

HEUBACH COLORANTS INDIA LIMITED
[formerly Clariant Chemicals (India) Limited]

Registered Office:
Rupa Renaissance, B Wing, 25th Floor
D-33, MIDC Road, TTC Industrial Area
Juinagar, Navi Mumbai – 400705. India
CIN: L24110MH1956PLC010806
www.heubach.com



August 31, 2024

To
BSE Limited
Corporate Relationship Department
1st Floor, New Trading Ring
Rotunda Building, P. J. Towers
Dalal Street, Mumbai - 400 001
Scrip: 506390

To
The National Stock Exchange of India Limited
Listing Department, Exchange Plaza,
5th floor, Plot No. C/1, G Block,
Bandra-Kurla Complex, Bandra (E),
Mumbai - 400 051
Scrip: HEUBACHIND

Subject: Business Responsibility and Sustainability Report for the FY 2023-24

Dear Sir,

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report (“BRSR”) of the Company for the Financial year 2023-24, which also forms part of the Annual Report for the Financial year 2023-24.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

For Heubach Colorants India Limited

Jugal Sahu
Executive Director
and Chief Financial Officer
DIN: 02629782

Encl: a/a

Business Responsibility and Sustainability Report (BRSR)

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Section A: General Disclosures



I. Details of the listed entity

Heubach colorants India Limited (HCIL) is (formerly known as Clariants Chemicals India Limited) established in the year 1956. HCIL is a global leader in color chemistry and material science and committed to drive the change in the pigment industry. Sustainability is a fundamental value and part of our ethos which plays an important role in driving our actions to achieve business resilience in a sustainable manner.

We understand the importance of sustainability due to risks arising from scarcity of resources, demographic change and global warming, we take the responsibility for people, the environment, and we conduct our business responsibly and reliably. With the collaborative effort along with our customers, partners and suppliers, we aim to change the pigment industry towards a greener future. We want to make sure "All colors are green".

1.	Corporate Identity Number (CIN) of the Company	L24110MH1956PLC010806
2.	Name of the Company	Heubach Colorants India Limited, formerly known as Clariant Chemicals (India) Limited
3.	Year of Incorporation	1956
4.	Registered office address	Rupa Renaissance, B Wing, 25 th Floor D-33, MIDC Road, TTC Industrial Area Juinagar, Navi Mumbai 400705 India
5.	Corporate office address	Rupa Renaissance, B Wing, 25 th Floor D-33, MIDC Road, TTC Industrial Area Juinagar, Navi Mumbai 400705 India
6.	E-mail	investor.relations_india@heubach.com

7.	Telephone	022 20874406
8.	Website	www.heubach.com
9.	Financial year for which reporting is being done	FY 2023-24
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited & National Stock Exchange of India Limited
11.	Paid-up Capital	INR 23,08,17,980
12.	Name and contact details (telephone, email address) of the person for BRSR Reporting	Mr. Jugal Sahu Executive Director & Chief Financial Officer jugal.sahu@heubach.com 022 - 2087 4406
13.	Reporting boundary	As the Company does not have any subsidiaries, the Business Responsibility & Sustainability Report has been prepared on a standalone basis.
14.	Name of assurance provider	Not Applicable
15.	Type of assurance obtained	Not Applicable

II. Products/Services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% Of Turnover of the entity
1.	Manufacturing and sale of synthetic organic coloring matter	Manufacture of organic, pigment preparations, dyes and specialty materials for various applications	100%

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

Sl. No.	Product/Services	NIC Code	% of total turnover contributed
1.	Manufacture of organic, pigment preparations, dyes and specialty materials for various applications	20114	87%

III. Operations

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

Sl. No.	Location	Number of plants	Number of offices	Total
1.	National	3	2	5
2.	International	Nil	Nil	Nil

19. Markets served by the entity

a. Number of locations

Sl. No.	Locations	Number
1.	National (Number of states)	27
2.	International (Number of countries)	4

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

Out of total revenue from contract with customers 78,070.58 Lakhs INR on standalone basis for the year 2023-24, the percentage of revenue from exports contribute to 31.67% (24,725.87 Lakhs INR).

c. A brief on types of customers

We have customers from various sectors for our high performance organic and inorganic pigments along with pigment preparations. The Company supplies around 500 products to cater diverse range coating applications. The details of our product categories and applications are provided below:

Sl. No.	Category	Applications
1.	Coatings	Automotive coatings, coil coatings, corrosion protection, exterior paints & plasters, floor coatings, industrial coatings, interior decorative paints, point of sale, powder coatings, road marking & traffic paints and wood coatings.
2.	Corrosion Protection	Anti-corrosive pigments for steel, protective coating alternatives for chrome based anti-corrosives and zinc free anti-corrosive pigments
3.	Plastics	Automotive plastics, construction & electrical, consumer goods, fiber and packaging
4.	Printing & digital printing	Ink jet, printing for packaging, publication, specialty printing and toner
5.	Special applications	Home & fabric care, personal care, seed coloration & crop protection, aluminium anodizing dyes & chemicals, stationery, viscose coloration, latex coloration, leather and paper coloration, concrete & plaster

For more details, please visit the website <https://heubach.com/products-applications/>

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sl. No.	Particulars	Total		Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	
Employees							
1.	Permanent (D)	235	201	85.53%	34	14.47%	
2.	Other than permanent (E)	28	21	75.00%	7	25.00%	
3.	Total employees (D+E)	263	222	84.41%	41	15.59%	
Workers							
4.	Permanent (F)	269	266	98.88%	3	1.12%	
5.	Other than permanent (G)	700	666	95.14%	34	4.86%	
6.	Total workers (F+G)	969	932	96.18%	37	3.82%	

b. Differently abled Employees and workers:

Sl. No.	Particulars	Total	Male		Female	
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled Employees						
1.	Permanent (D)	1	1	100%	Nil	NA
2.	Other than permanent (E)	Nil	Nil	NA	Nil	NA
3.	Total Differently abled employees (D+E)	1	1	100%	Nil	NA
Differently abled Workers						
4.	Permanent (F)	Nil	Nil	NA	Nil	NA
5.	Other than permanent (G)	Nil	Nil	NA	Nil	NA
6.	Total Differently abled workers (F+G)	Nil	Nil	NA	Nil	NA

21. Participation/Inclusion/Representation of women

	Total	No. and percentage of Females	
	No. (A)	No. (B)	% (B/A)
Board of Directors	6	1	16.67%
Key Management Personnel	1	1	100.00%

22. Turnover rate for permanent employees and workers

Category	FY 2024			FY 2023			FY 2022		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	18.78%	28.57%	20%	17.66%	19.05%	17.80%	4.07%	9.30%	4.30%
Permanent workers	6.27%	Nil	6.20%	5.64%	Nil	5.59%	5.19%	Nil	5.15%

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

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

Sl. 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.	Heubach Holding Switzerland AG (formerly Colorants International AG)	Holding	36.56%	No
2.	Heubach EBITO Chemieeteiligungen AG (formerly EBITO Chemieeteiligungen AG)	Holding	17.80%	No

VI. CSR details

24.

- i. Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes/No
- ii. If yes, Turnover - (in ₹) 79,070.15 Lakhs
- iii. Net worth - (in ₹) 47,244.13 Lakhs

VII. Transparency and Disclosures Compliances
25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGBRC):

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2024			FY 2023		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	https://heubach.com/heubach-india/investor-relations-india-overview/policies/	Nil	Nil	Nil	Nil	Nil	Nil
Investors		Nil	Nil	Nil	Nil	Nil	Nil
Shareholders		4	Nil	Nil	18	Nil	Nil
Employees and workers		3	Nil	Nil	1	Nil	Nil
Customers		26	2	Nil	78	Nil	Nil
Value Chain Partners		36	Nil	Nil	52	Nil	Nil
Other (please specify)		Nil	Nil	Nil	Nil	Nil	Nil

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

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Environment					
1.	Carbon emission	Risk	<ul style="list-style-type: none"> ▶ Higher carbon footprint of the products has negative impact on sales and revenue generation as customers are preferring lesser carbon footprint products. ▶ Climate change poses significant physical and transition risks to operations and supply chain of the Company. ▶ Global swift towards low carbon economy and sustainable practices leads to change in existing technologies to align with the requirements. 	<ul style="list-style-type: none"> ▶ Conduct Life Cycle Assessment (LCA) of products to estimate the carbon footprint. ▶ Deploy eco-friendly technologies and processes to reduce the carbon footprint of the products. ▶ Switch to renewable energy and replace fossil fuels with cleaner fuels. ▶ Conduct energy audit and implement energy conservation measures. ▶ Implement risk mitigation plan for the identified risks of physical and transition risks of climate change. 	Negative

