

July 8, 2023

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai 400001

Scrip Code: 532504

National Stock Exchange of India Limited

Exchange Plaza,
Bandra Kurla Complex, Bandra (East),
Mumbai 400051

Symbol: NAVINFLUOR EQ

Dear Sir / Madam,

Sub.: Business Responsibility and Sustainability Report for Financial Year 2022-2023

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report for the Financial Year 2022-2023 which also forms part of the Annual Report of the Company for the Financial Year 2022-2023.

This is for your information and record.

Thanking You,

Yours faithfully,

For **NAVIN FLUORINE INTERNATIONAL LIMITED**

Niraj B. Mankad

President Legal and Company Secretary

Encl.: a/a

Business Responsibility and Sustainability Report

Section A: General Disclosures

Details of the listed entity

1.	Corporate Identity Number (CIN) of the company	L24110MH1998PLC115499
2.	Name of the Listed Entity	Navin Fluorine International Limited ('NFIL' or 'the Company')
3.	Year of incorporation	1998
4.	Registered office address	Office No. 602, 6th floor, Natraj by Rustomjee, Near Western Express Highway, 194, Sir Mathuradas Vasanji Road, Andheri (East), Mumbai 400069
5.	Corporate address	Office No. 602, 6th floor, Natraj by Rustomjee, Near Western Express Highway, 194, Sir Mathuradas Vasanji Road, Andheri (East), Mumbai 400069
6.	E-mail	info@nfil.in
7.	Telephone	02266509999
8.	Website	www.nfil.in
9.	Financial year for which reporting is being done	2022-23
10.	Name of the Stock Exchange(s) where shares are listed	1. BSE limited 2. National Stock Exchange of India Ltd
11.	Paid-up Capital	Fully Paid-Up Capital INR 9,91,24,500 Partly Paid-Up Capital INR 8,920
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. Deepak Naik Designation: Senior Vice President - HSE & Head - Sustainability Telephone No.: +91 22 6650 9999 E-mail ID: deepak.naik@nfil.in
13.	Reporting boundary	NFASL (Dahej, Gujarat), NFIL (Surat, Gujarat and Dewas, MP) and offices (Mumbai, Chennai, Hyderabad, New Delhi and Surat)

Products/Services

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

Sr. no.	Description of the main activity	Description of business activity	% of turnover of the entity
1.	NFIL is one of the largest and the most respected Indian manufacturers of specialty fluorochemicals	High Performance Products, Specialty Fluorochemicals, Contract Development Manufacturing Organisation	98%

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.	Synthetic cryolite, fluorocarbon gases	2411	35%
2.	Hydrofluoric acid and other fluorine chemicals	2411	44%
3.	Other Chemicals	2411	21%

Operations –

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

Location	Number of plants	Number of offices	Total
National	3	6	9
International	0	3	3

17. Markets served by the entity:

a. Number of locations:

Locations	Number
National (No. of States)	6
International (No. of Countries)	3

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

53.75%

c. A brief on types of customers

At Navin Fluorine, the Company services the growing needs of marquee clients across the world. These customers comprise key global life science and crop science innovators, leading petrochemical players, stainless steel manufacturers, air-conditioner OEMs and other downstream fluorochemical users.

Employees -

18. Details as at the March 31, 2023:

a. Employees and workers (including differently abled):

Sr. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employee						
1	Permanent (D)	1246	1188	95%	58	5%
2	Other than Permanent (E)	0	0	0	0	0
3	Total employees (D + E)	1246	1188	95%	58	5%
Workers						
4	Permanent (F)	167	167	100%	0	0
5	Other than Permanent (G)	1770	1757	99%	13	1%
6	Total Workers (F + G)	1937	1924	99%	13	1%

b. Differently abled Employees and workers:

Sr. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently Abled Employees						
1	Permanent (D)	1	1	100%	0	0
2	Other than Permanent (E)	0	0	0	0	0
3	Total employees (D + E)	1	1	100%	0	0
Differently Abled Workers						
4	Permanent (F)	5	5	100%	0	0
5	Other than Permanent (G)	0	0	0	0	0
6	Total Workers (F + G)	5	5	100%	0	0

19. Participation/Inclusion/Representation of women:

	Total	No. and percentage of Females	
	(A)	No. (B)	% (B / A)
Board of Directors	12	2	17%
Key Management Personnel (KMP)	4	0	0

20. Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)

	FY 2022-23			FY 2021-22			FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	19.36	8.62	18.86	13.29	14.63	13.36	6.38	0.00	6.12
Permanent Workers	7.78	0.00	7.78	6.94	0.00	6.94	6.86	0.00	6.86

Holding, Subsidiary and Associate Companies (including joint ventures) -

21. 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	Sulakshana Securities Limited	Wholly Owned Subsidiary	100%	No
2	Navin Fluorine Advanced Sciences Limited	Wholly Owned Subsidiary	100%	Yes
3	Manchester Organics Limited	Wholly Owned Subsidiary	100%	No
4	NFIL (UK) Limited	Wholly Owned Subsidiary	100%	No
5	NFIL USA, INC.	Wholly Owned Subsidiary	100%	No
6	Navin Fluorine (Shanghai) Co, Limited	Wholly Owned Subsidiary	100%	No
7	Swarnim Gujarat Fluorspar Private Limited	Joint Venture	49.48%	No

CSR Details

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

(ii) Turnover (in ₹): 1628.14 Cr (standalone)

