

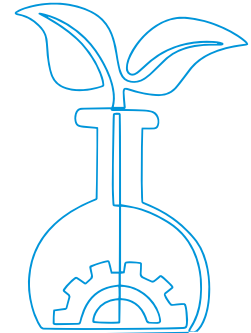
Business Responsibility and Sustainability Report

BRSR OVERVIEW

SECTION A – General disclosures

SECTION B – Management and process disclosures

SECTION C – Principle-wise performance disclosure



Principle 1

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

Principle 2

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

Principle 3

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

Principle 4

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

Principle 5

Businesses should respect and promote human rights

Principle 6

Businesses should respect and make efforts to protect and restore the environment

Principle 7

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

Principle 8

Businesses should promote inclusive growth and equitable development

Principle 9

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

HIGHLIGHTS

Principle 1:

Ethics

- **100%** of the BoD, KMP's, Employees and Workers underwent trainings on 9 NGRBC principles.
- **NIL** monetary/non-monetary proceedings or actions by the regulatory enforcement agency/ judicial institutions
- **100%** value chain partners underwent Safety Protocol and Material handling trainings

Principle 4:

Stakeholder Engagement

- **Robust Mechanism** to identify and engage with stakeholders.

Principle 7:

Public Policy Advocacy

- **0** cases filed regarding Unfair trade practices, Irresponsible advertising or Anti-Competitive behaviour.
- **5** chambers and associations in which TCL actively participates.

Principle 2:

Product Stewardship

- **7.14%** R&D investments utilised to Improve Environmental and Social Impacts of products.
- **91%** of our inputs are sustainably sourced.
- **16.7%** of our packaging material is reused in FY23-24

Principle 5:

Human Rights

- **100%** of Employees and Workers provided with Human Rights training.
- **NIL** complaints of POSH, Child Labour, Forced Labour, Discrimination at workplace, Wages issue for the reporting period FY23-24

Principle 8:

CSR Initiatives

- **66%** input material directly sourced from MSME/Small Producers
- **89.5%** input material sourced from within India

Principle 3:

Employee well-being

- **100%** of our Employees and Workers have Health Insurance and Accident Insurance
- **85%** Employees and 75% Workers provided with Skill Upgradation training.
- **92.5%** and 91% of our plants and offices are assessed for Health & Safety practices and Working Conditions respectively.

Principle 6:

Environment

- **493200 GJ** of Energy utilised in FY 23-24
- **741832 Kilo Litre** of Water Consumption
- **101475 Mt CO2e** of Scope 1 and **13050 Mt CO2e** of Scope 2 and **166216 Mt CO2e** of Scope 3 Greenhouse gases Emitted in FY23-24

Principle 9:

Customer Relations

- **0** Voluntary or Forced Recalls
- **0** Incidents of Data Breach

SECTION A – GENERAL DISCLOSURES

I. Detailed of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L24100MH1972PLC016149
2.	Name of the company	THIRUMALAI CHEMICALS LIMITED
3.	Year of incorporation	25/05/1972
4.	Registered office address	Thirumalai House, Road No.29, Sion-East, Mumbai-400 022
5.	Corporate address	Spic House, 5 th Floor, 88, Mount Road, Guindy, Chennai - 600032
6.	E-mail	rajagopalan.t@thirumalaichemicals.com
7.	Telephone	Tel: +91 22 2401 7841 / 53 / 61
8.	Website	www.thirumalaichemicals.com
9.	Financial year for which reporting is being done	2023-24
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11.	Paid-up Capital	₹10,23,88,120
12.	Name of contact details of the person who may be contacted in case of any queries on the BRSR Report	Rajagopalan T (Company Secretary & Compliance office) Tel: +91 22 2401 7841 / 53 / 61 rajagopalan.t@thirumalaichemicals.com
13.	Reporting boundary	Standalone
14.	Name of assurance provider	The report is not assured by an external assurance provider
15.	Type of assurance obtained	Not applicable

II. Products and Services

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

S. No.	Description of Main Activity	Description of Business Activity	% Of Turnover of the entity
1	Manufacture of basic chemicals except fertilisers and nitrogen compounds	Manufacturing, distribution, sales and marketing of basic chemicals except fertilisers and nitrogen compounds	100%

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	Phthalic Anhydride and Derivatives, Malic Acid, Fumaric Acid	2411	87%

III. Operations

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

TCL has its:

- Registered office in Mumbai
- Factories at Ranipet, Ranipet District, Tamil Nādu and Dahej, Gujarat
- Tank Farms at Walaja, Ranipet District, and Royapuram, Chennai, Tamil Nadu.
- Marketing offices at Chennai & Delhi

TCL has overseas subsidiaries in Malaysia, Singapore, the USA, the Netherlands & the UK.

Location	Number of Manufacturing Units	Number of Offices	Total
National	2	3	5

19. Markets served by the entity:**a. Number of locations**

Locations	Number
National (No. of States)	The Company sells its products in all the 28 states and 8 Union territories in the country
International (No. of Countries)	The Company sells its products in 4 continents (US, Europe, Asia, Middle East, Africa)

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

For FY 23-24, the exports contribution was 9%

c. A brief on types of customers

Phthalic Anhydride is a white crystalline substance used in the manufacture of plasticizers, pigments, dyes and resins.

It is notably consumed by the Phthalate plasticiser industry as a key component and is used in the production of flexible plastic products like wire & cable applications, hoses, pipes, coated fabrics, roofing membranes and swimming pool liners.

Phthalic Anhydride is also employed in the manufacturing of unsaturated polyester resins, (UPR), which are commonly mixed with glass fibres to create fiberglass reinforced plastics. The materials find significant applications in the construction, marine and transportation industries.

PA-based alkyd resins plays a crucial role in the formulation of paints and lacquers utilised in architectural, machinery, and furniture applications.

TCL is the sole manufacturer of Malic Acid in India and it is used predominantly in food and beverage application with customers including global companies like Perfetti, Symrise etc. Fumaric acid is used in the food industry and pharmaceutical industry.

IV. Employees**20. Details as at the end of Financial Year:****a. Employees and workers (including differently abled):**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	509	461	91%	48	9%
2.	Other than Permanent* (E)	27	25	93%	2	7%
3.	Total employees (D + E)	536	486	91%	50	9%
WORKERS						
4.	Permanent (F)	28	28	100%	0	0
5.	Other than Permanent* (G)	734	667	91%	67	10%
6.	Total workers (F + G)	762	695	91%	67	10%

* The Other than Permanent category of Employees & Workers are either Employed through contractor (Benefits as per the contractor) or Fixed term appointment on contract directly by TCL based on requirement

b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	1	1	100	0	0
3.	Total differently abled employees (D + E)	1	1	100	0	0
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	0	0	0	0	0

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	11	2	18%
Key Management Personnel	3	1	33%

22. Turnover rate for permanent employees and workers

	FY 23-24			FY 22-23			FY 21-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12%	8 %	20%	26%	13%	39%	19%	15%	34%
Permanent Workers	3.5%	-	3.5%	3%	-	3%	18%	-	18%

V. Holding, Subsidiary and Associate Companies (including joint ventures)**23. (a) Names of holding / subsidiary / associate companies / joint ventures**

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% Of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	TCL Intermediates Private Limited	Subsidiary of TCL	100%	Yes, The Company's Code of Conduct provides guidelines to the company along with all its subsidiaries for conducting business in an ethical, responsible, and accountable manner. The Company encourages its subsidiaries to carry out Business Responsibility Initiatives to the extent that they are material in relation to the subsidiaries' business activities and operating region.
2.	Optimistic Organic sdn bhd.	Subsidiary of TCL & Cheminvest	TCL (15.80%) Cheminvest (84.20%)	
3.	Lapiz Europe	Subsidiary of Cheminvest	100%	
4.	TCL Global BV	Subsidiary of TCL/ Holding of TCL INC.	100%	
5.	TCL INC.	Subsidiary of TCL Global BV/ Holding entity of TCLS LLC	100%	
6.	TCL Specialties LLC (TCLS LLC)	Sole Member Corporation	100%	

VI. CSR**24. (i)** Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)

Yes, CSR is applicable for Thirumalai Chemicals Limited as per section 135 of Companies Act, 2013.

