

August 07, 2024

<b>The BSE Ltd.</b> 1 <sup>st</sup> Floor, New Trading Wing, Rotunda Building Phiroze Jeejeebhoy Towers, Dalal Street, Fort Mumbai – 400001 <b>Scrip Code: 532884</b>	<b>The National Stock Exchange of India Ltd.</b> Exchange Plaza, 5 <sup>th</sup> Floor, C – 1, Block G Bandra – Kurla Complex, Bandra (E) Mumbai – 400051 <b>Symbol: REFEX</b>
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Dear Sir / Madam,

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

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report for the Financial Year 2023-24, which forms part of the Annual Report for the Financial Year 2023-24 on voluntary basis.

You are requested to take above information on record.

Kindly take the same on record.

Thanking you.

Yours faithfully,  
For **Refex Industries Limited**

**Ankit Poddar**  
Company Secretary and Compliance Officer  
ACS-25443

**Refex Industries Limited**  
A Refex Group Company

CIN: L45200TN2002PLC049601

# Business Responsibility & Sustainability Reporting

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity - L45200TN2002PLC049601
2. Name of the Listed Entity - REFEX INDUSTRIES LIMITED
3. Year of incorporation - 2002
4. Registered office address - 2<sup>nd</sup> Floor, No.313, Refex Towers, Sterling Road, Valluvar Kottam High Road, Nungambakkam, Chennai, Tamil Nadu, India, 600034
5. Corporate address - 2<sup>nd</sup> Floor, No.313, Refex Towers, Sterling Road, Valluvar Kottam High Road, Nungambakkam, Chennai, Tamil Nadu, India, 600034
6. E-mail - investor.relations@refex.co.in
7. Telephone – 044 – 4340 5900
8. Website - www.refex.co.in
9. Financial year for which reporting is being done – 2023-24
10. Name of the Stock Exchange(s) where shares are listed – Bombay Stock Exchange and The National Stock Exchange of India Limited
11. Paid-up Capital – ₹23,13,62,780/-
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report.  
Mr. Gagan Patnaik, Head ESG and Sustainability, mail: gagan.p@refex.co.in, Phone: 7358666474
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).  
Disclosures made in this report are on a consolidated basis.
14. Name of assurance provider - TUV India Private Limited
15. Type of assurance obtained: limited Assurance (ISAE 3000, Revised)

## II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Coal & Ash handling	Facilitation of coal and disposal service of coal ash to the thermal power plants.	68.38%
2	Power Trading	Transmission of electric energy	20.31%
3	Refrigerant Gas	Refilling and sales	5.23%

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Coal & Ash handling	46610	68.38%
2	Power Trading	35107	20.31%
3	Refrigerant Gas – (Refilling) and sales		5.23%

## III. Operations

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

Location	Number of plants	Number of offices	Total
National	1	6	7
International	0	0	0

### 19. Markets served by the entity:

#### a) Number of locations

Locations	Number
National (No. of States)	21 States and 4 UT
International (No. of Countries)	0

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

Not applicable as no export.

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

The majority of customers are industrial entities where we provide products and services. For our refrigerant business, our customers are both industrial and retail consumers. Our coal and ash handling business provides service to thermal power plants for both Independent Power Producer (IPP) and Captive Power Producer (CPP) across India. For the Refex Green Mobility Services, we provide commuting services in business to business (B2B) model as well as business to consumer (B2C) model.

#### IV. Employees

##### 20. Details as of the end of the Financial Year: (FY 2023-24)

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

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	165	133	81%	32	19%
2.	Other than Permanent (E)	41*	41	100%	-	-
3.	Total employees (D + E)	206	174	85%	32	15%
<b>WORKERS</b>						
4.	Permanent (F)	18	16	89%	2	11%
5.	Other than Permanent (G)	10**	10	100%	NIL	--
6.	Total workers (F + G)	28	26	93%	2	7%

\*Employees who are with direct fixed term contract with RIL.

\*\*Workers who are with direct fixed term contract with RIL.

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

We have zero number of differently-abled employees and workers in this financial year (FY2023-24).

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

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	6*	2	33.33%
Key Management Personnel	3*	2	66.67%

\*Note: Mr. Anil Jain has been counted under both the Board of Directors and Key Management Personnel.

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

(Disclose trends for the past 3 years)

	FY23-24 (Turnover rate in current FY)			FY22-23 (Turnover rate in previous FY)			FY21-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	22%	45%	67%	6%	13%	20%	10%	6%	16%
Permanent Workers	0%	0%	0%	0%	0%	0%	0%	0%	0%

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

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Refex Green Mobility Limited (RGML)	Wholly-owned subsidiary company	100%	Yes
2.	Refex EV Fleet Services Private Limited (formerly known as O3 Mobility Private Limited)	Subsidiary company	49.99%*	Yes

\*Note: As per Shareholders' Agreement, dated September 28, 2023, RGML controls the composition of majority of the Board of Directors of Refex EV Fleet Services Private Limited, hence, as per Section 2(87) of the Act, it becomes subsidiary of RGML.

## VI. CSR Details

### 24. Whether CSR is applicable as per section 135 of the Companies Act, 2013: (Yes/No) – Yes

- i. Turnover (in ₹) 1,62,914.96 in Lakhs\*
- ii. Net worth (in ₹) 31,439.65 in Lakhs\*

Amount pertains to FY 2022-23 as the criteria for determining CSR contribution is calculated based on the PY's Turnover, Net Worth and Net Profit.

## VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom the complaint is received	Grievance Redressal Mechanism in Place (Yes/No), (If Yes, then provide web-link for the grievance redress policy)	FY2023-24 Current Financial Year			FY2022-23 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	Nil	Nil	-	Nil	Nil	-
Investors (other than shareholders)	Yes	Nil	Nil	-	Nil	Nil	-
Shareholders	Yes	Nil	Nil	-	Nil	Nil	-
Employees and workers	Yes	2	Nil	Resolved	Nil	Nil	-
Customers	Yes	Nil	Nil	-	Nil	Nil	-
Value Chain Partners	Yes	Nil	Nil	-	Nil	Nil	-
Other (please specify)	Yes	Nil	Nil	-	Nil	Nil	-

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Legal & regulatory compliance	R	Noncompliance poses a risk to business	Proactive compliance and tracking	N
2	Systemic Risk Management	O	Opportunity to reduce/manage risk		P
3	Governance & Business Ethics	R/O	Noncompliance is a risk and good governance is an opportunity	An efficient governance mechanism is in place	P
4	Economic Performance	O	Opportunity to leverage and ensure growth	-	P
5	Health & Safety	R	Poor health and safety performance is a hindrance to growth	OHSMS ISO 45001 implemented and certified	N
6	Human Capital Development & Engagement	O	To consolidate further to ensure growth	-	P
7	Global Warming & Climate Strategy	R/O	Risk to business without having a strategy for business resilience and climate risk. A robust strategy and implementation is an opportunity	Resilience plan, Carbon reduction and net zero strategies developed and implemented	N/P
8	Energy Management	O	Enhance operational efficiency and cost savings	-	P
9	Water & Wastewater Management	R	Water scarcity is a threat to business	Strategy and action in place to be water-positive by 2035	N
10	Waste Management & Circularity of Materials	R/O	Poor waste management is a risk and circularity of material is an opportunity	EMS ISO 14001 implemented and certified with comprehensive waste management	P
11	Opportunities in Clean Technology	O	Big opportunity to leverage as a result of action on climate change	-	P
12	Ecological Impact, Biodiversity, and Land use	R	Rehabilitation of abandoned mines for ash handling business	Ecosystem restoration and plantation drive	N
13	Climate Strategy (Climate adaptation, resilience, and transition)	R/O	Without having a strategy is a risk and a robust strategy and implementation is an opportunity	Climate strategy with net zero target in place.	P

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	-	Y	Y
c. Web Link of the Policies, if available	<a href="https://www.refex.co.in/investors-information.php">https://www.refex.co.in/investors-information.php</a> and <a href="https://www.refex.group/esg/">https://www.refex.group/esg/</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	N	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	NA	Y	Y
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your - entity and mapped to each principle.	National Code on Corporate Governance and Regulation 17 to 27 read with clauses (b) to (i) and (t) of sub-regulation (2) of Regulation 46 and para C, D and E of Schedule V of SEBI (LODR), 2015 ISO 14001 and ISO 45001 ISO 45001 IIRC IR Principle Indian Labor Codes ISO 14001 - IIRC IIRC								
ESG Goals and Objectives									
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<ul style="list-style-type: none"> <li>i. Climate Change: Refex Industries Limited (RIL) aspires to be Net Zero by 2040 for Scope 1 and Scope 2 Emission.</li> <li>ii. Water Stewardship: RIL operations to be water positive by 2035.</li> <li>iii. Ecosystem Restoration: Pledged to plant and nurture 10,00,000 native species by 2035.</li> <li>iv. Renewable Energy: Refrigerant business to be run on 100 % on renewable solar energy by FY 2024-25 onwards.</li> <li>v. Waste Management: 100 % solid waste recycling/reuse from our operations by 2025 and beyond</li> <li>vi. Zero Harm: Achieving and maintaining zero harm for RIL Operations.</li> <li>vii. Mental Wellbeing: Promoting mental well-being among employees covering 100 % of the employees to go through the awareness program.</li> <li>viii. Diversity: Increase women's representation in our workforce to 15 % over the next 2 years.</li> <li>ix. Sustainable Supply Chain: 100 % ESG assessment on active Tier 1 value chain partners by FY2024-25.</li> <li>x. Grievance Mechanism: Comprehensive implementing of the company's grievance policy and timely resolution of all grievances and complaints.</li> </ul>								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Performance of each of the principles is reviewed periodically by various Committees led by the Management and Board of Directors and it met previous financial years' target. The details are available in Refex Group Sustainability Report for FY2023-24.								

## 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)

We Refex Industries Limited (RIL) are pleased to present our Second Business Responsibility and Sustainability Report (BRSR), which outlines our commitment to the nine principles of the National Guidelines on Responsible Business Conduct (NGRBC) in India. As a responsible and sustainable business, we believe it is essential to adhere to these guidelines to ensure the well-being of all our stakeholders.

At RIL, we are committed to creating sustainable value for all our stakeholders, including customers, employees, suppliers, communities, and the environment. We have taken significant steps to implement these principles across our operations, and we are continuously striving to improve our practices. We have developed a comprehensive Sustainability Framework that guides our business decisions, and we regularly measure our performance against industry benchmarks and international standards.

We are committed to engaging with our stakeholders to understand their needs and concerns, and we work closely with them to address any issues that may arise. We believe that open communication and collaboration are essential to building trust and creating sustainable value for all.

Environmental, social, and governance (ESG) issues are critical to the long-term success of our business and society. We recognize the importance of ESG megatrends and challenges such as climate change, resource depletion, inequality, diversity and inclusion, and ethical behavior. As a responsible business, we are committed to reducing our environmental impact, promoting sustainable practices, and conserving natural resources. We also prioritize the well-being of our employees, suppliers, customers, and the communities in which we operate, by promoting a safe, healthy, and inclusive workplace, ensuring ethical and sustainable practices in our supply chain, and contributing to community development. Additionally, we maintain strong governance practices, promoting transparency, accountability, and ethical behavior throughout our operations.

Although BRSR is not mandatory for us at this moment, we are pleased to disclose our ESG performance voluntarily for the second consecutive year through this BRSR framework demonstrating corporate citizenship, business ethics & integrity, and responsibility towards society and the environment.

