

Tatva Chintan Pharma Chem Limited

(CIN:L24232GJ1996PLC029894)



Date: 26 August 2023 Ref. No.: TCPCL/SEC/2023-24/00054

To.

The General Manager, Corporate relationship department, BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai-400 001

Scrip Code: 543321

The Manager, Listing department,

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block-G, Bandra-Kurla, Complex Bandra(E),

Mumbai-400 051

Scrip Symbol: TATVA

Subject: Submission of Business Responsibility and Sustainability Report of the Company for the Financial Year 2022-23 under Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations")

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the SEBI Listing Regulations, we are submitting herewith the Business Responsibility and Sustainability Report ("BRSR") for FY 2022-23 which forms part of the Annual Report FY 2022-23.

The BRSR is also available on the website of the Company at www.tatvachintan.com.

Kindly take the above information on record.

Thanking you,

Your Faithfully,

For Tatva Chintan Pharma Chem Limited

Ishwar Nayi Company Secretary and Compliance Officer M. No.: A37444

Encl.: As above



Business Responsibility and Sustainability Report

Section A: General Disclosures

| | Dataila | -44- | 1:-4-4 | |
|----|---------|--------|--------|--------|
| I. | Details | or the | iisteu | entite |

| •• | Details of the listed chitty | |
|-----|--|--|
| 1. | Corporate Identity Number (CIN) of the Listed Entity | L24232GJ1996PLC029894 |
| 2. | Name of the Listed Entity | Tatva Chintan Pharma Chem Limited |
| 3. | Year of Incorporation | 1996 |
| 4. | Registered Office Address | Plot No. 502/17 GIDC Estate, Ankleshwar, Dist. Bharuch-393002, Gujarat, India |
| 5. | Corporate Address | Plot No. 353, Makarpura GIDC, Vadodara, Gujarat – 390010, India |
| 6. | E-mail | cs@tatvachintan.com |
| 7. | Telephone | +91-7574848533/ 34 |
| 8. | Website | www.tatvachintan.com |
| 9. | Financial year for which reporting is being done | 01 April 2022 to 31 March 2023 |
| 10. | Name of the Stock Exchange(s) where shares are listed | BSE Limited (BSE); and National Stock Exchange of India Limited (NSE) |
| 11. | Paid-up Capital | ₹ 221.65 million |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | Mr. Chintan N. Shah Chairman and Managing Director Telephone number: +91 75748 48533/34 Email ID: chintan@tatvachintan.com |
| 13. | Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together). | Standalone Basis |

Products/Services

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

| Description of main activity | Description of business activity | % of turnover of the entity |
|------------------------------|---|-----------------------------|
| Specialty Chemicals | Manufacturing of specialty chemicals with diverse portfolio of SDA, PTC, electrolyte salts and PASC | 99.32% |

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

| Sr. No. | Product / Service | NIC Code | % of total turnover contributed |
|------------|--|----------|---------------------------------|
| 1 | Structure Directing Agents (SDA) | | 99.32% |
| 2 | Phase Transfer Catalysts (PTC) | 20119 | |
| 3 | Pharmaceutical and Agrochemical Intermediates and Other Specialty Chemicals (PASC) | 20119 | |
| 4 | Electrolyte Salts (ES) | | |

III. Operations

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

| Locations | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National | 2 | 2 | 4 |
| International | 0 | 0 | 0 |



17. Markets served by the entity:

Number of locations:

| Locations | Number |
|----------------------------------|--------|
| National (no. of states) | 17 |
| International (no. of countries) | 30 |

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

A brief on types of customers:

We have a wide customer base spread across major geography and across diverse sectors including:

- Agro chemicals
- Active pharmaceuticals ingredients
- Zeolites manufactures
- Specialty chemicals
- Personal care and hygiene
- Super capacitors and energy storage devices
- Resins
- Mining and metals

The Company serves customers directly as well as through agents in global market place.

IV. Employees

Details as at the end of Financial Year:

Employees and workers (including differently abled):

| Sr. | Particulars | Total (A) | Male | e | Female | | |
|-----|--------------------------|-----------|---------|-----------|---------|-----------|--|
| No. | | _ | No. (B) | % (B / A) | No. (C) | % (C / A) | |
| EMP | LOYEES | | | ' | | | |
| 1. | Permanent (D) | 337 | 324 | 96.14% | 13 | 3.86% | |
| 2. | Other than Permanent (E) | 0 | 0 | 0% | 0 | 0% | |
| 3. | Total employees (D + E) | 337 | 324 | 96.14% | 13 | 3.86% | |
| woi | RKERS | | | | | | |
| 4. | Permanent (F) | 271 | 271 | 100% | 0 | 0% | |
| 5. | Other than Permanent (G) | 279 | 277 | 99.28% | 2 | 0.72% | |
| 6. | Total workers (F + G) | 550 | 548 | 99.64% | 2 | 0.36% | |

Differently abled Employees and workers: b.

| Sr. | Particulars | Total (A) | Male | e | Female | |
|------|---|-----------|---------|-----------|---------|-----------|
| No. | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| DIFF | ERENTLY ABLED EMPLOYEES | | | | | |
| 1. | Permanent (D) | 0 | 0 | 0% | 0 | 0% |
| 2. | Other than Permanent (E) | 0 | 0 | 0% | 0 | 0% |
| 3. | Total Differently abled Employees (D + E) | 0 | 0 | 0% | 0 | 0% |
| DIFF | ERENTLY ABLED WORKERS | | | | | |
| 4. | Permanent (F) | 0 | 0 | 0% | 0 | 0% |
| 5. | Other than Permanent (G) | 0 | 0 | 0% | 0 | 0% |
| 6. | Total Differently abled Workers (F + G) | 0 | 0 | 0% | 0 | 0% |



Participation / Inclusion / Representation of women:

| | Total | No. and percentage of Females | | |
|--------------------------|-------|-------------------------------|-----------|--|
| | (A) | No. (B) | % (B / A) | |
| Board of Directors | 6 | 1 | 16.67% | |
| Key Management Personnel | 5 | 0 | 0% | |

Turnover rate for permanent employees and workers:

| | FY 2022-23 (Turnover rate in %) | | FY 2021-22 (Turnover rate in %) | | | FY 2020-21 (Turnover rate in %) | | | |
|---------------------|------------------------------------|--------|------------------------------------|--------|--------|------------------------------------|--------|--------|--------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 26.85% | 46.15% | 27.60% | 29.39% | 46.15% | 30.23% | 27.43% | 7.14% | 26.25% |
| Permanent Workers | 10.70% | 100% | 11.07% | 16.51% | 0.00% | 16.43% | 10.26% | 0.00% | 10.20% |

Holding, Subsidiary and Associate Companies (Including Joint Ventures)

Names of holding / subsidiary / associate companies / joint ventures:

| Sr. No. | Name of the holding/ subsidiary/associate companies/joint ventures (A) | Indicate whether holding / subsidiary / associate / joint venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the business responsibility initiatives of the listed entity? (Yes/No) |
|------------|--|---|---|--|
| 1 | Tatva Chintan USA Inc. | Wholly Owned Subsidiary of the Company | 100% | No |
| 2 | Tatva Chintan Europe B.V. | Wholly Owned Subsidiary of the Company | 100% | No |

VI. CSR Details

Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes 22. i.

