

July 09, 2024

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai 400001

Scrip Code: 532504

National Stock Exchange of India Limited

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

Symbol: NAVINFLUOR

Dear Sir / Madam,

Sub.: Business Responsibility and Sustainability Report for Financial Year 2023-2024

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Business Responsibility and Sustainability Report for the Financial Year 2023-2024 which also forms part of the Annual Report of the Company for the Financial Year 2023-2024.

This is for your information and record.

Thanking You,

Yours faithfully,

For **NAVIN FLUORINE INTERNATIONAL LIMITED**

Niraj B. Mankad

President Legal and Company Secretary

Encl.: a/a

Business Responsibility and Sustainability Report

SECTION A: GENERAL DISCLOSURE

I. Details of the Listed Entity

1 Corporate Identity Number (CIN) of the Listed Entity	L24110MH1998PLC115499
2 Name of the Listed Entity	Navin Fluorine International Limited
3 Year of incorporation	1998
4 Registered office address	Office No. 602, 6 th Floor, Natraj by Rustomjee, Near Western Express Highway, 194, Sir Mathuradas VasANJI Road, Andheri (East), Mumbai 400069
5 Corporate address	Office No. 602, 6 th Floor, Natraj by Rustomjee, Near Western Express Highway, 194, Sir Mathuradas VasANJI Road, Andheri (East), Mumbai 400069
6 E-mail	info@nfil.in
7 Telephone	+91 22 6650 9999
8 Website	www.nfil.in
9 Financial year for which reporting is being done	April 01, 2023, to March 31, 2024
10 Name of the Stock Exchange(s) where shares are listed	1. BSE Limited 2. National Stock Exchange of India Limited
11 Paid-up Capital	Fully Paid-Up Share Capital INR 9,91,37,880 Partly Paid-Up Share Capital INR 8,920
Contact Person	
12 Name and contact detail (telephone email address) of the person who may be contacted in case any queries on the BRSR report	Name: Mr. Abhishek Gupta Telephone No.: +91 22 6650 9999 E-mail ID: abhishek.gupta@nfil.in
Reporting Boundary	
13 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)	The report is prepared following a consolidation approach. The reporting boundary encompasses data and information gathered from Navin Fluorine International Limited (Surat, Gujarat, and Dewas, Madhya Pradesh), Navin Fluorine Advanced Science Limited (Dahej, Gujarat), and registered office (Mumbai) (hereafter referred to as 'Navin Fluorine' or 'the Company')
14 Name of assurance provider	For FY 2023-24, the assurance of BRSR core applies to the top 150 listed entities as per market capitalisation. Navin Fluorine does not fall within this category.
15 Type of assurance obtained	

II. Product/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% Turnover of the Entity
1	Navin Fluorine is one of the largest and most respected Indian manufacturers of specialty fluorochemicals	High-Performance Products, Specialty Fluorochemicals, Contract Development and Manufacturing Organisation	97%

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	Synthetic cryolite, fluorocarbon gases	2011	39%
2	Hydrofluoric acid and other fluorine chemicals	2011	49%
3	Other Chemicals	2011	12%

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	3	6	9
International	0	3	3

19. Market served by the entity

a. Number of locations

Locations	Numbers
National (No. of States/UTs)	26 (21 States and 5 Union Territories)
International (No. of Countries)	27

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

65%

c. A brief on types of customers

Navin Fluorine serves the evolving requirements of distinguished clients globally. These clients encompass prominent entities in global life science and crop science, leading figures in the stainless-steel manufacturers, air-conditioner OEMs, and other users of fluorochemicals downstream. The Company is dedicated to consistently meeting the diverse needs of its esteemed clientele.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled)

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1	Permanent Employees (D)	1,328	1,274	95.93%	54	4.07%
2	Other than Permanent Employees (E)	0	0	0	0	0
3	Total Employees (D+E)	1,328	1,274	95.93%	54	4.07%
Workers						
4	Permanent (F)	159	159	100%	0	0
5	Other than Permanent (G)	949	908	95.68%	41	4.32%
6	Total Workers (F+G)	1,108	1,067	96.30%	41	3.70%

b. Differently abled employees and workers

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled Employees						
1	Permanent Employees (D)	2	2	100%	0	0
2	Other than Permanent Employees (E)	0	0	0	0	0
3	Total Differently Abled Employees (D+E)	2	2	100%	0	0
Differently abled Workers						
4	Permanent (F)	9	9	100%	0	0
5	Other than Permanent (G)	0	0	0	0	0
6	Total Differently Abled Workers (F+G)	9	9	100%	0	0

21. Participation/Inclusion/Representation of women

Sr. No.	Category	Total (A)	No. and % of females	
			No. (B)	% (B/A)
1	Board of Directors	12	2	17%
2	Key Management Personnel*	2	0	0

*Excludes Directors of the Company

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

Category	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	17.41	13.44	17.55	19.36	8.62	18.86	13.29	14.63	13.36
Permanent Workers	6.72	0.00	6.72	7.78	0.00	7.78	6.94	0.00	6.94

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

23. Name of the holding / subsidiary / associate companies / joint ventures

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether it is a holding / Subsidiary / Associate / or 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.	Navin Fluorine Advanced Sciences Limited (NFASL)	Wholly Owned Subsidiary	100%	Yes
2.	Sulakshana Securities Limited	Wholly Owned Subsidiary	100%	No
3.	Manchester Organics Limited	Wholly Owned Subsidiary	100%	No
4.	NFIL (UK) Limited	Wholly Owned Subsidiary	100%	No
5.	NFIL USA, INC.	Wholly Owned Subsidiary	100%	No
6.	Navin Fluorine (Shanghai) Co, Limited	Wholly Owned Subsidiary	100%	No
7.	Swarnim Gujarat Fluorspar Private Limited	Joint Venture	49.48%	No

VI. CSR Details

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

Yes

ii. Turnover (₹ in crores) 2,065.01 (Consolidated)

iii. Net worth (₹ in crores) 2,382.67 (Consolidated)

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

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 2023- 24			FY 2022-23		
		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, Navin Fluorine addresses the concerns of the communities (inclusive of vulnerable and marginalized groups) through continuous interactions with them. The Company also has in place a dedicated Corporate Social Responsibility policy in place which encompasses the Company's philosophy for describing its responsibility as a corporate citizen, and lays down the guiding principles for the selection, implementation, and monitoring of its CSR activities. https://www.nfil.in/contact/grievance_redressal.html	0	0	-	0	0	-
Shareholders	The Company consistently works towards serving its investors and takes necessary steps from time to time for expeditious redressal of investor grievances. The Company has appointed KFin Technologies Limited (KFinTech) to discharge investor service functions on behalf of the Company. KFinTech is a Qualified Registrar and Transfer Agent with a vast number of Investor Service Centres across the country. It is entrusted with handling all share related matters including transmission, transposition, nomination, dividend, change of name/address/ signature, demat/remat of shares, issue of duplicate certificates, etc https://www.nfil.in/contact/grievance_redressal.html	50	5*	The complaints from shareholders pertain to service requests raised with the Company/ KFinTech.	65	1	The complaints from shareholders pertain to service requests raised with the Company/ KFinTech. The pending complaint is since resolved.
Investors (other than shareholders)							
Employees and workers	Yes, Navin Fluorine encourages ethical and transparent business conduct for all its employees and workers. The Company has incorporated the Whistle Blower Policy which provides a vigil mechanism to report any instance of unethical behavior against the employees and workers of the Company. https://www.nfil.in/contact/grievance_redressal.html	14	0	Resolved all complaints	6	0	Resolved all complaints

*3 resolved after the year end.