(iii) Net worth (in ₹): 2141.00 Cr

Transparency and Disclosures Compliances -

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) <i>(If yes, then provide web-link for grievance redress policy)</i>	FY (2022-23)			FY (2021-22)		
		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, NFIL addresses the concerns of the communities (inclusive of vulnerable and marginalized groups) through continuous interactions with them. The Company also have in place a dedicated Corporate Social Responsibility policy in place which encompasses the Company's philosophy for describing its responsibility as a corporate citizen, and lays down the guiding principles for selection, implementation and monitoring of its CSR activities	0	0	-	0	0	-
Shareholders	The Company consistently works towards serving its investors and takes necessary steps from time to time for expeditious redressal of investor grievances. The Company has appointed KFin Technologies Limited (KFinTech) to discharge investor service functions on behalf of the Company. KFinTech is an ISO 9002 Certified Registrar and Transfer Agent with a vast number of Investor Service Centres across the country. It is entrusted with handling all share related matters including transmission, transposition, nomination, dividend, change of name / address / signature, demat / remat of shares, issue of duplicate certificates, etc	65	1	The complaints from shareholders pertain to service requests raised with the Company/ KFinTech. The pending complaint as at the end of the financial year has been resolved.	33	0	-
Investors (Other than shareholders)	-	-	-	-	-	-	-
Employee & Workers	Yes, NFIL encourages ethical and transparent business conduct for all its employees and workers. The company has incorporated Whistle Blower Policy which provides a vigil mechanism to report any instance of unethical behavior against the employees and workers of the Company.	0	0	-	0	0	-

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) <i>(If yes, then provide web-link for grievance redress policy)</i>	FY (2022-23)			FY (2021-22)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Customers	NFIL is a customer-oriented Company. It undertakes regular customer satisfaction survey which enables it to enhance its performance.	24	0	-	26	0	-
Value Chain Partners	The Organization has online platform for Customer Survey which has option to raise complaints as well for the partners.						
Others (Please specify)	NA	NA	NA	NA	NA	NA	NA

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

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

Sr. no.	Material issue Identified	Indicate Whether Risk or Opportunity	Rationale for identifying Risk / Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Occupational Health & Safety	Risk	If a Company neglects to safeguard the health, safety, and welfare of its employees, it can have a detrimental effect on productivity, which can subsequently impact our business operations, customer satisfaction, and profitability.	We have online portal to log incidents detail which get assigned to the authorized person to analyze as well as to put control mechanism in place. It has escalation mechanism as well to ensure the compliances. We are extending the same portal to our other plants.	Negative
2.	Business Ethics	Risk	Failure to comply with applicable laws and regulations can result in legal and financial consequences for a company, such as fines, penalties, and legal action.	We have code of conduct in place where Business ethics is a key element to ensure ethical conduct.	Negative
3.	Compliances	Risk	Failure to comply with applicable laws and regulations can result in legal and financial consequences for a company, such as fines, penalties, and legal action.	We have online mechanism in place where all compliances are mapped to the corresponding owners who get alert as per timeline mapped. Owners have to then update in the platform to close the loop. It has escalation mechanism as well to ensure the compliances.	Negative

Sr. no.	Material issue Identified	Indicate Whether Risk or Opportunity	Rationale for identifying Risk / Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4.	Carbon Emissions	Risk	As a part of its commitment to becoming NET ZERO by 2070, the Indian Government has introduced various policies and initiatives aimed at reducing greenhouse gas emissions and promoting renewable energy. Companies that are not adequately prepared to comply with emerging energy and emissions-related laws and regulations in India may face significant financial, reputational, and operational risks.	Introducing of HFOs which is having zero ozone depleting potential in compare to ODS and following practices are in place to address the associated risk <ul style="list-style-type: none"> • Thermal oxidizers • Vent condensers on storage tanks to eliminate fugitive emissions <p>Moreover, we have strategically planned to shift from ozone depleting products to non-ozone depleting products to address impact on environment. We have strategy in place for carbon emission, recycle of water, landfill and usage of renewable source of energy.</p>	Negative
5.	Waste Management	Risk	Proper disposal of waste from operations is critical for environmental protection, public health, and safety. Improper disposal of chemical waste can result in the release of harmful substances into the air, soil, and water. This pollution can contaminate local ecosystems, harm wildlife, and even affect nearby human populations. Exposure to hazardous chemicals from poor waste management practices can lead to various health risks, including respiratory problems, cancer, and reproductive issues.	Each plant is managing waste through authorised / registered vendors.	Negative
6.	Water Management	Risk	Chemical production is a water intensive industry owing to its water usage in its day-to-day operations. Water scarcity is a significant risk for businesses that rely on water for their operations. Water scarcity can lead to disruptions in business operations, supply chains, and increased costs of raw materials, which can all have financial implications. Water scarcity can also pose a threat to the health and safety of employees and the local community, which could result in legal and reputational risks	Water is a crucial resource and we are committed to conserve it. One of our plants has zero liquid discharge and, in another plant, our discharged water gets treated in a sewage treatment plant and utilizing back the RO water in utility to reduce overall fresh water withdrawal.	Negative

Sr. no.	Material issue Identified	Indicate Whether Risk or Opportunity	Rationale for identifying Risk / Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7.	Customer and value chain partners' education on safe product handling	Opportunity	Well-informed customers and partners can become advocates for the company, promoting its products and services to others. When chemicals are misused or handled incorrectly, it can endanger human health and the environment. By providing education and training on safe product handling, companies can also reduce the risk of product recalls, liability claims, and potential legal action.	We have mechanism in place to arrange awareness sessions on safe product handling	Positive
8.	Data Privacy	Risk	Cybersecurity risks are a significant concern for organizations, as they can have far-reaching impacts on business operations, reputation, and customer base. Cyberattacks can disrupt critical systems, compromise sensitive data, and cause reputational damage, leading to financial losses and loss of customer trust.	It covers handling and protection of Company's information, assets and targets that it is available all the time to respective stakeholders.	Negative
9.	Human Rights assessments for employees and value chain partners	Opportunity	Human rights assessment is an opportunity for companies to enhance their reputation, attract and retain customers and employees who value ethical business practices, and avoid legal and reputational risks associated with human rights abuses.	-	Positive
10.	Sustainable product design and innovation	Opportunity	Sustainable product design and innovation is an opportunity for companies to reduce their environmental impact, enhance their brand reputation, and attract more investors and customers.	ESG integration (Safety, compliance, ethics), ISO, OHSAS, collaboration and digitization.	Positive
11.	Sustainable sourcing & Supply chain strategy	Risk	Supply chain disruptions can cause delays in production, increase cost of raw materials and affect customer satisfaction. Therefore, it is essential to develop robust supply chain risk management strategies to mitigate the impact of supply chain disruptions and ensure business continuity	We have reviewed sustainable supply chain code and have implemented the revised version in FY23. We are planning to engage via online portal along with physical visit to strengthen sustainable sourcing.	Negative
12.	Energy Management	Risk	Poor energy management can be a risk for a company, as it can lead to increased energy consumption, higher costs, and negative environmental impacts.	The Organization is committed to Environment. Thus, using Natural Gas as fuel wherever possible as well as shifting to renewable source of energy in phase manner to address environmental impacts	Negative

