



STOCK. EXG/ AG/ 2024-25

20th July, 2024

The Corporate Relationship
Department
BSE Limited,
1st Floor,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

The Listing Department
National Stock Exchange of
India Limited
Exchange Plaza, 5th Floor,
Plot No.-C/1, 'G' Block,
Bandra- Kurla Complex,
Bandra (E)
Mumbai – 400051

Listing Department
The Calcutta Stock
Exchange Ltd.
7 Lyons Range,
Kolkata-700001

Scrip Code : 509480

Scrip Code: BERGEPAIN

Scrip Code : 12529

Sub: Business Responsibility and Sustainability Report for the financial year 2023-24

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12th July 2023, please find enclosed the Business Responsibility and Sustainability Report for the financial year 2023-24, along with Reasonable Assurance Report provided by Futurestation Advisors LLP which forms an integral part of the 1st Integrated Report and Annual Accounts for the Financial year 2023-24.

This is for your information and record.

Thanking you.

Yours faithfully,
For **BERGER PAINTS INDIA LIMITED**

Arunito Ganguly
Vice President & Company Secretary

Encl.: a/a

Annexure VII to the Directors' Report

for the Financial year ended 31st March, 2024

Business Responsibility & Sustainability Report

Section A: General Disclosures

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity: L51434WB1923PLC004793
2. Name of the Listed Entity: Berger Paints India Limited
3. Year of incorporation: 1923
4. Registered office address: Berger House, 129 Park Street, Kolkata, West Bengal, India - 700017
5. Corporate address: Berger House, 129 Park Street, Kolkata, West Bengal, India - 700017
6. E-mail: **consumerfeedback@bergerindia.com**
7. Telephone: 033 2229 9724-28
8. Website: **www.bergerpaints.com**
9. Financial year for which reporting is being done: 2023-24
10. Name of the Stock Exchange(s) where shares are listed : National Stock Exchange of India Limited (NSE) (Scrip Code: BERGEPAIN), BSE Limited (Scrip Code: 509480) and The Calcutta Stock Exchange Limited (Scrip Code: 12529)
11. Paid-up Capital: ₹ 116.58 Crore
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:

S. No.	Particulars	Details
1	Name	Mr Arunito Ganguly
2	Designation	Vice President & Company Secretary
3	Telephone Number	033-2229 9724-28
4	E-mail id	consumerfeedback@bergerindia.com

13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together): Standalone Basis
14. Name of assurance provider: Futurestation Advisors LLP
15. Type of assurance obtained: Reasonable Assurance

II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Paints, varnishes, enamels or lacquers	Manufacture of paints, varnishes, enamels or lacquers	98.42

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	Manufacture of paints, varnishes, enamels or lacquers	202	98.42
2	Manufacture of organic and inorganic chemical compounds	201	1.58

III. Operations

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

Location	Number of plants	Number of offices	Total
National	15	187	202
International	Nil	Nil	Nil

19. Markets served by the entity:

a. Number of locations

Location	Number
National (No. of States)	28 States and 8 Union Territories
International (No. of Countries)	Nil

b. What is the contribution of exports as a percentage of the total turnover of the entity? 0.024%

c. A brief on types of customers: Household, Industries, Government, Government Institutions, OEMs and others.

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)	4001	3915	97.9%	86	2.1%
2.	Other than Permanent (E)	3143	3044	96.9%	99	3.1%
3.	Total employees (D + E)	7144	6959	97.41%	185	2.59%
Workers						
4.	Permanent (F)	444	443	99.8%	1	0.2%
5.	Other than Permanent (G)	6110	5889	96.4%	221	3.6%
6.	Total workers (F + G)	6554	6332	96.61%	222	3.38%

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)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	0	0	0%	0	0%

Annexure VII to the Directors' Report (contd.)

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently Abled Workers						
4.	Permanent (F)	0	0	0.0%	0	0.0%
5.	Other than Permanent (G)	3	3	100%	0	0.0%
6.	Total differently abled workers (F + G)	3	3	100%	0	0.0%

21. Participation/Inclusion/Representation of women

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	11*	2	20.00
Key Management Personnel	3	0	0

* Including Mr Subir Bose (w.e.f. 15.05.2024)

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

Particulars	FY 23-24 (Turnover rate in current FY)			FY 22-23 (Turnover rate in previous FY)			FY 21-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	32.56%	30.56%	32.52%	33.54%	14.72%	33.00%	17.30%	11.77%	17.12%
Permanent Workers	2.73%	10.00%	2.82%	14.18%	12.90%	11.51%	4.05%	0.00%	4.03%

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.	Berger Jenson & Nicholson (Nepal) Private Limited	Subsidiary	100	No
2.	Beepee Coatings Private Limited	Subsidiary	100	No
3.	SBL Specialty Coatings Private Limited	Subsidiary	100	No
4.	Berger Paints (Cyprus) Limited	Subsidiary	100	No
5.	Lusako Trading Limited	Subsidiary	100	No
6.	Berger Hesse Wood Coatings Private Limited	Subsidiary	51	No
7.	Berger Rock Paints Private Limited	Subsidiary	51	No
8.	STP Limited	Subsidiary	95.53	No
9.	Berger Becker Coatings Private Limited	Joint Venture	48.98	No
10.	Berger Nippon Paint Automotive Coatings Private Limited	Joint Venture	49	No
11.	Surefire Management Services Limited	Joint Venture	75	No
12.	U K Paints (India) Private Limited	Holding	50.10	No

VI. CSR Details

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

(ii) Turnover (in ₹): 10,002.93 Crore

(iii) Net worth (in ₹): 5,005.24 Crore

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide weblink for grievance redress policy)	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Community beneficiaries can send their complaint to : consumerfeedback@bergerindia.com and Complaints which are not frivolous are investigated and resolved in a time bound manner.	Nil	Nil	—	Nil	Nil	—
Investors (other than shareholders)	No	Nil	Nil	Nil	Nil	Nil	—
Shareholders	consumerfeedback@bergerindia.com , arunitoganguly@bergerindia.com, rajide@bergerindia.com and rta@cbmsl.com Post such complaints, internal process of resolution is activated.	11	1	It has been resolved in April, 2024	9	Nil	—
Employees and workers	The company has a Grievance Redressal Policy which is robust and all serious complaints, if any are considered for early resolution.	1	Nil	POSH Complaint has been resolved in March, 2024	Nil	Nil	—
Customers	The company has a dedicated complaint/feedback email id which is consumerfeedback@bergerindia.com. Post such complaints, internal process of resolution is activated.	12018	176	—	9058	145	—

Annexure VII to the Directors' Report (contd.)

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 Current Financial Year			FY 22-23 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Value Chain Partners	The company has a dedicated complaint/feedback email id which is consumerfeedback@bergerindia.com. Post such complaints, internal process of resolution is activated.	Nil	Nil	—	Nil	Nil	—
Other (please specify)	No	Nil	Nil	—	Nil	Nil	—

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk /opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Green House Gas (GHG) Management	Opportunity	Berger has taken several steps to reduce Green House Gas emissions, either through process changes or planned alternative energy. Latest in this matter is obtaining the GREENGUARD Gold Certification Standard includes health-based criteria for additional chemicals and also requires lower total VOC emissions levels to ensure that products are acceptable for use in environments such as schools and healthcare facilities.	—	Positive. The efforts in reduction of Green House Gas (GHG) shall also enable better usage and thereby impact lowering of cost.

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)
2.	Climate	Risk	The risks associated with the physical impacts of climate change stem from catastrophic events that may affect our Production infrastructure located in various parts of the country. The increasing frequency and severity of extreme weather events, such as Thunderstorms, Cyclones, Floods, Cloud Bursts, Landslides, Soil Erosion, Earthquakes, and Wildfires, pose significant challenges.	Mitigation can take place through careful assessment and planning for such risks with consideration for their time horizon and potential consequences. Ensuring the resilience of our infrastructure and implementing proactive measures are crucial to mitigating the adverse effects of climate change and safeguarding our operations. Moreover the company has taken comprehensive insurance to cover such eventualities.	Negative
3.	Human Rights	Opportunity	The Company has implemented a robust Human Rights Policy and procedure which will enhance productivity at all levels.	—	Positive. Human rights policy clearly states inclusivity of employees, zero tolerance to abuse and discrimination. The adherence to this policy shall continue to generate best of talents and consequent productivity.
4.	Stakeholder Engagement	Opportunity	The Company has a planned outreach to value chain partners by conducting awareness programs and also has ongoing programmes with engagement with investors and employees.	—	Positive. As the Company has connected with local eco- chain on sustainability issues, the benefits of such good practices shall be apparent in its sourcing and branding.
5.	Water Management	Risk	Although the Company is engaged in achieving water positive status in all plants, water being a finite resource can become a challenge in future.	The Company is planning for better water conservation through rain water harvesting, recycling of used water and reduced wastage in production facilities.	Negative. Shortage of water through natural resources could be a concern in future.

Annexure VII to the Directors' Report (contd.)