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 2023- 24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Customers	Navin Fluorine is a customer-oriented Company. It undertakes regular customer satisfaction surveys which enables it to enhance its performance. https://www.nfil.in/contact/grievance_redressal.html	18	0	Resolved all complaints	42	0	Resolved all complaints
Value Chain Partners	The Organization has an online complaints/grievances platform for the value chain partners. https://www.nfil.in/contact/grievance_redressal.html	0	0	-	0	0	-
Other	https://www.nfil.in/contact/grievance_redressal.html	-	-	-	-	-	-

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

Sr. No	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk/ Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
1.	Energy	Risk	Inadequate energy management poses a significant risk for companies due to its potential to escalate energy consumption, elevate costs, and generate adverse environmental effects.	The Company's environmental commitment drives proactive measures. This includes prioritizing the use of natural gas as a fuel wherever feasible and transitioning to renewable energy sources gradually. This phased approach aims to mitigate environmental impacts effectively while aligning with sustainable practices.	Negative
2.	Carbon Emission & Climate Change	Risk	The Indian Government is committed to achieving NET ZERO emissions by 2070, leading to the introduction of policies to curb greenhouse gas emissions and promote renewable energy. Companies not prepared for emerging energy and emissions regulations face significant financial, reputational, and operational risks.	To mitigate these risks, the Company has introduced hydrofluoroolefins (HFOS), which have zero ozone-depleting potential compared to Ozone Depleting Substances (ODS). Additionally, the Company has implemented the following measures: <ul style="list-style-type: none"> Thermal oxidizers Vent condensers on storage tanks to eliminate fugitive emissions Furthermore, the Company has been strategically transitioning from ozone-depleting to non-ozone-depleting products. The Company has also developed strategies for carbon emission reduction, water recycling, landfill management, and increased usage of renewable energy sources.	Negative

Sr. No	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk/ Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
3.	Waste	Risk	Ensuring proper waste disposal from operations is crucial for safeguarding the environment, public health, and safety. Incorrect handling of chemical waste can lead to the release of harmful substances into the air, soil, and water, posing a threat to local ecosystems, wildlife, and nearby communities. Exposure to hazardous chemicals due to inadequate waste management practices can result in various health issues such as respiratory ailments, cancer, and reproductive disorders.	Each plant manages its waste through authorized and registered vendors, adhering to environmental regulations. This ensures responsible disposal practices, minimizing the risk of environmental pollution and associated health hazards.	Negative
4.	Water	Risk	Chemical production is inherently water-intensive, making it susceptible to risks associated with water scarcity. Such scarcity can disrupt operations, supply chains, and inflate raw material costs, thereby impacting finances. Additionally, it can jeopardize the health and safety of employees and the local community, leading to potential legal and reputational risks.	Recognizing the critical importance of water conservation, the Company has implemented strategic measures. At one of its facilities, zero liquid discharge has been achieved, while at another, discharged water undergoes treatment in a sewage treatment plant. The treated water is then recycled for utility processes, thereby reducing the Company's reliance on fresh water sources and mitigating the impacts of water scarcity.	Negative
5.	Biodiversity	Opportunity	Increasing biodiversity can enhance ecosystem resilience and support sustainable practices. Biodiverse ecosystems are more resilient to environmental changes, such as climate variability and extreme weather events.	-	Positive
6.	Employee Retention and Satisfaction	Opportunity	Employee retention is a pressing concern for organizations seeking to strengthen their workforce. High turnover rates can disrupt operations and hinder growth. Companies that prioritize employee retention and satisfaction often enjoy higher levels of engagement and commitment from their workforce.	Town hall briefing, goal setting, performance appraisal, exit interviews, wellness programs, emails, etc.	Positive
7.	Learning and Development	Opportunity	Embracing employee learning and development offers companies a chance to boost employee engagement, retention, job satisfaction, and performance, while also fostering organizational agility.	Internal and External training seminars, conferences, workshops, and specific learning module courses on a case-to-case basis.	Positive

Sr. No	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk/ Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
8.	Sustainable Raw Material Sourcing	Risk	Reliance on unsustainable sourcing methods could lead to resource depletion, regulatory issues, or reputational damage. Unsustainable sourcing practices can result in the depletion of natural resources, leading to environmental degradation, habitat destruction, and loss of biodiversity.	Implement sustainable sourcing practices, diversify the supply chain, and invest in alternative materials.	Negative
9.	Sustainable Supply Chain Strategy	Risk	Supply chain disruptions can cause delays in production, increase the cost of raw materials, and affect customer satisfaction. Therefore, it is essential to develop robust supply chain risk management strategies to mitigate the impact of supply chain disruptions and ensure business continuity.	The Company has reviewed the sustainable supply chain code and has implemented the revised version in FY 23. The Supply chain engagement has been conducted for key suppliers to strengthen sustainable sourcing	Negative
10.	Local Community Development	Opportunity	Local communities are critical stakeholders for companies, as they can directly or indirectly impact a company's operations, reputation, and social license to operate. Companies that engage with local communities and understand their needs and expectations can benefit from stronger relationships, improved trust and credibility, and enhanced access to resources and markets.	Community visits, project engagements, partnership programs, seminars, and workshops.	Positive
11.	Diversity and Inclusion	Opportunity	Embracing diversity fosters innovation, enhances employee engagement, and improves corporate reputation. It leads to a wider range of perspectives and ideas, which can drive creativity and problem-solving. Additionally, inclusive workplaces tend to have higher employee satisfaction and retention rates, which contribute to overall productivity and competitiveness	Implement diversity and inclusion initiatives, ensure equitable hiring and promotion practices, and provide diversity training and education.	Positive
12.	Occupational Health and Safety	Risk	Neglecting the health, safety, and welfare of employees can significantly hamper productivity, subsequently impacting business operations, customer satisfaction, and profitability.	The Company has an online portal to log incidents in detail which gets assigned to the authorized person to analyze as well as to put a control mechanism in place. It has an escalation mechanism as well to ensure compliance. The Company is extending the same portal to our other plants.	Negative

Sr. No	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk/ Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
13.	Human Rights	Opportunity	Conducting human rights assessments presents an opportunity for companies to bolster their reputation, attract and retain customers and employees who prioritize ethical business conduct, and mitigate legal and reputational risks associated with human rights violations.	-	Positive
14.	Customer Health and Safety	Opportunity	Well-informed customers and partners can become advocates for the Company, promoting its products and services to others. When chemicals are misused or handled incorrectly, they can endanger human health and the environment. By providing education and training on safe product handling, companies can also reduce the risk of product recalls, liability claims, and potential legal action.	The Company has a mechanism in place to arrange awareness sessions on safe product handling.	Positive
15.	Sustainable Product Design and Innovation	Opportunity	Sustainable product design and innovation is an opportunity for companies to reduce their environmental impact, enhance their brand reputation, and attract more investors and customers.	ESG integration (Safety, compliance, ethics), ISO, collaboration, and digitization.	Positive
16.	Responsible Marketing	Opportunity	By promoting products in a transparent and ethical manner, a company can enhance its reputation & strengthen customer loyalty. Responsible marketing practices can also help companies comply with legal and regulatory requirements, avoid misleading or deceptive advertising, and prevent reputational damage or legal liabilities. Overall, responsible marketing can be an opportunity for companies to create long-term value for all stakeholders and achieve sustainable growth.	-	Positive
17.	Ethics & Governance	Risk	Failure to adhere to ethical standards and governance principles can erode company credibility and trust, leading to diminished customer loyalty and investor confidence.	The Company enforces a robust code of conduct emphasizing business ethics to uphold integrity and transparency in all operations.	Negative
18.	Compliances	Risk	Non-compliance with regulations can result in legal liabilities, financial penalties, and tarnished reputation, hindering market competitiveness and growth opportunities.	The Company implements a comprehensive compliance management system to ensure adherence to all regulatory requirements, proactively addressing compliance gaps and mitigating associated risks.	Negative

Sr. No	Material issue identified	Indicate whether Risk or Opportunity	Rationale for identifying Risk/ Opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
19.	Data Privacy	Risk	Cybersecurity risks are a significant concern for organizations, as they can have far-reaching impacts on business operations, reputation, and customer base. Cyberattacks can disrupt critical systems, compromise sensitive data, and cause reputational damage, leading to financial losses and loss of customer trust.	It covers handling and protection of the Company's information, assets, and targets that it is available all the time to respective stakeholders.	Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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	Y	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	c. Web Link of the Policies, if available	Code of Conduct	Supply Chain Management Policy	HSE Policy	CSR Policy	Remuneration policy	HSE Policy	Code of Conduct	CSR Policy	Quality Policy
		Whistle blower Policy	Sustainable Supply Chain Policy		Supply Chain Responsible Care Policy	POSH Policy	Responsible Care Policy			
		These policies are available at the links - https://www.nfil.in/investor/code_conduct.html https://www.nfil.in/investor/policies.html								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4	Name of the national and international codes/certifications/labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Global Reporting Initiatives (GRI) Standards	Responsible Care Environment Management System ISO (14001:2015)	Occupational Health and Safety Management System (ISO 45001:2018)	Global Reporting Initiatives (GRI) Standards	Global Reporting Initiatives (GRI) Standards	Environment Management System ISO (14001:2015) Responsible Care Global Reporting Initiatives (GRI)	Code of Conduct Global Reporting Initiatives (GRI) Standards	CSR Rules, Companies Act 2013 Global Reporting Initiatives (GRI) Standards	Global Reporting Initiatives (GRI) Standards