Sr. no.	Material issue Identified	Indicate Whether Risk or Opportunity	Rationale for identifying Risk / Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
13.	Learning and Development	Opportunity	Investing in employee learning and development can be an opportunity for a company to increase employee engagement and retention, improve job satisfaction and performance, and enhance organizational agility.	Internal and External training , seminars, conferences, workshops and specific learning module courses on case to case basis.	Positive
14.	Employee retention and satisfaction	Opportunity	Employee retention post-COVID is a critical issue for many organizations as they try to rebuild and recover from the pandemic. The COVID-19 pandemic has caused significant disruption to the job market, and many employees have been impacted by job losses, furloughs, and reduced working hours. Companies that prioritize employee retention and satisfaction can benefit from a more engaged and committed workforce.	Town hall briefing, goal setting, performance appraisal, exit interviews, emails, wellness programs etc.	Positive
15.	Responsible Marketing	Opportunity	By promoting products in a transparent, and ethical manner, a company can enhance its reputation & strengthen customer loyalty. Responsible marketing practices can also help companies comply with legal and regulatory requirements, avoid misleading or deceptive advertising, and prevent reputational damage or legal liabilities. Overall, responsible marketing can be an opportunity for companies to create long-term value for all stakeholders and achieve sustainable growth.	-	Positive
16.	Local Community	Opportunity	Local communities are critical stakeholders for companies, as they can directly or indirectly impact a company's operations, reputation, and social license to operate. Companies that engage with local communities and understand their needs and expectations can benefit from stronger relationships, improved trust and credibility, and enhanced access to resources and markets.	Community visit, projects engagements, partnership program, seminar and workshops	Positive

Section B: Management and Process Disclosures

The National Guidelines for Responsible Business Conduct (NGRBC) as prescribed by the Ministry of Corporate Affairs advocates nine principles referred as P1-P9 as given below:

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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	https://www.nfil.in/investor/policies.html								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trusted standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The policies that the Company has adopted are in conformity with relevant national and international standards, wherever statutorily applicable. The policies are compliant with the NGRBCs issued by the Ministry of Corporate Affairs and are drafted after taking into consideration the best practices adopted across the industry.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	NFIL has taken various initiatives with focused approach to reduce carbon emissions 10% and double the renewable energy consumption by FY2024 from the base year FY2023.								
6. Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	Business performances are reviewed on periodic basis by the respective committees led by the leadership team.								

Governance, leadership and oversight

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

Message from Director's desk:

Dear Stakeholders,

With the changing economic scenarios across geographies, we constantly strive to stay committed to our vision of providing world class innovative solutions to all our customers across sectors. For the current financial year, we have enhanced our profits while ensuring quality services/solutions to our valued customers. We not only focus on earning profits, but also endeavor to create a positive impact on all our stakeholders (employees, partners, investors, communities, among others). While ESG has always been an aspect of how we operate and manage our business, it is time for us to mainstream our ESG practices and be aware about our aspirations. We have embarked our journey of making ESG as one of key focus area of our strategy and have laid down progressive goals to mitigate the impacts on the environment and society at large. We believe that business growth and ESG can come together and create increasing and eternal value for our stakeholders. The Organization has established polices for Health, Safety & Environment (HSE), Prevention of Sexual Harassment (POSH), Sustainable Supply Chain Policy, Responsible Care Policy, Integrated Management System Policy and is committed to conducting ethical business practices to the labour, human capital and to the community. We aim to reduce our carbon emissions 10% and double the renewable energy consumption by FY2024 from the base year FY2023.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Radhesh R. Welling Designation: Managing Director DIN: 07279004 E-mail ID: info@nfil.in
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.	The Organization has Risk management committee chaired by our chairman for identified key business risks where Sustainability related issues are also included

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against above policies and follow up action	Mr. Radhesh R. Welling, Managing Director, is responsible for implementation of Business Responsibility policies and monitoring the Business Responsibility performance. NFIL shall be reviewing performance against its policies with the senior management on quarterly basis.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Managing Director, Chief Financial Officer and Company Secretary certify on a monthly basis, compliance with applicable laws under their respective domains. Such certificates are placed before the Board of the Company on at least quarterly basis.																	
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.	P1	P2	P3	P4	P5	P6	P7	P8	P9	Y	Y	Y	Y	Y	Y	Y	Y	Y

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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)	-	-	-	-	-	-	-	-	-

SECTION C: Principle wise performance disclosure

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

Essential Indicators -

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%Age of persons in respective category covered by the awareness programmes
Board of Directors	4	During the year, the Board of Directors and Key Managerial Personnel of the Company (including its Committees) has invested time on various updates related to regulatory changes. Topics covered includes: 1) Corporate Governance 2) Companies Act 3) SEBI Listing Requirements 4) Environmental & Safety matters	100%
Key Managerial Personnel	4		100%
Employees other than BOD and KMPs	5	1. POSH (One session every Qtr.) 2. Orientation & Onboarding session (Values, Code of Conduct, Ethics & Policies) – Every employee as they Join the Organization.	100%
Workers	4	POSH (One session every Qtr.)	100%