Section B: Management and Process Disclosures

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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	https://www.bergerpaints.com/about-us/policies/business-responsibility-and-sustainability-policy								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	-	ISO 9001:2015, ISO 14001:2015 and products range conforming to BIS/GRIHA/ ISI/GBC specifications	ISO 45001:2018 & products conforming to U/L specifications	Plants are designed as per national and international standards - NBC/ NFPA/ EN/ ATEX etc and compliance is ensured	-	EIA is carried out for all projects under the MOEF/ NGT guidelines under EPA.	-	SIA is carried out for all Projects.	-
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	-	Each of the procedures connected with the policies are reviewed annually as to its performance and non-achievement if any. The goals relating to all the principles are at place and are being constantly reviewed for improvement.							
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	-	The Company has not witnessed any underperformance.							
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure).	<p>Berger Paints India Limited (the Company) is gearing itself to integrate Environmental, Social and Governance (ESG) principles into its businesses which is essential to embed the subject of Sustainability in its system. Consequently the company adheres to the principles of product stewardship by enhancing health, safety and environmental impacts of products and services across their life-cycles. The environmental criteria impacts Climate, Resources (Energy & Water), Waste Management and Nature & Biodiversity. The Company has committed to achieve progress on such matters by taking steps to reduce its carbon emission and implement policies for Safety, Health & Environment ('SHE'). In addition the Company is committed to conducting beneficial and fair business practices to the labour, human capital and to the community.</p> <p>The Company also strives to inculcate the values of ESG during its constant engagement with Key Stakeholders including Value chain Partners.</p>								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name – Mr Abhijit Roy Designation – Managing Director and CEO DIN Number – 03439064								

9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.
- The entity has an ESG Committee empowered by Board and headed by an Independent Director, where Mr Abhijit Roy is also a member with other divisional heads.

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director/Committee of the Board/Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/Any other – please specify)									
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	
Performance against above policies and follow up action	Y	Y	Y	Y	Y	Y	Y	Y	Y										Annually
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Y	Y	Y	Y	Y	Y	Y	Y	Y										Annually

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.
- | | P 1 | P 2 | P 3 | P 4 | P 5 | P 6 | P 7 | P 8 | P 9 |
|--|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | No | No | No | No | No | No | No | No | No |

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)	–	–	–	–	–	–	–	–	–
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	–	–	–	–	–	–	–	–	–
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

Section C: Principle Wise Performance Disclosure

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

Annexure VII to the Directors' Report (contd.)

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	2	General Awareness of the Business and its conduct including ESG matters.	100
Key Managerial Personnel	2	General Awareness of the Business and its conduct including ESG matters.	100
Employees other than BoD and KMPs	120	1. Business Ethics	79
	218	2. Health & Safety	84
	242	3. Skill Upgradation	83
	89	4. Human Rights	51
Workers	28	1. Business Ethics	72
	1233	2. Health & Safety	88
	28	3. Skill Upgradation	91

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

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

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

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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
—	—

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 It is available in the Code of Conduct given in our website. Bribery can be considered to be included under “material benefits” as given in the following line in the Code of Conduct: -

Please refer to the following link: <https://www.bergerpaints.com/about-us/policies/anti-bribery-and-anti-corruption-policy>

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 Current Financial Year	FY 22-23 Previous Financial Year
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 Current Financial Year		FY 22-23 Previous Financial Year	
	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: Nil

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

	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Number of days of accounts payables	97	101

9. Open-ness of business

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

Parameter	Metrics	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	22%	21%
	b. Number of trading houses where purchases are made from	327	343
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	48.8%	40.9%

Annexure VII to the Directors' Report (contd.)

Parameter	Metrics	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	84.89%	85.57%
	b. Number of dealers / distributors to whom sales are made	41,379	37,229
	c. Sales to top 10 dealers distributors as % of total sales to dealers/distributors	2.4%	2.27%
Share of RPTs in	a. Purchases (Purchases with related parties/Total Purchases)	4%	5%
	b. Sales (Sales to related parties/Total Sales)	1%	1%
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	100%	100%
	d. Investments (Investments in related parties/Total Investments made)	94%	97%

Leadership Indicators

- Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programmes held	Topics/ principles covered under the training	%age of value chain programmes partners covered (by value of business done with such partners) under the awareness programmes
4	Human Rights for Corporates	80%

- 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. No.

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

Essential Indicators

- 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.

	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	20%*	11%*	1. Use of environmentally friendly chemicals in designing architectural paints 2. Development of products with lower carbon footprint 3. Development of high solid products to reduce VOC emissions 4. Development of air- drying systems for industrial products which require baking at present. Some baking systems are being converted to low bake systems which will require lower energy.
Capex	23.2%*	8%*	Investment in various machines and instruments that are used in preparation and testing of products mentioned above

* The various machines and instruments bought through capex have widespread application including the ones that are mentioned above. The percentage weightage indicated in the above table is the average usage in specified sustainability projects.

- Does the entity have procedures in place for sustainable sourcing? (Yes/No) — Yes
 - If yes, what percentage of inputs were sourced sustainably? — 75%

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.
- (a) Plastic packaging waste (both pre-consumer and post-consumer) undergo recycling for which the company appoints agencies for ensuring the necessary liaison with PWP (plastic waste processors) for recycling and credit transfer which is essential for the EPR target fulfilment on the CPCB portal. For FY 2023-24, in accordance to the guidelines of the Plastic Waste Management rules, the company is fulfilling its EPR obligations.
- (b) E-waste generated at the company's office/manufacturing/sales location falls under the bulk consumer category and the same is being disposed off safely to E-waste management agency and it is ensured that the E-waste is recycled in a proper and environmental friendly and sustainable manner in compliance to the E-waste Management rules, 2022. Recycling certificates along with manifest form is duly submitted to SPCB/CPCB as applicable.
- (c) Hazardous Waste is disposed through authorized recycler/ co-processor/ CHWTSDF registered with respective SPCBs.
- (d) Other waste generated is being either re-used by other purposes/ in house recycling or being safely disposed-off in compliance to local Municipality laws. Bio-Medical waste generated at occupational health centres of manufacturing units are disposed through various Biomedical waste Disposal facility as per BMW authorization.
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 applicable for Plastic Packaging Waste and the waste collection is done by company through agencies/PWP (plastic waste processors) who carry the same as per EPR target fixed by CPCB in accordance to the Plastic Waste management rules.

Leadership Indicators

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

The Life Cycle Assessments (LCA) of last Financial Year 2022-23 was concluded and no additional project was undertaken in the current Financial Year 2023-24.

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

Name of Product/ Service	Description of the risk/concern	Action Taken
—	—	—

Not Applicable as there are no concerns.

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 Current Financial Year	FY 22-23 Previous Financial Year
Washing Solvent Recycled	2.8%	2.5%
Powder RM /Sweeping dust Recovered	0.14%	0.13%

Annexure VII to the Directors' Report (contd.)

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

	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	0	17020.97*	9.088	0.000	15458.000	0.000
E-waste	0	0	9.19	0.000	0.000	4.12
Hazardous waste	1069.73	915.92	2499.775	286.79	924.46	1602.417
Other waste	0	513.65	2956.59	34.596	35.358	2226.768

* Due to CPCB portal issues, further PO's to WMA/PWP could not be fulfilled as per target before reporting date.

However company will ensure EPR target compliance before Annual return submission.

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 the respective category
EPR for entire Plastics Packaging by Brand Owner	100%

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E/A)	Number (F)	% (F / A)
Permanent employees											
Male	3915	3915	100	3915	100	0	0	3272	83.6	0	0
Female	86	86	100	86	100	86	100	0	0	0	0
Total	4001	4001	100	4001	100	86	2.1	3272	81.8	0	0
Other than Permanent employees											
Male	3044	3044	100	3044	100	0	0	0	0	0	0
Female	99	99	100	99	100	99	100	0	0	0	0
Total	3143	3143	100	3143	100	99	3.1	0	0	0	0

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C/ A)	Number (D)	% (D/ A)	Number (E)	% (E/A)	Number (F)	% (F/ A)
Permanent workers											
Male	443	443	100	443	100	0	0	0	0	0	0
Female	1	1	100	1	100	1	100	0	0	0	0
Total	444	444	100	444	100	1	0.2	0	0	0	0
Other than Permanent workers											
Male	5889	218	3.7	218	3.7	0	0	0	0	0	0
Female	221	0	0.0	0	0.0	0	0	0	0	0	0
Total	6110	218	3.6	218	3.6	0	0	0	0	0	0

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

	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Cost incurred on well- being measures as a % of total revenue of the company	0.08%	0.07%

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

Benefits	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of Total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100.0	100.0	Yes	100	100	Yes
Gratuity	100.0	100.0	Yes	100	100	Yes
ESI	0.02	3.60	Yes	0.75	0.75	Yes
Others – EPS (Employee Pension Scheme)	77.86	58.78	Yes	100	100	Yes

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.

- Steps taken to make our offices disabled employee friendly and from the Financial Year 2024-2025, there will be substantial positive change in this matter.