- 8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies). Anil Jain, Managing Director  
Refex Industries Limited.
- 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, RIL has The CSR Committee of the Board. The composition of the Committee is given hereunder:

Composition of CSR Committee:

S. No.	Name of the Director	Designation	Category
1	Ramesh Dugar	Independent Director	Chairman
2	Dinesh Kumar Agarwal	Non-Executive Director	Member
3	Anil Jain	Managing Director	Member

## 10. Details of Review of NGRBCs by the Company:

Subject for review	Indicate whether review was undertaken by Director / Committee of the Board/Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Performance evaluation is done quarterly in each financial years against the set goals and objectives.									Quarterly								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	There was a minor non-compliance under Regulation 33 of SEBI LODR Regulations, the Company was imposed a fine of Rs. 59,000/- for delayed submission of Consolidated Limited Review Report during the Quarter ended June 30, 2023.									-								



11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

P1	P2	P3	P4	P5	P6	P7	P8	P9
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An Independent assessment has been carried out for the financial results. Independent assessment of ESG data has been carried out by TUV India Private Limited. Assessment of all other policies and procedures pertaining to various management systems (QHSE, GHG Protocols) has been done in this financial year by TUV India.

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)	-	-	-	-	-	-	Y	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)	-	-	-	-	-	-	-	-	-

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

### PRINCIPLE 1

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

#### Essential Indicators

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

Segment	Total Number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	4	Discussion on SEBI (PIT) Regulations, 2015, SEBI (LODR) Regulations, 2015, SEBI (SAST) Regulations, 2011, SEBI (SEBI SBEB&SE) Regulations, 2021 and relevant amendments & Circulars thereon	100
Key Managerial Personnel	4	Discussion on SEBI (PIT) Regulations, 2015, SEBI (LODR) Regulations, 2015, SEBI (SAST) Regulations, 2011, SEBI (SEBI SBEB&SE) Regulations, 2021 and relevant amendments thereon	100
Employees other than BOD and KMPs	140	Company Policies, POSH, Employee's well-being at the workplace, Environment Health and Safety Practices etc.	100
Workers	14	Workplace safety and environment management	100

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

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	1	BSE Limited	₹59,000/-	Under Regulation 33 of SEBI LODR Regulations, the Company was imposed a fine of Rs. 59,000/- for delayed submission of Consolidated Limited Review Report during the Quarter ended June 30, 2023 whereas the Company had filed only the revised Consolidated Limited Review Report per the instructions of BSE.	Yes, the Company had sought for waive-off on the fine imposed and the same was approved by the Exchange.
Settlement					
Compounding fee					
Non-Monetary (None), there are no cases of imprisonment and punishment.					

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
1 Imposition of fine by BSE and further waived off	BSE Limited

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

Yes, Refex Group of Company has the ABAC policy which is abiding for RIL also. Please refer to <https://www.refex.group/wp-content/uploads/2023/02/Signed-ABAC-Policy.pdf>

RIL has a policy of 'zero tolerance' of any practice that may be classified as corruption, bribery or giving or receipt of bribes. This policy is applicable to all individuals working at all levels and grades, including Board Members, Executive Directors and Senior Managerial Personnel (Senior Officers), Supervisory, Executive, consultants, interns, contractors, agency staff, agents or any other person associated with our Company and such person acting on behalf of the Company.

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

None, no complaints were received in relation to the conflict of interest of the Directors and KMPs to the best of our knowledge.

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

None

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.

None

8. Number of days of account payable  $[(\text{Account Payable} \times 365) / \text{Cost of goods/services procured}]$  in the following format.

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Number of days of account payable	37.87	34.62

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:

Parameters	Metrics	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Concentration of purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA

### Leadership Indicators

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

Total number of awareness Programs held	Topics/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programs
10	Statutory Audits and Regulatory Requirements, Company policies, POSH.	100 % for the significant value chain partners who collectively contribute more than 50 % of the overall value.

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.

During the induction of new board members, the company secretariat runs the general briefing and induction on board member statutory duties, conflict of interest, and the necessity to report it voluntarily and also on related party transactions.

## PRINCIPLE 2

**Businesses should provide goods and services in a manner that is sustainable and safe**

### Essential indicators

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

	FY23-24 (Current Financial Year)	FY22-23 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	0	-	-
Capex	89.71%	11.64 %	Procurement of BS VI hauling vehicles that enhances coal ash disposal efficiency, emission control & pollution prevention, GHG emission reduction, Procurement of EV vehicles for refex green mobility business that ensures reduction of GHGs and tailpipe emissions.

2. a. Does the entity have procedures in place for sustainable sourcing?

The Company has a procedure for sustainable sourcing where all the new and existing supply chain partners are being evaluated on environment, health & safety, and sustainability parameters before onboarding which is a mandatory requirement. Also, supplier/vendor COC covers EHS and human Rights parameters to strictly abide with and is a requisite for the value chain partners to sign this document which is a part of contract documents (Purchase Order/Work Order).

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

Not available.

3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste, and (d) other waste.

- a. The Company does not have any specified product to reclaim at the end of life except refrigerant cans which it is not possible to reclaim from the retail consumers. As these are metallic cans, they are sold along with other cans to the recyclers. For industrial consumers, they have their recycling process and it is easy to recycle being non-toxic and metal with economic value

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.

EPR is not applicable.

### Leadership Indicators

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

No, we have not conducted LCA of any of our products or services.

2. If there are any significant social or environmental concerns and/or risks arising from the 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.

Not applicable as no LCA was carried out.

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).

Not applicable as we do not manufacture any product. However, our coal ash business provides service to thermal power plants to maximise the recycling of coal ash through cement manufacturing, brick manufacturing, and in road construction.