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2.	Circular economy (Waste & Water Management)	Opportunity	<p>Waste:</p> <ul style="list-style-type: none"> ▶ Promoting sustainable waste management practices (Reduce, Reuse & Recycle) reduces the dependency on natural resources and also conserves energy associated with raw material extraction, processing and transportation. ▶ Recycling and reuse of waste reduces waste disposal costs and also mitigates the environmental risks arising due to waste disposal. <p>Water:</p> <ul style="list-style-type: none"> ▶ 100% of treatment and reuse of treated wastewater in various industrial applications helps in mitigating water related risks. ▶ Conservation of water helps in reducing the water procurement, treatment & disposal costs of wastewater. 	<p>Waste:</p> <ul style="list-style-type: none"> ▶ Enhance the recycling of waste by identifying the end use applications. ▶ Optimize raw material consumption for resource conservation and to reduce waste generation. <p>Water:</p> <ul style="list-style-type: none"> ▶ Improve the treated wastewater parameters to reuse within the operations and reduce the dependency on freshwater resources. ▶ Implement water conservation measures through deployment of water efficient technologies and processes etc. ▶ Conduct water audits and identify the areas for water conservation. ▶ Practice rainwater harvesting. 	Positive
3.	Sustainable Innovation	Opportunity	<ul style="list-style-type: none"> ▶ Innovation leads to production of greener and sustainable products which has high market potential due to increase in the environmentally conscious customers. ▶ Innovation of new pigment products with improved characteristics such as better color, intensity, durability and resistance to fading shall have high customer acceptance and helps in business growth and expansion. ▶ Conservation of resources can be achieved through use of alternative and recycled materials in the product development. 	<ul style="list-style-type: none"> ▶ Invest in research and development of products with lesser environmental footprint and more sustainable. ▶ Collaborate with research institutes to leverage their expertise, resources and knowledge to develop breakthrough innovations. 	Positive

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Social					
4.	Occupational Health & Safety	Risk	<ul style="list-style-type: none"> ▶ Operations at manufacturing facilities involve working with heavy machinery & equipment and exposure to higher temperatures, chemical & physical hazards which may pose health & safety risks to employees and workers. ▶ Health & safety related incidents may hamper the operations of the company leading to lesser productivity. ▶ Non-compliance to health & safety standards may lead to legal actions by the regulatory agencies as per the local laws. 	<ul style="list-style-type: none"> ▶ Identify and mitigate the health & safety related risks through Risk Assessment and Hazard Identification process. ▶ Conduct safety audits to identify & mitigate health & safety related risks. ▶ Conduct regular training programs to employees and workers on health & safety practices. ▶ Provide necessary treatment to employees and workers by diagnosis of occupational and non-occupational health diseases. ▶ Improvement in ergonomics and implement 5S at workplace to mitigate the health & safety related risks. ▶ Ensure Personal Protective Equipment (PPE) is mandatory to all employees and workers prior to entry into plant premises. 	Negative

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5.	Operations & Supply Chain	Opportunity	<ul style="list-style-type: none"> ▶ Improves operational efficiency by promoting circular economy, energy conservation and conservation of resources. ▶ Responsible and ethical sourcing of raw materials mitigates environmental risks arising from the extraction of raw materials. ▶ Implementation of sustainable supply chain management practices mitigates the business disruption related risks in the value chain of the Company. 	<ul style="list-style-type: none"> ▶ Implement sustainable supply chain management practices to mitigate supply chain related business disruptions and associated risks. ▶ Diversify the suppliers and modes of transportation to mitigate the supply chain risks during adverse conditions. ▶ Assess the suppliers on environmental, social and governance parameters. ▶ Ensure HCIL responsible sourcing policy is adopted by all value chain partners of the Company. 	Positive
6.	Talent management	Opportunity	<ul style="list-style-type: none"> ▶ Enhancing the skills of the employees and workers fosters innovation, improve productivity and operational performance of the company. ▶ Retention of talented employees and workers with required skill set, experience and expertise improves the overall performance of the Company and ensures sustainable growth. 	<ul style="list-style-type: none"> ▶ Identify skill gaps and enhance the skills by conducting necessary technical and leadership training programs. ▶ Implement robust hiring system to hire talented people. ▶ Provide necessary support to employees and workers to motivate, empower and achieve their career aspirations. 	Positive

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
Governance					
7.	Business Ethics	Opportunity	<ul style="list-style-type: none"> ▶ Implementation of robust governance practices and ensuring utmost integrity, accountability and transparency helps in achieving long-term growth and success of the Company. ▶ Operating the business in an ethical and transparent manner in compliance with the local regulatory requirements mitigates business risks and enhance the reputation & brand value for the Company. 	<ul style="list-style-type: none"> ▶ Conduct due diligence on ethics and compliance aspects. ▶ Ensure compliance with applicable laws and regulations. ▶ Ensure strict adherence to Company's Code of Conduct. ▶ Implement enterprise level risk management framework mitigating ESG related risks. ▶ Implement appropriate systems and practices to prevent non-compliances. 	Positive
8.	Succession Plan	Opportunity	<ul style="list-style-type: none"> ▶ Implementation of succession planning helps in smooth transition of leadership roles avoiding disruption of business operations. ▶ Upcoming future leaders are aligned with the Company's strategic goals, targets & commitments facilitating long term execution of business strategies. 	<ul style="list-style-type: none"> ▶ Implementation of a robust leadership succession plan by identifying the critical roles. ▶ Create a succession plan with detailed guidelines on transitioning roles, timelines and procedures. ▶ Ensure mitigation plans are in place for business continuity risks during transition phases. 	Positive

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

Sl. No.	Principle Description
P1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
P2	Businesses should provide goods and services in a manner that is sustainable and safe
P3	Businesses should respect and promote the well-being of all employees, including those in their value chains
P4	Businesses should respect the interests of and be responsive to all its stakeholders
P5	Businesses should respect and promote human rights
P6	Businesses should respect and make efforts to protect and restore the environment
P7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
P8	Businesses should promote inclusive growth and equitable development
P9	Businesses should engage with and provide value to their consumers in a responsible manner

Policy and Management processes

Points	P1	P2	P3	P4	P5	P6	P7	P8	P9
1(a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1(b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1(c) Web Link of the Policies, if available	Heubach Code of Conduct - https://admin.heubach.com/wp-content/uploads/2023/05/New-Heubach-Code-of-Conduct.pdf Policy For Perservation And Archival Of Documents - https://admin.heubach.com/wp-content/uploads/2023/05/Policy-on-Preservation-of-Documents-1.pdf Insider Trading - Code of Conduct - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL-Insider-Trading-Code_Amended_2022-.pdf Code For Independent Directors - https://admin.heubach.com/wp-content/uploads/2023/05/HCIL_Code-for-Independent-Directors.pdf Risk Management Policy - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL-Risk-Management-Policy-EN.pdf Related Party Transaction Policy - https://admin.heubach.com/wp-content/uploads/2022/09/Clariant-CCIL-Related-Party-Transaction-Policy-20220803-EN.pdf Familiarization Programme For Independent Directors - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL-Familiarization-Programme-EN.pdf HCIL CSR Policy - https://admin.heubach.com/wp-content/uploads/2024/04/CSR-Policy.pdf								

Points	P1	P2	P3	P4	P5	P6	P7	P8	P9	
	Dividend Distribution Policy - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL-Dividend-Distribution-Policy-EN.pdf Vigil Mechanism & Whistle Blower Policy - https://admin.heubach.com/wp-content/uploads/2023/05/HCIL_Vigil-Mechanism-Policy.pdf Draft Letter of Appointment of Independent Director - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL_Letter-of-Appointment-Independent-Director.pdf Code of Conduct for the Members of Board of Directors & Senior Members of Management - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL_Code-of-Conduct-for-BoD-and-Senior-Management_2022_KY.pdf Policy on determining the materiality of events - https://admin.heubach.com/wp-content/uploads/2023/10/HCIL_Policy-for-determining-Materiality-of-Events_2023.pdf Nomination & Remuneration Policy - https://admin.heubach.com/wp-content/uploads/2023/02/HCIL-Nomination-Remuneration-Policy-EN.pdf									
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4	Name of the national and international codes/certifications/ labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<p>Principle 2:</p> <ul style="list-style-type: none"> ▶ ISO 9001:2015 (Quality Management Systems) ▶ ISO 14001:2015 (Environmental Management Systems) ▶ ISO 50001:2018 (Energy Management Systems) ▶ UN Global Compact ▶ The Chemical Industry Responsible Care Initiative ▶ Global labelling Mgt GLM Tool <p>Principle 3:</p> <ul style="list-style-type: none"> ▶ ISO 45001:2018 (Occupational Health & Safety Management System) <p>Principle 4:</p> <ul style="list-style-type: none"> ▶ Membership of Bombay Chambers of Commerce ▶ Indian Chemical Council <p>Principle 6:</p> <ul style="list-style-type: none"> ▶ OEKO-TEX ▶ Eco Passport Certification ▶ SDG Initiative <p>Principle 8:</p> <ul style="list-style-type: none"> ▶ As per CSR rules defined under the Companies Act, 2013 <p>Principle 9:</p> <ul style="list-style-type: none"> ▶ ISO 18001 (Occupational Health & Safety Management System) ▶ ISO 17205:2017 (Testing and Calibration Laboratories Standard) 								