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

Monetary					
	NGRBC Principle	Name of the Regulatory/ Enforcement agencies/ Judicial institution	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Penalty/ Fine	0				
Settlement					
Compounding Fee					
Non-Monetary					
	NGRBC Principle	Name of the Regulatory/ Enforcement agencies/ Judicial institution	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes / No)
Imprisonment	0				
Punishment					
Of the instances disclosed in above Question, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed	Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions			
		N/A			

3. 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, NFIL has covered the core elements of anti-corruption or anti-bribery as part of company's Code of Conduct. The same can be accessed at https://www.nfil.in/investor/code_conduct.html

Through NFIL's Code of Conduct, the Company advocates fair dealings. As per the Code, each employee, officer and director of the Company should endeavor to deal fairly with customers, suppliers, competitors, at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No payment in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. The Company and the employee, officer or director involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this code.

4. 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	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

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

6. 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

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	Percentage of value chain partners covered (by value of business done with such partners) under the awareness programmes
NA	NA	NA

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/ No) If yes, provide details of the same.

Yes, as per the Code of Conduct, Board Members are required to avoid situations that present a potential or actual conflict between their interest and the interest of the Company. Besides this, Directors interested in any business item being discussed at Board Meeting or Committee Meetings, recuse from voting on such items.

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

Essential indicators

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

	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impacts
R&D	100 %	100 %	Product development, pilot study along with improvement in processes led to reduction in its fugitive emissions
Capex	11.27%	34.07%	NFIL upgraded its Zero liquid Discharge (ETP, RO, MEE/ATFD) facility and enhance water recovery to promote overall sustainability at the Company

2. Does the entity have procedures in place for sustainable sourcing? If yes, what percentage of inputs were sourced sustainably?

The Company is dedicated on working with its vendors and suppliers to reduce the environmental impacts of sourcing. Measures adopted towards green procurement, amongst others, include procurement of certain solvents, catalysts and raw materials. We have ensured to procure our more than 30% of raw materials from the ISO 9001, ISO 14001 certified and socially responsible sources. Further, the Company utilizes sustainable packaging materials.

3. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

The products manufactured by NFIL are intermediate products for its customers who in turn finally produce the finished products to sell off in the market. Due to the production of intermediate chemicals, the products and associated packaging materials become pre-consumer plastic waste to the customers. All customers of NFIL abide by the regulatory norms and ensure to recycle the packaging material through authorized recyclers. Hence, EPR will not be applicable for postconsumer plastic waste for the Organization. NFIL also ensures the recycle of pre-consumer plastic waste through authorized recyclers. Furthermore, the Company is in process for implementing importer's license for its products.

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?

Currently NFIL has not conducted life cycle assessment for any of its products. The Company has forethought to design a framework to examine the lifecycle of its key products in a phased manner. The framework will enable NFIL to incorporate different interventions at each phase of its products' lifecycle.

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 the Product/Service	Description of the risk concern	Action taken
Mafron	While production of Mafron, high volumes of Global Warming Potential gas is generated	Operated Thermal Oxidation Unit (Under Clean development Technology) to reduce adverse impact of greenhouse gas emissions in the environment

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).

As Navin Fluorine is a specialty Chemicals & niche pharma intermediate producer, where most of the input materials comes from the virgin sources, hence it is not applicable.

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

Owing to the nature of business, NFIL does not reclaim any of its products. The intermediate chemicals produced by the Company are utilized by its customers/companies for production of final products.

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

Not applicable

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

Essential Indicators

1. Measures undertaken for Employee Well-being

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	1188	1188	100%	1188	100%	0	0	1188	100%	0	0
Female	58	58	100%	58	100%	58	100%	0	0	0	0
Total	1246	1246	100%	1246	100%	58	5%	1188	95%	0	0
Other than Permanent employees											
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

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent Workers											
Male	167	167	100%	167	100%	0	0	167	100%	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	167	167	100%	167	100%	0	0	167	100%	0	0
Other than Permanent employees											
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

2. Details of retirement benefits, for FY 2022-23 and FY 2021-22

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	39.15%	60.85%	Y	84.69%	15.31%	Y
Gratuity	8.86%	4.21%	Y	26.81%	12.99%	Y
ESI	0.19%	60.85%	Y	1.21%	0.09%	Y
Other	39.15%	0.00%	Y	84.69%	0.00%	Y

3. Accessibility of workplaces:

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

The Organization encourages differently abled employees and gives them preference to operate from offices. However, due to the nature of our operations and multiple floor buildings and the associated risk, jobs have been assigned to the offices which has provision for them.

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.

NFIL encourages equal opportunity for all of its employees irrespective of their caste, creed, gender, disability or religion. The Company ensures zero discrimination with respect to opportunities provided to all its employees across cadres and gender. Furthermore, the company has in place robust human rights policy to safeguard the rights of all employees including differently abled people.

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	100%	86%	100%	100%
Female	100%	100%	-	-
Total	100%	86%	100%	100%

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

	Yes/No
	<i>(If yes, then give details of the mechanism in brief)</i>
Permanent Workers	To address the grievances, NFIL have a robust Grievance Cell, POSH Committee and Whistle Blower Policy in place. The policy has laid the guidelines to comply with human rights parameters. If any incident with respect to human rights occurs, the same can be raised through the grievance cell which is further addressed by the POSH committee. Additionally, head of Human Resources of each specific location addresses the concerns and grievances raised by the employees/workers.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

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	0	0	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total Permanent Workers	167	167	100%	172	172	100%
Male	167	167	100%	172	172	100%
Female	0	0	0	0	0	0

8. Details of training given to employees and workers:

Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health Safety		On Skill Upgradation		Total (D)	On Health Safety		On Skill Upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	1,188	914	76.94	837	70.45	856	716	83.64	680	79.44
Female	58	28	48.28	26	44.83	41	38	92.68	36	87.80
Total	1,246	942	75.60	863	69.26	897	754	84.06	716	79.82
Workers										
Male	167	167	100	167	100	172	172	100	172	100
Female	0	0	0	0	0	0	0	0	0	0
Total	167	167	100	167	100	172	172	100	172	100

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

Benefits	FY 2022-23			FY 2021-22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1,188	1,188	100	856	856	100
Female	58	58	100	41	41	100
Total*	1,246	1,246	100	897	897	100
Workers						
Male	167	167	100	172	172	100
Female	0	0	0	0	0	0
Total*	167	167	100	172	172	100

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, a comprehensive occupational health and safety management system is implemented across the plants/premises of Navin Fluorine. The Company has implemented Integrated Management QHSE policy, Responsible Care Policy and Process Safety policy applicable to all its employees, workers and customers, in order to provide a safe, healthy and sustainable working environment for all.