Turnover (in ₹): 4030.44 million (FY 2022-23)

Net worth (in ₹): 5047.81 million (FY 2022-23)

VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom | Grievance redressal mechanism in place | | FY 2022-23 | | | FY 2021-22 | |
|--------------------------------------|---|--|--|----------|--|--|---------|
| complaint is received | If Yes, then provide web-link for grievance redress policy | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | Yes. Please refer Note A1 below | 0 | 0 | NA | 0 | 0 | NA |
| Investors (other than shareholders)* | Yes | 0 | 0 | NA | 0 | 0 | NA |
| Shareholders | Yes. As per SEBI Listing Regulations | 2 | 0 | NA | 61 | 0 | NA |
| Employees and workers | Yes. Please refer Note A2 below | 0 | 0 | NA | 0 | 0 | NA |
| Customers | Yes. Please refer Note A3 below | 9 | 0 | NA | 3 | 0 | NA |
| Value Chain Partners | Yes. Please refer Note A4 below | 0 | 0 | NA | 0 | 0 | NA |
| Other (please specify) | | | Not Ap | plicable | | | |



Notes:

A1: At all our manufacturing locations, we ensure that there is regular engagement on a pro-active basis with the local communities and their representatives. As such no complaint has been received during the year and there are no long standing grievances at any of our locations.

A2. The link to Grievance Redressal Policy for Employees is as follows: https://www.tatvachintan.com/investors/corporate-governance/

A3: Customer complaints and feedback are received by the marketing department, and addressed/attended to by them and the team of respective manufacturing facility. Complaints are tracked till closure.

In the detailed monthly review meeting, the details of all the complaints and the resolution status is shared, and corrective actions are discussed to eliminate such issues in future.

A4: The link to Grievance Redressal Policy for Supply Chain Partner is as follows: https://www.tatvachintan.com/investors/corporate-governance/

24. Overview of the entity's material responsible business conduct issue:

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

| Sr. 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. | Health & Safety | Risk | In chemical industry, Failure to ensure health and safety may hamper the smooth running | Health & Safety Management Plan, continuous Training, Process Safety & Risk Management etc. | Negative | | |
| | | | of operations, impact people and community and disrupt the operations. | Policies (internal) and rigorous trainings for employees and workers against health and safety hazards. In addition, safety campaigns, Mock Drills, Safety Week, Safety Committee Meeting are being conducted/celebrated and communication of all significant hazards across sites, factories and offices etc. | | | |
| | | | | The Company minimize safety and health risks by encouraging employees or workers to report unsafe conditions or near miss events and redressal thereafter. | | | |
| 2. | ethics ethics can result in significant risks for a company. If a company is found to be engaging in unethical behavior, it can damage the company's reputation and erode public trust creating a loss of customers, investors, and | | ethics can result in significant risks for a company. If a company | The Company adheres to the Tatva Code of Conduct which serves as a guide to each employee on the standards of values, ethics, and business principles. | Negative | | |
| | | | The Whistle Blower Policy of the Company provides a mechanism for the employees to approach the Chairman of Audit Committee and disclose information that may evidence unethical or improper activity concerning the Company. | | | | |
| | | | | Framing and Adoption of Various Policies, for transparent Environment. | | | |
| | | | | "Value Workshops" is conducted to ensure that the linkages between values and behaviours are well understood. | | | |



| Sr. 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. | Employee Development | Opportunity | This may have ability to attract, develop and retain a skilled workforce, can enhance innovation, productivity, and competitiveness. | NA | Positive |
| | | | This may improve employee competence, skills and knowledge which is key for organisational growth. | | |
| | | | Effective employee management can also improve employee engagement, morale and job satisfaction, leading to reduced attrition and increased employee loyalty. | | |
| 4. | Regulatory Issues and Compliance | Opportunity | Regulatory compliance provides: an increase in the efficiency of products; reduce risks; enables competitive advantage; and creates new business opportunities. Regulatory compliant businesses are less likely to face legal or regulatory action, and damage to reputation. | NA | Positive |
| 5. | Customer Centricity | Opportunity | Customer centricity provides an opportunity, to develop new products that are designed with a focus on increased efficiency, safety and quality. It also helps in receiving customer feedback and understanding their needs and concerns to create products that are not only safe, but also meet the needs of customers. | NA | Positive |
| 6. | Waste Management | Opportunity | Sustainable waste management practices and recycling can improve environmental performance and reduce dependency on virgin raw materials, while also potentially increasing financial returns. | NA | Positive |
| 7. | Water Stewardship | Opportunity | This may help in sustainable water balance, improve availability of water, becoming water neutral / positive. | Focus on minimising consumptions, effluent generation and reuse of treated effluent. Our Ankleshwar manufacturing unit is Zero Liquid Discharge Units since January 2020. Working on water reduction projects. We have taken up multiple water conservation projects like recycling, condensate recovery and steam recovery. | Positive |



| Sr. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|------------|---------------------------------|--|---|--|--|
| 8. | Reducing GHG emissions | Opportunity | Undertake GHG emissions reduction initiatives through use of fuel from renewable sources, increased use of electricity from renewable sources and implement energy efficient measures. | NA | Positive |
| 9. | Stakeholder Engagement | Opportunity | As we move towards growing into a more sustainable business, inclusion of various stakeholders in our growth journey is very important. We take their inputs to plan our business strategy. | NA | Positive |
| | | | We are continuously engaging with the employees, investors, suppliers, Service providers, customers etc. through employee engagement initiatives, Investor meet, Vendor meet, etc. on periodical basis. | | |
| 10. | Sustainable supply chain | Opportunity | The Company believes long term association with suppliers and consider them as long term partners in growth. | NA | Positive |
| | | | Strategic partners meet are organized on regular basis. | | |

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.