(ii) Turnover (in ₹) – 2,02,483 lakhs

(iii) Net worth (in ₹) – 98,395 lakhs

VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No) (If yes, then provide web-link for grievance redress policy)	FY 23-24			FY 22-23		
		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	0	0	-	0	0	-
Shareholders	Yes	8	0	All Complaints were duly addressed and closed	0	0	-
Employees & Workers	Yes	0	0	-	0		-
Customers	Yes	15	0	All Complaints were duly addressed and closed	19		All Complaints were duly addressed and closed
Value Chain Partner	Yes	0	0	-	0	0	-
Others	Yes	0	0	-	0	0	-
Weblink	https://thirumalaichemicals.com/wp-content/uploads/2023/05/STAKEHOLDER-GRIEVANCE-REDRESSAL-POLICY.pdf						

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

In FY 22-23, we carried out an extensive materiality assessment to identify and understand the material topics that directly or indirectly impacted our organisation and business operations within the ESG framework. Through this detailed analysis, we were able to focus our efforts on the most relevant sustainability issues for our stakeholders and strategic partners, aligning with our goals and targets.

Our approach, which prioritised stakeholder input, both external and internal, is seen as a balanced and holistic methodology to arrive at the topics most critical to the organisation. We identified key stakeholder groups vital to the entity and conducted surveys, incorporating ESG-related criteria. Additionally, we performed peer-benchmarking and analysed various ESG Rating agencies and standards within our sector to identify the specific materiality topics of importance to us. External Stakeholders included customers, suppliers, investors, and community representatives, while internal stakeholders comprised employees across different levels and departments. We designed comprehensive surveys that addressed a range of ESG-related topics such as environmental impact, social responsibility, ethical governance, and economic performance. These surveys were tailored to gather insights specific to each stakeholder group's perspectives and expectations. Once the surveys were completed, we analysed the data to identify the materiality topics. These findings were then mapped onto a materiality matrix, which visually represented the importance and impact of each material topic. This matrix helped us prioritise and categorise issues into high, medium, and low priority categories. The ESG materiality topics and matrix was presented by the senior management to the Board of Directors, highlighting key ESG issues based on stakeholder input and strategic priorities. Following a detailed review and discussion, the Board validated and firmed up the material topics, ensuring they accurately reflect the company's impact and objectives.

The comprehensive materiality assessment proved instrumental in establishing our ESG goals and targets. By identifying and prioritising key sustainability issues through this assessment, we were able to set specific and impactful targets that directly address the most relevant concerns for our stakeholders and business operations. Overall, integrating surveys and

interviews from both external and internal stakeholders allowed us to conduct a robust materiality assessment that informed our sustainability strategy and target-setting process effectively. This approach ensured that our ESG initiatives were aligned with stakeholder expectations and industry best practices, leading to measurable progress and positive outcomes in our sustainability journey.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Health & Safety	R	As a chemical manufacturing industry, prioritising health and safety is paramount and deeply ingrained in our organisation. We are committed to creating a safe workplace by maintaining an accident-free environment, aiming for zero safety accidents, injuries and incidents that could harm our workplace or the environment.	Our safety culture is exceptional, supported by a robust reporting system that involves all levels of our organisation. We conduct regular safety training sessions to enhance employee well-being and maintain a safe work environment.	Negative
2	Business Ethics	R	Ethical practices form the foundation of our business operations. Our Company's Code of Conduct outlines the essential compliance requirements and provides guidelines for internal stakeholders to fulfil their duties with the utmost integrity and accountability.	TCL has implemented stringent policies to ensure ethical practices within the organisation. Our code of conduct and ethical policies establish a comprehensive framework for employees and internal stakeholders. We also offer training programs to ensure understanding and adherence to these standards.	Negative
3	Water Stewardship	O	Energy & Water stewardship have become fundamental aspects of our organisation's identity. We are dedicated to conducting our business operations in a sustainable and environmentally friendly manner. In line with our dedication to water stewardship, we commit to achieving by a 10% reduction in water consumption by year 2030.		Positive
4	Employee Development		Employee development plays a pivotal role in our sustainability journey. By investing in the growth and skills enhancement of our workforce, we create a more capable and adaptable team. This, in turn, enables us to implement sustainable practices effectively, innovate solutions, and respond to evolving challenges in our industry and the broader environmental landscape. Additionally, a well-developed and motivated workforce is more engaged, leading to higher productivity, better retention rates and stronger commitment to our sustainability goals.		Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Community Support	O	Community support is integral to our sustainability journey. We recognise the importance of engaging with and supporting the communities where we operate. By collaborating with local stakeholders, NGO's and government bodies we understand community needs and priorities better. This enables us to develop sustainable initiatives that not only benefit our business but also contribute positively to the social and economic well-being of the communities we serve. Through partnerships, outreach programs, and community projects, we aim to foster trust, build relationships, and create shared value, ultimately enhancing our overall sustainability impact. We provide training programmes to the local youth to improve the employment rate and are involved with various charitable organisations for providing affordable healthcare and education.		Positive
6	Zero Waste to Landfill	O	TCL has implemented a range of measures to ensure the proper handling and disposal of wastes. Our focus is on capturing and synthesising valuable products from waste streams, including gases, liquids and solids. Through these efforts, we have achieved a remarkable recovery rate, with over 85% of solid wastes being transformed into highly pure saleable products and valuable by-products. This approach not only minimises environmental impact but also maximises resource efficiency, contributing to our overall sustainability goals. We aim to achieve a 10% reduction in our industrial waste by 2030, from the baseline year 2022-23.		Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7	Carbon Footprint	R	TCL is committed to combating climate change through initiatives focused on enhancing energy efficiency and increasing the use to renewable energy sources to lower our carbon footprint. Our manufacturing processes are among the most efficient in the industry, resulting in significant reductions in specific energy consumption. Over the last three decades, we have achieved an impressive 78% decrease in specific energy consumption, showcasing our commitment to sustainability and environmental stewardship.	To achieve a near zero energy footprint, we have adopted a three-pronged approach to energy savings. First, we harness energy from waste heat, maximising resource utilisation. Second, we prioritise energy efficiency across our operations, ensuring every unit of energy is used judiciously. Third, we foster a culture of innovation, among our employees, encouraging them to propose, and implement creative solutions that further reduce energy consumption and contribute to sustainability goals. As a result of this approach and mitigation plans we look to bring about 25% reduction in GHG emissions from the baseline year 2022-23	Negative
8	Corporate Governance	R	The Company's Board of Director's is responsible for setting policies and strategies, providing overarching supervision and control over the management of the company. The Board and its committees regularly review the implementation of these policies and support the executive management team as required. They also ensure the implementation of good governance and risk management policies and practices ,as well as efficient business processes, with a rigorous approach.	Compliance with progressive social norms and regulatory requirements is not just a necessary cost but also essential for our sustainability. These values are ingrained in our culture ,and we continuously collaborate with our employees to ensure they internalise and work within this framework. As a result, we have gained a strong reputation as an employer, business partner ,and community member. Both the Board of Directors and the management team are dedicated to upholding this culture of integrity and transparency in all aspects of our business operations	Negative
9	Regulatory Issues & Compliance	R	TCL's policies and practices have consistently adhered to ethical standards, legal requirements and sustainability principles. We firmly believe that it is possible to uphold these policies while remaining competitive in the market. By prioritising compliance, we not only contribute positively to society and environment but also enhance our long-term competitiveness and reputation as a responsible business entity.	The company strictly adheres to regulations and compliance requirements, integrating them into our organisational culture and practices, we have established robust systems and processes to monitor and ensure compliance with applicable laws, rules, regulations and guidelines. This proactive approach helps us operate ethically, mitigate risks, and uphold our commitment to legal and regulatory compliance across all aspects of our operations.	Negative
10	Product Safety & Quality	R	TCL gives paramount importance to ensure product safety and to deliver quality products for achieving customer delight.	We constantly communicate and receive feedback from the customers and work upon to fulfil their needs and requirements.	Negative