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. <https://www.bergerpaints.com/about-us/policies/equal-employment-opportunity-policy>

Annexure VII to the Directors' Report (contd.)

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100.0%	100.0%	*N.A.	*N.A.
Female	100.0%	100.0%	100.0%	100.0%
Total	100.0%	100.0%	100.0%	100.0%

* Not Applicable

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, any grievance brought to the notice, is discussed and resolved by a dedicated team consisting of respective department HOD, HR and Plant Head. Union for workers and complaint box for all.
Other than Permanent Workers	Yes. Any grievance brought to the notice, is discussed & resolved by team consist of respective department HOD, HR and Plant Head. Yes, Complaint box.
Permanent Employees	Please refer to the Grievance Redressal Policy of the Company, which details the procedure also
Other than Permanent Employees	Please refer to the Grievance Redressal Policy of the Company, which details the procedure also.

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

Category	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of Employees/workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	4001	59	1.5	2973	Nil	Nil
- Male	3915	59	1.5	2915	Nil	Nil
-Female	86	0	0	58	Nil	Nil
Total Permanent Workers	444	251	56.5	1115	319	28.61
Male	443	250	56.4	1096	319	29.11
Female	1	1	100	19	Nil	Nil

8. Details of training given to employees and workers:

Category	FY 23-24 Current Financial Year					FY 22-23 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	6959	5873	84	5797	83	2915	1873	64.25	996	34.17
Female	185	137	74	142	77	58	36	62.10	14	24.10
Total	7144	6010	84	5939	83	2973	1909	64.21	1010	33.97
Workers										
Male	6332	5578	88	5776	91	1096	900	82.12	376	34.31
Female	222	194	87	185	83	19	19	100	11	57.89
Total	6554	5772	88	5961	91	1115	919	82.42	387	34.71

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

Category	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	3915	3001	76.7	2915	1732	59.42
Female	86	64	74.4	58	36	62.10
Total	4001	3065	76.6	2973	1768	59.47
Workers						
Male	443	321	72.5	1096	602	54.93
Female	1	1	100.00	19	15	78.95
Total	444	322	72.5	1115	617	55.34

10. Health and safety management system:

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

Yes, the company has implemented an occupational health and safety management system which is covered to all stakeholders. This system encompasses risk assessment and planning, operational controls, employee training, monitoring and compliance reporting, emergency preparedness, and continuous improvement processes. The coverage and implementation details are tailored to meet the industrial standards and the specific operational needs of entity, aligning with ISO 45001 standards & certifications.

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

We follow a systematic approach to identify work-related hazards. This includes but is not limited to –

- Regular inspections of the workplace to identify hazards such as chemical exposure, machinery malfunctions, or ergonomic issues.

Annexure VII to the Directors' Report (contd.)

- Reviewing incident reports and near-misses to identify areas of concern.
- Consulting with employees and safety representatives who work directly with the equipment or processes to gather insights into potential hazards.
- Using risk assessment tools like HAZOP, HIRA, QRA, etc. for each activity or process, routine and for any significant project changes, including green/brown field projects to quantify and prioritise risks & involving relevant stakeholders, including employees, supervisors, and safety experts, in the risk assessment process. For critical changes, a Process Hazard Analysis (PHA) using HAZOP methodology is conducted by qualified professionals. This process systematically identifies potential hazards in the workplace and assesses the risks associated with them. Appropriate control measures are then determined to mitigate these risks. HAZOP studies are carried out across all units, and safety improvements are regularly implemented to reduce or eliminate risks in processes and operations.
- Regular safety audits and inspections by both external and internal parties in planned/surprise fashion to ensure compliance with safety procedures and regulations.
- Comprehensive safety measures through routine and specialised assessments conducted by reputable agencies and consultants. These include Hazardous Area Classification, ATEX Studies, Chemical Process Safety Assessments, Fire & Life Safety Assessments, and Electrical Safety Assessments.
- Ongoing training and education programs to keep employees informed about potential hazards and safe work practices.
- Implementing feedback mechanisms like near miss reporting, Abnormality Identification, Safety committee review, etc. to allow employees to report hazards or suggest improvements to safety procedures.
- On a non-routine basis we are also conducting risk assessments before introducing new processes, equipment, or materials into the workplace.
- Developing specific risk assessment protocols for non-routine tasks or activities, such as maintenance work or emergency response procedures.
- All major injuries & high potential incidents undergo detailed investigation using the methodology like 5-why analysis, 5W1H, Fishbone Analysis, etc. Corrective action & preventive action plan (CAPA) is then developed based on the findings of the investigation. The learnings are implemented & horizontally deployed across other units to avoid repetitive incidents and corrective actions are driven by site leadership of each location.

By following these steps, we can proactively identify and mitigate work-related hazards, helping to ensure the safety and well-being of their employees.

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

Yes, we have Abnormality reporting, Near miss reporting and Safety committee meetings to collect feedback from our employees on any impending risk in their work areas and also try to understand the potential chances of risk from our existing process in a such a way so that solutions can be devised to mitigate such risks.

These processes typically involve clear communication channels for reporting hazards, training on hazard recognition, and empowering workers to stop work if they see in any imminent danger at workplace.

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

Yes all permanent employees are covered under ESI scheme/ Medical health insurance scheme.

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

Safety Incident/Number	Category	FY 23-24	
		Current Financial Year	FY 22-23 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	1.37*
	Workers	0	2.087*
Total recordable work-related injuries	Employees	4	6
	Workers	19	76
No. of fatalities	Employees	0	1
	Workers	0	5
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	1
	Workers	0	16

* Re-arranged as per change in calculation criteria

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

Yes all permanent employees are covered under ESI scheme/ Medical health insurance scheme.

We are increasingly leveraging technology such as sensors, IoT devices, modern age equipments, etc. to monitor workplace conditions in real-time. This includes monitoring air quality, temperature for fire related devices activation and logic for smart automation, noise levels, critical areas for any toxic gas release, etc. to identify potential hazards and ensure compliance with safety standards. Ensuring compliance with relevant occupational health and safety regulations and standards set forth by local authorities and industry organizations with regularly reviewing and updating safety protocols to align with any changes in regulations or best practices has been our prime goal.

All our sites have emergency response plans for various scenarios, such as fires, chemical spills, or medical emergencies and we also ensure that employees are trained in emergency procedures and that adequate resources are available to respond effectively to emergencies. Conducting mock drills with supervision and associating with local fire authorities at our plants helps us to improve the standards of the exercise and identify any potential gap which is taken care with utmost priority.

We also encourage employee involvement in safety initiatives by soliciting feedback, conducting safety committees or meetings, and recognizing and rewarding safe behaviors. Creating an environment where employees feel empowered to report hazards and suggest improvements to safety practices.

The company also offers medical check-up, health and wellness programs to promote employee well-being, including access to healthcare services, counseling, fitness programs, and ergonomic assessments to prevent work-related injuries and illnesses.

For shop floor personnel, we ensure use of appropriate personal protective equipment, such as helmets, safety shoes, safety goggles, gloves, respirators, and protective clothing, to employees based on the nature of their work and potential hazards present in the workplace.

We are also conducting regular inspections of the workplace to identify and address potential hazards, such as faulty equipment, spills, or unsafe working conditions and working continuously towards building up robust maintenance program each year to ensure that machinery and facilities are properly maintained and in good working condition.

Also, comprehensive safety training is provided to all employees, including proper handling of chemicals, equipment operation, emergency procedures, and ergonomics. This ensures that employees are aware of potential hazards and know how to work safely.

We keep our new facilities abreast with Latest firefighting technologies which can be operated at a safe distance through SCADA as well as can be automatically actuated based on logic controlled programs. Fail safe scenarios are being developed to identify any gap in the existing control measures and best in class technologies/equipment are being installed at the shop floor to ensure that manual mistakes do not lead to any incident by making the system tamper-proof. We practice isolation

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measures through LOTO implementation in our shutdown/maintenance activities and all non- routine activities which are not involved in production is being carried out through Work Permit System.

Through proper identification and isolation of zones, we ensure that suitable flame proof equipment, firefighting devices and other preventive measures like Guard cover, multiple layer of protection in solvent & monomer unloading/handling, working practices as per standard procedure, necessary Single Point lessons, compatibility chart, etc. are being installed at the shop floor and proper training is provided to workers/operators and staff who are involved in the respective activities.

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

	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	—	Nil	Nil	—
Health & Safety	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% covered by Internal and External Auditors (DISH Inspectors, TUV Nord India Pvt Ltd., Ms. Cholamandalam Risk Services, Ms. Consultivo Business Solution, Ms. IND Safe Risk consulting, MSD Consultancy etc.)
Working Conditions	100% covered by Internal and External Auditors (DISH Inspectors, TUV Nord India Pvt Ltd., Ms. Cholamandalam Risk Services, Ms Consultivo Business Solution, Ms. IND Safe Risk consulting, MSD Consultancy etc.)

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.