The National Guidelines on Responsible Business Conduct (NGRBC) released by the Ministry of Corporate Affairs has updated and adopted nine areas of Business Responsibility. These are briefly as under:

| | areas or business nesponsibility. These are briefly t | as arracr. | | | | | | | | |
|-------|---|-------------|-------------|-------------|-------------|------------|--------------|-----------|------------|-----------|
| P1 | Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable | | | | | | | | | |
| P2 | Businesses should provide goods and services in a manner that is sustainable and safe | | | | | | | | | |
| Р3 | Businesses should respect and promote the we | II-being of | f all empl | oyees, inc | luding the | ose in the | ir value c | hains | | |
| P4 | Businesses should respect the interests of and b | oe respon | sive to all | its stakel | nolders | | | | | |
| P5 | Businesses should respect and promote human | rights | | | | | | | | |
| P6 | Businesses should respect and make efforts to p | protect an | d restore | the envir | onment | | | | | |
| P7 | Businesses, when engaging in influencing public | c and regu | latory po | licy, shou | ld do so ii | n a manne | er that is i | responsib | le and tra | insparent |
| P8 | Businesses should promote inclusive growth an | d equitab | le develo | pment | | | | | | |
| Р9 | Businesses should engage with and provide value | ue to their | r consum | ers in a re | sponsible | manner | | | | |
| Discl | osure questions | P1 | P2 | Р3 | P4 | P5 | Р6 | Р7 | Р8 | Р9 |
| Polic | y and management processes | | | | | | | | | |
| 1 (a) | Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes/No) | | | | | Yes | | | | |



| Disclosure questions | | | P2 | P3 | P4 | P5 | P6 | P7 | Р8 | Р9 |
|--|--|--|---|--------------------------------------|-------------------------------------|-------------------------|-------------------------|------------|-------------------------|-----------|
| (b) | Has the policy been approved by the Board? (Yes/No) | | | | | Yes | | | | |
| (c) | Web Link of the Policies, if available | | https:// | www.tatv | achintan. | com/inve: | stors/cor | orate-go | vernance | L |
| 2 | Whether the entity has translated the policy into procedures. (Yes/No) | | | | | Yes | | | | |
| 3 | Do the enlisted policies extend to your value chain partners? (Yes/No) | | | | | 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 | with IS manag Dahej F | e state-of O 9001 (Q ement sys Plant is acc accredite | uality ma tems), an credited w | nagement d ISO 450 vith Toget | t systems) 01 (Occup | , ISO 140 pational h | 01 (Enviro | onmental I safety) s | tandards. |
| 5 | Specific commitments, goals and targets set by the entity with defined timelines, if any. | t by Yes, we have started our sustainability journey. We understand that although our operations are sustainable, we need to quantify our ESG indicators and benchmark it against the industry standards. We are progressing towards advancement in our ESG journey and set goals and targets accordingly. | | | | | nd | | | |
| 6 Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met: | | | tioned in he proces commitn | s to devel | op metho | ds to mea | asure our | performa | • | • |

Governance, Leadership and Oversight

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).

The Company is committed towards sustainable development through continued and targeted efforts towards environment, social and governance aspects of our business. We are committed to contributing to the well-being of both our employees and all the stakeholders within our ecosystem. Our Company's operations are aligned with the sustainable development goals, among which the following are key priorities:

Environmental sustainability: Water is an essential resource to our business, and we ensure a sustainable approach through water conservation and wastewater treatment. We conserve water using water-efficient technologies and wastewater management systems, and we implement measures to create employee awareness. These actions have reduced water consumption across our operations. The Company emphasized on better managing natural resources, monitoring its consumption and waste generation to minimizing impacts arising from our activities on environment.

Operational sustainability: Our operational sustainability is aligned with our enterprise risk management. Focus on minimising consumptions, effluent generation and reuse of treated effluent. Our Ankleshwar manufacturing unit is Zero Liquid Discharge Unit since January 2020. Working on water reduction projects. We have taken up multiple water conservation projects like recycling, condensate recovery and steam recovery.

People/Social sustainability: We are an equal opportunity employer and abide by the principles of diversity and inclusivity. Our 'zero harm' philosophy drives our safety practices. Our Company also ensures the safety of our employees through safety audits. The Company is committed to conducting beneficial and fair business practices for labour, human capital, and the community. It provides employees and business associates with working conditions that are clean, safe, healthy and fair.

- Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies): Mr. Chintan N. Shah, Chairman and Managing Director (DIN: 00183618) under the guidance of the Board of Directors and its Committees is responsible for the implementation and oversight of the Business Responsibility policies.
- 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, the Board periodically monitors the financial, environmental, and social performance of the Company while addressing key risks and opportunities. The Company also has Audit Committee, Stakeholders Grievance Committee and Corporate Social Responsibility Committee. The Risk Management Committee of the Company reviews entity wide risks including ESG risks.



10. Details of Review of NGRBCs by the Company.

| Subject for review | | Indicate whether review was un Director / Committee of the Any other Committe | Board | • | Frequency (Annually / Half yearly / 0 / Any other - please specify | | | | • | | |
|--------------------|---|--|--------|---------|---|----------|----------------|----------|----------|-----------|----|
| | | P1 / P2 / P3 / P4 / P5 / P6 / P3 | 7 / P8 | / P9 | P1 / P2 / P3 / P4 / P5 / P6 / P7 / | | | | 7 / P8 / | / P8 / P9 | |
| а | Performance against above policies and follow up action | Yes | | | | | (| Quarter | ·ly | | |
| b | Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | Yes | | | | | (| Quarte | rly | | |
| | | | P1 | P2 | Р3 | P4 | P5 | Р6 | P7 | Р8 | P9 |
| | s the entity carried out independer orking of its policies by an external a | • | | | | | No | | | | |
| naı | me of the agency. | | d by a | policy | reasor | ns to be | stated | l: | | | |
| naı | | | d by a | policy, | reasor P3 | ns to be | stated | l: P6 | P7 | P8 | PS |
| naı | me of the agency. nswer to question (1) above is "No | " i.e. not all Principles are covere | | | | | | | P7 | Р8 | PS |
| nai | nswer to question (1) above is "No Questions The entity does not consider the business (Yes/No) | " i.e. not all Principles are covere e Principles material to its re it is in a position to formulate | | | | | P5 | | P7 | P8 | P |
| If a | nswer to question (1) above is "No Questions The entity does not consider the business (Yes/No) The entity is not at a stage when and implement the policies on s | " i.e. not all Principles are covered by i.e. not all Pri | | | | | P5 NA | | P7 | P8 | P |
| If a | nswer to question (1) above is "No Questions The entity does not consider the business (Yes/No) The entity is not at a stage when and implement the policies on s The entity does not have the fin | e Principles material to its re it is in a position to formulate specified principles (Yes/No) nancial or / human and technical (Yes/No) | | | | | P5 NA NA | | P7 | P8 | P |

Section C: Principle Wise Performance Disclosure

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible. As the leadership indicators are not mandatory, the Company has not provided data / details related to leadership indicators under this report.