SECTION B – MANAGEMENT AND PROCESS DISCLOSURES

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

Our comprehensive management framework is in line with the NGRBC principles and serves as a driving force for our dedication to sustainable solutions across the three pillars of people, planet, and profit. Our policies, practices and procedures are geared towards achieving the needs of our stakeholders, including customers and employees, with clear goals and objectives.

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

Principle 1	Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable
Principle 2	Businesses should provide goods and services in a manner that is sustainable and safe
Principle 3	Businesses should respect and promote the well-being of all employees, including those in their value chains
Principle 4	Businesses should respect the interests of and be responsive to all its stakeholders
Principle 5	Businesses should respect and promote human rights
Principle 6	Businesses should respect and make efforts to protect and restore the environment
Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
Principle 8	Businesses should promote inclusive growth and equitable development
Principle 9	Businesses should engage with and provide value to their consumers in a responsible manner

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	https://thirumalaichemicals.com/compliance-policies/								
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, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	All the policies of the Company are in compliance with national /international standards wherever applicable. TCL is a FSSC 22000 (equivalent to GFSI), HACCP, Halal & Kosher Certified, ISO 9001, ISO 9004, ISO 14001 & ISO 50001 compliant, SMETA and a Responsible Care Company								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any .	<p>Our organisation is committed to integrating Environmental, Social and Governance principles into our core operations. We have set specific goals across Environmental, Social and Governance (ESG) dimensions.</p> <p>Environmentally, we commit to *:</p> <ul style="list-style-type: none"> • 25% reduction in GHG emissions by 2030 • 10% reduction in water consumption by 2030 • 10% reduction in industrial waste by 2030 (*from the baseline year 2022-23) <p>Socially, we will:</p> <ul style="list-style-type: none"> • Ensure zero accidents at workplace • Continue to implement practices towards the Responsible Care Initiative 								

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

At Thirumalai Chemicals we uphold a strong commitment to conducting and governing ourselves with integrity, ensuring that all our actions and decisions are guided by ethical principles. Our commitment is unwavering as we conduct ourselves with the highest standards of honesty, integrity, and transparency. These values are ingrained in our corporate culture and guide us in creating sustainable and trustworthy relationships with our customers, employees and the community. Our Directors and Senior Management adhere to a comprehensive Code of Conduct that outlines their responsibilities and ethical obligations, enabling them to fulfil their duties in a responsible, transparent, fair and ethical manner.

SDG Linkages-



Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	2	Familiarisation Programs for Directors Awareness program on Sustainability	100%
Key Managerial Personnel	2	ESG Compliance, POSH	100%
Employees other than BoD and KMPs	51	Awareness on employee Well-being. Awareness on Human Rights	100%
Workers	17	Awareness on employee Well-being. Awareness on Human Rights	100%

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

	Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agency/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine			Nil		
Settlement					
Compounding fee					

	Non-Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agency/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment			Nil		
Punishment					

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

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

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

Yes, Our company maintains a robust and comprehensive anti-bribery and anti-corruption policy to ensure ethical business practices and integrity throughout our operations. This policy underscores our commitment to conducting business with transparency, fairness and honesty. It outlines clear guidelines and procedures to prevent bribery and corruption in all forms, emphasising compliance with legal requirements and ethical standards. Through continuous training, monitoring, and enforcement of this policy, we foster a culture of integrity and accountability within the organisation, building trust and assurance among our stakeholders.

The anti-corruption and anti-bribery policy is available on our website in the following link :

<https://thirumalachemicals.com/wp-content/uploads/2023/05/ANTI-BRIBERY-AND-ANTI-CORRUPTION-POLICY.pdf>

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

	FY 23-24	FY 22-23
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 23-24		FY 22-23	
	Number	Remarks	Number	Remarks
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 the KMPs		Nil		Nil

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

Not applicable

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

	FY 23-24	FY 22-23
Number of days of accounts payables	112 days	104 days

9. Open-ness of business

Parameter	Metrics	FY 23-24	FY 22-23
Concentration of Purchases	a. Purchases from trading houses* as % of total purchases	2.6%	2.7%
	b. Number of trading houses where purchases are made from	12	13
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	2.6%	2.7 %
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	NA	NA
	b. Number of dealers / distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	NA	NA

Parameter	Metrics	FY 23-24	FY 22-23
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	.007%	.02%
	b. Sales (Sales to related parties / Total Sales)	.04%	.04%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	Nil	.062%
	d. Investments (Investments in related parties / Total Investments made)	94.79%	99.97%

*A trading house refers to a business entity that primarily engages in import and export of goods .

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	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
4	Safety Protocols	Contract employees, logistics and visiting vendors- 100%
	Material Handling & Loading	Logistics-100 %
	Prevention of Sexual Harassment	Contract employees-30%
	Product responsibility	Critical vendors-57%

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, we have a comprehensive Code of Conduct policy which serves as a cornerstone, ensuring transparency and fairness in all our business dealings. This policy outlines clear guidelines and expectations for ethical behaviour, emphasising the importance of honesty, integrity and respect in each interaction. This commitment to ethical conduct not only strengthens trust and credibility with our stakeholders but also reinforces our dedication to operating with integrity and accountability.

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

TCL's commitment to sustainability shines through its dedicated R&D team, which focuses on developing innovative products that meet global standards and are environmentally friendly. TCL excels in business practices, striving for near-zero energy footprint by manufacturing with high efficiency through energy-saving measures and waste data recovery. Additionally, the company strives to integrate sustainability principles across all stages of the product lifecycle, from raw material procurement and manufacturing to transportation, delivery, and consumer disposal. We uphold a strong commitment to environmental responsibility and ensure that our products and services meet rigorous safety standards. Through continuous innovation and responsible practices, we strive to minimise our environmental impact and prioritise the safety of our customers and communities.

SDG Linkages-



Essential Indicators

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

	FY 23-24	FY 22-23	Details of improvements in environmental and social impacts
R&D	7.14 %	0%	Reducing the waste by 2.8 tons per day
Capex	1%	3%	1. HCL Dosing system for Reliability improvement 2. CCTV PTZ Camera (ETP)

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

Yes, the company has embraced Responsible Care Guidelines and SEDEX Members Ethical Trade Audit (SMETA) Best Practice Guidance to ensure sustainable sourcing. By sourcing raw materials in bulk, the company minimises road transportation over long distances, effectively reducing its carbon footprint.

Kindly refer to our Sustainable Procurement Policy for more information regarding our sustainable sourcing practices .Weblink : <https://thirumalachemicals.com/wp-content/uploads/2023/05/SUSTAINABLE-PROCUREMENT-POLICY.pdf>

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

91% of our inputs are sourced sustainably.