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:

The Company does not have any specified product to reclaim at the end of life except refrigerant cans which it is not possible to reclaim from retail consumers. As these are metallic cans, they are sold along with other cans to the recyclers. Industrial consumers of our refrigerant cans, they have their own recycling process and it is easy to recycle being non-toxic. However, the waste material generated at the operation and project sites is reused, recycled, and disposed of as per the applicable regulatory requirements.

	FY23-24 (Current Financial Year)			FY22-23 (Previous Financial Year)		
	Re-used	Re-cycled	Safely Disposed	Re-used	Recycled	Safely disposed
Plastics (including packaging)	-	260 kg	-	-	97 Kg	
E-waste	-	0	-	-	180 Kg	
Hazardous Waste	-	3012 kg	-	-	131 Kg	223kg
Other Waste		11725 kg	1204 kg (Food waste)	-	8691 Kg	1400kg (Food waste)

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

Not applicable.

### PRINCIPLE 3

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

#### Essential Indicators

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

Category	Total (A)	% of employees covered by									
		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	133	133	100%	Covered in Health Insurance	100	NA	-	Leave Benefits	-	Nil	-
Female	32	32	100%	Covered in Health Insurance	100	Covered in Health Insurance	100%	NA	-	NIL	-
<b>Total</b>	<b>165</b>	<b>165</b>	<b>100%</b>	<b>Covered in Health Insurance</b>	<b>100</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

#### Other than Permanent employees

Male	41	41	100%	Covered in Health Insurance	100	NA	-	Leave Benefits	-	Nil	-
Female	-	-	100%	Covered in Health Insurance	100	Covered in Health Insurance	100%	NA	-	NIL	-
<b>Total</b>	<b>41</b>	<b>41</b>	<b>100%</b>	<b>Covered in Health Insurance</b>	<b>100</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>Nil</b>	<b>-</b>

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

Category	Total (A)	% of workers covered by									
		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	16	16	100%	Covered in Health Insurance	100	NA	-	Leave Benefits	-	NIL	-
Female	2	2	100%	Covered in Health Insurance	100	Covered in Health Insurance	100%	NA	-	NIL	-
Total	18	18	100%	Covered in Health Insurance	100						
Other than Permanent workers											
Male	10	10	100%	Covered in Health Insurance	100	NA	-	Leave Benefits	-	-	-
Female	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>10</b>	<b>10</b>	<b>100</b>	<b>Covered in Health Insurance</b>	<b>100</b>						

- c. Spending on measures toward the well-being of employees and workers (including permanent and other than permanent. The detailed spending amount is under review and will be available in the next financial year in the requisite formats.

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

Benefits	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100	Y
Gratuity	100%	100%	Y	100%	100	Y
ESI	100%	100%	Y	100%	100	Y
Others	None	None	None	None	None	None

## 3. Accessibility of workplaces

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

Yes, the Company's permanent office building and rented office locations are accessible to differently-abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.



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

Yes, we have an equal opportunity policy as part of our overall HR policy as per the Rights of Persons with Disabilities Act, 2016.

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	100	100
Female	100	100	100	100
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes. We have a comprehensive grievance redressal mechanism for the Refex group of companies including Refex Industries Limited. Anyone can reach out to us through emails, WhatsApp messages, and or directly meet the Plant Head or Project manager to complain.
Other than Permanent Workers	
Permanent Employees	We have a dedicated HR email ID (hrsupport@refex.co.in) where employees can directly lodge their complaints and query. Also, nominated HR personnel are there to look after the employees' grievances and to report to CHRO to resolve them.
Other than Permanent Employees	

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

Category	FY 23-24 (Current Financial Year)			FY 22-23 (Previous Financial Year)		
	Total employees / Worker in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total Employee / 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	165	0	0	90	0	0
Male	133	0	0	73	0	0
Female	32	0	0	17	0	0
Total Permanent Workers	18	0	0	8	0	0
Male	16	0	0	8	0	0
Female	2	0	0	0	0	0

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

Category	FY 23-24 Current Financial Year					FY 22-23 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No.(C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	174	108	62	NA	NA	115	63	55	46	40
Female	32	22	68.7	NA	NA	32	28	88	16	50
<b>Total</b>	<b>206</b>	<b>130</b>	<b>63</b>	<b>NA</b>	<b>NA</b>	<b>147</b>	<b>91</b>	<b>61</b>	<b>62</b>	<b>42</b>
<b>Workers</b>										
Male	26	12	46	NA	NA	13	13	100	13	13
Female	2	2	100	NA	NA	0	NA	NA	NA	NA
<b>Total</b>	<b>28</b>	<b>14</b>	<b>50</b>	<b>NA</b>	<b>NA</b>	<b>13</b>	<b>13</b>	<b>100</b>	<b>13</b>	<b>100</b>

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

Category	FY23-24 (Current Financial Year)			FY22-23 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	133	133	100%	115	100	86%
Female	32	32	100%	32	23	71%
<b>Workers</b>						
Male	16	16	100%	13	9	69%
Female	2	2	100%	0	NA	NA

## 10. Health and safety management system:

- Whether an occupational health and safety management system has been implemented by the entity? (Y/N). If yes, the coverage of such system  
Yes, Refex Industries Limited has an Occupational Health and Safety Management System (OHSMS) conforming to ISO 45001:2018 which has been successfully implemented and has covered 100 % of its operations, facilities, and offices
- What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?  
The Company has developed and implemented standard operating procedures (SOP) in line with ISO 45001:2018 to identify and control work-related hazards on a routine and non-routine basis. In our manufacturing unit and operations sites, this SOP is followed to identify risk and to implement control measures by the operation heads. They have to document the entire process which has been audited from time to time by internal auditors and also, 3rd party external auditors.
- Whether you have processes for workers to report work-related hazards and to remove themselves from such risks.  
Yes, the Company has processes for workers to report work-related hazards and to remove themselves from such risks.
- Do the employees/ workers of the entity have access to non-occupational medical and healthcare services?  
Yes, first aid facilities are available for both employees and workers. We also have a tie-up with various medical service facilitators through the insurance providers to address medical emergencies and routine check-ups.