Points	P1	P2	P3	P4	P5	P6	P7	P8	P9
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company has identified key material issues under Environment, Social & Governance (ESG) by conducting materiality assessment and aligned with the business strategy. The performance on ESG related commitments, goals and targets are assessed by the CSR and Risk Management committee and updated to the board on periodical basis.</p> <p>ESG related commitments, goals and targets for the year 2030 against the baseline year 2019 are provided below:</p> <p>Environment:</p> <ul style="list-style-type: none"> • Reduce water intake by 3% • Reduce wastewater generation by 10% • Reduce specific hazardous waste generation by 10% • Reduce specific energy consumption by 10% • Reduce specific CO2 direct emission by 10% • Reduce specific water discharge by 10% • Implementation of sustainable water management practices at the sites located in Roha, Cuddalore and Nagda. 							
6	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	Yes, the performance on ESG goals and other relevant details are disclosed in this Annual Report FY 2023-24.							

Governance, leadership, and oversight

7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>Sustainability is embedded in our business strategy driving innovation, resource conservation, circular economy and product life cycle management for reducing environmental footprint of the company. As a responsible corporate towards environmental stewardship, we always strive to improve the energy utilization efficiency and switching to clean fuels to reduce the overall energy consumption and carbon footprint of the company. We promote circular economy through process optimization, innovation and deployment of eco-friendly technologies. We offer our customers innovative and high-quality products that help them save resources and achieve their sustainability goals. More than 90% of our production sites are ISO 9001, 14001 and 45001 certified by adopting highest standards across all operations of the company.</p> <p>Heubach is the signatory of UN Global Compact and committed to upholding the 10 principles in the areas of human and labor rights, anti-corruption, and environmental protection. Further, we are collaborated with Responsible Care, the chemical industry's global, voluntary initiative which aims to improve safe production, handling and use of chemicals across the supply chains.</p> <p>We believe in fostering positive relationships with all our stakeholders where we operate and with whom we interact. We ensure employee wellbeing through prioritization of health & safety measures across all business operations of the company. Our inclusive work environment leverages the diversity leading to a more enjoyable and productive workplace.</p> <p>We create a progressive environment at workplace by conducting training and development programs to nurture the talent and innovation of employees for achieving their career aspirations. We actively engage with local communities through implementation of Corporate Social Responsibility (CSR) projects for uplifting the marginalized and vulnerable groups contributing to the betterment of the society.</p>							
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		Our robust governance framework and ethical business practices ensures transparency, accountability and integrity across all business operations of the company. We strictly adhere to the applicable laws and regulations across all business operations of the company. We encourage open dialogue with our stakeholders addressing their concerns and fostering a positive relationship. By upholding the strong governance principles, we build trust in all stakeholders of the company.								
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Bharath R Sesha DIN: 01983066 Designation: Managing Director								
9	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, Corporate Social Responsibility (CSR) and Risk Management Committee of the Company are responsible for decision making and implementation of sustainability related commitments, goals and targets. The CSR and Risk Management Committee updates the status on implementation of sustainability aspects to the board of directors periodically. The Company has an internal frameworks/Committees to monitor the effective implementation of sustainability related policies.								
10	Details of Review of NGRBCs by the Company									
	Subject for Review	a. Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
	1. Performance against above policies and follow up action	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	2. Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Subject for Review	b. Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
	1. Performance against above policies and follow up action	The business responsibility policies are periodically reviewed by the department heads, plant heads and Board of Directors on an annual basis. During these assessments, the adequacy of the policies is reviewed and adequate changes to policies, procedures and internal controls are implemented accordingly.								
	2. Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances	The Company is compliant will all statutory requirements and applicable laws. There were no instances of non-compliance in the reporting period.								
11	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	The evaluation and assessment of policies are carried out periodically by an internal audit committee and group company auditors, risk management committee, CSR committee and the respective department heads to identify the improvement areas and updated to the board of directors for necessary amendments. Independent assessment is carried out by an external agency on need basis.								
12	If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:									
	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	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)	Not Applicable								
	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: Business should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

We are committed to the highest standards of integrity and quality towards people, the environment and our shareholders. Our corporate governance policy encompasses integrity, transparency, accountability and fairness across all business operations and activities of the Company. We set highest standards of corporate governance by adopting well established systems, procedures, robust internal controls, and benchmarking industrial best practices in compliance with the regulatory requirements to make informed business decisions. The company adheres to the corporate governance principles and aims to provide shareholder value and transparency to ensure sustainable long-term growth. We ensure regular tracking of compliances and adopted stringent quality assurance practices to operate the business in an ethical and responsible manner.

HCIL has adopted three corporate values which comprises of Safety, Sustainability (People, Planet and Profit) and Compliance in its Code of Conduct. These corporate values have been adopted to meet the stakeholders' ever-increasing expectations with respect to Environment, Social and Governance (ESG) requirements. All employees of the HCIL should strictly follow the Code of Conduct, policies and other guidelines issued by the Company from time to time strengthening its governance system. As sustainability is deeply embedded in the business strategy of the company, we take environmentally conscious decision mitigating the ESG related risks and ensures the collective growth and development protecting the best interests of our stakeholders.

ESSENTIAL INDICATORS

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

Segment	Total number of training & awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	4	As part of our familiarisation programme and meetings, we arrange special sessions for Board Members with the Executive Management Team and Key Managers. These sessions give detailed insights covering important areas such as business operations, innovation, ESG (Environmental, Social, and Governance) activities, CSR (Corporate Social Responsibility), managing employees, company culture, market strategies, technology, compliance and governance, code of conduct, insider trading rules, and anti-harassment policies.	100%
Key Managerial Personnel	4		100%
Employees other than BoD and KMPs	12	Health & Safety, E-Procurement, operations management, statutory requirements, reporting mechanism, resource optimization, skill development, human rights, Prevention of Sexual Harassment (PoSH), Code of Conduct, Corporate Social Responsibility (CSR) and Emergency preparedness.	100%
Workers	12	Health & Safety, E-Procurement, operations management, statutory requirements, reporting mechanism, resource optimization, skill development, human rights, Prevention of Sexual Harassment (PoSH), Code of Conduct, Corporate Social Responsibility (CSR) and Emergency preparedness.	100%

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

Monetary				
NGRBC Principle	Name of the regulatory/ enforcement agencies/ Judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/ No)
Penalty/Fine				
Settlement		Nil		
Compounding fee				
Non - 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)
Imprisonment				
Punishment		Nil		

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

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

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

The Company has adopted the Anti- Bribery and Anti-Corruption policy (ABC policy) which covers all employees and third parties with whom the Company is engaged in business activities. Under ABC policy, the Company is implementing the principles of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), the Prevention of Corruption Act 1988 (as applicable in India) and all equivalent local laws affecting the Company. ABC policy is available in the Company's intranet.

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

Sl. No.	Segment	FY 2024	FY 2023
1	Directors	Nil	Nil
2	Key Managerial Personnel	Nil	Nil
3	Employees	1	Nil
4	Workers	Nil	Nil

6. Details of complaints with regard to conflict of interest

Sl. No.	Segment	FY 2024		FY 2023	
		Number	Remarks	Number	Remarks
1	Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
2	Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest.