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

Waste type	Waste management procedure in place
Plastic (including packaging)	We are in process of tracking and increasing the reuse of our packaging materials. 16.7% of packaging material is reused this financial year. The remaining packaging materials and other plastics are disposed to authorised pre-processors.
E-waste	All our products like Phthalic Anhydride, Malic Acid, Fumaric acid are consumables in the manufacturing of plasticizers, pigments, dyes, resins, candies, beverages etc. Since Therefore, there is no scope for reusing / recycling products at the end of life. The specified category of wastes is not generated during our product life cycle. The waste generated during our manufacturing and operations are disposed through authorised vendors and as per waste management rules.
Hazardous waste	
Other waste (wastepaper and paper products)	

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, EPR is applicable for TCL and it is registered as a brand owner with the Central Pollution Control Board .

Leadership Indicators

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

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency	Results communicated in public domain	If yes, provide the web-link.
2411	Phthalic Anhydride Malic acid Fumaric acid	100 %	Life Cycle perspective is covered under the title” Product Stewardship”. The product stewardship summary is provided in the public domain. The summary covers 1. Properties 2.Health & safety information 3.Environmental information, which includes biodegradability, exposure potential during manufacture, handling and Use, and 4. Regulatory Information	The data are obtained from the dossier submitted by the lead registrant representing the Consortium of manufacturers of the product to EU registration Agency (ECHA) as a statutory requirement under the EU law named REACH. TCL is a member of the consortium and owns the right of the data.	Yes	http://192.168.1.202/iso/

Note: The above Life cycle assessment has been conducted from the perspective of REACH (EU) and not a cradle to grave analysis. TCL is in the process of evaluating conducting full scale LCA for its products in the coming years.

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
		These parameters have been outlined in Material Safety Data Sheet (SDS) in the products tab in our website. http://www.thirumalaichemicals.com/Products

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

Indicate input material	Recycled or re-used input material to total material	
	FY 23-24	FY 22-23
Our products are chemicals such Phthalic Anhydride, Malic Acid and Fumaric Acid. While usage of recycle materials could be limited, we are in process of tracking and increasing the reuse of our packaging materials.		

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:

- Not Applicable, since all our chemicals are used as consumables for the manufacturing of other products. There is no product reclamation at the end of product life.
- Plastics (including packaging) 24419 MT was reused out of the total despatch of 146028 MT in the current reporting period.
- The waste material generated at the manufacturing plant are disposed as per the applicable regulatory requirements as mentioned in Principle 6, Essential indicator 9.

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
Packaging material	16.7%

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

Our core values revolve around prioritising employee well-being. We are dedicated to fostering a workplace, that is supportive, inclusive, and empowering, focusing on nurturing the physical, mental, and emotional health of our employees. Discrimination or harassment based on any characteristic such a gender, caste religion, race, or ethnicity is strictly prohibited in our organisation. We invest in our employee's growth and development through various training programmes and skill building opportunities. Ensuring a safe and healthy work environment is paramount, and we adhere to stringent safety protocols. Our commitment to open and transparent communication encourages feedback and addresses employee concerns, ultimately cultivating a positive and engaged workforce.

SDG Linkages-



Essential Indicators

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

Category	Total (A)	% Of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	461	461	100 %	461	100%	-	-	0	0%	0	0%
Female	48	48	100%	48	100%	48	100%	-	-	0	0%
Total	509	509	100%	509	100%	48	100%	0	0%	0	0%
Other than Permanent employees											
Male	25	25	100%	25	100%	-	-	0	0%	0	0%
Female	2	2	100%	2	100%	2	100%	-	-	0	0%
Total	27	27	100%	27	100%	2	100%	0	0%	0	0%

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

Category	Total (A)	% Of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	28	28	100%	28	100%	-	-	0	0%	0	0%
Female	0	-	-	-	-	-	-	-	-	-	-
Total	28	28	100%	28	100%	-	-	0	0%	0	0%
Other than Permanent workers											
Male	667	667	100%	667	100%	-	-	0	0%	0	0%
Female	67	67	100%	67	100%	67	100%	-	-	0	0%
Total	734	734	100%	734	100%	67	100%	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 23-24	FY 22-23
Cost incurred on well-being measures as a % of total revenue of the company	0.10	0.16

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

Benefits	FY 23-24			FY 22-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI*	100%	100%	Y	100%	100%	Y
Others –please specify	NA	NA	NA	NA	NA	NA

* Note: As per applicability under the Employees' State Insurance Act, 1948.

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.

Currently some of the premises /offices are not accessible to differently abled employees and workers but the organisation is fully committed to fostering an inclusive environment where all employees feel valued and supported. Hence, recognising the importance to addressing this issue promptly, the company is dedicated to taking proactive steps to enhance accessibility soon. By prioritising these efforts, we aim to create a more inclusive and accommodating environments for all individuals within our workplace.

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

Yes. The company upholds a steadfast Equal opportunity Policy, which serves as the cornerstone of our organisational ethos. We are committed to providing a work environment where all employees are treated with dignity, respect and fairness, regardless of their background, identity or abilities. This policy underscores our commitment to fostering a diverse and inclusive workplace, where every individual has the opportunity to thrive and contribute to our collective success. We firmly believe that diversity strengthens our organisation, and we are dedicated to upholding these principles in all aspects of our operations.

Please find our weblink below:

<https://thirumalaichemicals.com/wp-content/uploads/2023/05/EQUAL-EMPLOYMENT-OPPORTUNITY-POLICY.pdf>

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	NA	NA	NA	NA
Female	NA	100%	NA	NA
Total	NA	100%	NA	NA

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

	Yes / No (If yes, then give details of the mechanism in brief)
Permanent Workers	Grievance Redressal Policy in place. Registration of grievance is through Phone number or e-mail ID available in the company's website.
Other than permanent workers	
Permanent Employees	
Other than permanent employees	

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

Category	FY 23-24			FY 22-23		
	Total employees / workers in respective category (A)	No. of employees/ workers in the respective category, who are part of the association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees/ workers in the respective category, who are part of the association(s) or Union (D)	% (D/C)
Total Permanent Employees						
Male	461	0	0%	447	0	0%
Female	48	0	0%	41	0	0%
Total	509	0	0%	488	0	0%
Total Permanent Workers						
Male	28	0	0%	31	0	0%
Female	0	0	0%	0	0	0%
Total	28	0	0%	31	0	0%

8. Details of training given to employees and workers:

Category	Total (A)	FY 23-24				Total (D)	FY 22-23			
		On health and safety measures		On skill upgradation			On health and safety measures		On skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No.(F)	% (F / D)
Permanent Employees										
Male	461	313	68%	391	85%	447	233	52%	264	59%
Female	48	31	65%	44	92%	41	18	44%	18	44%
Total	509	344	68%	435	85%	488	251	52%	282	58%
Permanent Workers										
Male	28	19	68%	21	75%	31	12	39%	21	68%
Female	0	0	0	0	0	0	0	-	0	-
Total	28	19	68%	21	75%	31	12	39%	21	68%

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

Category	FY 23-24			FY 22-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	461	322	70%	447	275	62%
Female	48	30	63%	41	28	68%
Total	509	352	69%	488	303	62%
Workers						
Male	28	28	100%	31	31	100%
Female	0	0	0	0	0	0
Total	28	28	100%	31	31	100%

10. Health and safety management system:

- a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, what is the coverage of such a system?

Yes, TCL places the highest importance on the health, safety, and happiness of its employees. The organisation has implemented comprehensive Occupational Health and Safety Management System with 100 % coverage across all areas of operation. We prioritise the health and safety of our employees above all else, recognising it as a fundamental aspect of our commitment to their well-being. In order to provide a safe and incident-free workplace, we have put into place stringent rules and protocols and all employees, contract labours, vendors visiting the facility are covered under the Safety systems of the organisation. 4 of our sites are certified under ISO 45001 which specifies requirements for Occupational Health and Safety management systems.