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

Essential Indicators

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

| Segment | Total number of training and awareness programmes held | Topics/ principles covered Under the training and its impact | % age of persons in respective category covered by the awareness programme |
|--|--|--|--|
| Board of Directors (BoD) | 4 | Business operations / performance, new business initiatives, regulatory, risk indicators / mitigation plans, safety, ESG Matters, compliances, legal cases, business ethics and values, human rights, Tatva Chintan Code of Conduct ("TCCOC"), etc. | 100% |
| Key Managerial Personnel (KMPs) | 4 | In addition to above referred topics / principles, updates and awareness related to regulatory changes are provided for the benefit of the KMPs. Topics covered include: Corporate Governance, Companies Act, 2013, SEBI regulations as applicable to the Company, ESG matters, TCCOC, Prevention of Sexual Harassment at Workplace (POSH), Values Workshop etc. | 100% |



| Segment | Total number of training and awareness programmes held | Topics/ principles covered Under the training and its impact | % age of persons in respective category covered by the awareness programme |
|--|--|--|--|
| Employees other than BoD and KMPs | 26 | Structured Behavioural Competency Development program designed for Managers & Supervisors by expert trainer. This includes, Decision Making, Conflict Resolution, Stress Management, Time Management, Team Building etc. On the job Technical training program on various process & product manufacturing, this includes, distillation, filtration, heat transfer, mass transfer, 5S, TQM etc. Compliance Programs including POSH awareness, whistle-blower, TCCOC, ABAC and human rights. | 100% |
| Workers | 24 | We regularly provide training, education and development opportunities to Company and contractor employees on topic of Technical, behavioural safety, MSDS etc. 5S housekeeping, area ownership etc. Safety culture is imbibed among employees by imparting and creating awareness about BBS (Behavioral Based Safety) and other Safety training ensuring their participation by continuously motivating them. Compliance Programs including POSH awareness, whistle-blower, TCCOC and human rights. | 100% |

Details of fines / penalties / punishment / award / compounding fees / settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators / law enforcement agencies / judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website):

| | | Monetary | | | |
|-----------------|--------------------|--|--------------------|---------------------------|--|
| | 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 | Registrar of Companies, ("ROC") Gujarat, Dadra and Nagar Haveli | 16,00,000 | Refer Note 1 Below | No |
| Settlement | NA | NA | NA | NA | NA |
| Compounding Fee | Principle 1 | Registrar of Companies, ("ROC") Gujarat, Dadra and Nagar Haveli | 2,30,000 | Refer Note 2 Below | No |
| | | Non - Monetary | | | |
| | NGRBC Principle | Name of the regulatory/ enforcement agencies/judicial institutions | Brief of the case | Has an appeal (Yes/No) | been preferred? |
| Imprisonment | | | NII | | |
| Punishment | | | Nil | | |

Note:

Company had found that it has not complied with the provisions of section 42 of the Companies Act, 2013 w.r.t. opening of separate bank account for depositing the share application money in the year 2015. The Adjudication Application was submitted by the Company on suo-moto basis to ROC in April 2021.

The Hon'ble RD, NWR, MCA has issued the order dated 07/07/2022, imposing penalty on the Company and its three Executive Directors/Promoters and disposed of the said matter.

The details of penalties which has been already paid by the Company and its three Directors are as follow:

| Sr. No. | Name | Amount (₹) |
|---------|--|-------------|
| 1 | Tatva Chintan Pharma Chem Limited | 10,00,000/- |
| 2 | Mr. Chintan N. Shah, Director (DIN: 00183618) | 2,00,000/- |
| 3 | Mr. Shekhar R. Somani, Director (DIN: 00183665) | 2,00,000/- |
| 4 | Mr. Ajaykumar M. Patel, Director (DIN: 00183745) | 2,00,000/- |



- Penalty of ₹ 1,10,000 on Company and ₹ 40,000 each on Mr. Chintan N. Shah (DIN: 00183618), Mr. Shekhar R. Somani (DIN: 00183665) and Mr. Ajaykumar M. Patel (DIN: 00183745) Directors of the Company, has been imposed by Registrar of Companies, ("ROC") Gujarat, Dadra and Nagar Haveli, for not complying with the provisions of section 203 of the Companies Act, 2013 towards delay in the appointment of Company Secretary as required under the Companies Act, 2013 in fiscal 2015. Penalty imposed is paid and not contested further. At present the said matter is disposed of. The above penalty is very nominal therefore, no disclosure made in terms of Regulation 30 and also on the website of the Company.
- Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or nonmonetary action has been appealed.

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

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

Yes. It is a part of our Code of Conduct. We ensure all our systems are operated ethically. It shows the commitment of the Company and its management for maintaining the highest ethical standards while undertaking open and fair business practices and culture, and implementing and enforcing effective systems to detect, counter and prevent bribery and other corrupt business practices.

Web-link to the policy:

https://www.tatvachintan.com/investors/corporate-governance/

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

| | FY 2022-23 | FY 2021-22 |
|-----------|------------|------------|
| Directors | | |
| KMPs | | • |
| Employees | | U |
| Workers | | |

Details of complaints with regard to conflict of interest:

| | FY 2022- | 23 | FY 2021 | FY 2021-22 | | |
|---|----------|---------|---------|------------|--|--|
| | Number | Remarks | Number | Remarks | | |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors. | 0 | NA | 0 | NA | | |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs. | 0 | NA | 0 | NA | | |

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

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

Essential Indicators

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

| | Current Financial Year (%) | | Details of improvements in environmental and social impacts |
|-------|----------------------------------|--------|--|
| R & D | - | - | While the Company makes significant investments in development of new sustainable and green technologies, however, we have not measured the impact specifically. |
| Capex | 5.36% | 12.95% | Employee health and safety, energy saving and effluent treatment plant. |



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

Yes, the Company has formulated a standard operating procedure to encourage such vendors. The quality assurance team of the Company conducts periodic audits of the vendors, especially those who supply key materials. The core element of an audit is to assess whether the vendor's products and services for operation are ethical, sustainable, and socially conscious, and also to encourage them to achieve and improve sustainability standards.

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

The Company has sourced approximately 16.36% of its raw materials 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.

(a) Plastics (including packaging)

All our finished goods (FG) are raw materials for our customer, hence we don't require them to reclaim.

Though if any of our products are rejected at the customer's end or in transit we have a procedure in place to reclaim them and reprocess or dispose off it in a safe manner with pollution control Board's authorised recycler.

For Damaged / rejected material, we have a procedure in place to reclaim it and re-process or dispose off it in a safe manner. For exported material, customers are required to safely dispose off the product as per local regulations.

(b) E-waste

The e-waste is handed over to certified vendors for safe disposal through the pollution control Board's authorised recycler.

(c) Hazardous waste

Hazardous waste is categorised as per the Rules and is sent for proper disposal at the Pollution Control Board's authorised recycler.

(d) Other waste

Not Applicable

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).

Yes

If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards?

No

If not, provide steps taken to address the same.

EPR registration application submitted, awaiting registration certificate.