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

Navin Fluorine have various tools to identify work related hazards such as Hazard Identification and Risk Assessment, Pre-startup safety review (PSSR), Job Safety Analysis, Work Permit System, Unsafe Act/Conditions reporting system, among others.

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

Yes

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

Yes

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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.19	0.30
Total recordable work-related injuries	Employees	0	0
	Workers	2	0
No. of fatalities	Employees	0	0
	Workers	0	1
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	1

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

Safety of employees and workers is at the core of NFIL operations. The company has implemented below mentioned initiatives to ensure safe work practices across its plants:

- ✓ Behavior-based safety program to enhance its engagement with the employees.
- ✓ Focus on plant design and systems to improve safety culture at site.
- ✓ Hazardous chemicals manual handling reduced by automations.
- ✓ Increased employee participation in various HSE platform by encouraging them through reward and recognitions.
- ✓ Workplace monitoring by a third party, audits of guards provided on rotatory parts, noise monitoring, and illumination monitoring.
- ✓ HAZOP study for all the new plants.
- ✓ Training and awareness programs conducted for Onsite emergency plan
- ✓ Distribution of safety booklet
- ✓ Regular meetings of Safety committee

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

Benefits	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	6	0	-	8	0	-
Health & Safety	-	-	-	-	-	-

14. Assessments for the year:

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

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

For all the incidents reported across plants, NFIL has integrated below mentioned practices to enhance safety of its employees and workers

- ✓ Breathing airline system provided in the hazardous chemical handling area.
- ✓ Dedicated emergency vehicle sending along with HF ISO /BF3 MEGCs for emergency handling.
- ✓ Concrete (Blast-proof) walls are provided in high pressure reaction area.
- ✓ Automation in manual operation in the KF plant by installation of PLC based SCADA system.
- ✓ Reduction of chemical drum handling work is in progress.

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)?

As a responsible organization, NFIL provides Group Medclaim & Group Personal Accident Policy and WC Policy to all its employees. Additionally, we contribute 1 day's basic salary from all permanent employees and employer which is further provided to immediate family member of the deceased employee.

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

NFIL ensures to prepare the challans through payroll department and the local accounts department deposits the same as per the requirement.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable Employment	
	FY 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
Employees	0	0	0	0
Workers	0	1	0	0

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

No, NFIL does not provide any transition assistance programs to its employees.

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	N/A
Working Conditions	N/A

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.

Not applicable

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.

Any individual or an entity, institution, group that impacts NFIL's activity is identified as a core stakeholder of the company. The Company has developed stakeholder-centric approach in all its business activities enabling socially relevant and future oriented approach to business. NFIL engages with a wide range of stakeholder categories viz. investors, customers, suppliers, employees, among others through scheduled events and various channels.

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
Investors	No	Email, Telephone, Virtual meetings, In-person meeting, Newspaper, website, public disclosures	Continuous	<ul style="list-style-type: none"> - Transparency in business practices - Strong ESG practices - dividends, profitability and financial stability, - climate change risks, - growth prospects
Customers	No	Email, Telephone, Virtual meetings, In-person meeting, website	Continuous	<ul style="list-style-type: none"> - Satisfaction in Product Quality - Product innovation by NFIL
Suppliers	No	Email, Telephone, Virtual meetings, In-person meeting, website	Continuous	<ul style="list-style-type: none"> - Robust grievance redressal mechanism - Effective delivery and payments
Regulators	No	Email, Telephone, Virtual meetings, In-person meeting, website / portals	Continuous	<ul style="list-style-type: none"> - Effective compliance management system - Robust health and safety system - Strong environmental performance
Community	Yes	In-person meeting, through implementing agencies	Continuous	<ul style="list-style-type: none"> - Education support - Quality Healthcare - Water & Sanitation access
Employee	No	Email, Telephone, Virtual meetings, In-person meeting, website, exit interviews, arbitration / union meetings, wellness initiatives, engagement survey, email, intranet, flat screens, poster campaigns, house magazines, confluence, circulars, quarterly publication, newsletters	Continuous	<ul style="list-style-type: none"> - Learning and Development initiatives - Employee health & well being

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.

NFIL prioritizes to build strong and meaningful relationships with a diverse range of its stakeholders. The Company has integrated a comprehensive stakeholder engagement mechanism to understand business dynamics and identify key risk areas/ concerns, communicate strategies and performances, and enhance trust among all its stakeholders. Furthermore, the company conducts surveys for its internal and external stakeholders (employees and customers) and the result is communicated with all the board members to enact appropriate action plans and ESG strategies.

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.

NFIL's stakeholder engagement mechanism aims to foster inclusivity, accountability, and responsibility. The Company works with its stakeholders on a myriad of issues on a regular basis, allowing it to identify key business and ESG risk areas and develop mitigation actions for each of the identified risks. NFIL continuously strives to incorporate stakeholder requirements into its business activities and address its performance and progress on each material topic presented throughout the stakeholder engagement exercise.