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

1. Hazard Identification and Risk Assessment (HIRA)

For our organisation, HIRA is a critical process to identify potential workplace hazards and assess associated risks. This procedure describes the methodology of calculating Hazard identification, Risk Assessment and Determining Controls study with connection to the various plants of Thirumalai Chemicals Ltd. HIRA Register is maintained to list out the sources or situations of various hazards and their associated risks. The identification of Hazard is done at the Worker, Supervisor and Engineer level in each department and reported to the Section Head. The Section Head and Head of Department analyze the identified hazards, review the severity and risk of the hazard, and take actions to implement suitable control measures to minimise or eliminate the risk.

2. Job Safety Analysis

Job Safety Analysis (JSA) is a systematic procedure that breaks each job/task into key training sequences, identifies safety elements of each job/task step and teaches the employee on how to avoid potential safety hazards.

3. Work Permit System

Work Permit system refers to a system procedure used to ensure that work is done safely and efficiently especially in Hazardous industries usually in connection with maintenance work. A Work Permit System also known as Permit to Work is an element of Process Safety and is usually given as a clearance from the Process Department to Maintenance to carry out a particular work.

4. Internal and external audits are carried out to identify work-related hazards and assess risks on a routine and non-routine basis by the entity.

Both these audits carried out to identify work related hazards ensure that minute details related to any process is not missed and is seen with an eagle's eye. The observations of the audit are highlighted to the top management to initiate suitable actions to eliminate the hazards.

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

Yes, Safety portal is available for reporting any work-related hazards identified by the workers. Every employee in the organisation is given a separate login id and password to access the Safety Portal. The Safety Portal covers all the aspects in connection with Work related hazards. The employee can enter the USA (Unsafe Act) and USC (Unsafe Conditions) in his work area. Once entered the area of concern is highlighted to the respective Section Heads and HOD's who will initiate actions for elimination of the USA and USC. Once resolved, the actions initiated is also recorded in the Safety Portal to close the observations. In addition, the Safety Portal also enables the employees to enter Safety Contacts (Case Studies), learnings from incidents, accidents inside and outside the industry.

- d. Do the employees/ workers of the entity have access to non-occupational medical and healthcare services?

Yes, non-occupational medical and Healthcare services is made available to workers and employees. Periodic eye screenings are conducted for employees to address age-related disorders. For other non-occupational ailments, employees are referred to "Thirumalai Mission Hospital" which operates under the charity wing of Thirumalai Group. An annual medical health check-up, covering major aspects of lifestyle diseases like diabetes, hypertension etc is conducted for both employees and workers, followed by counselling

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

Safety incident/number	Category	FY 23-24	FY 22-23
Lost Time Injury Frequency Rate (LTIFR) (per one-million-person hour worked)	Employees*	Nil	Nil
	Workers	0.55	Nil
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	1	Nil
No. of fatalities	Employees	Nil	Nil
	Workers	Nil	Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

*Employee data includes the FTE including workmen and contract employees.

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

Ensuring a healthy and safe workplace is a multifaceted approach that involves continuous education, active participation, and thorough evaluations. One of the key initiatives includes raising Environmental, Health and Safety (EHA) awareness among all employees through comprehensive training programs and regular safety toolbox talks. Innovative methods such as safety park models are employed for practical training, enhancing the understanding of safe work practices. Additionally, the company celebrates Environment Day and Safety Week to foster a culture of safety and environmental responsibility. To further incentivise adherence to best practices, rewards and recognition programs are in place highlighting the contributions of employees who demonstrate exemplary safety behaviours.

In maintaining a robust safety environment, the company also conducts cross-functional safety audits and specific electrical safety audits to ensure compliance and identify potential threats. Process Safety Management (PSM) Implementation and Job Safety Analysis (JSA) are conducted for all activities, ensuring that every task is scrutinised for safety risks. Furthermore, Hazard Identification and Risk Assessment (HIRA) is performed for all operations, complemented by Hazard and Operability (HAZOP) studies to pinpoint and mitigate risks. Engaging employees in activities like tree plantation programs also underscores the commitment to environmental sustainability, reinforcing the holistic approach to workplace safety and health.

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

	FY 23-24			FY 22-23		
	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	Nil	Nil	Nil	Nil	Nil	Nil
Health & safety	Nil	Nil	Nil	Nil	Nil	Nil

14. Assessments for the year

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

*These assessments are done the entity.

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.

There are no critical observations generated from Health Safety, working conditions assessments by the entity, authorities or third parties impacting operations .

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)**

Employee-Yes

Workers- Yes

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

The Company has safeguards and checks and balances in place to determine if the statutory dues have been deducted and deposited with respect of value chain partners to the extent applicable.

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 23-24	FY 22-23	FY 23-24	FY 22-23
	Employees	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

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.

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	92.5%
Working Conditions	91 %

*Note: The above assessment is done internally and has been only extended to our Tier 1 suppliers.

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

None

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

We understand that Stakeholder engagement and involvement are crucial elements for the success of our business. It is essential for us to respect the interests of all the stakeholders and be responsive to their needs, By actively engaging with stakeholders such as customers, employees, investors, suppliers, and the community, we can gain valuable insights, build trust, and foster positive relationships. We proactively involve our stakeholders by actively seeking their feedback, addressing their concerns, and meeting their expectations. We consider their inputs invaluable in shaping our decision-making process and value their feedback as a crucial component of our operations. This engagement allows us to align our strategies and decisions with the expectations and concerns of our stakeholders, leading to greater long-term success and sustainability.

SDG Linkages-



Essential Indicators

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

Any individual, group, or institution that contributes to the corporation's value chain or is significantly impacted by the entity's decision is recognised as a core stakeholder. The key stakeholders for the company are any such person or group that enhances the business and has a stronger impact on it. Presently, Thirumalai Chemicals has systematically identified its internal and external stakeholders and actively engages with investors, employees, customers, suppliers, governmental and regulatory authorities, trade unions, and the local community. The company adheres to a structured system of timely feedback and response, utilising both formal and informal channels of communication to ensure that stakeholders information remains current and updated.

Stakeholder group	Whether identified as vulnerable & marginalised group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community meetings, Notice board, Website), Other	Frequency of engagement (Annually/ half-yearly/ quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	<ul style="list-style-type: none"> Intranet Portal Functional and cross-functional committees Leader's talk Regular Employee Communication Forums 	On a regular basis	<ul style="list-style-type: none"> Employee benefits Equal opportunities Recognition Learning and development Safety and well-being Performance review and career development Business update
Customers	No	<ul style="list-style-type: none"> Customer Service Support Customer Satisfaction Survey 	On a regular Basis	<ul style="list-style-type: none"> Customer feedback Resolution of their queries

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 & marginalised 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
Suppliers and Vendors	No	<ul style="list-style-type: none"> • Supplier and Vendor meets • Face-to-face and electronic correspondence • Supplier Audits 	Annually	<ul style="list-style-type: none"> • Resolving queries • Assessing performance • Recognition and engagement activities • Undertaking discussion on Sustainability Parameters
Investors / Shareholders	No	<ul style="list-style-type: none"> • Email • Newspaper advertisement, • Website • Annual General Meetings • Disclosures to Stock exchanges. 	Need based	To update them about important developments in the Company and address their grievances
Community	No	<ul style="list-style-type: none"> • Community surveys and consultations • CSR initiatives • Volunteering activities • Community events 	Monthly	<ul style="list-style-type: none"> • Community development • Community grievance redressal
Regulatory And government bodies	No	<ul style="list-style-type: none"> • Annual reports • Making representations whenever needed • Formal dialogues 	On a need basis	<ul style="list-style-type: none"> • Policy Advocacy with concerned authorities • Deliberations and inputs on regulations and policies that have bearing on our operations and businesses. • Amendment in existing regulations

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.