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

Essential Indicators

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

| Category | % of employees covered by | | | | | | | | | | |
|----------|---------------------------|---|------------|---------------|------------|---------------|------------|---------------|------------|---------------|------------|
| | Total (A) | Total (A) Health insurance Accident insurance Maternity benef | | benefits | Paternity | Benefits | Day Care f | acilities | | | |
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) |
| | | | | Pe | rmanent e | employees | | | | | |
| Male | 324 | 324 | 100% | 324 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 13 | 13 | 100% | 13 | 100% | 13 | 100% | 0 | 0% | 0 | 0% |
| Total | 337 | 337 | 100% | 337 | 100% | 13 | 3.86% | 0 | 0% | 0 | 0% |
| | | | | Other th | an Perma | nent emplo | yees | | | | |
| Male | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |



Details of measures for the well-being of workers:

| Category | | | | | % of em | ployees cov | ered by | | | | |
|----------|--------------|---------------|------------|---------------|------------|-----------------------|------------|-----------------------|------------|---------------------|------------|
| | Total (A) | | | | | 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) |
| | | | | Perr | nanent w | vorkers | | | | | |
| Male | 271 | 271 | 100% | 271 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 271 | 271 | 100% | 271 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| | | | | Other tha | n Permar | nent worke | rs | | | | |
| Male | 277 | 277 | 100% | 277 | 100% | 0 | 0% | 0 | 0% | 0 | 0% |
| Female | 2 | 2 | 100% | 2 | 100% | 2 | 100% | 0 | 0% | 0 | 0% |
| Total | 279 | 279 | 100% | 279 | 100% | 2 | 0.72% | 0 | 0% | 0 | 0% |

Details of retirement benefits, for the current FY and previous financial year.

| Benefits | | FY 2022-23 | | FY 2021-22 | | | |
|-----------------------|--|---|--|--|---|--|--|
| | 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% | Υ | 100% | 100% | Υ | |
| Gratuity | 100% | 100% | Υ | 100% | 100% | Υ | |
| ESI | 11.51% | 11.51% | Υ | 23.6% | 23.6% | Υ | |
| Others please specify | | | | | | | |

Accessibility of workplaces

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

Yes, our office and manufacturing units are accessible to differently abled employees and workers.

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.

Equal opportunity is covered as part of our Code of Conduct.

https://www.tatvachintan.com/investors/corporate-governance/

The Company provides equal opportunities to all its employees and to all eligible applicants for employment in the Company. It does not unfairly discriminate on any ground including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.

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 | 0 | 0 | 0 | 0 | |
| Female | 0 | 0 | 0 | 0 | |
| Total | 0 | 0 | 0 | 0 | |



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

Yes/No (If Yes, then give details of the mechanism in brief)

Permanent Workers
Other than Permanent Workers
Permanent Employees
Other than Permanent Employees

Yes, the Company has a structured Grievance Redressal Mechanism procedure, Whistle blower Policy, Suggestion Box Scheme and Vigil Mechanism to provide a formal platform to employees and workers to report their concerns about resource requirement, unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct. The Policy provides for adequate safeguards against the victimisation of employees or workers who avail of these mechanisms. The Company is committed to create a healthy working environment and encourage employees and workers to share their concerns with their department head, HR or other member of the senior management. The Company has zero tolerance for sexual harassment and believes that all employees and workers of the Company have the right to be treated with dignity. The Company has formed Internal Complain Committees for each location that are accessible to all employees and workers. All the polices are the part of the induction programme and the Company on regular basis sensitises its employees and workers on the same through training, workshop and awareness programmes.

7. Membership of employees and workers in association(s) or Unions recognized by listed entity:

| | | V 7 | , | | | |
|----------------------------------|--|--|-----------|--|--|-----------|
| Category | | FY 2022-23 | | | FY 2021-22 | |
| | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B / A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D / C) |
| Total Permanent Employees | 337 | 0 | 0% | 258 | 0 | 0% |
| Male | 324 | 0 | 0% | 245 | 0 | 0% |
| Female | 13 | 0 | 0% | 13 | 0 | 0% |
| Total Permanent Workers | 271 | 0 | 0% | 213 | 0 | 0% |
| Male | 271 | 0 | 0% | 212 | 0 | 0% |
| Female | 0 | 0 | 0% | 1 | 0 | 0% |

8. Details of training given to employees and workers:

| Category | | | FY 2022-23 | | | | | FY 202: | 1-22 | |
|----------|--------------|-------------|------------|---------|-----------|--------------|---------------------|---------|------------------|---------|
| _ | Total (A) | On Health a | • | • | | Total (A) | On Health a Meas | • | On Si upgrada | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| | | | | | Employees | | | | | |
| Male | 324 | 324 | 100% | 324 | 100% | 245 | 245 | 100% | 245 | 100% |
| Female | 13 | 13 | 100% | 13 | 100% | 13 | 13 | 100% | 13 | 100% |
| Total | 337 | 337 | 100% | 337 | 100% | 258 | 258 | 100% | 258 | 100% |
| | | | | | Workers | | | | | |
| Male | 271 | 271 | 100% | 271 | 100% | 212 | 212 | 100% | 212 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 1 | 1 | 100% | 1 | 100% |
| Total | 271 | 271 | 100% | 271 | 100% | 213 | 213 | 100% | 213 | 100% |

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

| Category | rtegory FY 2022-23 | | | | FY 2021-22 | | | |
|----------|--------------------|---------|-----------|-----------|------------|---------|--|--|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) | | |
| | ' | ' | Employees | | | | | |
| Male | 324 | 324 | 100% | 245 | 245 | 100% | | |
| Female | 13 | 13 | 100% | 13 | 13 | 100% | | |
| Total | 337 | 337 | 100% | 258 | 258 | 100% | | |
| | | | Workers | | | | | |
| Male | 271 | 271 | 100% | 212 | 212 | 100% | | |
| Female | 0 | 0 | 0% | 1 | 1 | 100% | | |
| Total | 271 | 271 | 100% | 213 | 213 | 100% | | |



10. Health and safety management system:

- Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?
 - Yes, occupational health and safety management system has been implemented as per ISO 45001:2018 and certified.
- What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity? To identify routine & non-routine work related hazards, a job specific Hazard Identification & Risk Assessment ("HIRA") is prepared. The Material Safety Data Sheet ("MSDS") is followed for handling of chemical.
 - A HAZOP study is carried out for all the products and Pre-start up safety review ("PSSR") is carried out before operation. Third party safety audit is conducted to identify any kind of hazard at site and internal audit is also done after every six months. Organisation is having system to report all the unsafe acts, unsafe conditions, near-miss & incident at site with a reward & recognition system.
- Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N) Yes, we encourage our employees to report near-miss incidents identified through various platforms which is analysed by senior manager in consultation with safety department officials. All sites have specific procedure for reporting of work-related hazard, injuries, unsafe condition and unsafe act. Remedial Action is taken for accidents and near miss so that the same in not occur in the
- Do the employees/workers of the entity have access to non-occupational medical and healthcare services? (Yes/ No) Yes, the Company is organising half yearly medical check-up for all the employees and workers. Health Awareness camps are being organised in the plants on regular basis. All employees and workers are covered under health insurance scheme / ESI scheme.

11. Details of safety related incidents:

| Safety Incident/Number | Category | FY 2022-23 | FY 2021-22 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| Total recordable work-related injuries | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | Workers | 0 | 0 |

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

The Company has a thorough system in place to ensure workplace health and safety. PPEs (personal protective equipment) is ensured before any job. Permit to work system along with LOTO (lock out & tag out) is followed to identify and eliminate any non-routine work hazard at site. For all the routine activities SOPs are prepared and followed. To manage any emergency, we have ambulance and a wellequipped firefighting system with the firefighting team getting training from a third party on a regular basis. Mock drill is conducted as per schedule to check for response during any emergency for safe evacuation, rescue & firefighting. All the new joining employees, workers & visitors must go through safety induction programme and job related to functional area is arranged for all the workers & employees.