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

NFIL has taken multiple initiatives to address the concerns of vulnerable and marginalized stakeholders. It interacts with underprivileged sections of the society, differently abled group of communities and children from the weaker sections of the society. Concerns of each such stakeholders are addressed by the Company by taking initiatives for their development and growth.

Principle 5: Businesses should respect and promote human rights

Leadership Indicators

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. employees/workers covered (B)	% (B / A)	Total (C)	No. employees/workers covered (D)	% (D / C)
Employees						
Permanent	1246	1246	100%	1064	0	0
Other than permanent	0	0	0	0	0	0
Total Employees	1246	1246	100%	1064	0	0
Workers						
Permanent	167	167	100	0	0	0
Other than permanent	0	0	0	0	0	0
Total Workers	167	167	100	0	0	0

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

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equal to Minimum Wages		More than Minimum wages		Total (D)	Equal to Minimum Wages		More than Minimum wages	
		Number (B)	% (B / A)	Number (C)	% (C / A)		Number (E)	% (E / D)	Number (F)	% (F / D)
Employees										
Permanent										
Male	1188	0	0	1188	100%	856	0	0	856	100%
Female	58	0	0	58	100%	41	0	0	41	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	167	0	0	167	100%	172	0	0	172	100%
Female	0	0	0	0	100%	0	0	0	0	0
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

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (in ₹)	Number	Median remuneration/ salary/ wages of respective category (in ₹)
Board of Directors (BOD)	10	33.42 lakhs	2	33.08 lakhs
Key Managerial Personnel (KMP)	4	148.14 lakhs	0	NA
Employees other than BOD and KMP	1184	6.77 lakhs	58	12.45 lakhs
Workers	167	4.37 lakhs	0	-

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)

To address the issues specific to human rights, NFIL have a robust grievance cell, POSH committee and Whistle Blower Policy in place. The policy has laid the guidelines to comply with human rights parameters. If any incident with respect to human rights occurs, the same can be raised through the grievance cell which is further addressed by the site head and corporate office team. Additionally, head of Human Resources of each specific location addresses the concerns and grievances raised by the employees/workers.

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

The Company firmly believes in the principle of human rights protection and adheres to it in letter and spirit. The Company's commitment to human rights is substantiated by its Human Resource Policy which extends to all its employees.

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

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

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

NFIL ensures strict adherence of all its business activities in compliance with its Whistle Blower and Human Rights Policy. The Company respects human rights of each employee and strives to address all concerns raised by stakeholders. If any discrimination or misconduct is observed in connection with the complainant, the employee/workers can escalate their issues to Human Resource department or POSH committee set up by the Company.

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

The Organization has supplier code of conduct which we get it signed with our value chain partners. We have also reviewed it in FY23.

9. Assessments for the year:

	% Of your plants and offices that were assessed (By entity or statutory authorities or third parties)
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	-

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

Zero risks/concerns were accounted post the internal assessment of NFIL's plants for the human rights parameters.

Leadership Indicators

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

Not applicable, as zero complaints pertaining to human rights were received for FY 22-23

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

Internal assessment done for our plants and offices.

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?

Due to the nature of our operations, confidentiality contract with customers and the associated risk, visitors are allowed to the office area which has the provision for them.

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	N/A
Discrimination at workplace	N/A
Child Labour	N/A
Forced Labour/Involuntary Labour	N/A
Wages	We have not done quantification
Others	

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

Not Applicable

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

Essential Indicators

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

Parameter	FY 2022-23 (GJ)	FY 2021-22 (GJ)
Total electricity consumption (A)	209129.89	169596.45
Total fuel consumption (B)	1018897.24	250687.02
Energy consumption through other sources (C)	-	-
Total energy consumption (A+B+C)	1228027.13	420283.47
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	5.73x10 ⁻⁵	2.99x10 ⁻⁵
Energy intensity (optional) – the relevant metric may be selected by the entity.	-	-

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Not applicable

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

Parameter	FY 2022-23	FY 2021-22
Water withdrawn by the source (KL)		
Surface Water	85328	61568
Ground Water	0	0
Third Party Water	1151860.46	522853.76
Seawater/ desalinated water	0	0
Other sources	0	0
Total Vol of Water Withdrawn	1237188.46	584421.76
Total Vol of Water Consumed (KL)	720064.5	230754.8
Water intensity per rupee of turnover.	3.36x10 ⁻⁵	1.64x10 ⁻⁵
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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

Yes, our Dewas site wastewater treatment plant is Zero Liquid Discharge (ZLD) unit, comprises of Effluent Treatment Plant, Reverse Osmosis and Multi Effect Evaporator Plant. Treated effluent is being reused in utility (Cooling tower) and other applications. At Dahej location, we have installed wastewater treatment facility based on the characteristics with primary, biological and tertiary treatment. For concentrated streams we have installed Multi Effect Evaporator, finally the treated wastewater meeting the permissible limits is discharged to the industrial estate wastewater discharge point. At our Surat manufacturing site, treated wastewater is discharged to the community wastewater treatment plant after 3 stage treatment process and the treated water is recycled back at site for utility purposes.

5. 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
NO _x	MT	22.12	1.07
SO _x	MT	17.37	0.29
Particulate matter (PM)	MT	8.07	0.77
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	TCO ₂ e	97659.95	26686.83
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	TCO ₂ e	39960.37	35948.84
Total Scope 1 and Scope 2 emissions per rupee of turnover	TCO ₂ e/₹	6.42x10 ⁻⁶	4.46x10 ⁻⁶
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	TCO ₂ e/MT	-	-

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

NFIL continuously strives to reduce its GHG emissions across operations and mitigate its negative impacts on the environment and society at large. Some of the key initiatives implemented by NFIL include:

- ✓ Optimized waste generation through solvent recycling, waste conversion into by-products and novel technologies for energy conservation.
- ✓ Recycled treated wastewater, saving fresh-water consumption, made the recycled water available for irrigation purposes
- ✓ Continued the initiative of sustainable packaging practices; supplied products in ISO and IBC containers
- ✓ One of NFIL's manufacturing sites has zero liquid (wastewater) discharge facility. Treated wastewater is reused at site
- ✓ The mother plant of NFIL has opted a shift from fossil fuels to solar grid. The project will get commissioned from May 2023 onwards.

