced from local farmers.

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

100% of our procurement are from local farmers from within the districts or neighboring districts.

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not Applicable. We have not owned or acquired any intellectual properties during the financial year FY 2023-24.				

**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.	Conducted medical camps at Bijnor, Bareilly & Navalgarh districts	1,000	60%
2.	Construction of rainwater harvesting pits in Bijnor and Bareilly districts	200	100%
3.	Supplied horticulture development equipment	500	100%
4.	Infrastructure development works at R R Morarkar Public School (RRMPS) School at Bundki, Bijnor	1,200	100%
5.	Construction of classrooms and toilets at Bareilly and Bijnor districts	400	100%
6.	Infrastructure development at government college in Nawalgarh, Rajasthan	1,000	100%
7.	Construction of classrooms at Radheshyam Morarka Saraswati Vidya Mandir at Meerut, Uttar Pradesh	1,200	100%
8.	Horticulture development in Afzalgarh area, Uttar Pradesh	2,000	100%
9.	Development of Research & Development center at Deendayal Kamdhenu Gausshala	200	100%
10.	Distribution of agriculture equipment such as seedling trays etc.	300	100%
11.	Construction of lakes and ponds in nearby local communities	7,000	100%

\*Weblink of CSR policy is available at <https://www.dwarikesh.com/wp-content/uploads/2023/03/Policy-on-Corporate-Social-Responsibility-Amended-approved-in-BM-dtd-28.10.2022.pdf>

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



We deliver our products and services to our customers in a safe and responsible manner maintaining the highest standards meeting their expectations. We always strive for excellence through sustainable innovation and deployment of eco-friendly technologies for delivering long life and best quality products. We have an appropriate feedback mechanism to take suggestions and address the concerns of our customers time to time

**Name : Sunil Kumar Goel**  
*Designation : Chief Financial Officer*

We strongly believe in the freedom of choice of our customers and offer them products at competitive price in a safe and responsible manner. Our business vertical includes sugar production, alcohol production through distillery and renewable energy generation from co-generation plant.

Our customer orientation programs for delivering products and services in a safe and responsible manner include :

- We understand the requirements and expectations of our customers.
- We understand that customer loyalty, retention, and maximization of market share through clear focus on the needs and expectations our esteemed customers.
- We capture insights on customers’ needs and expectations and act accordingly.
- We build and maintain an effective and proactive relationships with our customers.

## ESSENTIAL INDICATORS

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

We have a grievance redressal mechanism and helpline number to receive and respond to complaints and feedback received from our customers. In addition, our sales teams and distributors regular interact with the customers through physical meetings, focused group discussions on proactive basis to understand the improvement areas for delivering better products and services.

We always encourage active participation of our customers, sugarcane farmers and value chain partners in utilizing the company’s redressal mechanism and processes for immediate response and resolution of their concerns.

### 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	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	100%



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

Category	FY 2024			FY 2023		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	Nil	NA	NA	Nil	NA	NA
Advertising	Nil	NA	NA	Nil	NA	NA
Cyber-security	Nil	NA	NA	Nil	NA	NA
Delivery of essential services	Nil	NA	NA	Nil	NA	NA
Restrictive trade practices	Nil	NA	NA	Nil	NA	NA
Unfair trade practices	Nil	NA	NA	Nil	NA	NA
Others	Nil	NA	NA	Nil	NA	NA

**Note :** We have not received any consumer complaints in the last two consecutive financial years.

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

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

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

Yes, we have cyber security data privacy & protection policy and robust framework for safeguarding digital assets, operations and reputation across all business operations of the company. An appropriate systems, procedures and practices are in place to protect against the cyber threats and vulnerabilities through proactive measures, risk management strategies and employee awareness.

Our policy ensures safeguards & protective measures ensuring cyber security and data privacy through authentication of access, data integrity, system integrity, use of IT devices, e-mail access from company's network, endpoint security, network security, access to social media sites, filtering of sites and security incident management process.

Implementation of cyber security and ensuring data privacy comprises of 3 steps :

- a. Risk Assessment : We conduct risk assessments to identify potential threats, vulnerabilities, and risks to the organization's assets and operations.
- b. Risk Mitigation : Implementation of appropriate controls, safeguards, and counter measures to mitigate identified risks and minimize their impact on the organization.

- c. Incident Response : We develop and maintain an incident response plan/Business continuity plan outlining procedures for detecting, responding to, containing, and recovering from cybersecurity incidents. The Business Continuity plan is tested annually at DSIL.

The cyber security data privacy & protection policy is applicable to all employees, contractors, consultants, vendors, and third-party entities with access to the DSIL's systems, networks, and data, regardless of location or device used. Weblink of cyber security data privacy & protection policy is available at <https://www.dwarikesh.com/wp-content/uploads/2024/05/Policy-on-Cyber-Security-Data-Privacy-Protection.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. We have not found any such instances related to cyber security, data privacy, product recalls or regulatory actions, and therefore no corrective actions were required.

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

- a. Number of instances of data breaches  
Nil. There are no reported instances of data breaches in the financial year FY 2023-24.
- b. Percentage of data breaches involving personally identifiable information of customers

There are no instances of data breaches involving personally identifiable information of customers in the financial year FY 2023-24.

- c. Impact, if any, of the data breaches  
Not Applicable, as there are no reported data breaches in the financial year FY 2023-24. Therefore, impact assessment is not required.

## LEADERSHIP INDICATORS

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

Information related to our products and services is available under products tab in our company website <https://www.dwarikesh.com/>, e-commerce platforms and social media. We also publish company's brochures and catalogues periodically with detailed information about the products and services.

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

We provide comprehensive information to our esteemed customers about the safe and responsible usage of our products and services. All our packaging contains relevant information about the products such as grades, standards, quality and other necessary information. In case of any queries further, our consumers can write an email to [sales.dn@dwarikesh.com](mailto:sales.dn@dwarikesh.com) or contact our helpline number available on product packaging.

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

We have established a robust mechanism to monitor and manage any potential risks of disruption or discontinuation of our essential services. In case of any such risk, we inform our customers through various channels, including our website and direct communication through our sales team and distributors. This helps us to ensure that our customers are well informed and can take the necessary steps to mitigate any potential impact. Additionally, we continuously review and update our contingency plans to ensure that we are always prepared to manage any unexpected business disruptions.

### 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)

No. We display the product related information strictly in line with the compliance requirements as per the applicable laws. All our product packaging contains information as per BIS regulations.

Yes, we conduct periodic surveys of our consumers pertaining to our major products and services across all areas of business operations in India.

#### Concluding remarks :

At Dwarikesh Sugar, we believe that sustainable and responsible business practices are crucial for the long-term growth and success of our business, while also contributing to the welfare and development of the society and environment we operate in. We are committed to ensuring ethical, transparent, and socially responsible operations across all our business functions. Our efforts towards mitigating various material issues such as climate change, waste management, and labour practices, while tapping into opportunities such as research and development, energy, and emissions management, have helped us create a positive impact on the society and environment we operate in. We remain committed to driving sustainable and responsible business practices and contributing to the development of the communities we serve.