Any significant risk/concern highlighted during the external or internal reviews/ routine and non-routine inspection/by workers or operators, etc. is being taken up with utmost priority and operations are also dismissed until proper corrective action is being taken while a robust preventive action plan is being drawn up by the local/Corporate Safety team. Near miss reporting and CAPA against any incident/accident is being done through online portal where tracking of such open issues is being done and proper resolution is being implemented through involvement of all concerned team members.

To address significant risks and concerns arising from assessments of health & safety practices and working conditions following measures are in place

- Developing a comprehensive Health & Safety Management System (HSMS) to ensure that all employees are aware of their responsibilities and the risks associated with their work.
- Establishing a Health & Safety Committee to review and monitor safety performance and ensure that any risks and concerns are addressed.
- Introducing a range of safety training programmes to ensure that all employees are aware of their responsibilities and the risks associated with their work.
- Implementing a range of safety initiatives to reduce the risk of accidents and injuries, such as ensuring proper personal protective equipment (PPE) compliance and the use of safety signage and warning systems.
- Carrying out regular risk assessments to identify any potential hazards and take appropriate action to reduce or eliminate them.

- Working with external health and safety consultants to review and update safety policies and procedures
- Establishing a safety culture within the organization to ensure that safety is given the highest priority.

With this approach, there had been no accident/major incidents in the past year. For minor spill and leakage related incidents which occurred previously both Corrective and preventive actions have been taken up. No environmental damage has occurred as the spills at the respective locations were contained and most of the material was also recovered however to ensure such material loss does not happen the installations were reviewed and necessary changes in the pipes and joints were being done by respective vendors.

Change management has also been introduced to ensure that any transitions in the process/ product is transitioned smoothly by providing a structured approach to planning, implementing, and monitoring changes. Also we ensure effective communication at all stages of the change process. Clear and transparent communication helps employees understand the reasons for the changes, the expected outcomes, and their roles in the process. This reduces uncertainty and confusion, leading to better acceptance of the changes and safer working environment.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N). – Yes
2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.
 - Regular audits are done at the third party service providers end as to whether statutory compliance have been done and reimbursement/ Payment is done based on production of evidence on compliances made.
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 Current Financial Year	FY 22-23 Previous Financial Year	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Employees	0	2	-	1
Workers	0	21	-	17

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) – Yes
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	NIL
Working Conditions	NIL

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.
NIL

Annexure VII to the Directors' Report (contd.)

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

Essential Indicators

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

The internal and external groups/bodies whose activities, participation and aspirations are integral to the business and have significant impact on the operations of Berger Paints India Limited, are regarded as key stakeholder groups and have been identified accordingly.

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

S. No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Websites), Others	Frequency of engagement (Annually /Half yearly/Quarterly others- please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
1.	Shareholder	No	Done through Annual General Meeting/Stock Exchange Disclosures/ Half yearly Results Publication/ Quarterly Results Publication/ Complaints and Resolutions.	AGM- Annually H/Y Results- Half yearly Q/Y Results- Quarterly Others - Factory visits	Financial Results, Dividends, financial Stability, Significant changes in shareholding, ESG practices, climate change risks, cyber risks, growth prospects
2.	Employees	No	Done through MDs communications, various HOD Communications including apprising of HR practices, KRA reviews, team meetings, performance appraisals, union meetings, wellness initiatives, Grievance Mechanism Functioning, email, intranet, websites, poster campaigns, house magazines, confluence, circulars, quarterly publication, newsletters.	Ongoing, year round process	Performance analysis and career path setting, innovation, operational efficiencies, improvement areas, long-term strategy plans, training and awareness, responsible marketing, brand communication, health, safety and engagement initiative, ESG awareness
3.	Customers	No	Through distributor, retailer, direct customer, achievers' meets, senior leader and customer meets/visits, customer plant visits, focus group discussion, trade body membership, complaints management, helpdesk, website, conferences, information on changes, customer surveys, excursions, frequent business meets and travels.	Ongoing, year round process	Product quality and availability, responsiveness to needs, increase of sales targets, business responsibility guidelines
4.	Suppliers/ Partners	No	Prequalification/vetting, communication and partnership meets, plant visits, MoU and framework agreements, online training, meets, contract management/ review, product workshops/on site presentations, satisfaction surveys, help desks.	Ongoing, year round process	Quality, timely delivery and payments, ESG consideration (sustainability, safety checks, compliances, ethical behavior), ISO and OHSAS standards, Introduction of ESG qualities
5.	Government	No	Advocacy meetings with local/state / national government ministries, authorities, seminars, media releases, related meetings.	Ongoing, year round process	Compliance with ESG practices (frameworks for sustainability and beyond compliance changes in regulatory frameworks, skill and capacity building, employment, environmental measures), policy advocacy, timely contribution to exchequer
6.	Communities	Yes	Community visits and projects, partnership with local charities, volunteerism, seminars/conferences.	Ongoing	Waste management, integrated water management, clean water, climate change impacts, community development, self-sustainability, livelihood support, disaster relief, support of the United Nations Sustainable Development Goal (UN SDGs) building capacity of future leaders, digital ecosystem development

Leadership Indicators

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

The company has engaged with customers and suppliers on matters of human rights Ethics and business values in a robust forum of discussion. The feedback has been positive but no discernible suggestions have yet emerged for consideration.

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

Yes, the company has commenced the process and worthwhile suggestions, if any will be incorporated on merit.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.- The Company has not engaged with vulnerable/marginalised stakeholder groups.

PRINCIPLE 5 Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	4001	2046	51	2973	1825	61.3
Other than permanent	3143	Nil	Nil	4909	Nil	Nil
Total Employees	7144	2046	29	7882	1825	23.2
Workers						
Permanent	444	165	37.16	1115	376	33.72
Other than permanent	6110	Nil	Nil	2819	Nil	Nil
Total Workers	6554	165	2.51	3934	376	9.56

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

Category	FY 23-24 Current Financial Year					FY 22-23 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent										
Male	3915	0	0.00	3915	100.00	2915	*NA	*NA	2915	100
Female	86	0	0.00	86	100.00	58	*NA	*NA	58	100

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Category	FY 23-24 Current Financial Year					FY 22-23 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Other than Permanent										
Male	3044	0	0	3044	100.00	4687	2355	50.2	2332	50
Female	99	0	0	99	100.00	222	96	43.2	126	57
Workers										
Permanent										
Male	443	0	0	443	100.00	1096	*NA	*NA	1096	100
Female	1	0	0	1	100.00	19	*NA	*NA	19	100
Other than Permanent										
Male	5889	5671	96.3	218	3.7	2738	1820	66.4	918	33.53
Female	221	221	100.00	0	0	81	67	82.7	14	17.29

*Not Applicable

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)	10*			
Executive Director	2	4,44,98,351.5	1	72,26,075
Non- Executive Director (Commission only)	6	7,20,000	1	7,20,000
Key Managerial Personnel	3	92,24,026	0	0
Employees other than BoD and KMP	3911	9,44,862	85	6,97,665
Workers	443	2,62,896	1	2,98,440

* Excluding Mr Subir Bose who was appointed w.e.f. 15.05.2024.

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

	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Gross wages paid to females as % of total wages	0.22%	0.24%

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

No individual or committee has been tasked with this responsibility. Such matters are dealt by Human Resource Department.

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

The Company has framed a comprehensive HR Policy and all grievances relating to Employees are dealt in a fair and transparent manner based on the provisions mentioned in the said policy.

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

	FY 23-24 Current Financial Year			FY 22-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	1	Resolved	* Please refer notes	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

Notes:- * Yes & the accused person is terminated in the month of April 2024.

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

	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013(POSH)	1	Nil
Complaints on POSH as a % of female employees/ workers	0.25	Nil
Complaints on POSH upheld	Yes & the accused person is terminated in the month of April 2024.	Nil

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

Such matters, if any are referred to the Internal Complaint Committee and the Human Resource Department for appropriate action.

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

(Yes/No) Yes

Annexure VII to the Directors' Report (contd.)

10. Assessments for the year:

	% of your plants & offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100 %
Forced/involuntary labour	100 %
Sexual harassment	100 %
Wages	100 %
Others- please specify	100 %

Self-assessment done internally. No external agency was involved.

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above: No corrective action is warranted as no significant concern has emerged.