Disclosure Questions	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>Environmental</p> <ul style="list-style-type: none"> 100% recycling of packaging materials by 2025 30% reduction in carbon emissions by 2030 50% use of renewable electricity by 2030 Engagement with 100% key value chain partners by 2030 <p>Social</p> <ul style="list-style-type: none"> 10% diversity in the Company employees by 2030 25% gender diversity in leadership teams by 2030 25% gender diversity in the Board of Directors by 2030 <p>Governance</p> <ul style="list-style-type: none"> 100% resolution of complaints Zero cases of corruption and bribery. 								
6 Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	<p>Environment</p> <ul style="list-style-type: none"> 70% recycling of packaging materials (target is 100% by 2025) Renewable energy increased by ~7 folds from the previous year 23.6% use of renewable electricity (target is 50% by 2030) Engaged with 19% key value chain partners (target is 100% key value chain partners by 2030) <p>Social</p> <ul style="list-style-type: none"> 3.9% diversity in the workforce (target is 10% by 2030) 2.8% gender diversity in leadership team (target is 25% by 2030) 17% gender diversity in the Board of Directors (target is 25% by 2030) <p>Governance</p> <ul style="list-style-type: none"> 100% resolution of complaints Zero cases of corruption and bribery 								
Governance, Leadership and Oversight									
7 Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements	<p>Message from Chairman's Desk</p> <p>Dear Stakeholders,</p> <p>As we reflect on the past year's journey, I am profoundly inspired by the strides we've made towards a more sustainable future. Today, I am thrilled to share our progress and commitments across key sustainability dimensions. Our dedication to environmental stewardship remains unwavering. Recognizing the urgent need to address climate change and minimize our ecological footprint, we have implemented a range of initiatives aimed at reducing energy consumption, optimizing waste management practices, and increasing investments in renewable resources. By embracing sustainable practices, we are actively contributing to a healthier planet for current and future generations. Central to our mission is a commitment to social responsibility. We believe in fostering diverse, inclusive workplaces where every individual can thrive. Through initiatives focused on employee well-being and community support, we are creating a positive social impact and driving sustainable development. Our efforts extend beyond our organizational boundaries, as we actively engage with stakeholders to address pressing social issues and contribute to the well-being of society at large. Ethical conduct and transparency are foundational to our governance framework. Upholding the highest standards of corporate governance, we ensure accountability and build trust with our stakeholders. By embedding ethical practices and robust governance structures throughout our organization, we mitigate risks and uphold our commitment to principled leadership. Looking forward, our journey toward sustainability remains dynamic and evolving. We recognize the importance of continuous improvement and innovation. Together, we will continue to collaborate, innovate, and lead with purpose, driving positive change and creating shared value for all stakeholders. In conclusion, I extend my sincere gratitude to our employees, partners, and other stakeholders for their unwavering support and dedication. Together, we are shaping a brighter, more sustainable future for our planet and communities.</p>								
8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	<p>Mr. Vishad P. Mafatlal Designation: Executive Chairman DIN: 00011350 E-mail ID: info@nfil.in</p>								
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.	<p>As part of the sustainability initiatives at Navin Fluorine, the Company ESG team oversees matters to sustainability. Additionally, a review of sustainability related matters is done on a fortnightly basis with the leadership team which is headed by the Chairman.</p> <p>Looking forward, the Company plans to formulate an ESG Steering Committee to, inter alia, develop sustainability strategies, monitor and evaluate the Company's ESG performance, and identify opportunities to enhance sustainability practices.</p>								

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	Mr. Vishad P. Mafatlal (Executive Chairman) is responsible for the implementation of Business Responsibility policies and monitoring the Business Responsibility performance.									Q	Q	Q	Q	Q	Q	Q	Q	Q	Q
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	The Managing Director (and subsequent to his resignation, the Executive Chairman for the interim period till the vacancy of Managing Director is filled), alongside the Chief Financial Officer and Company Secretary, attest to the adherence to applicable laws within their respective domains on a monthly basis. These attestations are presented to the Board of the Company at least quarterly.									Ongoing basis									

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

Yes, the Company has undergone independent assessment and evaluation of its policies by external agencies. The Responsible Care (RC) certification audit was conducted by the Indian Chemical Council. Additionally, audits for ISO 9001:2015, ISO 14001:2015, and 45001:2018 were carried out by Bureau Veritas Certification Holding SAS-UK Branch.

'Together for Sustainability' (TfS) is an initiative founded by leading chemical companies to advance sustainability practices within their supply chains. Navin Fluorine is a member of TfS. As part of its commitment to the initiative, Navin Fluorine underwent an independent sustainability audit at its sites, conducted by SGS 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)									
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)									

All Principles are covered by policies

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

ESSENTIAL INDICATORS

1. Percentage coverage by training and awareness program 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	5	Throughout the year, the Board of Directors and Key Managerial Personnel of the Company, along with its committees, have dedicated significant time to engage with various updates pertinent to regulatory changes. The topics encompassed in these discussions include:	100%
Key Managerial Personnel	5	<ul style="list-style-type: none"> Corporate Governance Sustainability Companies Act SEBI Listing Regulations Environmental and Safety Compliance Matters 	100%
Employees other than BODs and KMPs	42	The training covers behavioral, capability building, compliance, health, safety, and environment (HSE), Sustainability as well as professional and technical aspects.	63.70%
Workers	30		74.21%

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 Requirements) Regulations, 2015 and as disclosed on the entity’s website):

a. Monetary					
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Principle 6	Gujarat Pollution Control Board	1,00,00,000	The Company’s wholly owned subsidiary, Navin Fluorine Advanced Sciences Limited (‘NFASL’), was directed by the Gujarat Pollution Control Board on August 04, 2023, to pay Environment Damage Compensation for alleged violations of provisions of the Air (Prevention and Control of Pollution) Act, 1981	No
Settlement	Nil	Nil	Nil	Nil	Nil
Compounding fee	Nil	Nil	Nil	Nil	Nil
b. Non-Monetary					
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the case		Has an appeal been preferred? (Yes/No)
Imprisonment	Nil	Nil	Nil		Nil
Punishment	Nil	Nil	Nil		Nil

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
	Nil

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.

Navin Fluorine has comprehensively covered the essential aspects of anti-corruption and anti-bribery within the Company’s Code of Conduct. The Code is accessible at https://nfil.in/investor/code_conduct.html Through Navin Fluorine’s Code of Conduct, the Company promotes fair and ethical business practices. According to the Code, every employee, officer, and director of the Company is expected to conduct themselves with fairness when dealing with customers, suppliers, competitors, and others, adhering to ethical standards.

The Code explicitly prohibits any form of unfair advantage-seeking behavior, including manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unethical practices. It strictly prohibits the offering or acceptance of payments, directly or indirectly, to or from anyone to secure business opportunities or favorable actions.

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

Category	FY 2023-24	FY 2022-23
Directors	Nil	Nil
KMPs		
Employees		
Workers		

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

Topic	FY 2023-24	FY 2022-23
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of KMPs		

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.

No cases of corruption and conflicts of interest have been reported in FY 2023-24, hence it is not applicable.

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	136	82

9. Open-ness of business

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses** as % of total purchases	8.94%	6.69%
	b. Number of trading houses** where purchases are made from	151	151
	c. Purchases from top 10 trading houses** as % of total purchases from trading houses	59.93%	56.21%
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	15.18%	13.09%
	b. Number of dealers/distributors to whom sales are made	189	136
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	62.53%	58.69%
Share of RPTs (as respective %) in	a. Purchases (Purchases with related parties / Total Purchases)	Please refer to Note 45 on page 245 of this Annual Report for the financial year 2023-24.	Please refer to Note 45 on page 245 of this Annual Report for the financial year 2023-24.
	b. Sales (Sales to related parties / Total Sales)		
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	98.10%	97.42%
	d. Investments (Investments in related parties / Total Investments made)	0.00%	27.45%

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
33	<p>Navin Fluorine undertakes several initiatives aimed at fostering awareness among its value chain partners regarding the key tenets outlined in the 9 Principles of the National Guidelines for Responsible Business Conduct. The awareness programs conducted for value chain partners are principally organized into three categories: Safety, Ethics, and Business Responsibility:</p> <p>a) Safety: Navin Fluorine is committed to achieving 'Zero Harm' and aims to excel as an industry leader in Safety & Health performance. To this end, it has established comprehensive safety policies providing clear directives, implemented a robust safety governance framework, instituted effective management & reporting systems, conducted extensive training and communication campaigns, and established precise performance metrics to monitor Safety & Health performance. These measures encompass not only employees and workers but also extend to all value chain partners accessing our sites. Mandatory safety training is mandated for all individuals, including contract employees engaged with vendor partners, aligning with the training standards set for the company employees. This ensures a unified understanding of safety risks and principles among all personnel present on site.</p> <p>b) Ethics: Navin Fluorine regularly conducts awareness sessions for its vendor partners, focusing on the Company's Anti-bribery and Anti-corruption Policy, Code of Conduct, and Prevention of Sexual Harassment Policy. These sessions cover essential topics such as governance, ethics, health and safety, labor practices, and human rights.</p> <p>c) Supply Chain Responsibility: Navin Fluorine has introduced its Sustainable Supply Chain Policy Programme, addressing concerns related to ethical conduct, human rights, health & safety, and environmental sustainability, among other aspects. These policies are integrated into the vendor qualification process for relevant entities, and all vendors are obligated to comply with the principles outlined in these policies.</p>	20.36%

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, in adherence to the Code of Conduct, it is mandated for Board Members to steer clear of circumstances that may pose a potential or real conflict between their personal interests and those of the Company. Moreover, Directors who hold vested interests in any business matter under discussion during Board or Committee Meetings recuse from voting on such matters.