8. 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 tonnes)		
Plastic waste (A)	2.24	0
E-waste (B)	0	1.3
Bio-medical waste (C)	0.002	0
Construction and demolition waste (D)	0	0
Battery waste (E)		
Radioactive waste (F)	0	0.86
Other Hazardous waste. Please specify, if any. (G)	42147.116	5061.02
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	1439.36	1065.24
Total (A+B + C + D + E + F + G + H)	43588.71	6128.42
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	12270.91	3006.33
(ii) Re-used		
(iii) Other recovery operations	214.55	-
Total	12485.46	3006.33
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of disposal Method		
(i) Incineration	1567.7	22.0
(ii) Landfilling	5956.19	2606.3
(iii) Other disposal operations	11113.98	522.2
Total	18637.87	3150.5

9. 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 waste management practices adhere to the Hazardous and Other Wastes (Management Transboundary Movement) Rules, 2016. GPS (AIS-140) mounted vehicles are used for hazardous waste transportation. We have partnered with authorized vendors only for waste disposal or recycle in line with the guidelines stipulated by the PCB. The Company also sends hazardous waste to the Cement industry for co-processing.

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:

Not applicable

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

No assessment has been undertaken in current financial year.

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

Yes

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2022-23	FY 2021-22
From renewable sources (in GJ)		
Total electricity consumption (A)	6513.99	5778.94
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	6513.99	5778.94
From non-renewable sources (in GJ)		
Total electricity consumption (D)	202615.95	163817.51
Total fuel consumption (E)	1018897.24	250687.02
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	1221513.19	414504.53

Note: No external assurance was carried out on environmental parameters for FY 2022-23

2. Provide the following details related to water discharged:

Parameter	FY 2022-23	FY 2021-22
Water discharge by destination and level of treatment (KL)		
(i) To Surface Water		
- No treatment	-	-
- With treatment (please specify level of treatment)	469605	338054
(ii) To Groundwater		
- No treatment	-	-
- With treatment (please specify level of treatment)	-	-
(iii) To Seawater		
- No treatment	-	-
- With treatment (please specify level of treatment)	-	-
(iv) Sent to third parties		
- No treatment	-	-
- With treatment (please specify level of treatment)	-	-
(v) Others		
- No treatment	-	-
- With treatment (please specify level of treatment)	-	-
Total Water discharged (KL)	469605	338054

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

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

Not Applicable. NFIL's operation sites are not located in water stressed regions. Neither water is withdrawn, consumed, nor discharged from any water stressed areas.

a. Name of the area

b. Nature of operations

c. Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23	FY 2021-22
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	-	-
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (in kilolitres)	-	-
Total volume of water consumption (in kilolitres)	-	-
Water intensity per rupee of turnover (Water consumed / turnover)	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kilolitres)		
(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	-	-
Total water discharged (in kilolitres)	-	-

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)*	Metric tonnes of CO ₂ equivalent	48875.76	25335.67
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent	2.28x10 ⁻⁶	1.81x10 ⁻⁶
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO ₂ equivalent	-	-

*Scope 3 calculations are reported for 4 categories; (Upstream transportation and distribution, Waste generated in operations, Business travel and Employee travel)

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not applicable. NFIL's operations are not located in or around any ecologically sensitive areas.

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

Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Economizer for RC1 in one of the plants	Energy saving by process-to-process heat transfer	Energy Saving 691200 GCal/Annum Power Saving 468792 GCal/Annum
Reduction of Batch cycle Time in Stage-2 of R4E28	Energy saving by reduction in BCT	Energy Saving 33512 KWH/Annum Steam Saving 294 KWH/Annum
Implementation of Zero Liquid Discharge system	We have installed full-fledged ETP/ Zero Liquid Discharge (ZLD) facility equipped with RO, MEE, ATFD for Primary, Secondary and Tertiary treatment of effluent. Entire effluent load inclusive of process and domestic streams are treated to finally yield good quality water which is recycled/reused back to cooling tower/utility purpose.	Resource conservation-Treated effluent is utilized in utility thus reduces fresh water consumption.
Co-processing / Pre-processing of Hazardous waste	We have explored the possibility of utilizing our hazardous waste in Cement industry as Co-processing/ Pre-processing measures and same is implemented also. This is a good example of resource conservation by utilizing our hazardous waste in Cement kiln as fuel instead of disposing at TSDF.	Resource conservation

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

Yes, NFIL has a comprehensive business continuity and disaster management plan which covers emergencies inclusive of natural and man-made. The disaster management plan focuses to reduce the risk and negative impact of business operations on human health; both within the permissible work boundary and beyond. It further prioritizes to minimize damage to property and protect the environment at large. Additionally, the plan enables effective communication between NFIL, Government Authorities, Public forums and Press and avoids any sort of public disorder

8. 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?

NFIL has conducted assessment for some of its key suppliers associated with its mother plant in Surat. The assessment enabled the Company to understand the best practices of its suppliers. NFIL is further taking initiatives to amplify the scope of the assessment to other suppliers across plants.

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

NFIL has not monitored data on percentage of value chain partners assessed during FY 2022-23..

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

Essential Indicators

1. Public Policy Advocacy

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

Yes, NFIL is a member of two associations.

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

Sr. no.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Indian Chemical Council	National
2	Indian Chamber of Commerce	National

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

Zero instances of anti-competitive conduct were reported at NFIL for the current financial year.

Leadership Indicators

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

The Company participates in various programmes of these associations and has represented and worked towards the benefit and inclusive development policies for the Chemical Industry as a whole.