To ensure this Tatva Chintan has implemented robust safety measures across all its workplaces and facilities over the years to lay the foundation to a culture of conducive safe working environment wherein proper safety protocols are adhered to, an accident reporting system, safety equipment is given the due importance and orderly work locations are maintained. The Company's strive to achieve the same is validated by the ISO 14001:2015 certification bestowed upon the Company for its health, safety, and environment management systems. The Company also regularly conducts mock drills, safety trainings and on-the-job training sessions to create awareness of health and safety for its personnel.



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

| | | FY 2022-23 | | FY 2021-22 | | |
|--------------------|--------------------------|---------------------------------------|---------|--------------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working conditions | 0 | 0 | NA | 0 | 0 | NA |
| Health and Safety | 0 | 0 | NA | 0 | 0 | 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 and safety practices and working conditions.

All safety-related accidents are being investigated and learnings from investigation reports are shared across organisation for deployment of corrective actions to stop recurrence of such incidents. Effectiveness of Corrective actions deployment being checked during safety Audits. Significant risks/concerns arising from assessment of Health and Safety Practices are addressed through hierarchy of risk controls.

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

Essential Indicators

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

Internal and external group of stakeholders have been identified. Presently, the given stakeholder groups have an immediate impact on the operations and workings of the Company. This includes Employees, Shareholders, Customers, Communities, Suppliers, Service Provider, Business Partners and Vendors.

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 |
|---|--|---|---|--|
| Employees and Workers | No | Meetings, Email, Posters, Slogans, Notice Board. | Ongoing | General Feedback, Grievances, to share relevant & useful information to employees, Employee Success, Legal Compliance, Motivation, Operational efficiencies, improvement areas, long-term strategy plans, training and awareness, health, safety and engagement initiatives. |
| Shareholders and Investors | No | Email, SMS, Newspaper advertisement, website | Quarterly / Half yearly / Annually / Periodically and as & when required | Dividends, Annual Financial statements and other related information, Corporate Governance Practice. |
| Customers | No | Email, meetings, website | Ongoing | Informing them about products of the Company, feedback, etc. |
| Suppliers | No | Emails, meetings | Ongoing | Supply of materials / services. |
| Community | No | Directly or through CSR implementation | Ongoing | Education, empowerment, health, infrastructure, conservation, etc. |
| Central, State and Local Government, Various Statutory and Regulatory Bodies | No | Email, Direct engagement | Ongoing | For Compliance & Communication |
| Banks and Financial Institutions | No | E-mail, letters, meetings | Ongoing | Financial requirements, Compliance and transactions. |



PRINCIPLE 5: Businesses should respect and promote human rights.

Essential Indicators

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

| | | EV 2000 00 | | | EV 2024 22 | | |
|----------------------|------------|--|---------|------------|--|---------|--|
| | FY 2022-23 | | | FY 2021-22 | | | |
| Category | Total (A) | No. of employees / workers covered (B) | % (B/A) | Total (C) | No. of employees / workers covered (D) | % (D/C) | |
| | | Employees | | | | | |
| Permanent | 337 | 337 | 100% | 258 | 258 | 100% | |
| Other than permanent | 0 | 0 | 0% | 0 | 0 | 0% | |
| Total Employees | 337 | 337 | 100% | 258 | 258 | 100% | |
| | | Workers | | | | | |
| Permanent | 271 | 271 | 100% | 213 | 213 | 100% | |
| Other than permanent | 279 | 279 | 100% | 247 | 247 | 100% | |
| Total Workers | 550 | 550 | 100% | 460 | 460 | 100% | |

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

| Category | | | Y 2022-23 | } | | | ı | Y 2021-22 | ! | |
|----------------------|--------------|---------|-----------------|----------------|---------|--------------|----------------|-----------------|----------------|---------|
| | Total (A) | | al to m Wage | More Minimu | | Total (D) | Equa Minimu | al to m Wage | More Minimu | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| | | | Eı | nployees | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 324 | 0 | 0% | 324 | 100% | 245 | 0 | 0% | 245 | 100% |
| Female | 13 | 0 | 0% | 13 | 100% | 13 | 0 | 0% | 13 | 100% |
| Other than permanent | | | | | | | | | | |
| Male | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| | | | - | Workers | | | | | | |
| Permanent | | | | | | | | | | |
| Male | 271 | 0 | 0% | 271 | 100% | 212 | 0 | 0% | 212 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 1 | 0 | 0% | 1 | 100% |
| Other than permanent | | | | | | | | | | |
| Male | 277 | 0 | 0% | 277 | 100% | 246 | 0 | 0% | 246 | 100% |
| Female | 2 | 0 | 0% | 2 | 100% | 1 | 0 | 0% | 1 | 100% |

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

| | | Male | Female | | |
|----------------------------------|--------|---|--------|---|--|
| | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category | |
| Board of Directors (BoD) | 5# | 1,65,03,252 | 1^ | 1,80,000 | |
| Key Managerial Personnel | 5* | 1,65,03,252 | 0 | 0 | |
| Employees other than BoD and KMP | 319 | 2,94,863 | 13 | 3,69,360 | |
| Workers | 271 | 2,63,738 | 0 | 0 | |

^{*} Out of 5 Directors, 3 are executive directors who are paid remuneration, rest are independent directors who only receive sitting fee.

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

Yes, the focal point is the Team-HR which takes care of human rights issues.

[^] We have only one female independent director, who is paid sitting fee. Please refer corporate governance report for details

^{*} includes MD and WTDs.



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

The Company has established a human rights policy that is communicated to every employee. Employees are encouraged to provide their feedback and there are anonymous reporting mechanisms set up for sharing their concerns and grievances. We have developed a Human Rights checklist to improve human rights reporting across our units. It was found that, none of the manufacturing units considered were found to have any risk for incidents of child labor, forced labor and young workers exposed to hazardous work. All hiring is done with supporting documentation and proof of age required.

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

| | | FY 2022-23 | | FY 2021-22 | | |
|-----------------------------------|--------------------------|---|---------|--------------------------|--|---------|
| | Filed during the year | Pending resolution at the end of the year | Remarks | Filed during the year | Pending resolution at the end of the year | Remarks |
| Sexual Harassment | 0 | 0 | NA | 0 | 0 | NA |
| Discrimination at workplace | 0 | 0 | NA | 0 | 0 | NA |
| Child Labour | 0 | 0 | NA | 0 | 0 | NA |
| Forced Labour/ Involuntary Labour | 0 | 0 | NA | 0 | 0 | NA |
| Wages | 0 | 0 | NA | 0 | 0 | NA |
| Other human rights related issues | 0 | 0 | NA | 0 | 0 | NA |

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

All major labour laws and other policies about workplace ethics are well communicated to employees through display boards, handbooks, internet and other forms of communication. These include policies such as the whistle blower policy, the sexual harassment policy and strict legal compliance observed as laid down by local and national acts and regulations. There is no discrimination in recruitment, development, promotion based on gender, age, religion or disability.