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

ESSENTIAL INDICATORS

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

Type	FY 2023-24	FY 2022-23	Details of improvement in social and environmental aspects
Research & Development (R&D)	100%	100%	All R&D investments are directed towards the development of sustainable technologies and green chemistries, as well as the creation of products and technologies that enhance human health and well-being, utilizing environmentally friendly methods and deriving chemicals from sustainable sources.
Capital Expenditure (CAPEX)	7.97%	11.27%	Project initiatives encompass pollution control, safety for employees and the community, climate change mitigation, circularity efforts like harnessing solar energy for electricity, and promoting human health and sustainable chemicals.

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

Navin Fluorine has a Sustainable Supply Chain Policy that mandates suppliers to comply with laws, ensure product integrity and fair competition, prohibit bribery and corruption, uphold labor and human rights standards, maintain health and safety protocols, promote environmental sustainability, avoid conflicts of interest, adhere to ethical business practices, conduct regular assessments, and promptly report violations.

Navin Fluorine has established a supplier assessment process involving questionnaire submissions by suppliers, followed by Navin Fluorine's evaluation and rating. Phase 1 has covered 19% of key suppliers, with plans for extension to remaining suppliers.

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

All suppliers of Navin Fluorine are required to confirm their commitment to sustainability standards as part of the registration procedure. Presently, 19% of our inputs in India are obtained from suppliers who demonstrate alignment with our guiding principles by submitting declarations during registration.

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.

Product	Process to safely reclaim the product
a. Plastics (including packaging)	Navin Fluorine does not reclaim any of its fluorochemical and specialty chemicals which are delivered to customers. Plastic Packaging Waste management falls under the Extended Producer Responsibility (EPR) obligations for Navin Fluorine, as per the Plastic Waste Management Rules of 2016. The Company has obtained EPR registration from the Central Pollution Control Board (CPCB) and meticulously aligned its waste collection plan with the EPR framework outlined in its submission to the CPCB. Navin Fluorine has effectively met its EPR targets for FY 2023-24 concerning Plastic Packaging Waste.
b. E-Waste	This is not applicable as Navin Fluorine does not manufacture electrical and electronic items, thus there is no reclamation of electronic items. All e-waste generated in-house is handed over to certified vendors for recycling.
c. Hazardous Waste	The process for safely reclaiming our products for reuse, recycling, or disposing of hazardous waste is not applicable to Navin Fluorine. Our products are typically consumed by other industries, which incorporate them into the production of finished goods for end-users.
d. Other Waste	Not applicable

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, in accordance with the Plastic Waste Management Rules of 2016, it is obligated to manage Plastic Packaging Waste under the Extended Producer Responsibility (EPR) framework. The Company has obtained EPR registration from the Central Pollution Control Board (CPCB) and has ensured that its waste collection plan for Plastic Packaging Waste aligns with the EPR plan submitted to the CPCB. For FY 2023-24, Navin Fluorine has successfully met its EPR targets in managing Plastic Packaging Waste.

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?

The Company has undertaken a Life Cycle Assessment (LCA) utilizing a Gate-to-Gate approach within its operational boundary during phase 1. Moving forward, the Company plans to transition to a product-level LCA approach in the subsequent phase.

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
Mafron	"Mafron" is a brand name for refrigerant gases, primarily used in air conditioning and refrigeration systems. It poses environmental risks due to its dual impact on ozone depletion and global warming.	The Thermal Oxidation Unit, operating within the framework of Clean Development Technology (CDT), serves as a strategic asset aimed at mitigating the adverse impact of greenhouse gas emissions on the environment. The unit neutralizes the greenhouse effect from any fugitive emissions of Mafron.

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).

Navin Fluorine incorporated 30% of recycled solvent into its manufacturing process, relative to the total production volume.

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:

Particular	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)*	Nil	454.00	Nil	Plastic Waste EPR Registration was obtained in FY 2023-24		
E-waste	Packaging and product reclamation of e-waste at the end of product lifecycle is not applicable to Navin Fluorine, as the Company is not involved in the manufacturing, recycling, or processing of electric and electronic equipment or waste.					
Hazardous waste	Packaging and product reclamation of hazardous waste and other waste at the end of product lifecycle is not applicable for Navin Fluorine as its products primarily consist of intermediate chemicals. These chemicals are utilized by other industries to manufacture finished products for end-user consumption.					
Other waste						

* This includes data related to plastic packaging waste. Reclamation of plastic products at the end of their lifecycle is not applicable to Navin Fluorine, as the Company is not engaged in the manufacturing of plastic products.

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
Synthetic cryolite, fluorocarbon gases	70% (Plastic packaging materials)
Hydrofluoric acid and other fluorine chemicals	The Company has obtained EPR registration from the Central Pollution Control Board (CPCB) and has ensured that its waste collection plan for Plastic Packaging Waste aligns with the EPR plan submitted to the CPCB. For FY 2023-24, Navin Fluorine has successfully met its EPR targets in managing Plastic Packaging Waste.
Other Chemicals	

Navin Fluorine does not possess designated products for reclamation, as they primarily consist of intermediate chemicals. These chemicals are utilized by other industries to manufacture finished products for end-user consumption.

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

ESSENTIAL INDICATORS

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

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
	No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)	
Permanent Employees											
Male	1,274	1,274	100%	1,274	100%	0	0	1,274	100%	0	0
Female	54	54	100%	54	100%	54	100%	0	0	0	0
Total	1,328	1,328	100%	1,328	100%	54	100%	1,274	100%	0	0
Other than Permanent Employees											
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

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	
	No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)	
Permanent Workers											
Male	159	159	100%	159	100%	0	0	159	100%	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	159	159	100%	159	100%	0	0	159	100%	0	0
Other than Permanent Workers											
Male	908	908	100%	908	100%	0	0	0	0	0	0
Female	41	41	100%	41	100%	0	0	0	0	0	0
Total	949	949	100%	949	100%	0	0	0	0	0	0

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

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company	0.25%	0.15%

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

Sr. No.	Benefits	FY 2023-24			FY 2022-23 [#]		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	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 worker	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100.00%	100.00%	Y	100.00%	100.00%	Y
2	Gratuity	100.00%	100.00%	Y	100.00%	100.00%	Y
3	ESI	0.06%	40.00%	Y	0.57%	41.09%	Y
4	Others – Superannuation	89.31%	0.00%	Y	88.64%	0.00%	Y

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.

Navin Fluorine promotes the inclusion of differently abled employees and prioritizes their placement within office spaces. However, due to operational considerations, including the nature of work and the structure of multi-floor buildings, roles are assigned to offices that have been appropriately outfitted to accommodate their needs, while also considering associated safety considerations. https://www.nfil.in/investor/code_conduct.html

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.

Navin Fluorine promotes equal opportunity for all employees, regardless of their caste, creed, gender, disability, or religion. The Company maintains a zero-tolerance policy against discrimination in terms of opportunities extended to employees across all levels and genders. Additionally, Navin Fluorine has implemented a comprehensive human rights policy to protect the rights of all employees, including those with disabilities.

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%	94%	100%	86%
Female	100%	67%	No permanent female workers employed	
Total	100%	82%	100%	86%

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.