Principle 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

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

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:

Not applicable

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

Initiatives conducted under CSR are tracked to determine the outcomes achieved and the benefits to the community. The Company undertakes impact assessment survey of its implementing agencies and wherever possible, initiates internal tracking mechanisms, regular reports and follow-up field visits and telephonic and email communications.

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	29%	28%
Sourced directly from within the district and neighbouring districts	52%	46%

*It includes services also along with input materials

Leadership Indicators

1. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

State	Aspirational District	Amount spent (In INR)
Gujarat	Narmada	15,05,200

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

NFIL has in place Supplier Chain Management Policy wherein it ensures ethical and responsible engagement and procurement from all its suppliers. The company prioritizes to comply with environmental and social parameters to minimize negative impacts associated with its supply chain. NFIL prefers to procure majority of its raw materials from local and MSME suppliers.

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

As of now the Organization is sourcing materials from MSME as well as from local districts but do not have marginalized / vulnerable groups

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

Not applicable

3. 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:

NFIL does not acquire intellectual properties of its own. The Company collaborates with industries across sectors, for which it produces intermediate chemicals based on their technical know-how and as per the agreement with each of the industry/ customer.

4. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved

For the reporting year, no disputes were reported with respect to intellectual property.

5. Details of beneficiaries of CSR Projects:

CSR Projects*	No. of persons benefitted from CSR Projects		% of beneficiaries from vulnerable and marginalized groups
	Direct	Indirect	
Shri Sadguru Seva Sangh Trust - Purchase of equipment for cornea department	Not available as equipment was procured towards the end of the Year		100%
Charutar Arogya Mandal Hospital - Purchase of Colour Doppler Unit, USG machine with advanced O&G and neonate applications, Neonatal incubator, Tissue processor, Video Pleuroscope and Flexible Ureteroscope	1,289	-	100%
Blind People's Association – (i) Mental health; (ii) Assistive Devices; (iii) Early childhood services; (iv) Soft skills and empowerment of blind women; and (v) Livelihood enhancement and self-employment for persons with disabilities	7707	6,000	80%
Foundation for promotion of sports	OGQ supports 166 Junior Athletes and 4 Junior Para Athletes	-	-
Sir JJ Hospital - Purchasing Neurosurgical Electrical Drill Machine for Sir JJ Hospital	1,350	-	~100%
The Society for the rehabilitation of crippled children - Supporting economically challenged families of children with life threatening disorders and for buying Electronic Muscle Dynamometer with console and Respiratory Pressure Meter	13	30 +	100%

CSR Projects*	No. of persons benefitted from CSR Projects		% of beneficiaries from vulnerable and marginalized groups
	Direct	Indirect	
Consumer Education & Research Centre – The Company has made a contribution of ₹10 Lakhs to CERC. The details of beneficiaries are for CERC as a whole.	<ul style="list-style-type: none"> 80,000 households via Grahak Sathi Over 8,500 complainants via Grahak Suvidha Kendra 	<p>Undetermined. However, many receivers of Grahak Sathi have multiple readership. For example, Grahak Sathi is sent to hundreds of schools and colleges and some of these institutions forward the same to their students.</p> <p>Further, stories about successful complainants are shared through Graham Sathi and also through our YouTube Channel 'Jeeta Graham'. This serves the purpose of motivating other consumers to seek justice to their grievance.</p>	At least 22.60%
Prayas (Green NGO) - Animal Welfare, bird rescue and rehabilitation	Approximately 2,000 injured / abandoned homeless animals/birds.	-	-
Mobile health services in villages around Surat and Dewas for medical care including routine checkup and medicines	62,940	-	100%
Supporting provision of stationery to schools in villages	700	-	100%
Repairs & Annual Maintenance Cost of 6 RO water systems	2,700	-	100%

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

Essential Indicators

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

The Company is customer focused. It undertakes regular customer satisfaction survey which enables it to improve. The survey indulges with external and internal customers. The external customers respond to this feedback annually while the internal customers are surveyed four times a year. Based on the ratings or inputs received, the concerned departments work to improve their performance.

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

	As a percentage to total turnover
Environmental product 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:

	FY 2022-23		Remark	FY 2021-22		Remark
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	9	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	33	-	-	34	-	-

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

	Number	Reason for Recall
Voluntary Recall	0	0
Forced Recall	2	In-transit damage and leakage

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, NFIL has an IT/Cybersecurity policy which addresses incidents related to cyber security and data privacy. The policy sets forth basic requirements for keeping a workplace safe, where confidential and sensitive information about NFIL employees, customers, suppliers, and all stakeholders is secured.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

Not applicable, as no such incidents were reported for current financial year.

Leadership Indicators

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

NFIL abides to all the applicable laws with respect to product labelling. Relevant labeling on packaging is also done indicating nature of hazards as per the defined format identified in domestic / international laws. NFIL practices an internationally recognized standard in which product details are always displayed by providing MSDS and TREM card along with products. MSDS is sent with each consignment for exports whereas for domestic customer, it is sent as and when asked. However, TREM card is sent with all consignments.

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

NFIL provides material safety data sheet and GHS labels on each of its consignment for creating awareness among its consumers regarding safe handling of the products.

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

Yes, we do have mechanism to inform the consumers about any risk of disruption/discontinuation of our services via email / over concall and cell phone device messages.

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)

NFIL discloses product information as per the applicable laws and regulations. The company conducts regular customer satisfaction survey which indulges its external and internal customers. The external customers respond to the survey annually while the internal customers are surveyed four times a year. Based on the ratings or inputs received after the survey, the concerned departments take initiatives to enhance their efforts and meet the requirements of the customers of NFIL.

5. Provide the following information relating to data breaches:

a. Number of instances of data breaches along with impact

No incidents of data breaches were reported for FY 22-23

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

No incidents of data breaches were reported for FY 22-23

By order of the Board of Directors
For NAVIN FLUORINE INTERNATIONAL LIMITED

Vishad P. Mafatlal
Chairman
DIN: 00011350

Date: May 13, 2023

Place: Mumbai

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