Our approach to stakeholder consultation is guided by our Stakeholder Engagement Policy, which outlines clear directives and guidelines for our consultation process. We prioritise open and transparent communication channels to engage with our stakeholders effectively. Additionally, any critical topics or issues are promptly communicated to ensure transparency and foster constructive dialogue. This proactive approach enables us to address concerns, gather valuable feedback, and collaboratively work towards sustainable solutions that benefit all stakeholders involved.

Weblink: <https://thirumalaichemicals.com/wp-content/uploads/2023/05/STAKEHOLDER-ENGAGEMENT-POLICY.pdf>

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

Yes, stakeholder consultation is used for identification of environmental and social topics. No critical issues concerning environmental, and social topics were raised in the current reporting period.

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

We actively engage with the vulnerable/ marginalised stakeholder groups through our CSR initiatives, actively seeking their inputs, suggestions, and concerns throughout the process. This inclusive approach ensures that their voices are heard and integrated into our decision-making processes, by fostering meaningful dialogue and collaboration, we aim to address the specific needs and challenges faced by these groups, driving positive impact and sustainable outcomes within our communities. No concerns were recorded in the reporting period.

Principle 5: Businesses should respect and promote human rights

TCL is committed to respecting and promoting human rights. We strive to create a workplace that safeguards and advances the rights and dignity of all individuals, both within and outside our organisation. We uphold fundamental principles such as non-discrimination, fair labor practices, and safe working conditions across all aspects of our operations. Through our policies, practices and partnerships, we endeavour to create a workplace and business environment that fosters dignity, equality, and respect for human rights.

SDG Linkages-



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 23-24			FY 22-23		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	509	509	100%	488	290	59 %
Other than permanent	27	25	93%	24	18	75 %
Total employees	536	534	100%	512	308	60 %
Workers						
Permanent	28	28	100%	31	31	100 %
Other than permanent	734	734	100%	Aspects of Human rights forms part of our business contract and all our contract work adhere to firm's policies and guidelines regarding Human rights.		
Total workers	762	762	100%	31	31	100 %

2. Details of minimum wages paid to employees and workers

Category	Total (A)	FY 23-24				Total (D)	FY 22-23			
		On health and safety measures		On skill upgradation			On health and safety measures		On skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No.(F)	% (F / D)
Employees										
Permanent										
Male	461	51	11%	410	89%	447	68	14%	379	85%
Female	48	5	9%	43	90%	41	1	2%	40	98%
Other than Permanent										
Male	25	0	0	25	100%	21	0	0	21	100%
Female	2	0	0	2	100%	3	0	0	3	100%
Workers										
Permanent										
Male	28	0	0	28	100%	31	0	0	31	100%
Female	0	0	0	0	0	0	0	0	0	0
Other than permanent										
Male	667	667	100%	0	0	446	446	100%	0	0
Female	67	67	100%	0	0	49	49	100%	0	0

3. Details of remuneration/salary/wages

a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	1*	3,33,00,000	1	1,41,00,000
Key managerial personnel	3	1,61,00,000	-	-
Employees other than BoD and KMP	461	5,00,016	45	5,97,716
Workers	28	5,31,294	0	0

*The remaining Board members receive only sitting fees for attending meetings of the board/ committee.

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

	FY 23-24	FY 22-23
Gross wages paid to females as % of total wages	9.79%	9.19%

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, the responsibility for overseeing human rights impacts or issues fall under the purview of the head of Human Resources. Any grievances raised in this context are addressed by the head of HR. This ensures that the company's policies and actions align with human rights standards and that employees' concerns are appropriately handled.

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

There are various channels available for employees and workers to communicate grievances within the organisation :

1. Email and Phone: Employees can directly contact the HR department or specific individuals responsible for handling grievances via email or phone calls.
2. Suggestion boxes: These provide a confidential and anonymous way for employees to raise concerns or suggestions, including grievances, without revealing their identity.
3. Hierarchical System: there is a designated system/process of hierarchy within the company to communicate grievances right from the designated Human Rights Officer, Factory Manager, Site head and CEO & Managing Director,

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

	FY 23-24			FY 22-23		
	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	Nil	Nil	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child labour	Nil	Nil	Nil	Nil	Nil	Nil
Forced labour/Involuntary labour	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights-related issues	Nil	Nil	Nil	Nil	Nil	Nil

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

	FY 23-24	FY 22-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees / workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

TCL is dedicated to upholding a safe and productive work environment that is free from discrimination or harassment of any kind. To ensure prompt and impartial resolution of any related complaints, we have established a trained internal complaints committee.

Also, TCL has a well-defined comprehensive POSH policy to address discrimination and harassment at workplace.

Weblink: <https://thirumalaichemicals.com/wp-content/uploads/2023/05/POSH-POLICY.pdf>

Further to this, there is also a Stakeholder Grievance Redressal policy for resolution of all grievances raised by the stakeholders,

Weblink:<https://thirumalaichemicals.com/wp-content/uploads/2023/05/STAKEHOLDER-GRIEVANCE-REDRESSAL-POLICY.pdf>

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

The Company has a robust mechanism to address human rights requirements which are evidenced by the Company's Code of Conduct, Employment and Hiring policies, Supplier Code of Conduct in place. TCL has a Business and Human Rights policy in place to outlining procedures and actions in response to human rights violations.

Weblink provided

<https://thirumalaichemicals.com/wp-content/uploads/2023/05/BUSINESS-AND-HUMAN-RIGHTS-POLICY.pdf>

10. Assessments of the year

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

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

No risk/concern were identified and there is no necessity for corrective action.

Leadership Indicators

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

Since there were no Human Rights grievances/complaints, no modifications of the processes was undertaken.

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

No due diligence has been conducted

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

The premises are currently not accessible to disabled visitors. However, we are committed to working on improvements to make it accessible in the future .

4. Details on assessment of value chain partners:

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

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

None.

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

We are committed to environmental responsibility recognising the importance of protecting and restoring the natural world. We prioritise sustainable practices in our operations, minimise our ecological footprints, and actively seek opportunities to contribute positively to environmental conservations efforts. Our dedication to respecting and safeguarding the environment extends to promoting awareness, implementing green initiatives, and continuously improving our sustainability practises for the benefit of current and future generations. Our commitment extends beyond compliance to environmental regulations; we strive to be leaders in sustainable business practices by investing in eco-friendly technologies, collaborating with stakeholders on environmental initiatives, and continually improving our environmental performance. By integrating environmental stewardship into our core values and decision-making processes, we are dedicated to making a positive impact on the environment and fostering a greener, more sustainable future.

SDG Linkages-



Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity

	Unit@	FY 23-24	FY 22-23
From renewable sources			
Total electricity consumption (A)	GJ	17223	18037
Total fuel consumption (B)	GJ	-	-
Energy consumption through other sources (C) (Waste Heat Recovery)	GJ	167932	150508
Total energy consumption (A+B+C)	GJ	185156	168545
From non-renewable sources			
Total electricity consumption (D)	GJ	15334	13327

Parameter	Unit@	FY 23-24	FY 22-23
Total fuel consumption (E)	GJ	292710	674298
Energy consumption through other sources (F)	GJ	0	0
Total energy consumed from non renewable sources (D+E+F)	GJ	308044	687625
Total energy consumed (A+B+C+D+E+F)	GJ	493200	856170#
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees lakhs)	GJ / million INR	24.36	46.35
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP*) (Total energy consumed / Revenue from operations adjusted for PPP)	GJ / million INR adjusted for PPP	557.26	1060.59
Energy intensity in terms of physical output	GJ / MT of production	3.23	5.60

* PPP conversion factor, GDP (₹ per international \$) by World Bank is considered for calculation.