Category	Yes/No (If yes, give details of the mechanism in brief)
Permanent Workers	Yes, to handle grievances effectively, Navin Fluorine has established a strong Grievance Cell, Internal Complaints Committee under Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013, and Whistleblower Policy. These policies outline guidelines for adhering to human rights standards. In the event of any human rights-related incident, individuals can report it through the grievance cell, which is then addressed by the POSH committee. Furthermore, the Human Resources head at each location is responsible for addressing concerns and grievances raised by employees and workers.
Other than Permanent Workers	
Permanent Employees	In the event of any human rights-related incident, individuals can report it through the grievance cell, which is then addressed by the POSH committee. Furthermore, the Human Resources head at each location is responsible for addressing concerns and grievances raised by employees and workers.
Other than Permanent Employees	

https://www.nfil.in/contact/grievance_redressal.html

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

Category	FY 2023-24			FY 2022-23 [#]		
	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	1,328	0	0	1,246	0	0
Male	1,274	0	0	1,188	0	0
Female	54	0	0	58	0	0
Total Permanent Workers	159	159	100%	167	167	100%
Male	159	159	100%	167	167	100%
Female	0	0	0	0	0	0

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23 [#]				
	Total (A)	On Health & Safety Measures		On Skill Upgradation		Total (D)	On Health & Safety Measures		On Skill Upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	1,274	486	38.15%	804	63.11%	1,188	914	76.94%	837	70.45%
Female	54	16	29.63%	29	53.70%	58	28	48.28%	26	44.83%
Total	1,328	502	37.80%	833	62.73%	1,246	942	75.60%	863	69.26%
Workers										
Male	1,067	1,067	100%	117	10.97%	1,937	1,937	100%	1,937	100%
Female	41	41	100%	0	0	0	0	0	0	0
Total	1,108	1,108	100%	117	10.56%	1,937	1,937	100%	1,937	100%

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

Category	FY 2023-24			FY 2022-23 [#]		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who had a career review (B)	%(B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who had a career review (D)	%(D/C)
Employees						
Male	1,274	1,274	100%	1,188	1,188	100%
Female	54	54	100%	58	58	100%
Total	1,328	1,328	100%	1,246	1,246	100%
Workers						
Male	1,067	159	14.90%	1,937	167	8.62%
Female	41	0	0	0	0	0
Total	1,108	159	14.35%	1,937	167	8.62%

10. Health and safety management system:

- Whether an occupational health and safety management system has been implemented by the entity? (Yes/No) If yes, the coverage of such system?** Yes, the ISO 45001:2018 Occupational Health and Safety Management System has been comprehensively implemented throughout all factory premises, ensuring coverage for all employees, contract workers, and external parties engaged in activities at or visiting the Company's sites.
- What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?** The processes employed to identify work-related hazards and assess risks on both routine and non-routine bases encompass a range of comprehensive methodologies. These include Hazard Identification and Risk Assessment (HIRA), Pre-Startup Safety Review (PSSR), Job Safety Analysis (JSA), Work Permit System, and Unsafe Act/Conditions Reporting system. Additionally, the Company utilizes various techniques such as What-if analysis, HAZOP (Hazard and Operability Study), Permit to Work (PTW) systems, and Checklist-based assessments. These integrated approaches ensure a thorough and systematic evaluation of potential hazards and risks across our operational activities, enabling proactive measures for hazard identification, control, and mitigation.
- Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)** Yes, the Company has established clear protocols for employees and workers to promptly report any work-related hazards they encounter. Additionally, employees and workers are empowered to remove themselves from situations they perceive as dangerous and posing a critical risk.
- Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)** Navin Fluorine ensures comprehensive healthcare coverage for all employees and workers through various schemes, including Medclaim, life-term insurance policies, and ESIC (Employees' State Insurance Corporation). Health promotion services and programs are personalized according to routine medical assessments. The Company emphasizes healthy dining choices in the canteen and offers recreational amenities including a gym with indoor sports like table tennis, as well as outdoor games like cricket and badminton. Additionally, Navin Fluorine's Occupational Health Center (OHC) is accessible to all workers for non-occupational medical consultations, bolstering the overall healthcare support provided to employees and workers across the organization.

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

Safety Incident/Number	Category*	FY 2023-24	FY 2022-23 [#]
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.46	0.33
Total recordable work-related injuries	Employees	0	0
	Workers	3	2
No. of fatalities	Employees	0	0
	Workers	1	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	1	0

*Including in the contract workforce

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

Navin Fluorine has established a robust occupational health and safety management system aligned with ISO 45001:2018 standards. This system encompasses various key components including a comprehensive Health, Safety & Environment (HSE) Policy, clearly defined roles and responsibilities, active consultation and participation of workers and employees, and regular training on health and safety topics.

Furthermore, Navin Fluorine conducts thorough hazard identification and risk assessment studies for both routine and non-routine activities, implementing control measures across the site. Personal protective equipment is provided to all workers and employees to ensure their safety.

Navin Fluorine also adheres to various safety protocols such as Pre-Startup Safety Review (PSSR), Job Safety Analysis (JSA), Work Permit System, and Management of Change procedures. Additionally, regular health and safety audits are conducted to ensure compliance and continual improvement in safety standards across the organization.

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

Topic	FY 2023-24			FY 2022-23		
	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	2	0	Resolved all complaints	6	0	Resolved all complaints
Health & Safety	12	0		-	-	

14. Assessments for the year:

Topic	% 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.

Some corrective actions have been taken, while others are underway, to address safety-related incidents and significant risks/concerns identified during assessments of health & safety practices and working conditions.

- Implementation of strategies aimed at reducing manual handling of drums.
- Introduction of cherry pickers (Boom-Lifters) at the site to facilitate the safe execution of critical tasks at elevated heights.
- Strengthening of Hazard Identification and Risk Assessment (HIRA/HAZOP) procedures related to the handling of hazardous materials.

- Development of procedures aimed at safeguarding moisture-sensitive materials to prevent contamination during transfer or dispensing processes.
- Expansion of safety signage display boards to enhance visibility and awareness of safety protocols throughout the premises.
- Ongoing revamping of the Fire Hydrant system to improve its functionality

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, Navin Fluorine extends a compensatory package to all its employees including workers in the event of death. The Company offers a comprehensive term life insurance policy to ensure financial security for employees' families during unforeseen circumstances. Additionally, the Company's unique benevolent fund, supported by employee contributions matched by the Company, provides additional financial support. These initiatives supplement the statutory coverage of Employees Deposit Linked Insurance (EDLI).

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

Navin Fluorine has a robust mechanism to ensure the timely submission of all statutory dues to regulatory authorities. Additionally, the Company diligently monitors regulatory dues for our value chain partners on a monthly basis, collecting the necessary supporting evidence as required.

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 are 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 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	0	0	0
Workers	2	0	0	0

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

No, Navin Fluorine does not provide any transition assistance to its employees and workers.

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

Following assessments of health and safety practices and working conditions within our value chain partners, no significant risks or concerns have been identified. Consequently, there are currently no active initiatives or measures in place to address such issues.

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:

Navin Fluorine identifies any individual, entity, institution, or group that significantly impacts its operations as a core stakeholder. Embracing a stakeholder-centric ethos, Navin Fluorine integrates socially relevant and forward-looking strategies into its business activities. The Company actively interacts with a broad spectrum of stakeholders, including investors, customers, suppliers, and employees, utilizing scheduled events and diverse communication channels to foster meaningful engagement and collaboration.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other)	Frequency of engagement (Annually/ Half yearly/ Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors	No	Email, Telephone, Virtual meetings, In-person meetings, Newspaper, Website, Public disclosures, Annual reports, conference calls, Shareholder meetings	Continuous	<ul style="list-style-type: none"> Transparency in business practices Strong ESG practices Dividends, profitability, and financial stability Climate change risks Growth prospects
Customers	No	Email, Telephone, Social media, Website, In-person interactions, Surveys/feedback forms, Events/seminars	Continuous	<ul style="list-style-type: none"> Satisfaction with product quality Product innovation by Navin Fluorine
Suppliers	No	Email, Telephone, Vendor meetings, Conferences/trade shows, Purchase orders/invoices, Site visits	Continuous	<ul style="list-style-type: none"> Robust grievance redressal mechanism Effective delivery and payments
Regulatory	No	Email, Telephone, Regulatory filings, Regulatory portals, Meetings/hearings, Compliance reports, Industry conferences, Legal notices	Continuous	<ul style="list-style-type: none"> Effective compliance management system Robust health and safety system Strong environmental performance
Community	Yes	Email, Telephone, Community meetings, Social media, Community events	Continuous	<ul style="list-style-type: none"> Education support Quality Healthcare Water & Sanitation access
Employees and workers	No	Email, Telephone, Virtual meetings, In-person meetings, Website, Exit interviews, Arbitration/Union meetings, Workplace committees, Safety meetings, Training manuals, Wellness initiatives, Performance reviews, Engagement surveys, Intranet, Flat screens, Recognition programs, Suggestions/feedback boxes, Poster campaigns, House magazines, Confluence, Circulars, Quarterly publications, Newsletters.	Continuous	<ul style="list-style-type: none"> Learning and Development initiatives Employee health & well being

LEADERSHIP INDICATORS

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

Navin Fluorine places a high priority on cultivating robust and meaningful relationships with a diverse array of stakeholders. The organization has implemented a comprehensive stakeholder engagement framework aimed at comprehensively grasping business dynamics, identifying critical risk areas and concerns, communicating strategies and performance, and fostering trust among all stakeholders. Additionally, the Company conducts surveys targeting both internal and external stakeholders, namely employees and customers.