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

Yes. The business agreements and contracts do include Company's expectations to promote sustainability, fair competition and respect for human rights.

9. Assessments for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) | | |
|-----------------------------|--|--|--|
| Child Labour | | | |
| Forced / Involuntary Labour | 100%. Our Team HR takes a survey by randomly selecting employees and | | |
| Sexual Harassment | contractors for evaluation. An external auditor verifies and assesses the processes followed by our HR team. Regulatory inspectors also verify the | | |
| Discrimination at Workplace | | | |
| Wages | processes being followed in our manufacturing plants. | | |
| Others – please specify | | | |

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

Not Applicable

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

Essential Indicators

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

| Parameter | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Total electricity consumption (A) in Giga Joules | 45613.00 | 58296.91 |
| Total fuel consumption (B) in Giga Joules | 62563.61 | 66439.24 |
| Energy consumption through other sources (C)* in Giga Joules | 893.22 | 963.55 |
| Total energy consumption (A+B+C) in Giga Joules | 109069.83 | 125699.70 |
| Energy intensity per rupee of turnover. (Total energy consumption/turnover in rupees) | 0.0000271 | 0.0000294 |

^{*} Other sources include diesel and petrol fuel consumption for company owned vehicles and DG set used during power cutoff or maintenance.



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, the company did not carry out independent assessment by an external agency.

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

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

| Parameter | FY 2022-23 | FY 21-22 |
|--|------------|-----------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | 0 | 0 |
| (ii) Groundwater | 0 | 0 |
| (iii) Third party water | 69708 | 70702 |
| (iv) Seawater / desalinated water | 0 | 0 |
| (v) Others | 0 | 0 |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 69708 | 70702 |
| Total volume of water consumption (in kilolitres) | 69708 | 70702 |
| Water intensity per rupee of turnover (Water consumed / turnover) | 0.0000173 | 0.0000165 |

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, the company did not carry out independent assessment by an external agency.

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

The Company's Ankleshwar unit is a zero liquid effluent discharge facility. It recovers and reuses all the wastewater generated through the use of effluent treatment plant (ETP), single-effect evaporators and reverse osmosis. The Company focuses on water conservation through optimal use, wastewater treatment and reuse.

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

| Parameter | Please specify unit | FY 2022-23 | FY 2021-22 |
|-------------------------------------|---------------------|------------|------------|
| NOx | Kg/Year | 0.2 | 0.5 |
| SOx | Kg/Year | 700 | 896 |
| Particulate matter (PM) | Kg/Year | 4 | 6 |
| Persistent organic pollutants (POP) | Kg/Year | 0 | 0 |
| Volatile organic compounds (VOC) | Kg/Year | 0 | 0 |
| Hazardous air pollutants (HAP) | Kg/Year | 0 | 0 |
| Others– please specify | Kg/Year | 0 | 0 |

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, the company did not carry out independent assessment by an external agency.

Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format: 6.

| Parameter | Unit | FY 2022-23 | FY 2021-22 |
|--|-------------|------------|------------|
| Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | t CO2 eq. | 1055.57 | 1119.85 |
| Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | t CO2 eq. | 10262.92 | 13116.80 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | t CO2 eq./₹ | 0.00000281 | 0.00000333 |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity | t | NA | NA |



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

No, the company did not carry out independent assessment by an external agency.

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

Yes, the Company has established a roadmap for carbon emission reductions and is working on renewable sources of energy along with technological intervention to meet its carbon reduction plan.

Energy conservation themes and GHG reduction projects have resulted in improved energy efficiency. Project description: (a) For lowcarbon energy consumption project initiative includes LED lamps replacing conventional lights, Installed APFC panel (3860 KVAR) for power factor improvement, Installed VFD in brine plants & ATFD machines to reduce power consumption, improvements in recovery of steam condensate water to reuse the same in boiler; (b) For energy efficiency in production processes project initiative includes Internal consumption of byproducts, steam elimination in the last stage of the new dryer and waste heat recovery.

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

| Parameter | FY 2022-23 | FY 2021-22 |
|---|--|--|
| Total waste generated (in metric to | onnes) | |
| Plastic waste (A) | 48.99 | 61.52 |
| E-waste (B) | 0.23 | 0.19 |
| Bio-medical waste (C) | 0.000505 | 0.00007 |
| Construction and demolition waste (D) | 0 | 0 |
| Battery waste (E) | 0 | 0 |
| Radioactive waste (F) | 0 | 0 |
| Other Hazardous waste. Please specify, if any. (G) | 4,136.22 | 5,195.73 |
| Other Non-hazardous waste generated (H) . Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) | 0 | 0 |
| Total (A+B+C+D+E+F+G+H) | 4,185.44 | 5,257.44 |
| For each category of waste generated, total waste recovery operations (in nate of the category of waste) Category of waste | | |
| category of waste | | |
| (i) Recycled (Sent to recycler) | 1.986.68 | 3.393.90 |
| (i) Recycled (Sent to recycler) (ii) Re-used | 1,986.68 1,035.00 | 3,393.90 591.58 |
| . , , , , | , | · · · · · · · · · · · · · · · · · · · |
| (ii) Re-used | 1,035.00 | 591.58 0 |
| (ii) Re-used (iii) Other recovery operations | 1,035.00 0 3,021.68 | 591.58 0 3,985.48 |
| (ii) Re-used (iii) Other recovery operations Total | 1,035.00 0 3,021.68 | 591.58 0 3,985.48 |
| (iii) Re-used (iii) Other recovery operations Total For each category of waste generated, total waste disposed by natur Category of waste | 1,035.00 0 3,021.68 | 591.58 0 3,985.48 onnes) |
| (iii) Re-used (iii) Other recovery operations Total For each category of waste generated, total waste disposed by nature Category of waste | 1,035.00 0 3,021.68 re of disposal method (in metric to | 591.58 0 3,985.48 onnes) |
| (iii) Re-used (iii) Other recovery operations Total For each category of waste generated, total waste disposed by natur Category of waste (i) Incineration | 1,035.00 0 3,021.68 re of disposal method (in metric to | 591.58 0 3,985.48 |

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, the company did not carry out independent assessment by an external agency.

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.

All the waste is handled as required by Consent to Operate / Hazardous Waste authorization of the individual sites. The Company has obtained Gujarat Pollution Control Board ("GPCB") consent to operate the plant in safe manner & all the wastes are collected, stored, reused & disposed off in a safe manner as per consent (CC & A) by GPCB.