@ GJ – Giga Joules

For FY2022-23, the energy values are revisited and restated.

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

No assessment by external agency has been conducted in the current reporting year.

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

Not applicable. There are no sites/facilities that have been identified as Designated Consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India

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

Parameter	FY 23-24	FY 22-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Groundwater	Nil	Nil
(iii) Third-party water (Municipal Water Sources)	749810	567710
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	749810	567710
Total volume of water consumption (in kilolitres)	741832	556663
Water intensity per rupee of turnover (Total water consumption / Revenue from operations) kL / million INR	36.63	30.14
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP*) (Total water consumption / Revenue from operations adjusted for PPP) kL / million INR adjusted for PPP	838.18	689.57
Water intensity in terms of physical output kL / MT of production	4.85	3.64

* PPP conversion factor, GDP (₹ per international \$) by World Bank is considered for calculation

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

No assessment by external agency has been conducted in the current reporting year

4. Provide the following details related to water discharged

Parameter	FY 23-24	FY 22-23
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(ii) To Groundwater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) To Seawater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties	-	-
No treatment	-	-
With treatment – please specify level of treatment	7978*	11047*
(v) Others	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
Total water discharged (in kilolitres)	7978	11047

*Ranipet manufacturing facility is Zero Liquid Discharge unit. The above-mentioned discharge pertains to Dahej Plant.

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

No assessment by external agency has been conducted in the current reporting year

5. Has the entity implemented a mechanism for zero liquid discharge? If yes, provide details of its coverage and implementation.

Out of the two manufacturing facilities, Ranipet manufacturing unit has been 100% Zero Liquid Discharge since 2006. ZLD was audited and certified by IIT Madras in 2021 for adequacy.

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

Parameter	Unit@	FY 23-24	FY 22-23
NOx	µg/m ³	56	50
SOx	µg/m ³	145	80
Particulate matter (PM)	µg/m ³	32	45
Persistent organic pollutants (POP)	-	NA	NA
Volatile organic compounds (VOC)	µg/m ³	12	12
Hazardous air pollutants (HAP)	-	NA	NA
Others (Carbon Monoxide)	µg/m ³	14	15

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

No assessment by external agency has been conducted in the current reporting year

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

Parameter	Unit@	FY 23-24	FY 22-23
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	101475	123850
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	3050	3989
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent / million INR	5.16	6.92
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)	Metric tonnes of CO ₂ equivalent / million INR adjusted for PPP	118.10	158.36
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes of CO ₂ equivalent / MT of production	0.68	0.84

* PPP conversion factor, GDP (₹ per international \$) by World Bank is considered for calculation

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

No assessment by external agency has been conducted in the current reporting year

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

The company has identified and initiated several projects aimed at reducing greenhouse gas(GHG) emissions. These projects are part of our ongoing commitment to sustainability and environmental responsibility.

- We are planning to switch Fuel from FO to PNG for thermic fluid heaters resulting in 10% emission reduction.
- Utilise excess steam generated in plant in purification section to reduce FO consumption which reduces the burning of FO/ PNG, hence reducing emissions.

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

Parameter	FY 23-24	FY 22-23
Total waste generated (in metric tonnes)		
Plastic waste (A)	0	0.05
E-waste (B)	2.04	0.4
Bio-medical waste (C)	0.001	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	5662.0	5216.0
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	231.0	51.1
Total (A + B + C + D + E + F + G + H)	5895.0	5267.5
Waste intensity per rupee of turnover (Total waste generated/ Revenue from Operations) MT/ million INR	0.29	0.29
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP*) (Total waste generated / Revenue from operations adjusted for PPP) MT/ million INR adjusted for PPP	6.66	6.53
Waste intensity in terms of physical output MT/ MT of production	0.039	0.034
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		

Parameter	FY 23-24	FY 22-23
Category of waste		
(i) Recycled	12.4	7.85
(ii) Re-used	NA	NA
(iii) Other recovery operations	NA	NA
Total	12.4	7.85
For each category of waste generated, total waste disposed of by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0
(ii) Landfilling	32.5	94#
(iii) Other disposal operations	4847.3	5165.6#
Total	4880.0 @	5260.0 @

* PPP conversion factor, GDP (₹ per international \$) by World Bank is considered for calculation

Values in some categories have changed for FY23, because of regrouping of waste categories as per SEBI guidelines.

@ The difference in value between the waste generated and disposed is the ATFD Salt waste stored inside the facility as per the regulatory norms.

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

No assessment by external agency has been conducted in the current reporting year.

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

1. The Ranipet Unit is ZLD from 2006 onwards. All the waste waters generated in the unit is treated and recycled back into the system.
2. The Hazardous Waste generated in the manufacturing units are stored and disposed as per the Hazardous Waste Management, Handling and Transboundary rules 2016.
3. The Scrubber Solution which is a PA Plant effluent is collected and used as a raw material for the manufacture of Fumaric Acid (Wealth from Wastes). The emissions from the Scrubber and Thermic Fluid Heater systems are connected online and monitored on a 24 X 7 basis. These emissions are also monitored by TNPCB and CPCB. E-Waste generated in the unit is disposed to TNPCB authorised E-Waste recyclers on a regular basis

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:

Sr. No.	Location of operations/offices	Location of operations/offices	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
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No Operations in these areas. All operations in SIPCOT and GIDC complexes earmarked for industry with valid EIA and EC's

12. Details of Environmental Impact Assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (yes/ no)	Relevant Web link
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Not applicable and all manufacturing facilities are located at Industrial estate areas.

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 there under (Y/N). If not, provide details of all such non-compliances:

Yes, we are fully compliant with the applicable environmental law/ regulations and guidelines in India.

Sr. 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
Not applicable				

Leadership Indicators

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

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

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

	FY 23-24	FY 22-23
Water withdrawal by source (in kilolitres)		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed / turnover)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
No treatment		
With treatment – please specify level of treatment		Not applicable
(ii) Into Groundwater		
No treatment		
With treatment – please specify level of treatment		
(iii) Into Seawater		
No treatment		
With treatment – please specify level of treatment		
(iv) Sent to third-parties		
No treatment		
With treatment – please specify level of treatment		
(v) Others		
No treatment		
With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

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

No independent assessment/ evaluation/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 23-24	FY 22-23
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	We are in the process of identifying, assessing, and cataloging our Scope 3 emissions.	No assessment was done in FY 22-23.
Total Scope 3 emissions per rupee of turnover (in lakhs)			
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity			-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?

(Y/N) If yes, name of the external agency.

No independent assessment/ evaluation/assurance has been carried out by an external agency.

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

No ecologically sensitive areas around the unit

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.	Production of Fumaric Acid from the Scrubber solution of PA Plant	Adopted the Isomerisation process to produce Fumaric Acid from Maleic Acid (Scrubber Solution) http://www.thirumalaichemicals.com/environment.html	74.1 Cr. / Year Savings
2	Zero Liquid Discharge Process	Implemented Zero Liquid Discharge Process http://www.thirumalaichemicals.com/environment.html	0.45 Cr. / Year Savings
3	PP and HDPE bags disposal to authorised recyclers	The used and damaged bags generated during the process is sent to authorised recyclers instead of Hazardous Waste	0.02 Cr./ Year Savings

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

Yes, the organisation has a disaster recovery plan, which is a comprehensive framework designed to ensure swift and effective responses to unforeseen events that could disrupt operations. This plan outlines strategic measures to mitigate risks, restore critical functions, and minimise downtime in the event of natural disasters, technological failures, or other emergencies. The responsibility for the Business Continuity and Disaster Management plan lies with the Safety Department Head, referencing ISO 14001:2015, and ISO 45001 Clause 8.2- Emergency Preparedness and Response.