Not Applicable

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

	FY 2024	FY 2023
Number of days of accounts payables	132	135

9. Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	FY 2024	FY 2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	9.15%	12.62%
	b. Number of trading houses where purchases are made from	76	73
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	51%	48%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	Nil	Nil
	b. Number of dealers / distributors to whom sales are made	Nil	Nil
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	Nil	Nil
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	22.39%	18.83%
	b. Sales (Sales to related parties / Total Sales)	30.40%	32.99%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	Nil	Nil
	d. Investments (Investments in related parties / Total Investments made)	Nil	Nil

LEADERSHIP INDICATORS

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
2	Human rights, Child and forced labors, Working conditions, responsible sourcing, Environment & Health Protection, Safety, Occupational Health & Safety, Compliance- Business ethics, fair competition	100%

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, the Company has an appropriate system and practices to avoid conflict of interest at board level. A separate code of conduct is available for the Board of Directors and Senior Management to ensure that they do not engage in any business, relationship or activity which might be detrimentally conflict with the interest of the company. In case, there is likely to be a conflict of interest, the concerned director must make full disclosure of all facts and circumstances. The board is collectively responsible for decision making on conflict of interest disclosed to the board on any business decisions, where any of the directors are involved.

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



We are a pioneer in the development of sustainable color technologies, including bio-based materials and the substitution of questionable materials to improve environmental characteristics fulfilling the regulatory compliance requirements. The Company emphasizes the significance of sustainable chemistry, which involves designing products and processes to reduce or eliminate hazardous substances and minimize environmental impacts while promoting economic growth. The Company adheres to the twelve principles of 'Green Chemistry' in its pursuit of sustainable chemistry, which include prevention, atom economy, less hazardous chemical synthesis, designing safer products, employing safer solvents and auxiliaries, promoting energy efficiency in design, utilizing renewable stocks, reducing derivatives, leveraging catalysis, designing for degradation, implementing real time analysis for pollution prevention, adopting inherently safer chemistry practices.

Our utmost importance to product quality and safety ensuring sustainability provides confidence to our customers to take environmentally conscious and informed decisions. All our value chain partners should strictly adhere to responsible sourcing policy of HCIL practicing responsible sourcing of minerals and compliance while they are associated with any business activity with the Company.

ESSENTIAL INDICATORS

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

Segment	FY 2024	FY 2023	Details of improvements in environmental and social impacts
R&D	Nil	Nil	Disclosed in HCIL's Annual Report for the FY 2023-24
Capex	₹ 2,018.65 Lakhs	₹ 1,688.54 Lakhs	

2.

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

Yes. Our responsible sourcing policy shall be adhered by all suppliers (*suppliers of goods and services, as well as distributors and agents that sell Heubach's products*) which ensure compliance with all legal requirements, and reduce the risk of supply chain disruptions, reputational harm and perform better. All our purchasing decisions are conducted in accordance with the highest ethical and professional standards, as set out in our Code of Conduct. Our selection criteria of suppliers are based on quality, service, price, and sustainability performance etc.

All suppliers shall adhere to the responsible sourcing policy of Heubach which include:

- a. Health and safety standards:** Suppliers shall comply with applicable laws on health & safety.

- b. Human rights:** Suppliers shall comply with human rights related laws and regulations which include non-harassment, avoid child, forced labour & modern slavery, maintain good working conditions, non-discrimination at workplace and provide equal opportunity and right to organize and bargain collectively.
- c. Resource efficiency and environmental protection:** Suppliers shall promote the prevention and minimization of emissions and waste from their operations. Monitor and reduce consumption of natural resources such as energy, raw materials, water, and soil. Waste must be handled, collected, stored, and disposed in a manner that is environmentally sound and in accordance with applicable law.
- d. Sourcing of conflict minerals mica & cobalt:** Prevent sourcing of minerals from conflict-affected or high-risk areas. Heubach shall conduct audits of suppliers in accordance with the Responsible Minerals Assurance Process of Cobalt (RMAP). Supplier must not use or purchase Mica as a raw material for products supplied to Heubach without permission.
- e. Land & property rights:** Suppliers should ensure land and property rights of individuals and communities are respected and not unlawfully taken away.
- f. Environmental & health protection:** Suppliers shall take necessary measures to reduce the environmental impact from their operations. Suppliers must work continuously to improve the environmental compatibility of their products and processes. Products must be monitored, inspected, and assessed by means of a comprehensive HSE (Health, Safety and Environment) and quality management system.
- g. Occupational health and safety:** All suppliers should comply with the occupational health & safety laws and regulations.
- h. Emergency preparedness:** Potential emergency situations must be assessed. Emergency processes and safeguards must be in place to ensure comprehensive emergency management and response.
- i. Business Ethics:** No benefits of any kind, including gifts, invitations for meals or entertainment, may be accepted or offered in the course of interactions with public officials or business partners, which may be seen as intending to influence business decisions to one's own advantage.
- j. Fair competition:** Anti-trust and other competition laws shall be complied.
- k. Business Records and Fraud:** All transactions are documented accurately, and financial books and records are properly maintained in accordance with applicable law and generally accepted accounting practices.
- l. Embargoes and Trade Control:** Applicable trade control regulations, embargoes and other restrictions shall be complied.
- m. Money Laundering:** Suppliers shall abstain from money laundering activities and set appropriate preventive actions.
- n. Conflicts of Interest:** Suppliers shall disclose to Heubach any situation that may appear as a conflict of interest, such as a Heubach employee having professional, private and / or financial advantages or interests in any of the supplier's businesses.
- o. Data Protection:** Personal Data is protected and processed in accordance with applicable Data Protection Legislation.
- p. Confidentiality, Information Security, and Intellectual Property:** Intellectual Property Rights of Heubach or third parties shall be respected. Confidential information provided by Heubach is to be protected.

Any violations of the Supplier Code of Conduct can be reported through Heubach's Digital Whistleblower System that can be accessed through Heubach's Website <https://www.heubach.com/about/compliance/> or by writing to group.compliance@heubach.com. These reports can be made anonymously through the Digital Whistleblower System. Any form of retaliation against a whistleblower who reports a violation or potential violation of the Supplier Code of Conduct in good faith will not be tolerated.

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

100% of the input materials were sourced sustainably by adopting Heubach's responsible sourcing policy.

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

The Company is implementing sustainable waste management practices in all facilities through prioritizing reduce, reuse and recycle of waste wherever possible and dispose the residual waste fractions in safe manner. Plastic waste, other hazardous waste and other non-hazardous waste is being generated from the plant operations. Plastic waste is either recycled or co-processed, non-hazardous waste is composted, and hazardous waste is either incinerated or landfilled based on the type and composition of the waste.

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

Yes, Extended Producer Responsibility (EPR) is applicable as per the Plastic Waste Management Rules, 2016 and subsequent amendments. The Company has already obtained Plastic Waste EPR Authorization from the Central Pollution Control Board (CPCB) and the waste collection plan is in line with the EPR targets given by the CPCB.

LEADERSHIP INDICATORS

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
20114	13 Azo pigments	Refer the weblink for details	https://www.heubach.com/sustainability-at-heubach-group/sustainablesolutions/		

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of Product / Service	Description of the risk / concern	Action Taken
Not Applicable		

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or re-used input material to total material	
	FY 2024	FY 2023
Packaging Material (Paper box, HDPE)	0.3%	0.3%

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

	FY 2024			FY 2023		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	Nil	29	97.35	Nil	25.63	83
E-waste	Nil	Nil	Nil	Nil	Nil	Nil
Hazardous waste	Nil	Nil	4181.09	Nil	Nil	3219.27
Other Waste	Nil	Nil	1971.40	Nil	Nil	1343.74

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Plastic waste	More than 90%

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



We continuously strive for operational excellence by prioritizing the employee engagement fostering collaborative work environment leveraging collective growth and development. Our positive and inclusive culture, offering ample growth opportunities by recognizing the employee efforts cultivates a motivated and productive team for long term sustainable growth and success of the Company. We conduct regular training programs to inculcate the technical and leadership skills in employees to harness their intrinsic potential facilitating professional growth and personal well-being. The Company promotes diversity & inclusion and provides equal opportunity to all employees irrespective gender, ethnicity, age, and background of each and every individual for collective growth of the Company by ensuring harmony, pride and trust among all employees.

Employee health and safety is paramount to our Company as the employees are the valuable asset for the Company. HCIL is committed to Safety First Culture by adopting highest health & safety standards and continuous improvement of health & safety practices creating safe & healthy workplace and enhancing employee morale, productivity, and satisfaction.

ESSENTIAL INDICATORS

1.