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

Safety Incident/Number	Category	FY23-24 (Current Financial Year)	FY22-23 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	1.49
	Workers	0.76	-
Total recordable work-related injuries	Employees	0	1
	Workers	1	0
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

We have a mission of “zero harm” in place with our dedicated health and safety policy, where we are committed to providing a safe workplace to our employees and workers. This is a mission where we envisage zero harm to property, people, and the planet. This has been accomplished through developing and implementing the occupational health and safety management system (OHSMS). In compliance with the implemented OHSMS ISO 45001:2018, it is mandatory to identify health and safety risks at the workplace and to lay down control measures. Regular awareness and skill training are provided to the workforce to implement and monitor safe working practices and rectify any shortcomings to ensure a safe workplace. Regular internal and external audits are conducted to see the effectiveness of our OHSMS management system and the outcome is reported to the management for further input to ensure continual improvement.

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

	FY 23-24 (Current Financial Year)			FY 22-23 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working Conditions Health & Safety	No significant complaints were received during this reporting and the previous financial year. Day-to-day observations and regular verbal complaints are addressed immediately and we do not record them. Only formal complaints which are raised officially through the dedicated grievance email, WhatsApp number, and complaint/suggestion box are officially recorded.					

14. Assessments for the year:

	% of your plants and offices that were assessed (by the entity or statutory authorities or third parties)
Health and safety practices Working Conditions	100 %. Reflex Industries Limited has comprehensive Internal audit procedures in line with Occupational Health and Safety Management System ISO 45001:2018 requirements. The scope of the audit covers all offices, manufacturing units, operation sites, and other facilities. A minimum of one internal audit is conducted in a financial year for all such operation sites/manufacturing units/offices.

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.

In line with the Company's zero harm mission, a review of all accidents and incidents and root cause analysis is done to initiate corrective and preventive action. Any significant incident or near-miss incident which has the potential to be a major incident/accident is duly investigated and addressed as appropriate. In our green mobility operations, we witnessed frequent road accidents by our drivers and we conducted a comprehensive root cause analysis and found that these accidents are causing as a result of rash driving. We initiated mandatory defensive driving and vehicle training. Simultaneously we have been monitoring rash driving through technological integration and training, award and disciplinary actions are being taken. This has been resulted in significant reduction in the accident frequency rate.

#### Leadership indicators

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

The Company extends life insurance coverage for work-related deaths of its employees and workers.

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

Strict adherence to the applicable statutory provisions including payment and deduction of statutory dues is included in the contract agreement and work orders with the value chain partners. The Company makes sure that all the relevant statutory dues and compliance requirements are honored by both parties.

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:

Not applicable as we have zero cases of high-consequence work-related injury / ill-health / fatalities in the current and previous reporting periods.

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?

The Company provides transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement after long service only.

5. Details on assessment of value chain partners:

We have not conducted any specific assessment for the value chain partners on health and safety practices but regular monitoring, inspection, and audits were carried out on all the active vendors and subcontractors who worked with us in this financial period. We have covered 100 % of such value chain partners for the reporting period.

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 such significant risks/risks identified.

## PRINCIPLE 4

### Businesses should respect the interests of and be responsive to all its stakeholders

#### Essential Indicators

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

Based on our business model, the products and services, the geographical area that we serve, and the community and environment where we do our business, we have classified our entire stakeholders into external and internal stakeholders. For internal stakeholders, we consider our employees and the subcontractors as our internal stakeholders and our customers, clients, regulatory bodies, media, suppliers value chain partners and community members are the important external stakeholders. In the previous reporting financial year, we conducted a stakeholder engagement and materiality assessment exercise to identify our stakeholders, to engage with them, and to conclude the material topics for us in collaboration with the E&Y consulting firm. We followed the 5 steps process of stakeholder engagement suggested by BSR® (BSR® is a sustainable business network and consultancy).

#### 2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as a Vulnerable & Marginalized Group (Yes/No)	Channels of Communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders and investors	No	Press releases, dedicated email ID for Investor grievances, quarterly results, annual reports and corporate website.	As and when required	To understand their need and expectations which are material to us. Key topics are the company's financial and ESG performance, etc.
Media	No	Press releases, quarterly results, annual reports, AGM (shareholders interaction), and media interactions.	As and when required	Performance reporting, good practices, showcases, awards and achievements, initiatives, etc are discussed and reported
Customers	No	Business interactions, client satisfaction surveys	Quarterly	Customer satisfaction and feedback.
Government	No	Press Releases, Quarterly Results, Annual Reports, Stock Exchange filings, issue-specific meetings etc.	As and when required	Reporting requirements, statutory compliance, support from authority, and resolution of issues.
Employees	No	Townhall address Circular, messages from corporate and line management Corporate social initiatives and volunteering Welfare initiatives for employee and their families Internal news bulletins	Different frequencies for different topics from daily, monthly, and quarterly to a need basis	Employee growth and benefits, their expectation, volunteering, career growth, professional development, continuing education and skill training, etc.
Suppliers/ contractors	No	Meetings, mails, and phone calls	As and when required	ESG awareness & due diligence, training, regulatory compliance, and EHS performance evaluation etc.
CSR Beneficiaries (Community)	Yes	Direct engagement and through our CSR project implementation partner (NGO)	As and when required	Need and impact assessment, beneficiary feedback and complaints etc.