The Company adopts the strategy of Reduce, Reuse, Recycle, Recovery and Disposal methodology by optimizing and modifying the process from time to time. Continuous improvements in manufacturing process and technology is the key to reduce the generation of hazardous waste at our site.



Plastic waste generated (during packaging & production) & E- Waste is sent to GPCB approved vendor for recycling & safe disposal.

Hazardous waste is collected, stored and sent to BEIL/RSPL (GPCB approved vendor) to dispose off safely. The Company has agreement with all these agencies for hazardous waste disposal. Substitution with less hazardous chemicals also contribute positively. High calorific value waste is sent to cement kilns for use as co-fuel.

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

| Sr. 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. |
|------------|--------------------------------|--------------------|---|
| | NA | NA | NA |

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

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

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

| Sr. | Specify the law / regulation | Provide | Any fines / penalties / action taken by | Corrective action |
|-----|---|----------------------------------|---|-------------------|
| No. | / guidelines which was not complied with | details of the non-compliance | regulatory agencies such as Pollution Control Board or by courts | taken, if any |
| NA | NA | NA | NA | NA |

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

Essential Indicators

- Number of affiliations with trade and industry chambers/ associations. 1. 6 (Six)
 - 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.

| Sr. No. | Name of the trade and industry chambers / associations | Reach of trade and industry chambers / Associations (State/National) |
|------------|---|---|
| 1 | Ankleshwar Industries Association | State |
| 2 | Bharuch District Management Association | State |
| 3 | Vadodara Chamber of Commerce and Industry | State |
| 4 | Dahej Industries Association | State |
| 5 | Export Promotion Council for EOUS & SEZ Units | National |
| 6 | Basic Chemicals Cosmetics & Dyes Export Promotion Council (CHEMEXCIL) | National |

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

Nil

| Name of authority | Brief of the case | Corrective action taken |
|-------------------|-------------------|-------------------------|
| | Not Applicable | |



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

Essential Indicators

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

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

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

| S. No. | Name of Project for which R&R is ongoing | State | District | No. of Project Affected Families (PAFs) | % of PAFs covered by R&R | Amounts paid to PAFs in the FY (INR) |
|--------|--|-------|----------|--|-----------------------------|--------------------------------------|
| | | | | Not Applicable | | |

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

The Company works closely with the community in the identified areas for carrying out the Corporate Social Responsibility initiatives. Within the area of work, the employees of the Company work with the communities to understand the impact of the projects on the intended beneficiaries. These interactions provide the people with ample opportunities to gauge and address community concerns. Based on these interactions, we have not received any specific grievances from the community at present.

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

| | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| Directly sourced from MSMEs/ small producers | 35.95% | 10.97% |
| Sourced directly from within the district and neighbouring districts | 45.22% | 32.82% |

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

Essential Indicators

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

The Company has a well-established consumer complaint redressal system for its customers. Complaints are resolved within the time-bound period, depending on the nature of the complaint, and escalated to next level in case the same remains unresolved within the stipulated time frame.

To ensure customer complaints are redressed promptly and effectively, the Company has put in place a customer complaint SOP and has a Quality Assurance ("QA") team that is responsible for handling customer complaints. Complaint records are maintained by HOD-QA. The Complete record contains complaint details, an investigation report, a response to the complainant, and the closure of complaint handling process. Appropriate Corrective and Preventive actions are being taken. The procedure flow is as below:

Schematic flow chart of handling market complaints

Marketing Department forward the complaints to Quality Assurance Department

QA Manager categorizes the complaint Critical / Major / Minor & assign complaint number

QA Manager in coordination with the concerned department arrange investigation

Record the details of Investigation in the Investigation Report, Draft the reply is prepared and forwarded to QA for approval.

QA Manager shall forward the approval reply to Head Marketing with a copy to Director within 30 working days

Marketing Department shall reply to the customer with a copy to QA & Director



Grievance Redressal Mechanism: Key Highlights

Easy upload and creation of complaints:

On receipt of communication, written or verbal, directly from any customers, regarding the Quality, defect in the purity, efficacy, safety, labeling defects, physical appearance, shortages, complaint related to adverse reaction or any other such complaints are considered as Market Complaints. All such complaints should be addressed & forwarded to the QA department through marketing department. Upon receipt of the market complaint, designee QA shall make entry of complaint details in Customer complaint register (Format no. SOP/QA/004/F1) & assign customer complaint number.

Verification of customer credentials, customer information security:

Customer communicates complaint/s to Marketing Department and response to customer complaints are communicated to customer by Marketing Department.

iii. Complaint ID acknowledgement mail and advisory to customers:

The Marketing department acknowledges the customer within 24 hours of receiving the complaint. Upon receipt of the market complaint, the designated QA shall enter the complaint details in the Customer complaint register & assign a customer complaint number. A brief investigation report shall be prepared, along with corrective and preventive action. Such an investigation report shall be forwarded to customer within 30 working days, and an appropriate CAPA shall be implemented.

Assignment of Complaints:

In-charge QA shall review the nature of complaint and shall define type of complaint i.e. Major or Minor. As per the customer complaint SOP, the Company has to ensure that complaints are resolved effectively and promptly. A category of complaint is assigned and responded to by the quality assurance department.

Monitoring and Analysing Complaints:

The quality assurance department carries out root cause analysis on a regular basis by applying problem-solving techniques. A brief investigation report shall be prepared, along with corrective and preventive action. It should be signed by concerned departmental personnel and approved by Manager QA. Such an investigation report shall be forwarded to customer within 30 working days, and appropriate CAPA shall be implemented. If response regarding the complaint from the customer is satisfactory. Designee QA shall make entry for complaint closing in Market complaint register. This visibility ensures that complaints are resolved.

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

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

Number of consumer complaints in respect of the following:

| | FY 2022-23 | | | FY 2021-22 | | |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------------|-----------------------------------|---------|
| | Received during the year | Pending resolution at end of year | Remarks | Received during the year | Pending resolution at end of year | Remarks |
| Data privacy | 0 | 0 | NA | 0 | 0 | NA |
| Advertising | 0 | 0 | NA | 0 | 0 | NA |
| Cyber-security | 0 | 0 | NA | 0 | 0 | NA |
| Delivery of essential services | 0 | 0 | NA | 0 | 0 | NA |
| Restrictive Trade Practices | 0 | 0 | NA | 0 | 0 | NA |
| Unfair Trade Practices | 0 | 0 | NA | 0 | 0 | NA |
| Other | 0 | 0 | NA | 0 | 0 | NA |



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

| | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | 0 | Not applicable |
| Forced recalls | 0 | Not applicable |

- 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.
 - No, the Company has various Information technology ("IT") Risk Measures in place related with E-mail Security, IT Network, Internet, data privacy, applications, computers, IT equipment, IT facilities, IT infrastructure etc. However, the same needs to be strengthened /
- Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty/action taken by regulatory authorities on safety of products/services.
 - Not Applicable, as there were no issues or concerns related to advertising, delivery of essential services, cyber security, penalties or actions initiated by regulatory authorities for safety of Company's products.