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

Category	% Of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	201	201	100%	201	100%	NA	NA	201	100%	NA	NA
Female	34	34	100%	34	100%	34	100%	NA	NA	NA	NA
Total	235	235	100%	235	100%	34	14.47%	201	85.53%	NA	NA
Other than Permanent Employees											
Male	21	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	28	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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	266	266	100%	266	100%	NA	NA	266	100%	NA	NA
Female	3	3	100%	3	100%	3	100%	NA	NA	NA	NA
Total	269	269	100%	269	100%	3	1.12%	266	98.88%	NA	NA
Other than permanent workers											
Male	666										
Female	34	Wellbeing measures for contractual workers is taken care by the third party agencies.									
Total	700										

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

	FY 2024	FY 2023
Cost incurred on wellbeing measures as a % of total revenue of the company	0.13%	0.16%

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

Sl. No.	Benefits	FY 2024			FY 2023		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	100%	Yes	100%	100%	Yes
2	Gratuity	100%	100%	Yes	100%	100%	Yes
3	ESI	NA	4.09%	Yes	NA	8.60%	Yes
4	Others – Superannuation	37.87%	Nil	Yes	42.79%	Nil	Yes

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

Yes, all offices and plants of the Company are accessible to differently abled employees.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

The code of conduct of the Company covers equal opportunity to promote diversity and do not tolerate any form of discrimination based on gender, racial or ethnic origin, religion, belief, disability, age, sexual identity or other differences that make each of us a unique individual. We offer equal opportunities during the recruitment, employment, promotion and development of our employees. Furthermore, we believe in creating a truly inclusive organizational culture where differences are valued and leveraged. The Company's policy is available at <https://admin.heubach.com/wp-content/uploads/2023/05/New-Heubach-Code-of-Conduct.pdf>

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%	100%	NA	NA
Female	NA	NA	NA	NA
Total	100%	100%	NA	NA

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

		Yes/No (If yes, then give details of the mechanism in brief)
1	Permanent workers	<p>Yes, The Company's Whistle Blower Policy applicable to all directors, officers, employees and third parties of the Company to report concerns or misconduct on violation of the code of conduct through a vigil mechanism, a secured reporting mechanism administered by the Chairman of the Audit Committee.</p> <ul style="list-style-type: none"> Bringing the violation or concern to the attention of their local supervisor, or any member of local management, as appropriate Informing the Country Compliance Officer, Legal Counsel, or Human Resources (HR) Manager Making a direct report (in a sealed envelope) addressed to Audit Committee. <p>The Company ensures confidentiality in the entire process of grievance redressal protecting the identity and grievance related information. The grievance will be routed and redressed through site head at plant locations and through human resources department or line manager in the corporate office. The Company's Whistle Blower policy is available at https:// admin.heubach.com/wp-content/uploads/2023/05/HCIL_VigilMechanism-Policy.pdf</p>
2	Other than Permanent Workers	
3	Permanent Employees	
4	Other than Permanent Employees	

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

Category	FY 2024			FY 2023		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / Workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	235	Nil	NA	215	Nil	NA
Male	201	Nil	NA	193	Nil	NA
Female	34	Nil	NA	22	Nil	NA
Total Permanent Workers	269	192	71.38%	279	191	68.46%
Male	266	192	72.18%	276	191	69.20%
Female	3	Nil	NA	3	Nil	NA

8. Details of training given to employees and workers

Category	FY 2024					FY 2023				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
Employees										
Male	201	201	100%	201	100%	193	193	100%	193	100%
Female	34	34	100%	34	100%	22	22	100%	22	100%
Total	235	235	100%	235	100%	215	215	100%	215	100%
Workers										
Male	266	266	100%	Nil	NA	276	276	100%	1	0.4%
Female	3	3	100%	Nil	NA	3	3	100%	Nil	NA
Total	269	269	100%	Nil	NA	279	279	100%	1	0.4%

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

Category	FY 2024			FY 2023		
	Total (A)	No (B)	% (B/A)	Total (C)	No (D)	% (D/C)
Employees						
Male	201	201	100%	193	193	100%
Female	34	34	100%	22	22	100%
Total	235	235	100%	215	215	100%
Workers						
Male	266	NA	NA	276	NA	NA
Female	3	NA	NA	3	NA	NA
Total	269	NA	NA	279	NA	NA

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, The Company has implemented Occupational Health & Safety Management System covering 100% of all sites including both employees and contractors. Safety is a value at the Company, hence it is non-negotiable. The Company is successful because its employees go back from work as healthy and safe as they entered the workplace, every single day. Next to being a value, the Company feel an obligation towards the dear ones of employees, contractor, guest & visitors, in providing a safe workplace. The facilities of the Company have been certified by ISO 45001 and periodic audits are conducted on occupational health and safety (OH&S) management system.

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

The Company has a detailed process/mechanism mentioned under health hazards section in the Environmental, Health & Safety (EHS) guidelines to identify & evaluate work related hazards and assess risks on a routine and non-routine basis. An appropriate system is in place to strengthen the systems, processes and existing controls based on the identified risks for all activities within the premises of the organization.

As part of Company's ambition in building and sustaining a Safe workplace in all plants and offices, the company have started conducting an event **"Tag the Unsafe @ 48 hr"**, across all its manufacturing sites, commercial offices, warehouses and labs.

An effort of Red Tagging the Unsafe (Condition, Situation, Act & Behaviour) is going to alert employees and workers on a safety hazard contributing to Company's goal to make **"Together we make Heubach Injury Free"**.

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

Yes, the Company has a detailed procedure of reporting the unsafe conditions and hazards as well as near miss incidents. The employees are authorised to take action to maintain working area free from hazards.

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

Yes, the Company is having full-fledged occupational health center with medical officer and supporting staff to take care of the overall physical and mental well-being of all employees and workers.

11. Details of Safety related incidents

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

*Including contract workforce

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

The Company has taken several measures for improving ergonomics and implemented 5S at workplace that offers great opportunities to enhance efficiency, productivity and overall success. 5S stands for 5 key principles:

- **Sort:** The first step is to eliminate unnecessary items from our workspaces.
- **Set in Order:** This principle focuses on arranging items in a logical and efficient manner.
- **Shine:** A clean and well-maintained workspace not only enhances visual appeal but also promotes safety and quality.
- **Standardize:** Standardization is key to maintaining efficiency and consistency throughout the organization.
- **Sustain:** The final principle emphasizes the need for continuous improvement and long-term sustainability. It involves creating a culture of responsibility and accountability, where each team member actively participates in upholding the 5S principles and continually seeks opportunities for improvement.

The implementation of 5S has resulted in:

- To eliminate waste, reduce unnecessary movement, and optimize workflows. This leads to increased productivity, shorter lead times, and improved customer satisfaction.
- **To enhance safety:** A clean and organized workspace reduces the risk of accidents, injuries, and potential hazards.
- **To improve Quality:** 5S promotes a culture of excellence by setting clear standards and ensuring adherence to them.
 - Implementation of mitigation measures based on the identified work-related hazards.
 - Awareness programs on practicing of best health & safety practices.
 - Regular training of employees, workers and contractors in plant premises on health & safety management systems.
 - JSA (Job Safety Analysis) – JSA is conducted to ensure all safety measures are in place before starting any modification in the job.
 - HAZOP Study – It is carried out to Analyze and Mitigate the Hazards involved in operations.
 - MOC (Management of Change) – Any modification in the system should follow the MOC.
 - Site ESHA Clearance – Any new product has to be approved by ESHA before starting from safety point of view.
 - PSSR (Pre-start Safety Review) – All new processes and installation are reviewed before start-up from safety point of view.

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

	FY 2024			FY 2023		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	NA	NA	Nil	NA	NA
Health & Safety	Nil	NA	NA	Nil	NA	NA

14. Assessments for the year

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

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

Not Applicable

LEADERSHIP INDICATORS

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

Yes, all employees and workers are covered under the health insurance and accident insurance. Further, the permanent employees are also covered under term life insurance. The insurance amount for all categories of employee and workers will be paid to the nominee in the event of death.

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

The Company ensures that statutory dues as applicable are deducted and deposited in accordance with the regulations. This activity is also reviewed as part of the internal and statutory audit. The Company expects its value chain partners to uphold business responsibility principles and values of transparency and accountability.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024	FY 2023	FY 2024	FY 2023
Employees	Nil	Nil	NA	NA
Workers	1	Nil	1	NA

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)

In certain cases, there can be an extension of employment for retired employees. No other transition assistance programs are available.

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	100%
Working Conditions	100%

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



We ensure sustainable growth of the Company meeting stakeholders' expectations and protecting their best interests. We have a dedicated stakeholder engagement plan along with various communication channels to gather insights of the stakeholder, address their concerns leveraging collective growth & development of the Company. We encourage open dialogue with stakeholders to operate the business in an ethical manner ensuring transparency, accountability and responsibility.

Uplifting of the marginalized and vulnerable groups in the nearby local communities where we operate is carried out through implementation of Corporate Social Responsibility (CSR) projects. To maintain cordial relationship with the stakeholders, a dedicated team with assigned roles and responsibilities along with appropriate procedures and practices for periodical review and track stakeholder engagement plan is in place.