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.

Navin Fluorine's stakeholder engagement mechanism is designed to promote inclusivity, accountability, and responsibility. The Company actively collaborates with its stakeholders on various issues on an ongoing basis, enabling the identification of crucial business and ESG (Environmental, Social, and Governance) risk areas and the formulation of corresponding mitigation strategies. Navin Fluorine remains committed to integrating stakeholder requirements into its business operations, while also diligently addressing its performance and advancement on each material topic highlighted throughout the stakeholder engagement process.

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

Navin Fluorine has implemented several initiatives to address the concerns of vulnerable and marginalized stakeholders. The Company engages with underprivileged segments of society, differently abled communities, and children from economically disadvantaged backgrounds. Navin Fluorine endeavors to address the specific concerns of each stakeholder group through targeted initiatives aimed at fostering their development and growth.

PRINCIPLE 5: Businesses should respect and promote human rights

ESSENTIAL INDICATORS

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

Category	FY 2023-24			FY 2022-23 [#]		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	1,328	1,328	100%	1,246	1,246	100%
Other than permanent	0	0	0	0	0	0
Total Employees	1,328	1,328	100%	1,246	1,246	100%
Workers						
Permanent	159	159	100%	167	167	100%
Other than permanent	949	0	0	1,770	0	0
Total Workers	1,108	159	14.35%	1,937	167	100%

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

Category	FY 2023-24				FY 2022-23 [#]					
	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										
Male	1,274	0	0	1,274	100%	1,188	0	0	1,188	100%
Female	54	0	0	54	100%	58	0	0	58	100%
Other than permanent										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Workers										
Permanent										
Male	159	0	0	159	100%	167	0	0	167	100%
Female	0	0	0	0	0	0	0	0	0	0
Other than Permanent										
Male	908	0	0	908	100%	1,770	0	0	1,770	100%
Female	41	0	0	41	100%	0	0	0	0	0

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (₹ in lacs)	Number	Median remuneration/ salary/ wages of respective category (₹ in lacs)
Board of Directors (BoD) [#]	10	27.08	2	27.25
Key Managerial Personnel [#]	2	250.39	0	-
Employees other than BoD and KMP	1,272	8.54	54	14.94
Workers	1,067	2.43	41	1.36

*Excludes Directors of the Company

[#]The details pertain to the Board of Directors/KMPs of Navin Fluorine International Limited only.

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

	FY 2023-24	FY 2022-23
Gross wages paid to female as % of total wages	3.96	3.88

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, to effectively address human rights concerns, Navin Fluorine has implemented a comprehensive framework comprising a robust grievance cell, a POSH committee, and a Whistle Blower Policy. This policy delineates clear guidelines aimed at ensuring compliance with human rights standards. In the event of any human rights violation, individuals are encouraged to report such incidents through the grievance cell, which is then escalated for resolution by both the site head and the corporate office team. Moreover, the Human Resources head at each location is tasked with addressing and resolving any concerns or grievances raised by employees or workers.

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

The Company firmly upholds the principle of safeguarding human rights, adhering to it with utmost diligence. This commitment is demonstrated through its Human Resource Policy, which extends its protective measures to encompass all employees without exception.

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

	FY 2023-24			FY 2022-23		
	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 Labor	0	0	-	0	0	-
Forced Labor/Involuntary Labor	0	0	-	0	0	-
Wages	0	0	-	0	0	-
Other human rights related issues	0	0	-	0	0	-

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

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

Navin Fluorine is committed to upholding the highest standards of compliance with its Whistle Blower and Human Rights Policy across all business activities. Demonstrating profound respect for the human rights of each employee, the Company diligently addresses all concerns raised by stakeholders. In instances of observed discrimination or misconduct pertaining to the complainant, employees, and workers are encouraged to elevate their issues to the Human Resources department or the dedicated Internal Complaints Committee under Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 established by the Company.

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

Yes, the Organization has a supplier code of conduct which we get signed with our value chain partners.

10. Assessments for the year:

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

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

No corrective actions are currently underway as no significant risks were identified through the above assessments.

LEADERSHIP INDICATORS

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints
No modifications or introductions to business processes were made as there were no reported grievances or complaints related to human rights.

2. Details of the scope and coverage of any Human rights due-diligence conducted
Navin Fluorine conducted internal assessments encompassing all employees and workers throughout our plants and offices, with a comprehensive focus on human rights. These assessments have been meticulously designed to address critical elements including child labor, forced labor, sexual harassment, workplace discrimination, and fair wage considerations.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?
Due to the inherent nature of the Company’s operations and the associated risks involved, access to the visitors is restricted to office area, with designated provisions made available for their accessibility.

4. Details on assessment of value chain partners:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others	Nil

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.
No significant risks or concerns have been identified from the assessments conducted regarding child labor, forced/ involuntary labor, sexual harassment, discrimination at the workplace, and wages. As a result, there are no corrective actions currently underway to address such issues.

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 energy consumption unit as GJ	FY 2022-23 [#] energy consumption unit as GJ
From renewable sources		
Total electricity consumption (A)	49984.84	6513.99
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total energy consumed from renewable sources (A+B+C)	49984.84	6513.99
From non-renewable sources		
Total electricity consumption (D)	162047.44	202615.95
Total fuel consumption (E)	1434638.56	1018930.90
Energy consumption through other sources (F)	0.00	0.00
Total energy consumed from non-renewable sources (D+E+F)	1596685.96	1221546.85
Total energy consumed(A+B+C+D+E+F)	1646670.80	1228060.84

Parameter	FY 2023-24 energy consumption unit as GJ	FY 2022-23 [#] energy consumption unit as GJ
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	7.77*10 ⁻⁵	5.81*10 ⁻⁵
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	1.78*10 ⁻³	1.32*10 ⁻³
Energy intensity in terms of physical output	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: No external assurance has been carried out by an external agency. an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

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 has not been identified as a designated consumer 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	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	86006.00	85328.00
(ii) Groundwater	0.00	0
(iii) Third party water	1242686.38	1151860.46
(iv) Seawater / desalinated water	0.00	0.00
(v) Others	0.00	0.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1328692.38	1237188.46
Total volume of water consumption (in kilolitres)	1087670.66	720064.50
Water intensity per rupee of turnover (Water consumption / Revenue from operations)	5.13*10⁻⁵	3.41*10⁻⁵
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue⁷ from operations adjusted for PPP)	1.17*10⁻³	0.77*10⁻³
Water intensity in terms of physical output	-	-
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: No external assurance has been carried out by an external agency. an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23 [#]
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
(ii) To Groundwater	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
(iii) To Seawater	0	0
No treatment	0	0
With treatment – primary, biological, and tertiary processes alongside a Multi-Effect Evaporator system	308177.00	142495.00

Parameter	FY 2023-24	FY 2022-23 [#]
(iv) Sent to third-parties	0	0
No treatment	0	0
With treatment – Primary treatment (post-primary treatment, sent to the common effluent treatment plant)	250589.00	327110.00
(v) Others	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	558766.00	469605.00

Note: No external assurance has been carried out by an external agency.
an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

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

Yes, the Company's wastewater treatment plant at Dewas site operates on a Zero Liquid Discharge (ZLD) principle, incorporating an Effluent Treatment Plant, Reverse Osmosis, and Multi Effect Evaporator Plant. The treated effluent is utilized for various purposes, including within its utility systems such as the cooling tower. Similarly, at the Company's subsidiary location in Dahej, a wastewater treatment facility designed to address specific characteristics through primary, biological, and tertiary treatment methods has been implemented. To manage concentrated streams, a Multi Effect Evaporator is utilized, ensuring compliance with permissible limits before discharge to the industrial estate wastewater point. Meanwhile, in Surat, the manufacturing site treats wastewater through a three-stage process before discharging it to the community treatment plant. The treated water is then recycled onsite to support utility needs.