Leadership Indicators

- Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.
No such case warranted action.
- Details of the scope and coverage of any Human rights due-diligence conducted.
Constant vigilance is carried out by Factory and Office personnel throughout the year.
- 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?
Steps taken to make our offices disabled employee friendly and from the Financial Year 2024-25, there will be substantial positive change in this matter.
- Details on assessment of value chain partners:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	The Company has undertaken Value Chain Outreach in 2023-24 disseminating information on Human Rights, Equal Opportunity and ESG matters and encouraging the latter to walk the ESG path. The matter of assessment is under process. It is planned to hold more awareness programmes on such matters.
Forced/involuntary labour	
Sexual harassment	
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. Not Applicable

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

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

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
From renewable sources		
Total electricity consumption (A)	3,32,47,030 MJ	2,39,08,147 MJ
Total fuel consumption (B)	15,69,33,100 MJ	12,43,70,049.7 MJ
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	19,01,80,130 MJ	14,82,78,197 MJ
From non-renewable sources		
Total electricity consumption (D)	14,88,49,387 MJ	12,63,70,595 MJ
Total fuel consumption (E)	6,76,96,934 MJ	7,36,95,358.85 MJ
Energy consumption through other sources (F)	-	37,33,992 MJ*
Total energy consumed from non-renewable sources (D+E+F)	21,65,46,321 MJ	20,37,99,946 MJ*
Total energy consumed (A+B+C+D+E+F)	406726451 MJ	352078143 MJ*
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations)	4066.077 MJ/Mln.INR	3717.58 MJ/Mln.INR
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP)	91080 MJ/Mln.INR adjusted for PPP	82418.8 MJ/Mln.INR adjusted for PPP
Energy intensity in terms of physical output	552.955 MJ/ KL-MT	544.62 MJ/ KL-MT
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

* Rearranged as per changed in the calculation criteria.

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

Yes. The energy consumption data and energy intensity data are audited and verified by Futurestation Advisors LLP as part of 'Reasonable Assurance' for the BRSR.

2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any. No
3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	92356
(ii) Groundwater	384081	300375
(iii) Third party water	87724	8512

Annexure VII to the Directors' Report (contd.)

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
(iv) Seawater / desalinated water	—	—
(v) Others	3730	5373
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	475535	406616
Total volume of water consumption (in kilolitres)	414424	404321
Water intensity per rupee of turnover (Total water consumption/Revenue from operations)	4.14KL/Mln.INR	4.27KL/Mln.INR
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	92.8KL/Mln.INR adjusted for PPP	94.6 KL/Mln.INR adjusted for PPP
Water intensity in terms of physical output	0.56 KL/ KL-MT	0.62 KL/KL-MT
Water 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.

Yes. Futurestation Advisors LLP has conducted a reasonable assurance.

4. Provide the following details related to water discharged:

Parameter	FY 23-24 Current Financial Year	FY 23-24 Previous Financial Year
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of Treatment (through ETP (Primary, secondary, and tertiary treatment))	8942	8668.25
(ii) To Groundwater	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment	Nil	Nil
(iii) To Seawater	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third-parties	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of Treatment (After primary & secondary treatment sent to CETP)	3020	2855
(v) Others	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of Treatment (ZLD/Gardening/ Firewater tank top-up/process)	49149	32047
Total water discharged (in kilolitres)	61110.80	43570.25

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

Yes. Futurestation Advisors LLP has conducted a reasonable assurance.

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

Yes, 50% manufacturing locations have been covered and operating successfully. One more plant will be covered with ZLD installations by Financial Year 2024-25.

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

Parameter	Please specify unit	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year*
NOx	mg/m3 (Average)	30.75	30.13
SOx	mg/m3 (Average)	19.19	17.78
Particulate matter (PM)	mg/m3 (Average)	53.76	50.15
Persistent organic pollutants (POP)	—	—	—
Volatile organic compounds (VOC)	ppm (Average)	4.01	5.50
Hazardous air pollutants (HAP)	—	—	—
Others – please specify	—	—	—

* Rearranged.

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

Yes, Envirocheck, Envirotech, Qualissure, EkoPro Aman Enviro, etc. and others as approved by local PCBs.

Apart from Quarterly work place monitoring there are CPCB authorized audits from Industry experts and competent bodies which are conducted on surprise/ planned basis and no non-conformance observed in last FY.

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

Parameter	Unit	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
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	9666	2484.73
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	29604.49	29837.5
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	Metric tonnes of CO ₂ Equivalent/Mln-INR of Turnover	0.39	0.34
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/ Mln-INR adjusted for PPP	8.79	7.57
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes of CO ₂ Equivalent /KL- MT	0.053	0.049
Total Scope 1 and Scope 2 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.

Yes. Futurestation Advisors LLP has conducted a reasonable assurance.

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

Sl. No.	Project Name	Project Cost (₹ in Crores)	When Implemented	Cost Savings in FY 23-24 (₹ in Crores)	GHG Emission reduction in FY 23-24 (Mt of CO ₂)
1	Rooftop Solar Power Plant - Hindupur	3.65	Feb'20	1.38	988.8
2	Rooftop Solar Power Plant - Jejuri Ph I	3.10	Oct'20	1.28	859.0
3	Rooftop Solar Power Plant - Jejuri Ph II - New Addition	1.00	Sep'23		

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Sl. No.	Project Name	Project Cost (₹ in Crores)	When Implemented	Cost Savings in FY 23-24 (₹ in Crores)	GHG Emission reduction in FY 23-24 (Mt of CO2)
3	Rooftop Solar Power Plant - Naitali Ph I	1.01	Nov'20	0.42	299.5
	Rooftop Solar Power Plant - Naitali Ph II	0.76	Apr'22		
4	Rooftop Solar Power Plant - Rishra	1.90	Feb'21	0.44	364.7
5	Rooftop Solar Power Plant - Goa	2.06	Jan'22	0.49	425.9
6	Rooftop Solar Power Plant - Pondicherry Ph I	1.79	Dec'22	0.79	765.7
	Rooftop Solar Power Plant - Pondicherry Ph II - New Addition	1.53	Apr'23		
7	Rooftop Solar Power Plant - Sandila	6.89	Oct'22	2.04	1753.3
8	Rooftop Solar Power Plant - Jammu	2.21	Nov'22	0.29	400.4
9	Rooftop Solar Power Plant - Br. Paints - Hindupur Ph I	2.12	Jan'20	0.96	933.2
	Rooftop Solar Power Plant - Br. Paints - Hindupur Ph II	1.41	Aug'21		
10	Rooftop Solar Power Plant - Br. Paints - Sikandrabad Ph I	1.35	Jun'21	0.27	245.9
	Rooftop Solar Power Plant - Br. Paints - Sikandrabad Ph II - New Addition	0.90	Aug'23		
11	Rooftop Solar Power Plant - Br. Paints - Nalbari	0.95	Jun'21	0.16	177

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

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Total Waste generated (in metric tonnes)		
Plastic waste (A)	1216	124.63
E-waste (B)	7	4
Bio-medical waste (C)	0	0.008
Construction and demolition waste (D)	0	0
Battery waste (E)	60	4
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	3709	2301.88
Other Non-hazardous waste generated (H) . Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	3339	2278.28
Total (A + B + C + D + E + F + G + H)	8331	4711.799
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations)	0.083 MT/Mln. INR	0.0498 MT/Mln. INR
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operations adjusted for PPP)	1.87 MT/Mln. INR adjusted for PPP	1.1 MT/Mln. INR adjusted for PPP
Waste intensity in terms of physical output	0.011 MT/ KL-MT	0.007 MT/ KL-MT
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	839	942.358
(ii) Re-used	1047	308.596
(iii) Other recovery operations	3	47.027
Total	1889	1297.98
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	5
(ii) Landfilling	0	264
(iii) Other disposal operations	6442	3548.818
Total	6442	3816.818

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

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

Yes. Futurestation Advisors LLP has conducted a reasonable assurance.

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

Company has launched a project **WOW (War on Waste)** under Manufacturing excellence umbrella which aims at 4R (Reduce, Reuse, Recycle, Recreate) under which reduction of waste at source, Sticky loss recovery, powder RM reuse in batches and recreate a usable RM from waste is being done and system is set in place to monitor the process and ensure that no such material sent out as waste.

For filling operation all our plants have shifted towards use of automatics machines, where the chance of spillage is very less. Excess/less filling is stopped which could result in product rejection due to tinting.

Defect prevention is targeted in products through RFT (Right First Time) implementation to minimize process waste generation.

Washing solvent generated from washing of equipment is being reused in subsequent production batches. Spent solvent is reused for cleaning purpose and after multiple such uses, fresh solvent is recovered in-house from waste solvent through distillation process. The recovered fresh solvent is recycled into paint manufacturing process related activities. '19th barrel syndrome' – project taken to limit generation of washing solvent at plant so within 18 barrels washing solvent generated gets reused in washing.

Barrels used for production and storage purposes are re-used - another step towards Carbon Footprint reduction.

Plastic waste from raw material packaging and damaged packaging material is sent to an authorized plastic recycler. Under Plastic Waste management rules, Berger Paints has established action plan as per our EPR obligations and carried out the compliance for recycling with company appointed WMA (Waste Management Agencies). Also, recycled plastic content is used in our product packaging which ensured that use of virgin plastic can be reduced.

Waste generated inside the plant is being collected and disposed through approved Cement plants for co-processing.

Powder collected from Dust extraction system is reused in making economy grade products.

Project JAL has been taken ahead by the plants to curb wastage of water and which has helped to save on an average of 3.2 lac Liters of water daily.

Through **Project PARAGON** our in-transit damages have reduced significantly causing lesser harm to environment and better storage condition at the depots.