ESSENTIAL INDICATORS

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

The stakeholders of the Company play an important role in achieving ESG related goals & targets and business resilience. Heubach has a robust stakeholder process which is developed considering the nature of business operations and associated activities. The internal and external stakeholder identification has been carried out based on their importance, influence, impact on performance and services of the Company. In order to identify the relevant stakeholder, we have developed a matrix prioritizing the key stakeholders. We ensure periodical coordination with all key stakeholders through various communication channels such as periodical meetings, surveys, consultations etc., to capture the valuable insights and expectations of the stakeholders to align with the business strategy of the Company.

- a. Stakeholder Identification:** The factors considered in stakeholder identification process includes impact, interest, legitimacy, influence, and criticality.
- b. Review Process:** The company periodically reviews and make necessary changes in the stakeholder identification process considering changes in business strategy, operations and applicable laws & regulations. Regular interaction with all stakeholders is carried out and feedback is taken in a timely manner for addressing their concerns.
- c. Channels of Communication:** Each stakeholder is consulted and communicated through various channels such as direct & virtual meetings, site visits, feedback surveys, focused group discussions, email communication and periodical meetings. An appropriate method is chosen considering the accessibility and the business needs.
- d. Frequency of Engagement:** The frequency of engagement may vary for each stakeholder group depending up on the needs and priorities that the company identifies through review process. The timeline for stakeholder engagement and consultation may include daily, weekly, quarterly, half-yearly and annually.

In order to ensure timely coordination with all key stakeholders, the company has assigned roles & responsibilities and method of engagement with each stakeholder. We have tailored stakeholder engagement programs specially designed considering the needs and requirements of each stakeholder. We also conduct regular awareness programs to our employees on stakeholder engagement process to understand and resolve the concerns of all key stakeholders.

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	No	Emails, meetings, notice board, website etc.	Monthly townhall meetings by MD, monthly cascade meetings by department leads	Purpose - Establish connect and sense of engagement within the employees. Key topics - Business performance, Key business updates, Challenges and achievements. Initiatives like - Employee engagement groups, HR Open House, Sales meets etc are also undertaken.
Suppliers and Vendors	No	Emails, meetings	Yearly	Company's policies, achievements, targets, sustainability improvements, business status & progress.
Regulatory and statutory bodies	No	Emails, meetings	As per the requirement	Statutory Compliances
Shareholders	No	All important information relating to the Company, its performance, shareholding pattern, quarterly results, press releases and other information as per the SEBI Regulations are regularly posted on Company's website and also forwarded to the Stock Exchanges. The quarterly, half-yearly and annual Financial results of the Company are published in newspapers. Annual Report is circulated to the shareholders. Annual General Meeting is conducted once a year.	Periodic & annually	Provide them the updates about the Company
Certifying and testing agencies	No	Email, meetings	Annually	Statutory Compliances
Communities	Yes	Email, meetings, focused group discussions	Monthly	Implementation of CSR initiatives and projects

LEADERSHIP INDICATORS

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

The consultation with the identified stakeholders of the Company is carried out by conducting periodical meetings through CSR and Risk Management committees. The board is updated on quarterly basis based on the inputs received from various stakeholders on economic, environmental and social topics for further decision making.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, the inputs from the identified stakeholders were captured through surveys for identification of ESG material issues and preparation of sustainability strategy of the Company on 4 pillars i.e. Economic Performance (Innovation, Production quality, Product Safety), Environment (CO2 emission, waste, sustainable products), Social (Health & safety, HR policy, Human Rights) and Corporate Governance (Code of Conduct, Compliance, Collaboration). The feedback received from internal and external stakeholders is considered in amending the company's policies and aligning with the business strategy.

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

The Company has dedicated Corporate Social Responsibility (CSR) committee to interact with vulnerable/ marginalized stakeholder groups and to identify the need-based CSR initiatives and projects. Based on the concerns of the vulnerable/marginalized stakeholder groups, the Company implements CSR initiatives and projects through its CSR policy.

Principle 5: Businesses should respect and promote human rights



We ensure zero tolerance towards discrimination, child labor, and forced labor across all business operations and value chain of the Company. Our responsible sourcing policy covers human rights aspects which should be adhered by all value chain partners associated with the company in performing various business activities. We create an inclusive environment by treating each and every individual with dignity, respect, equality and fairness regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights are intrinsic freedoms that every person has the right to exercise individually or collectively, without hindrance.

We organize regular training programs on human rights to all employees covering human rights related principles, best practices and grievance mechanism to report any human rights related violations. We strictly follow global standards on human rights such as Universal Declaration of Human Rights, International Labor Organization's (ILO) Fundamental Human Rights Conventions, and the UN's Guiding Principle on Business and Human Rights. In case of any violation of human rights such as health & safety, fair compensations, labor rights, working conditions and right to privacy, the aggrieved employee shall get an immediate resolution of the grievance through the grievance redressal mechanism.

ESSENTIAL INDICATORS

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

Category	FY 2024			FY 2023		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	235	235	100%	215	215	100%
Other than permanent	28	28	100%	18	18	100%
Total employees	263	263	100%	233	233	100%
Workers						
Permanent	269	269	100%	279	279	100%
Other than permanent	700	700	100%	405*	405	100%
Total workers	969	969	100%	684	684	100%

*In the FY 2023, the contractual workers hired by the third party agencies were not considered.

2. Details of minimum wages paid to employees and workers

Category	FY 2024					FY 2023				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
Employees										
Permanent	235	Nil	NA	235	100%	215	Nil	NA	215	100%
Male	201	Nil	NA	201	100%	193	Nil	NA	193	100%
Female	34	Nil	NA	34	100%	22	Nil	NA	22	100%
Other than permanent	28	Nil	NA	28	100%	18	Nil	NA	18	100%
Male	21	Nil	NA	21	100%	14	Nil	NA	14	100%
Female	7	Nil	NA	7	100%	4	Nil	NA	4	100%
Workers										
Permanent	269	Nil	NA	269	100%	279	Nil	NA	279	100%
Male	266	Nil	NA	266	100%	276	Nil	NA	276	100%
Female	3	Nil	NA	3	100%	3	Nil	NA	3	100%
Other than permanent	700	Nil	NA	700	100%	405	Nil	NA	405	100%
Male	666	Nil	NA	666	100%	369	Nil	NA	369	100%
Female	34	Nil	NA	34	100%	36	Nil	NA	36	100%

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/salary/ wages of respective category (₹ in Lakhs)	Number	Median remuneration/salary/ wages of respective category (₹ in Lakhs)
Board of Directors (BoD)	5	15.2	1	14
Key Managerial Personnel	Nil	NA	1	44.48
Employees other than BoD and KMP	199	10.70	33	11.93
Workers	266	6.69	3	4.13

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

	FY 2024	FY 2023
Gross wages paid to females as % of total wages	6.7%	6.2%

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

Yes

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

Yes, the Company has a Whistle Blower Policy applicable to all directors, officers, employees and third parties to report concerns on violation of human rights through a vigil mechanism, a secured reporting mechanism administered by the Chairman of the Audit Committee. The redressal of grievances related to human rights, if any, is overseen by the internal compliance committee. The Company has adopted internationally recognized standards, such as the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights and the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work to redress grievances related to human rights.

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

	FY 2024			FY 2023		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	3	Nil	Nil	Nil	Nil	NA
Discrimination at workplace	Nil	Nil	NA	Nil	Nil	NA
Child Labour	Nil	Nil	NA	Nil	Nil	NA
Forced Labour/ Involuntary Labour	Nil	Nil	NA	Nil	Nil	NA
Wages	Nil	Nil	NA	Nil	Nil	NA
Other human rights related issues	Nil	Nil	NA	Nil	Nil	NA

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

	FY 2024	FY 2023
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	3	Nil
Complaints on POSH as a % of female employees / workers	3.85%	NA
Complaints on POSH upheld	3	NA

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

The Company ensures the confidentiality on the matters pertaining to complainant in discrimination and harassment cases and have zero retaliation mechanism. Access and processing of data related to complainant are restricted to members of team investigating the matter and to those persons who are assigned the remediation processes.

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

Yes, the clauses related to human rights are included in the business agreements and contracts. All suppliers and service providers should accept the conditions related to human rights in the HCIL responsible sourcing policy prior to execution of business agreements and contracts.

10. Assessments for the year

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

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

Not Applicable

LEADERSHIP INDICATORS

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

Not Applicable. The existing policies, processes and mechanisms addresses all kinds of human rights related risks and there is no such requirement for business process modification.