## 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 Company has set up a CSR committee and other committees as required under The Companies Act 2013 and SEBI's LODR on economic & ESG governance and for performance monitoring. The CSR committee is chaired by an executive board member too who oversees the progress in CSR and Sustainability and ESG. Quarterly performance updates and reviews were conducted by the respective committees on these topics and consolidated performance reports and outcomes are presented to the Board in their quarterly meetings. Also, the Company has been conducting stakeholder engagement exercises from time to time on ESG topics. The outcome of the recent stakeholder engagement exercise that was conducted in the previous financial year (FY2022-23) was presented to the board in this financial year

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, in the previous financial year (FY2022-23) we conducted our first stakeholder engagement and materiality assessment exercise and the outcome of this exercise was taken forward to identify the material topic of concern on social, economic, and environmental matters for the company. Based on this discussion, their need and expectation which is a risk or an opportunity to the company, and thus key material topics on ESG parameters are identified. Based on this materiality, further strategy development, policy setting, objectives, and goal setting with monitoring mechanisms were developed and implemented.

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

From time to time, we engage with our CSR beneficiaries which are from the vulnerable/ marginalized stakeholder groups to evaluate the impact and success of our programs. Also, engagement with members of this group has been considered in our recently concluded stakeholder engagement and materiality assessment exercise. This helps us to understand their need and expectations and to design and develop our CSR and sustainability projects and strategies.

## PRINCIPLE 5

### Businesses should respect and promote human rights

#### Essential Indicators

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

We are a member organization of the United Nations Global Compact Network India and through their training and awareness program, 30 of our total 206 employees have completed this training program which is 14.5 %.

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

Category	FY23-24 (Current Financial Year)					FY22-23 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Permanent										
Male	133	-	-	133	100%	73	-	-	73	100%
Female	32	-	-	32	100%	17	-	-	17	100%
<b>Other than Permanent</b>										
Male	41	-	-	41	100%	42	-	-	42	100%
Female	0	-	-	0	0	15	-	-	15	100%
<b>Workers</b>										
Permanent										
Male	16	-	-	16	100%	8	-	-	8	100%
Female	2	-	-	2	100%	0	-	-	0	0
<b>Other than Permanent</b>										
Male	10	-	-	10	100%	5	-	-	5	100%
Female	0	-	-	0	0	0	-	-	0	0

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

#### a. Median remuneration / Wages

	Male		Female	
	Number	Median Remuneration/ Salary/ wages of the respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	1*	84,00,000	0	-
Key Managerial Personnel	0	-	2**	36,28,603
Employees other than BoD and KMP	133	2,91,311	32	4,38,569
Workers	28	3,13,827	2	72,126

\*There is a total of 6 number of Board of directors out of which only 1 person is on payroll and receiving salary. The rest are getting seating fees.

\*\*There is a total of 3 Key Managerial Personnel out of which only one person is on payroll and receiving salary. The rest are getting seating fees.

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

	FY 23-24	FY 22-23
Gross wages paid to females as % of total wages	24%	-

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, The Chief Human Resource Officer is responsible for addressing human rights issues.

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

The company has a comprehensive governance policy and redressal mechanism to redress grievances of any kind within the company's jurisdiction and control which also includes human rights issues. This includes various channels which include but are not limited to dedicated WhatsApp number, email ID, and specific points of contact to lodge complaints and or grievances.

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

	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	-	0	0	-
Discrimination at workplace	0	0	-	0	0	-
Child Labour	0	0	-	0	0	-
Forced Labour/ Involuntary Labour	0	0	-	0	0	-
Wages	1	0	-	0	0	-
Other Human Rights related issues	0	0	-	0	0	-

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

There are zero cases in the current and previous financial years.

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

The Company has established the Whistle Blower Policy, the Grievance Policy, and a Mechanism where anyone including employees can complain without fear of retaliation for wrong practices, unethical behaviour, or noncompliance that may have a detrimental effect on the organization. Also, the Employee's Code of Conduct of the Company requires employees to behave responsibly in their actions and conduct. Apart from that, the Company has a POSH Committee for the protection of women in the workplace to ensure their rights, receive grievances, conduct an investigation, and take action.

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

Yes, the Company is an organizational member and committed to adhering to the UNGC (United Nations Global Compact) principles which include Human Rights clauses. These clauses are part of our contracts with suppliers, partners, and NGOs, and are extended across our supply chain in the form of the Company's Supplier/Vendor Code of Conduct.



## 10. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100 %, We regularly assess our sites and offices through our EHS, Human Resources, and Administration functions.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

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

No significant risks/concerns are raised.

### Leadership Indicators

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

No complaint was received in FY24 for human rights grievances/complaints.

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

Not applicable as no due diligence was conducted.

#### 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?

Our office buildings are accessible to differently-abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

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

We have not done any assessment of our value chain partners for the reporting period of FY2023-24 on sexual harassment and discrimination at the workplace.

#### 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 as no assessment was conducted.

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

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>From renewable sources</b>		
Total electricity consumption (A)	11920 MJ	0
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	None	None
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>11920 MJ</b>	<b>0</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	1310000 MJ	547726 MJ
Total fuel consumption (E)	41470000 MJ	24920000 MJ
Energy consumption through other sources (F)	None	None
<b>Total energy consumption (D+E+F)</b>	<b>42780000 MJ</b>	<b>25467726 MJ</b>
<b>Total Energy Consumed ( A+B+C+D+E+F)</b>	<b>42791920 MJ</b>	<b>25467726MJ</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumption/ turnover in rupees*)	3,094.427* MJ per Million INR	1563.25MJ per Million INR
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)		
<b>Energy intensity in terms of physical output</b>		
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

\* On Annual Turnover of 1,38,287.04 Lakhs (FY2023-24)

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

Yes, sustainability data assurance is carried out by TUV India Private Limited.