The procedure involves identifying potential emergencies by analyzing all activities and products for their environmental impact. It also anticipates emergencies like major fires, flammable liquid releases, explosions, natural disasters, Structural Collapse, Uncontrollable leakage of hazardous chemicals, Deluge of untreated effluent or High Pressure Steam Etc. Each one of them or a combination of them can be an Emergency Situation

The Business Continuity and Disaster Management Plan applies to all the emergency situations which can occur in any of the locations like the Factory premises in SIPCOT, Ranipet, Receiving terminal at Walaja Road Railway Station, Ammoor or Storage Installation at Royapuram, Chennai near Chennai Port. The Emergency Preparedness and Response plan are prepared by the Safety Head, Terminal Heads, and Productions Heads, approved by Management representatives, and distributed to relevant personnel. Regular testing, including unannounced drills, is conducted for each scenario, with observations documented for continual improvement. Plans are regularly reviewed based on insights from mock drills and real emergencies by the Safety Head.

Web Link: <https://thirumalaichemicals.com/wp-content/uploads/2023/05/BUSINESS-CONTINUITY-POLICY.pdf>

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

Not yet assessed

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

There are vendor assessment checklist and supplier assessment checklist available covering various environmental management parameters. These checklists enable us to track the environmental impacts of our value chain partners. While the entity has not yet conducted an analysis of this data, we plan to do so in the future.

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

TCL is affiliated with numerous reputable trade and industry chambers, enabling us to actively participate in diverse business communities, acquire valuable insights and contribute to industry growth and development. These partnerships are instrumental in fostering meaningful collaborations, staying informed about industry trends, and collectively striving to make a positive impact on businesses.

SDG Linkages-



Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.
TCL is affiliated to 5 trade and industry chambers and associations.
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such a 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	Confederation of Indian Industry	National
2	Indian Chemical Council	National
3	Chemical Industries Association	National
4	Indo American Chamber of Commerce	India, USA
5	Chemicals & Petrochemicals Manufacturers Association	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.

Name of authority	Brief of the case	Corrective action taken
No cases were filed by any stakeholder against TCL regarding unfair trade practices, irresponsible advertising, and anticompetitive behaviour during the financial year.		

Leadership Indicators

1. Details of public policy positions advocated by the entity

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of review by board (Annually/ half yearly/ quarterly / others – please specify)	Web-link, if available
1	Administrative participation by company personnel in Chem Skill Development Centre (CSDC)- Established for training Chemical Engineering graduates.	Through Industry associations covering ~300 graduates every year including industrial training	Yes	No board review	-

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

At the core of our values, we endeavour to make a positive impact on the society and believe in creating opportunities that are accessible to everyone, regardless of background or circumstances. This commitment is reflected in our CSR(Corporate Social Responsibility) activities Through our initiatives and partnerships, we aim to empower marginalised communities, promote diversity and inclusion, and contribute to building a more equitable and prosperous society for all. Our CSR policy covers wider areas of principal support like Education, Health, Women Empowerment and Community development services. Our dedicated CSR committee recommends the spending on approved CSR activities and monitors them to achieve impactful result.

SDG Linkages-

**Essential Indicators**

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

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

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

S No.	Name of project for which R&R is ongoing	State	District	No. of project affected families (PAFs)	% Of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
Not Applicable						

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

There is a Manual system in place for community to record grievances at main entrance gate of each of facilities.

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

	FY 24	FY 23
Directly sourced from MSMEs/ small producers	66%	64 %
Directly from within India	89.5%	94.5%

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	Current FY	Previous FY
Rural	0	0
Semi-urban	13	12
Urban	72	77
Metropolitan	15	12

(Place to be categorised 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):

Details of negative social impact identified	Corrective action taken
Not applicable	

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

Sr. No.	State	Aspirational District	Amount spent (In INR)
Not Applicable			

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

Our selection of suppliers is purely based on their reputation in the Market, recommendation from any of their business associates and our assessment of their technical ability.

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

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

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:

Sr. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared	Basis of calculating benefit share
Nil				

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

Name of authority	Brief of the Case	Corrective action taken
None		

6. Details of beneficiaries of CSR Projects:

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups
1	Thirumalai Charity Trust- Early detection, Monitoring and Control of Non-Communicable diseases	39160	90 %
2	Freedom Trust, Chennai (For providing beneficiaries with artificial limbs at HD Kote, Karnataka)	93	100%
3	Bhuvana Foundation, Chennai (For donation under CSR for its School "Vidya Vanam" at Anaikatty, Coimbatore.)	112	100%
4	South Central India Network for Development Alternatives (SCINDeA), Vellore (For a Project on RO based Water Purifier with 1 Year Comprehensive AMC Plan for Students of 1 Rural School & Renovation of a Toilet Block in 1 Rural School)	430	100%

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

Our company operates with a customer-centric mindset, placing a high value on engaging with our customers and providing them with meaningful value in a responsible manner. We believe that by actively listening to our customers, understanding their needs, and delivering products and services that meet and exceed their expectations, we can build lasting relationships and drive sustainable growth. Our commitment to responsible engagements ensures that we prioritise transparency, fairness, and ethical practices in all our interactions with customers, fostering trust and loyalty.

SDG Linkages-

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

Upon receiving a customer complaint, it is promptly directed to the respective plant for investigation. The root cause of the problem is identified, and corrective actions are implemented. Subsequently, the details of the corrective actions taken are communicated to the customer.

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

	As a % to total turnover
Environmental and social parameters relevant to the product	100 %
Safe and responsible usage	100 %
Recycling and/or safe disposal	None

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

	Current FY			Previous FY		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil	Nil	Nil
Delivery of essential services	Nil	Nil	Nil	Nil	Nil	Nil
Restrictive trade practices	Nil	Nil	Nil	Nil	Nil	Nil
Unfair trade practices	Nil	Nil	Nil	Nil	Nil	Nil
Other	15	0	None	19	19	Quality issues

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

	Number	Reasons for Recall
Voluntary Recalls	0	0
Forced Recalls	0	0

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

Yes- Thirumalai Chemicals has a comprehensive Cyber Security policy to safeguard sensitive data, systems and networks from cyber threat. It outlines comprehensive guidelines and procedures for ensuring the confidentiality, integrity, and availability of information assets. By prioritising cybersecurity, we aim to protect our organisation and stakeholders from potential cyber-attacks, and data breaches, maintaining trust, and upholding the integrity of our operations.

Weblink : <https://thirumalaichemicals.com/wp-content/uploads/2023/05/CYBER-SECURITY-POLICY.pdf>

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

There have been no instances of issues related to advertising, delivery of essential services, cyber security and data privacy of customers, hence no corrective actions were taken.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches	Nil
b. Percentage of data breaches involving personally identifiable information of customers	TCL through its robust IT infrastructure ensures complete record of any data breach incidence. Since there were no data breaches during the reporting period
c. Impact, if any, of the data breaches	None

Leadership Indicators

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

TCL's services and information can be accessed through the website www.thirumalaichemicals.com.

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

The customers are provided the required process and product handling annexures for safe usage.

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

In case of unavailability of products customers are kept duly informed.

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)

The information such as product Name, Batch No. CAS No., Date of production, Date of Expiry, supplier details, bag net weight & gross weight, labelling instructions, hazard statements, & precautionary statements are displayed on the product. TCL hasn't carried out any customer satisfaction survey relating to the major products / services of the entity.