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

None

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes

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	100%
Discrimination at workplace	100%
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Wages	100%
Others – please specify	NA

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



The production of pigments is associated with energy intensive processes and may have an impact on the climate change. To mitigate the climate change related risks, we have adopted sustainable initiatives in our operations which includes energy conservation through deployment of energy efficient equipment & processes, increasing the percentage of renewable energy in the total energy consumption and switching to cleaner fuels to reduce the carbon footprint of our products. We also promote circular economy by promoting recycling and reuse of waste generated from our operations and reducing the water consumption through optimization of water consumption across various equipment and processes.

We take environmentally conscious decisions in our business activities mitigating environmental related risks. As sustainability is deeply embedded in our business strategy, we achieve business resilience through our sustainable business practices by mitigating various climate change related physical and transition risks to the Company.

ESSENTIAL INDICATORS

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

Parameter	FY 2024	FY 2023
From renewable sources		
Total electricity consumption (A) (GJ)	40,446	Nil
Total fuel consumption (B) (GJ)	2,92,620	2,53,570
Energy consumption through other sources (C) (GJ)	Nil	Nil
Total energy consumed from renewable sources (A+B+C) (GJ)	3,33,066	2,53,570

Parameter	FY 2024	FY 2023
From non-renewable sources		
Total electricity consumption (D)	51,391	79,647
Total fuel consumption (E)	53,485	35,331
Energy consumption through other sources (F)	Nil	56,685
Total energy consumed from non-renewable sources (D+E+F)	1,04,876	1,71,663
Total energy consumed (A+B+C+D+E+F)	4,37,942	4,25,233
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations in crores)	554	554
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations in crores adjusted for PPP)	12,407	12,428
Energy intensity in terms of physical output	NA	NA
Energy intensity (optional) – the relevant metric may be selected by the entity	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.

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

Parameter	FY 2024	FY 2023
Water withdrawal by source (in kiloliters)		
(i) Surface water	Nil	Nil
(ii) Groundwater	2,85,149	2,29,553
(iii) Third party water	6,32,910	5,88,867
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	9,18,059	8,18,420
Total volume of water consumption (in kiloliters)	9,18,059	8,18,420
Water intensity per INR lakhs of turnover (Total water consumption / Revenue from operations in crores)	1,161	1,068
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/ Revenue from operations in crores adjusted for PPP)	26,008	23,920
Water intensity in terms of physical output	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity	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.

4. Provide the following details related to water discharged

Parameter	FY 2024	FY 2023
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) To Groundwater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA

Parameter	FY 2024	FY 2023
(iii) To Seawater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	2,29,475	2,07,424
(iv) Sent to third-parties		
- No treatment	NA	NA
- With treatment – please specify level of treatment	5,70,568	5,10,016
(v) Others		
- No treatment	NA	NA
- With treatment – please specify level of treatment	3,099	4,299
Total water discharged (in kilolitres)	8,03,142	7,21,739

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.

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

The Company is having 3 facilities in Roha, Nagda and Cuddalore. Among these 3 facilities, Nagda facility has implemented Zero Liquid Discharge Mechanism and in the remaining plants more than 80% of the water is being recycled.

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

Parameter	Please specify unit	FY 2024	FY 2023
NOx	Tons/year	5.49	1.59
SOx	Tons/year	5.42	4.16
Particulate matter (PM)	Tons/year	1.45	1.45
Persistent organic pollutants (POP)	-	NA	NA
Volatile organic compounds (VOC)	-	NA	NA
Hazardous air pollutants (HAP)	-	NA	NA
Others – please specify	-	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.

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

Parameter	Unit	FY 2024	FY 2023
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,475.6	1,550.24
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	10,428.1	11,578.75
Total Scope 1 and Scope 2 emission intensity per INR lakhs of turnover (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations in crores)		15.05	17.13
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations in crores adjusted for PPP)		337	384
Total Scope 1 and Scope 2 emission intensity in terms of physical output		NA	NA
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		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.

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

The Company has taken various initiatives for reducing greenhouse gas emission which comprises of

1. Renewable Energy:

- ▶ Solar power project has been commissioned at Roha site. Currently, 57% of the total electricity is at Roha site is being sourced from renewable sources.
- ▶ A hybrid model of sourcing renewable energy comprising of wind and solar energy was implemented for Cuddalore site. Around 40% of the total electricity at Cuddalore site is sourced from renewable sources.

2. Conservation of energy through optimization of steam consumption:

- ▶ Weekly monitoring of steam network is carried out and steps have been initiated to replace defective steam traps by leak tag system.
- ▶ Steam condensate reused to conserve energy.
- ▶ Target rationalized to reduce the steam consumption per ton of production.
- ▶ Regular Steam/Air Audits were conducted and identified areas for conservation of energy.
- ▶ Installed an additional spin flash dryer and membrane filter presses at Roha. This setup eliminated the need for steam consumption typically required by dryers and removed the need for compressed air for milling products dried in drying chambers, thereby further reducing steam consumption.

3. Conservation of energy through optimization of systems:

- ▶ Installed a valve bag auto packing machine at Roha, which optimized container loading for export and minimized energy consumption during the overseas transport of products.
- ▶ Reduction of frequency of Variable Frequency Drives (VFDs) for higher HP motor to get desired result without compromising quality and quantity.
- ▶ Replaced conventional lights by energy efficient LED lights across all facilities and offices.
- ▶ Old air conditioners (AC) being replaced by new energy efficient AC and usage has been optimized by setting timer for temperatures control.
- ▶ "Compressed Air audit" has been conducted on weekly basis.
- ▶ Replacing old motors by energy efficient motors to conserve energy.
- ▶ Replaced old-damaged roof sheets with adequate transparent sheets to achieve abundant natural light which in turn reduced the dependency on lighting system.
- ▶ Timer logic has been implemented for stirrer operations of noncritical equipment to conserve energy.
- ▶ VFD Based Air compressor has been installed to save electricity during load fluctuations.
- ▶ Use of Gravity flow for effluent handling instead of pumping to avoid energy consumption.
- ▶ Rearranged lighting switches from centralized to localized to switch off lights where not required.

4. Operational efficiency:

- ▶ Higher batch size wherever possible to conserve energy and resources.
- ▶ Reduction in drying time of tray dryers and RVDs by optimizing drying temperature to conserve energy resources and enhance operational efficiency.

5. Steps taken by the Company for utilizing alternate sources of energy:

- ▶ Use of higher calorific value LPG in place of Bio Diesel for hot air generator, which resulted in reducing carbon emission.
- ▶ Installation of solar water heater for restrooms at site to conserve energy.
- ▶ Switched to LSHS oil as fuel instead of furnace oil to reduce the emission of greenhouse gases.
- ▶ Cuddalore facility has switched from diesel to LPG fuel for spin flash dryers to reduce the greenhouse gas emissions.

9. Provide details related to waste management by the entity

Parameter	FY 2024	FY 2023
	Total Waste generated (in MT)	
Plastic waste (A)	126.35	108.63
E-waste (B)	Nil	Nil
Bio-medical waste (C)	Nil	Nil
Construction and demolition waste (D)	6.82	Nil
Battery waste (E)	Nil	Nil
Radioactive waste (F)	Nil	Nil
Other Hazardous waste. Please specify, if any. (G)	4,181.09	3,219.27
Other Non-hazardous waste generated (H). Please specify, if any.	1,971.40	1,343.74
Total (A+B + C + D + E + F + G + H)	6285.64	4,671.64
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations in crores)	7.95	6.09
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations in crores adjusted for PPP)	178.07	136.54
Waste intensity in terms of physical output	NA	NA
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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

Category of waste	FY 2024	FY 2023
	Total Waste generated (in MT)	
(i) Recycled	102.35	25.63
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	102.35	25.63

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

Category of waste	FY 2024	FY 2023
	Total Waste generated (in MT)	
(i) Incineration	48.18	298.82
(ii) Landfilling	2,179.17	1,390.2
(iii) Other disposal operations	4,058.31	2,956.99
Total	6,285.65	4,646.01

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.

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

Waste generated at manufacturing sites is segregated into various types based on composition and potential industrial applications. Waste is reused and recycled wherever possible and residual fraction of waste is safely disposed through waste management agencies authorized by the pollution control board.