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

Parameter	Unit	FY 2023-24	FY 2022-23 [#]
NOx	MT	11.42	3.01
SOx	MT	11.37	1.94
Particulate matter (PM)	MT	9.67	1.49
Persistent organic pollutants (POP)	-	Nil	Nil
Volatile organic compounds (VOC)	-	Nil	Nil
Hazardous air pollutants (HAP)	-	Nil	Nil
Others – please specify	-	Nil	Nil

Note: No external assurance has been carried out by an external agency.
an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

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

Parameter	Unit	FY 2023-24	FY 2022-23 [#]
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	171152.10	92498.78
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	31959.36	39960.37
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue⁷ from operations)	Tco ₂ e/₹	9.58*10 ⁻⁰⁶	6.27*10 ⁻⁰⁶
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)	-	2.19*10 ⁻⁰⁴	1.42*10 ⁻⁰⁴
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	-	-	-

Note: No external assurance has been carried out by an external agency.
an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

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

- The Thermal Oxidation Unit, established in 2006, operates under the Clean Development Technology (CDT) framework, strategically aimed at reducing the environmental impact of greenhouse gas emissions. This asset plays a pivotal role in mitigating the adverse effects of emissions on the environment. It neutralizes the greenhouse effect caused by any fugitive emissions of Mafron.
- A power purchase agreement (PPA) has been established for renewable energy sources such as solar and wind, aimed at significantly curbing its emissions. This initiative involves a contractual agreement between parties to procure electricity generated from sustainable sources, thereby reducing reliance on fossil fuels and mitigating environmental impact. Navin Fluorine is currently in the process of establishing the PPA, with the objective of achieving approximately 50% of its electricity from renewable sources.

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

Parameter	FY 2023-24	FY 2022-23 [#]
Total Waste generated (in metric tonnes)		
Plastic waste (A) MT	253.38	47.13
E-waste (B) MT	11.22	10.00
Bio-medical waste (C) MT	0.073	0.061
Construction and demolition waste (D) MT	0.00	0.00
Battery waste (E) MT	1.69	0.00
Radioactive waste (F) MT	0.00	0.00
Other Hazardous waste. Such as Distillation residues, incineration ash, sulphur sludge, used oil, spent catalyst, discarded containers, process sludge, process residue & waste, spent carbon, cotton waste, chemical sludge from wastewater treatment, concentration of evaporation residue, off-specification product, spent catalyst, incinerated ash, distillation residue, spent solvent, pre-processing waste (G) MT	67062.98	38512.18
Other Non-hazardous waste. Such as Cardboard, plywood, and various types of scrap including rubber, cable, wood, used drums, glass, mild steel, and stainless steel (H), MT	5924.18	5124.96
Total Waste Generated (A + B + C + D + E + F + G + H) MT	73253.52	43694.27
Waste intensity per rupee of turnover (Total waste generated / Revenue ⁷ from operations)	3.46*10 ⁻⁰⁶	2.07*10 ⁻⁰⁶
Waste intensity per rupee of turnover adjusted Purchasing for Power Parity (PPP) (Total Waste Generated / Revenue from operations adjusted for PPP)	7.91*10 ⁻⁰⁵	4.68*10 ⁻⁰⁵
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	12943.16	15026.44
ii. Reused	41280.71	21416.70
iii. Other recovery operations	0.00	0.00
Total	54223.87	36443.14
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of Waste:		
i. Incineration	7828.64	1567.76
ii. Landfilling	11347.12	5524.60
iii. Other disposal operations – Co-processing	0.00	0.00
Total	19175.76	7092.36

Note: No external assurance has been carried out by an external agency.
an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

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.

The Company's waste management plan encompasses comprehensive strategies for waste minimization, segregation, and safe disposal. Navin Fluorine meticulously handles both hazardous and non-hazardous waste, ensuring that non-hazardous waste is disposed of through authorized recyclers, while hazardous waste is sent to authorized vendors for responsible recycling and disposal.

The Company's facility features an advanced Effluent Treatment Plant (ETP) with Zero Liquid Discharge (ZLD) capabilities, employing Reverse Osmosis (RO), Multiple Effect Evaporation (MEE), and Agitated Thin Film Dryer (ATFD) technologies.

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:

Navin Fluorine's operations and offices are not situated in or around ecologically sensitive areas. As a result, there is no requirement for environmental approvals or clearances in this regard.

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

No environmental impact assessments have been conducted for projects undertaken by Navin Fluorine in the current financial year in accordance with applicable laws.

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, in the following format:

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
1	Air (Prevention and Control of Pollution) Act, 1981	The Company's wholly owned subsidiary, Navin Fluorine Advanced Sciences Limited ('NFASL'), was directed by the Gujarat Pollution Control Board on August 04, 2023, to pay Environment Damage Compensation for alleged violations of provisions of the Air (Prevention and Control of Pollution) Act, 1981.	The Company's wholly owned subsidiary, Navin Fluorine Advanced Sciences Limited ('NFASL'), was directed by the Gujarat Pollution Control Board on August 04, 2023, to pay ₹1,00,00,000 as Environment Damage Compensation for alleged violations of provisions of the Air (Prevention and Control of Pollution) Act, 1981.	The Company is committed to the highest environment and safety standards. Adherence to various laws, including applicable environmental compliances, is given utmost importance. The Company has done thorough review of the concerns raised and has taken immediate measures towards an expeditious resolution of the matter. Corrective measures include the implementation of enhanced monitoring and control protocols.

LEADERSHIP INDICATORS

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

Navin Fluorine's operational sites are not situated in water-stressed regions. No water is withdrawn, consumed, or discharged from any such areas.

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

- i. Name of the area : Not Applicable
- ii. Nature of operations : Not Applicable
- iii. Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Groundwater	Nil	Nil
(iii) Third party water	Nil	Nil
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres)	Nil	Nil
Total volume of water consumption (in kilolitres)	Nil	Nil
Water intensity per rupee of turnover (Water consumed / turnover)	Nil	Nil
Water intensity (optional) – the relevant metric may be selected by the entity	Nil	Nil
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	Nil	Nil
No treatment	Nil	Nil
With treatment – please specify level of treatment	Nil	Nil
(ii) Into Groundwater	Nil	Nil
No treatment	Nil	Nil
With treatment – please specify level of treatment	Nil	Nil
(iii) Into Seawater	Nil	Nil
No treatment	Nil	Nil
With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third-parties	Nil	Nil
No treatment	Nil	Nil
With treatment – please specify level of treatment	Nil	Nil
(v) Others	Nil	Nil
No treatment	Nil	Nil
With treatment – please specify level of treatment	Nil	Nil
Total water discharged (in kilolitres)	Nil	Nil

Note: No external assurance has been carried out by an external agency.

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

Parameter	Unit	FY 2023-24	FY 2022-23 [#]
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	30223.72	23428.78
Total Scope 3 emissions per rupee of turnover⁷	MTCO ₂ e/₹	1.43*10 ⁻⁶	1.11*10 ⁻⁶
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

Note: No external assurance has been carried out by an external agency.
an increase due to inclusion of New plant at Dahej which has completed its first full year production in FY 23-24

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, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Process modification	Steam condensate recovery from Mafron, Argo 1.0, sulfuric acid (H ₂ SO ₄) plant, and Multi-Purpose Plant (MPP), as well as condensate recovery from the process plant after checking conductivity and pH, aims to reduce demineralized (DM) water and natural gas (NG) consumption in the NG-fired boiler by ensuring clean condensate transfer to the boiler DM water tank.	The initiative led to a reduction of 140,557 cubic meters in natural gas consumption, a reduction of 265 metric tons (MT) in CO ₂ emissions, and a reduction of 10,565 kiloliters (KL) in water consumption.
2.	Process modification	Implemented a process aimed at reducing steam is achieved by integrating liquid hydrofluoric acid (HF) into the Mix-II reaction at the Boron Trifluoride (BF ₃) plant, thus eliminating the necessity for Hydrofluoric Acid (HF) vaporization.	The initiative resulted in a decrease of 246 metric tons (MT) in steam consumption.
3.	Process modification	Implemented a process aimed at reducing chiller compressor power consumption through the integration of liquid Hydrofluoric Acid (HF) into the Mix-II reaction at the Boron Trifluoride (BF ₃) plant	The initiative led to a decrease of 80766 kWh in electricity consumption and a reduction of 57 metric tons (MT) in CO ₂ emissions.
4.	Implementation of Zero Liquid Discharge system	Installation of a full-fledged ETP/Zero Liquid Discharge (ZLD) facility equipped with reverse osmosis (RO), multiple Effect Evaporator (MEE), and agitated thin film dryer (ATFD) for Primary, Secondary, and Tertiary treatment of effluent. The entire effluent load inclusive of process and domestic streams are treated to finally yield good quality water which is recycled/reused back to the cooling tower/ utility purpose.	Resource conservation - Treated effluent is utilized in utility thus reducing freshwater consumption.
5.	Co-processing / Pre-processing of Hazardous waste	Exploration and implementation of utilizing hazardous waste in the Cement industry as Co-processing/Pre-processing measures. A good example of resource conservation is by utilizing hazardous waste in a Cement kiln as fuel instead of disposing it at TSDF.	Resource conservation

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

Yes, Navin Fluorine has a thorough plan for business continuity and disaster management, covering natural and man-made emergencies. The focus is on reducing risks to human health, minimizing property damage, and protecting the environment. This plan also ensures effective communication between Navin Fluorine, government authorities, public forums, and the press to prevent any public disorder.