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

No, the Company does not have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	2559	1802
(iii) Third party water	11640	21312
(iv) Seawater / desalinated water	0	0
(v) Others (Bottled water)	98	74.4
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	14198	23188.4
Total volume of water consumption (in kilolitres)	13620	23188.4
Water intensity per rupee of turnover (Total water consumption / Revenue from operations*)	0.984 KL per Million INR*	1.4 KL per Million INR*
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	NA	--
Water intensity in terms of physical output	NA	--
Water intensity (optional) –the relevant metric may be selected by the entity	--	--

\* On Annual Turnover of 1,38,287.04 Lakhs (FY2023-24)

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

Yes, sustainability data assurance is carried out by TUV India Private Limited.

## 4. Provide the following details related to water discharged:

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres) *		
(i) To Surface water	--	
- No treatment		
- With treatment – please specify level of Treatment		
(ii) To Groundwater	0	
- No treatment		17734.7
- With treatment – please specify level of Treatment		
(iii) To Seawater	0	
- No treatment		
- With treatment – please specify the level of Treatment		
(iv) Sent to third-parties		
- No treatment (Sent for treatment)	573.42	816.04
- With treatment – please specify level of Treatment		
(v) Others		0
- No treatment		
- With treatment – please specify level of Treatment		
<b>Total water discharged (in kilolitres)</b>	<b>573.42</b>	<b>18550</b>

\*A significant portion of water is used for fly ash dust suppression during backfilling and road construction work and is hence considered as consumed. The wastewater released from our domestic consumption in offices is collected and sent to STP through tanker for treatment where we do not have any information on further use /recycling

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

Yes, by TUV India Private Limited.

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

Not applicable as we do not have any manufacturing process where wastewater is generated.

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

Refex Industries Limited does not have any captive power plant or manufacturing process involving chemical processes. The refrigerant plant situated in Thiruporur village, Tamil Nadu is a bottling plant where refrigerant gases are repacked. The only emissions from RIL operations are from the diesel-run heavy coal ash hauling vehicles and 2 small DG generators for emergency backups. The emission from transport vehicles has been not quantified owing to the nonavailability of a standard measurement methodology or guidelines. The emission from the 2 small generators used in our refrigerant plant is very negligible as they are used for emergency purposes only.

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

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 Equivalent	2880	1719
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	287.49	124.8
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) *	Metric tonnes of CO2 Equivalent Per ` Million	0.23	0.11
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 adjusted for PPP)			
Total Scope 1 and Scope 2 emission intensity in terms of physical output			
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

\* On Annual Turnover of 1,38,287.04 Lakhs (FY2023-24)

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by a n external agency? (Y/N) If yes, name of the external agency.  
Yes, by TUV India Private Limited.

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

Yes, the Company has programs in place to reduce Scope 1 and Scope 2 emissions and the Company had set a target of carbon neutral by 2040 and water neutral by 2035. For Scope 2 Emission, we have an energy transition program and to shift to solar power by 100 % on or before 2030. On Scope 1 Emission, we are planning to reduce our energy intensity, especially for the Scope 1 Mobile combustion through adoption of EV fleet and carbon offsetting mechanism.

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0.260	0.097
E-waste (B)	0	0.18
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0.01
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) (Used oil, rags and oil filter and discarded paints)	2.951	0.354
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) (Scrap wood + packaging material and scrap metal)	11.727	8.691
Total (A+B + C + D + E + F + G + H)	14.938	9.332
Waste intensity per rupee of turn over (Total waste generated / Revenue from operation) *	0.0010	0.00057
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)		
Waste intensity in terms of physical output		
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	14.938	9.109
(ii) Re-used		
(iii) Other recovery operations		
Total	14.938	9.109
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0.155
(ii) Landfilling		
(iii) Other disposal operations	1.204 (Food waste)	
Total		

\* On Annual Turnover of 1,38,287.04 Lakhs (FY2023-24)

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

Yes- TUV India Private Limited.

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

Refex Industries Limited has implemented the environmental management system in accordance with EMS ISO 14001:2015 and the scope covers its entire operations including offices, headquarters, temporary facilities, manufacturing unit, and industrial facilities. Under this, we have a dedicated procedure for comprehensive waste management for the identification, segregation, collection, recycling, and final disposal. We also regularly provide awareness training on waste management and waste management performance data are regularly collected, and monitored and data assurance is carried out through 3rd party external agencies.

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

No, the entity has not any operations/offices in/around ecologically sensitive areas.

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

The Company has not conducted any environmental impact assessments (EIA) of the project or industrial facility in the financial year (FY2023-24) as not applicable to the entity based on applicable law.

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 Actt, and rules thereunder (Y/N).

Yes, the entity is fully compliant with applicable environmental laws/ regulations/ guidelines in India. The entity has zero noncompliance for the reporting period.

### Leadership Indicators

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

We have not assessed our water footprint in the water-stressed area as the magnitude is low and insignificant. We have planned for detailed mapping in the near future.

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

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	30.09*	28.44*
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO2 Equivalent per Million INR	0.0021	0.0017
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

\* Emission from business air travel and employees' commuting by company hired vehicles have been taken into consideration.

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.

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 as no ecologically sensitive areas reported at Question 11

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, as per the following format:

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	100% Rooftop Solar Energy for Refex Refrigerant Plant	In this financial year, we commissioned a 50.76 KWp rooftop solar power plant at our Refrigerant gas factory. The plant uses 'Solex' make 545 WP, Mono PERC PV solar modules, and 'Growatt' make solar inverters.	The solar power plant will be generating 92,637 units per year offsetting 65 MT of CO2
2	Maximizing recycling of Coal Ash	Our Coal and Ash business vertical is providing service to the thermal power plants to maximise the recycling of coal ash in collaboration with Cement Manufacturers, Brick & Block Manufacturers and Road Contractors.	Reduces pollution and GHG emissions, ecosystem restoration, and material circularity through reduced demand for virgin minerals.
3	Refex Green Mobility Service	We have a fleet of EV cars where we provide commuting services in business to business (B2B) model as well as business to consumer (B2C) model.	Reduction of Scope 3 Emissions and Pollution Control.