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

Sl. 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.
1.	Plot No. 113/114 MIDC Dhatav Industrial Estate, Dhatav village, Roha Taluka, Raigad	Production	Yes

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
1 (d) schedule B-2 Category project (New Cogeneration Plant in the existing unit of the company in MIDC Dhatav	SEIAAEC-0000000510	November 6, 2018	Yes	Yes	https://ec.ecmpcb.in/login/download_ec_publicU0VJQUeU1RBVEVNRU5ULTAwMDAwMDA3NjN8U0VJQUeTUI0VRFUy0wMDAwMDAwNzlyfDE3NjQ=
5 (f) schedule B-1 Category synthetic organic chemical industry Kudikadu village, SIPCOT Industrial Complex, Cuddalore, Tamil Nadu	Letter No. SEIAA/TN/F 6462/5(f)/EC - 59/2017	April 16, 2018	Yes	Yes	https://environmentclearance.nic.in/auth/ECGeneral_Report.aspx?pid=42518

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

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
	Yes, the Company is compliant with all applicable laws, regulations and guidelines and there are no non-compliances in the reported period.			

LEADERSHIP INDICATORS

1. Water withdrawal, consumption, and discharge in areas of water stress (in kiloliters): Yes

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

- Name of the area: Cuddalore
- Nature of operations: Manufacturing of pigments
- Water withdrawal, consumption, and discharge:

Parameter	FY 2024	FY 2023
Water withdrawal by source (in kiloliters)		
(i) To Surface water	NA	NA
(ii) Groundwater	2,85,149	2,29,553
(iii) Third party water	39,409	52,605
(iv) Seawater / desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kiloliters)	3,24,558	2,81,258
Total volume of water consumption (in kiloliters)	3,24,558	2,81,258

Parameter	FY 2024	FY 2023
Water intensity per rupee of turnover (Water consumed / turnover in crores)	410.47	366.98
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA
Water discharge by destination and level of treatment (in kiloliters)		
(i) Into Surface water		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) Into Groundwater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iii) Into Seawater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	2,29,475	2,07,424
(iv) Sent to third parties		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(v) Others		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
Total water discharged (in kiloliters)	2,29,475	2,07,424

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency
No.

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

Parameter	Unit	FY 2024	FY 2023
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		
Total Scope 3 emissions per rupee of turnover		Not monitored	
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency
No.

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

Not Applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Sustainable pigment development	▶ Sustainable PCF and bio-based selected Azo & HPP product development for coating and plastic application	Resource conservation and reduces the environmental footprint of the products.
2.	Implementation of circularity in preparation of pigments for plastic industry	▶ Circular economy colour solution for pigments used in plastics industry. a. Detectable black b. PCR shade matching c. Re-cycle range d. Ok for compostable	Promotes recycling of materials
3.	Preparation of biodegradable pigment products	▶ Biodegradable colour solution to H&PC	Reduces environmental footprint of pigment products

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
4.	Resource conservation in the production process of pigments	▶ Mass coloration of Lyocell fibre for reducing water consumption	Water conserved through deployment of mass coloration for Lyocell fibres
5.	Utilization of renewable fuels	▶ Non-renewable fuels and high carbon emitting fuels are replaced with Biomass briquettes at Roha and Cuddalore facilities. ▶ 85% of the fuel for production of steam comprises of biomass briquettes.	Reduces greenhouse gas emissions from the operations of the Company.

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

The Company has a risk and emergency management system where a comprehensive assessment of risks related to the operations and products is carried out as a pre-requisite to business processes. Emergency management plan is in place to mitigate business continuity and disaster management related risks. The detailed process and mechanism is available in the Company's intranet.

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

Not Applicable

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

None

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



We associate with various industrial associations and make a collaborative effort for overall growth and success of the pigment manufacturing industry. We play an instrumental role in representing the risks hampering the long-term growth and success of the pigment industry. Our business policies, procedures and practices are in a responsible, ethical and transparent manner in line with the compliance requirements. Our operations and business activities are performed with honesty and integrity aligning with the business strategy of the company.

Our robust governance framework ensures highest ethical standards and responsible business decisions adhering to all legal and regulatory requirements. We actively engage with industrial associations, institutions, and organizations, both Governmental and non-Governmental, that are involved in formulation of policies or influence policy-formulation and business-related decisions.

ESSENTIAL INDICATORS

1. a. **Number of affiliations with trade and industry chambers / associations: 2**
- b. **List the top 10 trade and industry chambers / associations (determined based on the total members of such body) the entity is a member of / affiliated to.**

Sl. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	The Bombay Chambers of Commerce	State
2.	Indian Chemical Council	National

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

Name of Authority	Brief of the case	Corrective action taken
Not Applicable		

LEADERSHIP INDICATORS

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

Sl. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others - please specify)	Web Link, if available
Nil					

Principle 8: Businesses should promote inclusive growth and equitable development



We strive for inclusive growth and equitable development through implementation of Corporate Social Responsibility (CSR) programs and uplifting of marginalized and vulnerable groups in nearby local communities where we operate. Our CSR strategy is built upon three fundamental pillars which comprises of goodwill, compliance and impact. The Company’s prime focus in designing and implementing CSR programs are providing education, development of infrastructure, creating livelihood opportunities, providing necessary healthcare support and development of forestry through plantation drives.

We have a dedicated CSR policy and committee to implement CSR related projects and to address grievances of local communities. Our CSR projects are in line with the Sustainable Development Goals (SDGs) creating positive impact, enduring economic growth and social value in the local communities where we operate.

ESSENTIAL INDICATORS

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

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

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

Sl. No.	Name of project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY 24 (in INR)
Not Applicable						

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

The CSR committee periodically interacts with the communities to receive and redress grievances. The communities can also communicate their grievances to site level CSR team or to the corporate office via email. The site level team also regularly communicates with key stakeholders from the surroundings communities. The CSR team also implement necessary initiatives and projects through its CSR policy redressing the grievances of the communities.

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

	FY 2024	FY 2023
Directly sourced from MSMEs/ small producers	5%	14%
Directly from within India	78.38%	72.65%

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

Location	FY 2024	FY 2023
Rural	Nil	Nil
Semi-urban	36%	45%
Urban	10%	15%
Metropolitan	54%	40%

LEADERSHIP INDICATORS

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Not Applicable	

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

Sl. No.	State	Aspirational District	Amount Spent (in INR)
Not Applicable			

3.

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

No

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

Not Applicable

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

Not Applicable

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

Sl. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not Applicable				

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

Name of authority	Brief of the Case	Corrective action taken
Not Applicable		

6. Details of beneficiaries of CSR Projects:

Sl. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1.	Infrastructure development in schools	6,000	100%
2.	Conducted health camps	5,000	100%
3.	Skill development by conducting training programs on tailoring	2,000	100%
4.	Provided vehicles for collection and transportation of waste	2,000	100%
5.	Construction of mobile washrooms in villages	1,000	100%

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



We continuously invest in developing new products and enhancing the quality of our existing products meeting the customers' expectations. We deliver the valuable products to our customers which are more sustainable and responsible towards environment facilitating customers to make environmentally conscious decisions.

The Company has adopted robust Quality Management System (QMS) and ensures stringent quality parameters across all its product portfolio. All our products meet the respective quality standards of pigment industry. We ensure exceptional customer services by delivering personalized and top-tier assistance in a timely manner addressing their concerns.

ESSENTIAL INDICATORS

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

The customer complaints are handled through QNS system in SAP Database. The Company is having online customer complaints register and evaluation system is connected in System Application and Product Database. All registered complaints are shared with applicable area owner & quality managers who would analyze it and share the solutions with concerns. All these complaints are in reference with the quality safety, transportation issue, packing issue, environment issue, dispatch issues.

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

State	As a percentage to total turnover
Environmental and social parameters relevant to the product	
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	

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

	FY 2024			FY 2023		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	NA	NA	Nil	NA	NA
Advertising	Nil	NA	NA	Nil	NA	NA
Cyber-security	Nil	NA	NA	Nil	NA	NA
Delivery of essential services	26	2	Nil	78	Nil	NA
Restrictive trade practices	Nil	NA	NA	Nil	NA	NA
Unfair trade practices	Nil	NA	NA	Nil	NA	NA
Others	Nil	NA	NA	Nil	NA	NA

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

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

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

No. Currently, the Company do not have framework/policy on cyber security and risks related to data privacy. The Company is in process to implement such policies.

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

Nil

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches

Nil

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

Nil

c. Impact, if any, of the data breaches

Nil

LEADERSHIP INDICATORS

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

Information on all products of Company is available on the website of the Company. Information can be accessed through the weblink <https://www.heubach.com/products/>.

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

Every consignment has been provided with necessary product details, Material Safety Data sheets (MSDS) which elaborates details on safe usage of various products manufactured by the Company.

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

Any disruptions in supply of products will be informed to customers on priority basis through sales team located across India.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

No