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We have also implemented a number of waste reduction initiatives, such as reducing packaging, using recycled materials, and encouraging employees to reduce their own waste. We have implemented a number of waste recycling programs, such as paper, plastic, Container segregation and its best utilization. These initiatives help us to reduce our environmental impact and ensure that our products and processes are safe and sustainable.

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: None

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
-	-	-	-

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
Additional Capacity expansion at Hindupur, AP	S.O. 1533 (E) dated 14.09.2006	17.04.2023	Yes	Yes	https://www.bergerpaints.com/about-us/expansions
Panagarh Project, WB	S.O. 1533 (E) dated 14.09.2006	17.08.2023	Yes	No, undergoing assessment	-

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

S. No.	Specify the law/regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines/penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
1	Water (Prevention and Control of Pollution) Act	None	None	NA
2	Air (Prevention and Control of Pollution) Act	None	None	NA
3	Environment Protection Act	None	None	NA

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:

- Name of the area – Berger Paints Hindupur
- Nature of operations – Liquid paints Manufacturing

(iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	40656
(ii) Groundwater	Nil	Nil
(iii) Third party water	38819	3640
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	-	38
Total volume of water withdrawal (in kilolitres)	38819	44334
Total volume of water consumption (in kilolitres)	38819	44334
Water intensity per rupee of turnover (Water consumed / turnover)	0.388 KL/Mln.INR	0.468 KL/Mln.INR
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	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment	Nil	Nil
(ii) Into Groundwater	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment	Nil	Nil
(iii) Into Seawater	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third-parties	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment	Nil	Nil
(v) Others	Nil	Nil
– No treatment	Nil	Nil
– With treatment – please specify level of treatment Through ETP (Primary, secondary, and tertiary treatment)	4572.09	4235
Total water discharged (in kilolitres)	4572.09	4235

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

Yes. Futurestation Advisors LLP has conducted a reasonable assurance.

- (i) Name of the area – British Paints division of the Company, Hindupur
(ii) Nature of operations-Liquid paints Manufacturing
(iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	-
(ii) Groundwater	16062	17073
(iii) Third party water	202	Nil
(iv) Seawater/desalinated water	Nil	Nil
(v) Others	0	476
Total volume of water withdrawal (in kilolitres)	16264	17549
Total volume of water consumption (in kilolitres)	16051	16353
Water intensity per rupee of turnover (Water consumed/turnover)	0.16 KL/Mln.INR	0.17 KL/Mln.INR
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	720
(ii) Into Groundwater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iii) Into Seawater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third-parties	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(v) Others	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	213	Nil
Total water discharged (in kilolitres)	213	720

- (i) Name of the area – British Paints division of the Company, Sikandrabad
(ii) Nature of operations-Liquid Paints Manufacturing
(iii) Water withdrawal, consumption and discharge in the following format

Parameter	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	–	–
(ii) Groundwater	13823.9	16059
(iii) Third party water	Nil	Nil
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres)	13823.9	16059
Total volume of water consumption (in kilolitres)	13158.77	15785
Water intensity per rupee of turnover (Water consumed/turnover)	0.13 KL/ Mln. INR	0.17 KL/ Mln. INR
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	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	750
(ii) Into Groundwater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iii) Into Seawater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third-parties	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(v) Others	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	665	Nil
Total water discharged (in kilolitres)	665	750

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

Parameter	Unit	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	NA*	NA*
Total Scope 3 emissions per rupee of turnover	–	NA*	NA*
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. Yes. Futurestation Advisors LLP has conducted a reasonable assurance.

***The Company has not carried out computation of Scope 3 emissions for the current year.**

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities. Not Applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Zero Liquid Discharge System	From the Effluent Treatment Plants installed at all of our Units, the treated water was earlier released after the characteristics of the effluent water were met as per the PCB recommendation but, to recycle & reuse that water & thereby, to reduce the water consumption of the Units, we have also installed ZLD (Zero Liquid Discharge) systems at applicable units which consists of various Filtration units along with RO module & MEE (Multiple Effect Evaporator). Further we have upgraded the system with MVRE which is low energy consumption. After treating the effluent water coming from ETP, through ZLD system, this water is used for domestic & industrial utility application.	1) Zero discharge of liquid effluent & reuse of the same after treatment. 2) Reduction of water consumption.
2	Effluent Treatment Plants in all Berger Units, with Activated Sludge Process & Tertiary Treatment.	Essentially, the paints manufacturing process, as such, does not directly generate any wastewater streams to cause any water pollution. However, at a typical paints manufacturing facility, the wastewater streams generated from the operations include those from equipment cleaning/ reactor washing and from the support utilities. These waste water are collected from their respective point of generation & transferred to the ETP's with Activated Sludge Process & Tertiary Treatment, where these are treated to maintain level for certain parameters like BOD, COD, TDS, TSS etc. within the limits prescribed by the PCB.	1) Reduction of BOD, COD, TSS etc. to the maximum extent in the treated water, to maintain the same within the prescribed limit of PCB.
3	Usage of Bio-Fuel instead of Diesel for the Thermic Fluid Heaters of Resin Plants.	In the Resin Plants, Thermic Fluid Heaters are used to supply process heat to the Reactors. Earlier we used Diesel as the fuel for this Thermic Fluid Heaters but now we have replaced the Diesel fired heaters by Bio-fuel fired Heaters like use of Ground nut pellets, cashew nuts pellets, Sugarcane baggase, etc. with fully automatic closed loop charging system. Bio-fuel being much greener fuel compared to Diesel, the Carbon foot print & Green House gas emission has reduced dramatically, apart from the huge monetary savings obtained.	1) Reduction of huge amount carbon foot print. 2) Reduction of Green House Gas emission.

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S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
4	Usage of PNG (CLEANER –Fuel) instead of LSHS for the Thermic Fluid Heaters of Resin Plants and DUAL Fuel KIT PNG Based for operation of DG Set	<p>1. PNG Cleaner Fuel has been used by replacing LSHS/ HSD/ FO Pollutant Fuel earlier being used for operation of Resin Thermopac, which is much cleaner fuel means that it produces fewer emissions and pollutants when burned. This helps to reduce air pollution and improve air quality.</p> <p>2. PNG is also more efficient than LSHS, meaning that it requires less fuel to generate the same amount of heat. This can result in lower operating costs for the thermic fluid heater.</p> <p>3. PNG is also a safer fuel than LSHS, as it is non-toxic and lighter than air. This reduces the risk of fire and other accidents in the workplace.</p> <p>4. Finally, PNG is a more sustainable fuel than LSHS, as it is derived from Fossils fuels and very cleaner fuel not left any residue .This helps to reduce the environmental impact of the thermic fluid heater.</p>	<p>1) Reduction of huge amount carbon foot print.</p> <p>2) Reduction of Green House Gas emission.</p>
5	(B)All Out	Project (B)ALL Out, our flagship initiative to enhance grinding efficiency with safer & economically viable means, has made significant progress since you have last heard about it. We have successfully replaced Ball Mills with safer and more efficient technologies, such as Basket Mills, IEC, Stator Rotor, mixed combinations, or new technologies. This strategic move has not only mitigated safety risks and eliminated noise pollution but also delivered substantial power savings.	We have been able to save more than two lacs unit of electricity through this initiative.
6	DPV Water reuse	We have installed Pigging system in our plant to collect maximum retention during emulsion and water based paints transfer. This is being recollected and used up in batches thereby helping to decrease material loss and decrease our ETP load.	Around 100 KL of water and 20 MT of emulsion per month is being saved through this initiative.
7	Project JAL	Taken across all our units with target to reduce our ETP intake water by 50% through re-using measures, arresting leakages and spread awareness on less wastage of water and proper accounting.	<p>1) 3.2 Lac Litres of water saved daily.</p> <p>2) No need to enhance ETP capacity with increase in production load</p>
8	Green STP	Rediscovering Nature's Genius in treating Sewage - the cow's stomach. The unique patented technology treats sewage in a decentralized, self- sustainable way in underground chambers without power, chemicals or human intervention. Using Biomimicry, regenerative innovation inspired by nature, the Green-STP utilizes functional principles and strategies of microorganisms and ecosystem found in a cow's stomach	15,00,000 Liter sewage water purification per year capacity.
9	Rain-water harvesting by adaptation of pond	An artificial pond is being adopted in nearby village at Gaziveerpuram which will recharge 50 % rain water and 50% will evaporate by sun dried of own storage capacity.	43155 m3 of annual rainfall is being harvested
10	Installation of Roof Top Solar Power Plant	We have recognized the importance of sustainability and renewable energy. One of the initiatives they might have undertaken is the installation of rooftop solar plants on their facilities. Solar energy has significantly reduce electricity consumption over the long term. By generating our own electricity from solar panels, we have been able to offset the consumption from the grid, thus switching over to cleaner and greener alternatives.	1,00,74,876 kWh generated in FY 23-24
11	Many products have been developed with zero heavy metal content	All our Two-wheeler formulations are RoHS compliant. In decorative segment, we offer Green label certified products.	Lead, Chrome, Mercury Free products

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

Yes, the entity has a business continuity and disaster management plan. This plan outlines the steps the entity will take to

ensure the continuity of operations in the event of a disaster. It includes a risk assessment, a detailed plan for responding to and recovering from a disaster, and a plan for testing and maintaining the plan. The plan also includes a communication plan to ensure that employees, customers, and other stakeholders are informed of the situation and the steps that are being taken to address it. The plan is regularly updated to ensure that it is current and effective.