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

The Company has developed and established disaster and emergency management plans for its refrigerant plant and operation sites. The overall plan encompasses action plans anticipating different emergency situations. The effectiveness of the emergency plans at different locations is tested through regular mock drills and outcomes are recorded. Operation and location-wise, the company has dedicated emergency management teams with well-defined responsibilities that are communicated precisely to all.

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?

No significant adverse impact was reported from any value chain partners. A dedicated Code of Conduct has been extended to vendors and service providers which covers the need for compliance with environmental regulations, health and safety, labour practices, human rights aspects, minimum wages, freedom of association, collective bargaining, prohibition of child labour, and forced and compulsory labour, ethical behaviour, transparency in business processes and environment conservation. All new vendors/ service providers need to sign this combined CoC as part of the initial empanelment process. From time-to-time internal environmental management system audits for ISO 14001:2015 and external audits are conducted to evaluate compliance which includes our value chain partners.

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

We have developed a mandatory green sourcing screening procedure where all the value chain partners are being assessed in this financial year which includes environmental impacts including pollution. For new value chain partners, this will be applied during the time of onboarding and all existing value chain partners will also go through the assessment. From time to time, we also conduct internal audits covering the Environment, Health, and Safety management system at least once a year for all our projects, manufacturing units, and operation sites covering all the value chain partners working there.



**PRINCIPLE 7**

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

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

Two

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
2.	PHD Chamber of Commerce and Industry	National
3.	UN Global Compact Network India	International

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

None

**Leadership Indicators**

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

None

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

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

No SIA was undertaken in this reporting period as no CSR project was eligible based on the project value.

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

Not applicable. No rehabilitation and resettlement were undertaken by our entity during this reporting period.

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

Refex Industries Limited has a dedicated grievance policy and redressal mechanism, where any stakeholders which include but are not limited to members from the community can lodge complaints and report their grievances. The company has established a mechanism to investigate the applicable and legitimate complaint and to redress it in an agreed time. The channel for lodging complaints/grievances is WhatsApp numbers and email addresses that are displayed at our sites, offices, and operational units and on the company website. In addition to this, we have also a whistle-blower policy under which the community can lodge complaints against any financial wrongdoing. From time to time, we conduct need assessment and stakeholder engagement exercises with the community in and around our operation to understand the needs and expectations of the community and to plan our CSR projects.

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

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Directly sourced from MSMEs/ small producers	0*	0
Sourced directly from within the district and neighboring districts	0*	0

\*Refrigerant gases are the only input materials sourced from China.

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

No data available.

## 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):

Not applicable as the SIA requirement was not there.

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

We have undertaken several CSR projects in Chennai and Chennai Suburbs and Delhi NCR region mostly in child education, accommodation to job aspirants appearing for various competitive exams, healthcare and medical diagnosis, and water bodies restoration. Although the beneficiaries are from various parts of the country and some might be from the aspirational district, we do not have specific information on this.

3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups?

No, we do not have a preferential procurement policy to purchase from marginalized /vulnerable groups as our supplies are industrial products in nature.

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:

Not applicable as we do not have any intellectual properties owned or acquired by our entity (in the current financial year), based on traditional knowledge.

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:

Not applicable.

## 6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Financial Grants to School Children from Ramakrishna Mission School who are from socially and economically backward categories	5	Not available
2	Accommodation is provided to the Job aspirants in the NCR region who are appearing for various government jobs through the Ugamdevi Tarachand Foundation	30	Not available
3	Financial assistance is provided to school children in Chennai and Chennai Suburban areas through the Ugamdevi Tarachand Foundation	485	Not available
4	Plantation Drive with GCC and in Kendriya Vidyalaya Avadi	Nearby locality and the school children. A study on the exact number has not been conducted.	Not available
5	Grant for installation of security camera for the Swabodhini Foundation working on Autistic Children	57	Not available
6	Financial assistance was provided for life support healthcare to Red Heart Foundation through the Ugamdevi Tarachand Foundation	Not available	Not available
7	Financial assistance was provided for higher professional and technical studies through the Ugamdevi Tarachand Foundation	2	Not available

## PRINCIPLE 9

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

### Essential Indicators

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

We have only one product which is refrigerant gas and our consumers are industrial consumers. We have also developed and implemented a quality management system conforming to ISO 9001:2015. We do regular customer satisfaction surveys including consumers to improve our product quality. Customer complaints are also received through email, transmittal letter communications, and verbal communications directly through our sales team. Also, customers can lodge complaints through our WhatsApp number and email address provided in the Company website. We have also dedicated Grievance WhatsApp number and email ID where anyone including our customers can lodge a complaint.

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

As a percentage to the total turnover	
Environmental and social parameters relevant to the product	100 % of our Refrigerant Gas products
Safe and responsible usage	100 % of our Refrigerant Gas products
Recycling and/or safe disposal	100 % of our Refrigerant Gas products

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

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	
Data privacy	0	0	-	0	0	
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	
Delivery of essential Services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	0	0	-	0	0	-

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

Nil for the reporting period of FY 2023-24.

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? If available, provide a web-link of the policy

Yes, the Company has a framework/ policy on cyber security and risks related to data privacy.

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 the safety of the products/services.

None.

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along with the impact: Nil
- b. Percentage of data breaches involving personally identifiable information of customers: Nil

#### Leadership Indicators

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

Our business offerings can be found on the website: <https://www.refex.co.in>

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

Product and service awareness training sessions are being conducted including safe and responsible usage of our products and services.

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

Not applicable owing to the nature of our operation and business model.

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)

Yes, RIL has products in one category only which is Refrigerant Gas. We display all the environmental, health & safety data as mandated by law. Also, we conduct customer satisfaction surveys as per our quality management system requirement.