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.

Navin Fluorine efficiently dispatches chemicals from its designated site to the respective port via trailers, ensuring seamless transportation. Each trailer is accompanied by a water tanker as a precautionary measure to mitigate any potential mishaps. This strategic arrangement allows swift response and management in the event of an incident, underscoring Navin Fluorine's commitment to safety and operational excellence.

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

A total of 19% of our value chain partners underwent assessments to evaluate their environmental impacts.

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

ESSENTIAL INDICATORS

1. a) Number of affiliations with trade and industry chambers/ associations.
Navin Fluorine is a member of two associations.

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

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

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

There were no reported cases of anti-competitive behavior at Navin Fluorine during the present fiscal year.

LEADERSHIP INDICATORS

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

The Company actively engages in diverse association programs, advocating for and contributing to inclusive development policies that benefit the Chemical Industry at large.

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.

In adherence to the prevailing legal framework, particularly the Right to Fair Compensation and Transparency in Land Acquisition Act of 2013, and the Rehabilitation and Resettlement Act of 2013, it is imperative to note that Navin Fluorine is not subject to the stipulations outlined within these legislative mandates. Consequently, the necessity for Social Impact Assessments (SIA) does not apply to Navin Fluorine, as per the scope of its operations and legal obligations.

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

For the current financial year, Navin Fluorine has not engaged in any land acquisition activities, nor have we been involved in any displacements. As a result, Rehabilitation and Resettlement (R&R) measures are not applicable to our operations during this period.

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

Initiatives conducted within the realm of Corporate Social Responsibility (CSR) undergo meticulous tracking to assess achieved outcomes and community benefits. The Company voluntarily conducts impact assessment surveys of its implementing agencies for select projects and, whenever feasible, implements internal tracking mechanisms, issues regular reports, and conducts follow-up field visits, as well as engages in telephonic and email communications. The community can report their grievance using the below web-based grievance reporting form:

https://www.nfil.in/contact/grievance_redressal.html

4. Percentage of input material (inputs to total inputs by value) sourced from local or small-scale suppliers:

	FY 2023-24	FY 2022-23 [#]
Directly sourced from MSMEs/Small producers	34.18%	29.00%
Sourced directly from within the district and neighboring districts	28.49%	28.34%

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

Location	FY 2023-24	FY 2022-23
Rural	0	0
Semi-urban	24.55%	19.55%
Urban	15.62%	14.96%
Metropolitan	59.83%	65.49%

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

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):

Social Impact Assessments (SIA) are not applicable to Navin Fluorine, aligning with the scope of its legal obligations.

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

S. No.	State	Aspirational District	Amount spent in INR Lacs
1.	Madhya Pradesh	Vidisha	200.00
2.	Gujarat	Narmada	24.97
3.	Gujarat	Dahod	0.44

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

Navin Fluorine has implemented a Sustainable Supply Chain Policy to uphold ethical and responsible procurement practices from all suppliers. The Company places emphasis on partnering with suppliers who adhere to environmental and social standards, aiming to mitigate adverse impacts within its supply chain.

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

Navin Fluorine prioritizes sourcing a majority of its raw materials from local and Micro, Small, and Medium Enterprises (MSME) suppliers.

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

15.74%

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:

Navin Fluorine does not hold proprietary intellectual properties. Instead, the Company engages in collaborative ventures with industries across various sectors. In these partnerships, Navin Fluorine produces intermediate chemicals based on the technical expertise provided by each industry, operating within the framework of individual agreements with its partners.

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.

For Navin Fluorine, there are no corrective actions taken or underway based on any adverse order in intellectual property-related disputes involving the usage of traditional knowledge.

6. Details of beneficiaries of CSR Projects:

S. CSR Project No	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
Projects undertaken by Navin Fluorine International Limited		
1. Shri Sadguru Seva Sangh Trust	30,000+	-
2. Charutar Arogya Mandal	10,000+	-
3. Blind People's Association	3,800+	13.80%
4. Arvind Mafatlal Foundation	9,500+	90.75%
5. Olympic Gold Quest	86	-
6. Cancer Patients Aid Association	50	100%
7. Sir J. J. Hospital	100+	100%
8. Mobile Health Vans – catering to villages around Surat and Dewas	70,000+	-
9. Project Nanhi Kali	489	100%
10. Consumer Education & Research Centre	-	-
11. Prayas	1,200*	-
Projects undertaken by Navin Fluorine Advanced Sciences Limited		
1. Shakti Foundation	2,150	100%
2. Building two classrooms for a school in Bharuch	-	-
3. Project Nanhi Kali	486	100%
4. Food distribution around Dahej factory	3,150	-

* This encompasses stray animals that have benefited from the Company's CSR project.

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

ESSENTIAL INDICATORS

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

The Company maintains a customer-centric approach, demonstrated through regular customer satisfaction surveys aimed at continual improvement. Routine surveys engage both external and internal stakeholders, with external customers providing feedback annually and internal customers surveyed quarterly. The ratings and inputs received are meticulously analyzed, prompting respective departments to take proactive measures to enhance their performance based on the feedback received.

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

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

3. Number of consumer complaints

	FY 2023-24			FY 2022-23		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	2	0	-	9	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Others (product specification, product packaging)	16	0	-	33	0	-

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

	Number	Reason for recall
Voluntary recalls	0	Not Applicable
Forced recalls	0	Not Applicable

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

Yes, Navin Fluorine has established an IT/Cyber security policy designed to manage incidents pertaining to cybersecurity and data privacy effectively. This policy outlines fundamental standards to maintain a secure work environment, ensuring the protection of confidential and sensitive information concerning Navin Fluorine employees, customers, suppliers, and all stakeholders.

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.

In the current reporting period, the Company has not encountered any instances necessitating corrective actions pertaining to advertising and delivery of essential services, cyber security and data privacy of customers, re-occurrence of instances of product recalls, or penalties/actions taken by regulatory authorities on the safety of products/services.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches

No instances of data breaches were recorded during FY 2023-24

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

No instances of data breaches were recorded during FY 2023-24

c. Impact, if any, of the data breaches

No instances of data breaches were recorded during FY 2023-24

LEADERSHIP INDICATORS

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

Access to information on Navin Fluorine products is available through the following link: <https://www.nfil.in/>

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

Navin Fluorine provides a material safety data sheet with all of its products to inform and educate consumers about the safe and responsible usage of the products.

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

Navin Fluorine is able to predict and foresee any potential disruption to its essential services. The Company has mechanisms in place to notify consumers about any potential risk of disruption or any discontinuation of its services through emails, conference calls, and mobile device messages.

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

Navin Fluorine adheres to relevant laws and regulations in disclosing product information. Navin Fluorine displays product labels, Product Safety Data Sheets labels, hazard class labels, and Globally Harmonized System (GHS) labels on each consignment for safe handling of the product.

The Company conducts routine customer satisfaction surveys involving both external and internal stakeholders. External customers participate annually, while internal customers are surveyed quarterly. Feedback from these surveys informs departmental initiatives aimed at improving service quality and meeting Navin Fluorine's customer needs.

* The data has been restated to ensure alignment with the guidance note for the Business Responsibility & Sustainability Report

** This includes raw material purchases from trading houses.

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

Vishad P. Mafatlal
Chairman
DIN: 00011350

Date: May 07, 2024
Place: Mumbai

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