On site emergency plans are available and communicated to the relevant stakeholders. Mock Drills are conducted periodically as emergency preparedness plan to deal with any unforeseeable natural or man-made disaster or emergency situation.

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 Assessed

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

None

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

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.
 - Manufacturing Excellence team has won ‘Smart and Future Ready Factory of the year Award’ at Manufacturing and MSME Conclave 2023 by ASSOCHAM.
 - Berger Paints received the Gold Award for excellence in EHS practices during CII- SR- EHS Excellence Awards 2023.
 - Naltali Plant won the State championship at 16th CII Encon Awards 2023.
 - Jejuri Unit declared winner in 4th Green Urja & Energy efficiency Awards.
 - Corporate Manufacturing Excellence team has won the “Special Jury” award in CII External Regional Productivity Awards 2022.
 - Corporate Engineering and VVN unit won Genentech Energy Conservation Award 2021.
 - Berger Paints won Best in Class Carbon Footprint award in the Stars of the Industry Awards -2021 by the World Manufacturing Congress.
 - Corporate EHS won most prestigious Environment Protection Awards – 2021 by Greentech Foundation as Winner in the Gold Category, competing with all large Public Sector Organizations and large Multi-National Companies.
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/affiliated to.

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/ associations (State/National)
1	Bengal Chamber of Commerce and Industry (BCC & I)	State
2	Confederation of Indian Industry (CII)	National
3	Indian Paint Association (IPA)	National

Annexure VII to the Directors' Report (contd.)

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
Nil	Nil	Nil

There is no adverse order against the Company.

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 public domain? (Yes/No)	Frequency of Review by Board (Annually/Half yearly/ Quarterly/Others – please specify)	Web Link, if available
–	Nil	Nil	Nil	Nil	–

PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

Essential Indicators

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

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
Additional Capacity expansion at Hindupur, AP	As per the EIA notification S.O. 1533 (E) dated 14.09.2006, EIA studies are being carried out. Socio Economic Impact Assessment is being carried out for criteria such as –	17.04.2023	Yes	Yes	https://www.bergerpaints.com/about-us/expansions
Panagarh Project, WB	1. Employment to local people 2. Transportation of raw material and finished goods 3. Contribution to state and central exchequers by way of taxes and duty 4. CER activities which bring positive impact towards development of ecosystem and social habitat Social management plan is accordingly developed.	17.08.2023	Yes	No, undergoing assessment	

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format: Not Applicable

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 INR)
–	–	–	–	–	–	–

3. Describe the mechanisms to receive and redress grievances of the community.
Berger Paints has a process to receive, register, assess and resolve grievances of CSR beneficiaries

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

	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Directly sourced from MSMEs/small producers	11%	22%
Directly from within India	79%	78%

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

Location*	FY 23-24 Current Financial Year	FY 22-23 Previous Financial Year
Rural	20.26%	20.26%
Semi-urban	3.33%	3.32%
Urban	43.61%	43.41%
Metropolitan	32.78%	32.99%

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

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
There are no negative impacts. However, projects are undertaken maintaining all environmental related recommendations mentioned in the ToR report issued by competent authority.	Not applicable as there are no negative impacts.

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

S. No.	State	Aspirational District	Amount spent (In INR)
1	Andhra Pradesh	Vizianagaram	1,77,760
2	Assam	Barpeta	58,960
3	Bihar	Aurangabad	97,460
4	Bihar	Gaya	1,14,840
5	Bihar	Katihar	76,780
6	Bihar	Muzaffarpur	3,35,060
7	Bihar	Sitamarhi	78,100
8	Chhattisgarh	Bijapur	1,95,140
9	Chhattisgarh	Korba	2,13,840
10	Chhattisgarh	Rajnandgaon	93,940
11	Jharkhand	Bokaro	1,28,700
12	Jharkhand	Chatra	26,620
13	Jharkhand	Godda	48,840
14	Jharkhand	Khunti	4,180
15	Jharkhand	Latehar	1,96,020

Annexure VII to the Directors' Report (contd.)

S. No.	State	Aspirational District	Amount spent (In INR)
16	Jharkhand	Lohardaga	20,020
17	Jharkhand	Pakur	220
18	Jharkhand	Palamu	4,25,700
19	Jharkhand	Purbi Singhbhum	1,73,800
20	Karnataka	Raichur	24,640
21	Maharashtra	Osmanabad	10,560
22	Maharashtra	Washim	48,400
23	Odisha	Dhenkanal	3,520
24	Odisha	Kalahandi	16,280
25	Odisha	Rayagada	3,520
26	Uttar Pradesh	Balrampur	4,840

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) No as the Company does not have information on marginalized vulnerable groups.
- (b) From which marginalized /vulnerable groups do you procure? The Company does not have information on marginalized/vulnerable groups.
- (c) What percentage of total procurement (by value) does it constitute? Not Available
4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge: Not Applicable

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

5. Details of corrective actions taken or underway based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved. Not Applicable

Name of authority	Brief of the Case	Corrective action taken
-	-	-

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	iTrain	1,24,158 across all locations	Not Applicable as the Company does not have information on marginalised/vulnerable groups

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

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.
- The Company has established an adequate grievance redressal mechanism for the consumers which addresses customer concerns, feedbacks and complaints. The Company maintains a specific section in its website, a dedicated email id and dedicated phone numbers including a toll-free number where the customers can post their queries, grievances, suggestions, feedback for the products and/or services of the Company. Wherever required, the Company escalates the complaints to the level of business heads, regional heads/ functional heads and other concerned officials.

Receiving Grievances

Berger Paints has created multiple means through which affected parties can bring their grievances to the attention of the company.

- Email: **consumerfeedback@bergerindia.com**
- Post: To registered office at Berger House, 129 Park Street, Kolkata 700017
- Phone: Call Centre with multi-lingual language support at 1800 103 6030 OR phone numbers of Berger's registered office, +91 33 2229 9724/2229 6005/06/1
- Fax: Over facsimile +91 33 2249 9009/9729
- Website: **<https://www.bergerpaints.com/investors/services>**
- Social Media: Facebook, Twitter, Instagram, Pinterest, YouTube.
- ORM Tool: The Simplify360 tool is used by the company for online listening and capturing the digital voice of various stakeholders across platforms. This allows Berger Paints the ability to identify and reach out to parties who have problems that need solving.
- Offline: Complaints can be registered with any of the company's sales offices across the country. The contact details of these offices are available on the company's website as well in the annual report and on its trade pricelists.

Information regarding the various means of reaching Berger are adequately publicized through various physical and digital means. All product packaging, promotion material, printed matter, digital resources of the company carry details of the manner in which stakeholders can escalate their grievances to the company.

Registering Grievances

All complaints and grievances are registered and archived digitally on Microsoft Dynamics CRM or SharePoint depending on the nature of the complaint, with a unique Service Request number and date.

The **consumerfeedback@bergerindia.com** email address is used to transmit and escalate complaints to the personnel in various functions and divisions tasked with assessing and resolving them.

The Customer Grievance Officer monitors all grievances till they are closed.

Assess and Resolve Grievances

Product Complaints - Any product complaint received by Berger Paints whether online or offline is attended to and investigated by technically competent personnel from the concerned business division. These are also logged into a SharePoint portal and details are shared with the concerned product, production and R&D team members for information and further investigation.

Service Complaints - A Complaint regarding service failure at any worksite are attended to and investigated by personnel from the concerned business division.

Shareholder Issues or Complaints - These are attended to by the secretarial and legal department in a time-bound manner.

Dealer/Distributor Complaints - These are attended to by the sales team members and are tracked till closure by the national head of sales.

Service Provider (Interior Designers, Painters, Architects etc.) Complaints - These are attended to by exclusive field teams who are deployed to service these stakeholders

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	80%
Safe and responsible usage	100%
Recycling and/or safe disposal	NIL

Annexure VII to the Directors' Report (contd.)

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

	FY 23-24 Current Financial Year		Remarks	FY 22-23 Previous Financial Year		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil	-	Nil	Nil	-
Advertising	Nil	Nil	-	Nil	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	Nil	Nil	-	Nil	Nil	-
Restrictive Trade Practices	Nil	Nil	-	Nil	Nil	-
Unfair Trade Practices	Nil	Nil	-	Nil	Nil	-
Other	Nil	Nil	-	Nil	Nil	-

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

	Number	Reason for recalls
Voluntary recalls	Nil	Nil
Forced recalls	Nil	Nil

This is a decorative product sold on retail basis and traditionally there is a no practice of recall in such product distribution.

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

Web-link of the Cyber Security Policy - <https://www.bergerpaints.com/about-us/policies/cyber-security-policy>

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

As regards complaints against delivery of essential services the Company evaluates the complaints and wherever necessary resolves the same. As no one has complained on issues relating to advertising; cyber security and data privacy of customers; re-occurrence of instances of product recalls, there is no corrective action necessary.

7. Provide the following information relating to data breaches:

- Number of instances of data breaches: Nil
- Percentage of data breaches involving personally identifiable information of customers: Nil
- Impact, if any, of the data breaches: NA

Leadership Indicators

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).
<https://www.bergerpaints.com/>
2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

Dealers meet; Customer Complaint Resolution meets on quarterly or yearly basis to discuss about safe and responsible usage of products and/or services.

Usage instructions of the company's decorative products are available online on **www.bergerpaints.com**. The Product Data Sheet (PDS) & Material Safety Data Sheet (MSDS) for each product is also provided for the customer to access.
3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

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

Yes, a customer survey of Express Painting customers is carried out on completion of the job and customers rate the quality of the service experience, products, contractors and workmanship.

Annexure VII.I to the Directors' Report

Reasonable Assurance Report of Business Responsibility and Sustainability Report – Core Indicators vide SEBI Circular No. SEBI/HO/CFD- SEC-2/P/C CIR/2023/122 dated July 12, 2023

Assurance Statement

To The Management and Board of Directors Berger Paints India Limited

Futurestation Advisors LLP (also referred as “Futurestation” or “we” or “us”) was engaged by Berger Paints India Limited (also referred as “BPIL”) to conduct a reasonable assurance procedure on the BRSR Core attributes FY 2023-24 as reported by BPIL for the period stated below. This Assurance Statement applies to the procedure conducted by us as per the engagement agreement dated 22nd September 2023 signed between BPIL and Futurestation. The determination of the BRSR Core attributes is the sole responsibility of BPIL. Futurestation’s responsibility was to conduct reasonable assurance procedure based on applicable standards as per the engagement agreement referred above.

Reporting Period

1st of April 2023 to 31st of March 2024.

Level of Assurance

Reasonable Assurance. A reasonable assurance procedure involves assessing the risk of material mis-statement of the agreed attributes whether due to fraud or error, responding to the assessed risk as necessary under the circumstances. We conducted our reasonable assurance procedure in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. These standards require that we plan and perform this engagement to obtain reasonable assurance about whether the reported BRSR Core attributes are prepared, in all material respects, in accordance with the reporting criteria.

The procedures we performed were based on our professional judgement and included inquiries, observation of processes performed, inspection of data recording procedures on sample basis particularly for operational attributes (like energy, water and waste), inspection of data collating and recording procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above, we:

- Made BPIL’s management and process owners aware of the procedures to be performed by us.
- Understood and evaluated the design of the key structures, systems, processes and controls for managing, recording and reporting on the identified attributes.
- Checked consolidation for various plants and corporate offices for ensuring the completeness of data being reported
- Based on that understanding and the risks that the reported data may be materially misstated, determined the nature, timing and extent of further procedures
- Performed substantive testing on a selective basis of the identified attributes at the corporate head office in Kolkata, office in New Delhi, and visited sample representative plants to check that data had been appropriately measured, recorded, collated and reported;
- Reviewed records and performed testing including recalculation of sample data to establish an assurance trail
- Reviewed the level of adherence to the reporting criteria and the reporting framework followed by BPIL in preparing the BRSR Core data
- Reviewed the level of risk involved in material incorrectness in recording, collating and reporting of the data

BRSR Core Attributes

The BRSR Core attributes are mentioned in page 3 of this statement.

Observations

Our observations after conducting the reasonable assurance procedure are:

1. The data on GHG, Energy, Water, Waste and Safety include only those pertaining to the plants at Howrah, Pondicherry, Goa, Rishra, Jammu, Jejuri, Hindupur (2 plants), Naltali, Taloja, Sandila, Sikandrabad, Samba and Nalbari.

2. The Organisational Boundary considered in computation of Scope 1 and Scope 2 GHG emissions is limited to the plants mentioned above. Equity share, Financial or Operational control criteria of GHG Protocol have not been used to set the boundary.
3. The data recording, collation and reporting process for energy, water and waste is fair. However, there is scope to improve its robustness to reduce risk of misstatement.
4. The waste segregation, measurement and storage facilities have scope of improvement

Inherent Limitations

The absence of a significant body of established practice on which to draw to evaluate and measure non financial information allows for different, but acceptable, measures and measurement techniques and can affect comparability between entities. In addition, GHG quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emission factors and availability of updated credible values.

Assurance Opinion:

Based on the procedures we have performed and the evidence we have obtained, the BRSR Core attributes for the financial year ended 31 March 2024 are prepared in all material respects.

Statement of independence, impartiality and competence

Futurestation Advisors LLP is an independent professional services company that specializes in sustainability advisory and assurance services. No member of the reasonable assurance procedure performing team has a business relationship with BPIL, its directors or managers beyond that required of this assignment. We conducted this procedure independently and to our knowledge there has been no conflict of interest. The team has extensive experience in conducting assurance over environmental, social, ethical, governance, health and safety information, systems and processes, has over 30 years combined experience in this field and an excellent understanding of the subject matter.

SUDIPTA DAS

Partner

Futurestation Advisors LLP

15th May, 2024

This assurance statement, including the opinion expressed herein, is provided to Berger Paints India Limited and is solely for the benefit of Berger Paints India Limited in accordance with the terms of our agreement. We consent to the release of this statement by you in order to satisfy the requirements of SEBI but without accepting or assuming any responsibility or liability on our part to SEBI or to any other party who may have access to this statement.

Annexure VII.I to the Directors' Report (contd.)

BRSR Core FY 2023-24

Sr. No.	Attribute	Parameter	Measurement	Data
1	Green-house gas (GHG) footprint	Total Scope 1 emissions	tCO ₂ e	9666
		Total Scope 2 emissions	tCO ₂ e	29604
		GHG Emission Intensity (Scope 1 +2)	Total Scope 1 and Scope 2 emissions tCO ₂ e/Total Revenue from Operations adjusted for PPP (tCO ₂ e/Mln INR)	8.79
			Total Scope 1 and Scope 2 emissions tCO ₂ e/KL of Product	0.053
2	Water footprint	Total water consumption	KL	414424
		Water consumption intensity	KL/Mln INR adjusted for PPP	92.8
			KL/KL of Product	0.56
		Water Discharge by destination and levels of Treatment	KL/Secondary level treatment in ETP / Release to surface water outside	8942
			KL/Secondary level treatment in ETP / Release to CETP outside	3020
			KL/Secondary level treatment in ETP / Release to garden inside	49149
3	Energy footprint	Total energy consumed	Mega Joules	406726451
		Total energy consumed % of energy consumed from renewable sources	In % terms	47
		Energy intensity	Mega Joules per Mln INR/adjusted for PPP	91080
			Mega Joules/KL of Product	552.95
4	Embracing circularity - details related to waste management by the entity	Plastic waste (A)	MT	1216
		E-waste (B)	MT	7
		Bio-medical waste (C)	MT	0
		Construction and demolition waste (D)	MT	0
		Battery waste (E)	MT	60
		Radioactive waste (F)	MT	0
		Other Hazardous waste. (G)	MT	3709
		Other Non-hazardous waste generated (H).	MT	3339
		Total waste generated ((A+B + C + D + E + F + G + H)	MT	8331
		Waste intensity	MT/Mln INR adjusted for PPP	1.87
			MT/KL of Product	0.01
		Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations	MT	1889
	Intensity %	23		
For each category of waste generated, total waste disposed by nature of disposal	MT	6442		
	Intensity %	77		
5	Enhancing Employee Wellbeing and Safety	Spending on measures towards well- being of employees and workers – cost incurred as a % of total revenue of the company	In % terms	0.08
		Details of safety related incidents for employees and workers (including contract-workforce)	Number of Permanent Disabilities	0
			Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	0
			No. of fatalities	0

BRSR Core FY 2023-24 (contd.)

Sr. No.	Attribute	Parameter	Measurement	Data	
6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	In % terms	0.22	
		Complaints on POSH	• Total Complaints on Sexual Harassment (POSH) reported	1	
			• Complaints on POSH as a % of female employees/workers	0.25	
			• Complaints on POSH upheld	1	
7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India	In % terms – As % of total purchases by value	11	
		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non- permanent / on contract) as % of total wage cost	In % terms – As % of total wage cost	23.59	
8	Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	In % terms	0	
		Number of days of accounts payable	(Accounts payable *365)/Cost of goods/services procured	97	
9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	• Purchases from trading houses as % of total purchases	22	
			• Number of trading houses where purchases are made from	327	
			• Purchases from top 10 trading houses as % of total purchases from trading houses	48.8	
			• Sales to dealers/distributors as % of total sales	84.89	
			• Number of dealers/distributors to whom sales are made	41,379	
			• Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	2.4	
			Share of RPTs (as respective %age) in -		
			• Purchases	4	
• Sales	1				
• Loans & advances	100				
• Investments	94				