

Business Responsibility and Sustainability Report

SECTION A: GENERAL DISCLOSURE

I. BASIC DETAILS

01. Corporate identity number	L99999GJ1975PLC002859
02. Name	Atul Ltd
03. Year of incorporation	1975
04. Registered office address	Atul House, G I Patel Marg, Ahmedabad 380 014, Gujarat, India
05. Corporate office address	Atul 396 020, Gujarat, India
06. E-mail address	sec@atul.co.in
07. Telephone	(+91 2632) 230000
08. Website	www.atul.co.in
09. Financial year	2022-23
10. Stock exchanges	BSE Ltd and National Stock Exchange of India Ltd
11. Paid-up capital	₹ 29,51,37,550
12. Contact person	Mr Bharathy Mohanan (+91 2632) 230000 bn_mohanan@atul.co.in
13. Reporting boundary	Standalone

II. PRODUCTS | SERVICES

14. Business activities

No.	Main activities	Business activities	% of total turnover
1.	Life Science Chemicals	R&D, technology, procurement, manufacturing, sales and marketing	36%
2.	Performance and Other Chemicals	R&D, technology, procurement, manufacturing, sales and marketing	63%
3.	Others	R&D, technology, procurement, manufacturing, sales and marketing	1%

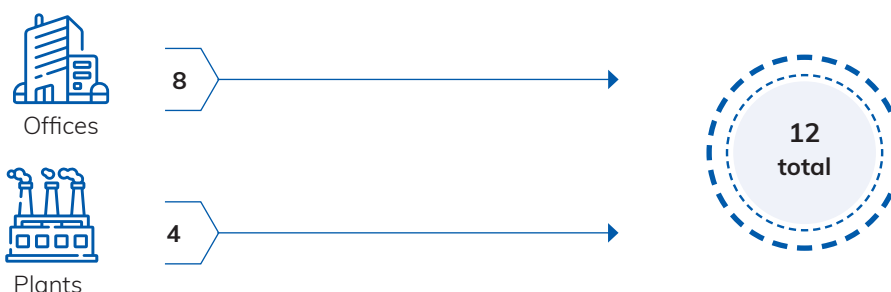
15. Products | services sold

No.	Products Services	NIC* code	% of total turnover
1.	Intermediates	201	31%
2.	Epoxy resins and hardeners	202	30%
3.	Herbicides	202	23%
4.	Textile dyestuffs	202	12%

*National Informatics Centre

III. OPERATIONS

16. Number of locations where offices and plants are situated



17. Markets served

a) Number of locations

Locations	Numbers
National (states)	29
International (countries)	83

b) Contribution of exports as a percentage of total turnover
50%

c) Types of customers
The Company serves ~ 4,000 customers belonging to ~ 30 diverse industries.

IV. EMPLOYEES

18. As at the end of the financial year

No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
a. Employees						
Managers						
1.	Permanent managers (A)	1,737	1,598	92%	139	8%
2.	Other than permanent managers (B)	43	35	81%	8	19%
3.	Total managers (A+B)	1,780	1,633	92%	147	8%
Workers						
4.	Permanent workers (C)	1,447	1,447	100%	-	NA
5.	Other than permanent workers (D)	2,558	2,520	99%	38	1%
6.	Total workers (C+D)	4,005	3,967	99%	38	1%
b. Differently abled employees						
Managers						
1.	Permanent managers (E)	4	4	100%	-	NA
2.	Other than permanent managers (F)	-	-	NA	-	NA
3.	Total differently abled managers (E+F)	4	4	100%	-	NA
Workers						
4.	Permanent workers (G)	-	-	NA	-	NA
5.	Other than permanent workers (H)	-	-	NA	-	NA
6.	Total differently abled workers (G+H)	-	-	NA	-	NA

NA: not applicable

19. Representation of women

	Total (A)	No. and % of females	
		No. (B)	% (B/A)
 Board of Directors	12	1	8%
 Key Managerial Personnel (KMP)	5	-	-

20. Turnover rate for permanent employees (%)

	FY 2022-23			FY 2021-22			FY 2020-21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
MANAGERS	19%	14%	19%	19%	16%	19%	10%	8%	10%
WORKERS	10%	-	10%	10%	-	10%	9%	-	9%

V. HOLDING, SUBSIDIARY AND ASSOCIATE ENTITIES (INCLUDING JOINT VENTURES)

21. Subsidiary, joint venture and associate entities

This information is given on page numbers 30 and 31 in the annexure to the Directors' Report. The entities do not participate in business responsibility initiatives.

VI. CORPORATE SOCIAL RESPONSIBILITY

22. Applicability of CSR as per Section 135 of the Companies Act, 2013



VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

23. Complaints or grievances on any of the nine principles under National Guidelines on Responsible Business Conduct (NGRBC)

Stakeholder group from whom complaint is received	Grievance redressal mechanism and its URL	2022-23			2021-22		
		Complaints received	Complaints pending resolution	Remarks	Complaints received	Complaints pending resolution	Remarks
Communities	A mechanism is in place to interact with community leaders to understand and address their concerns, if any	Nil	Nil	-	6	Nil	-
Shareholders	Under implementation	22	Nil	-	9	Nil	-
Investors (other than shareholders)		Nil	Nil	-	Nil	Nil	-
Employees		Nil	Nil	-	Nil	Nil	-
Customers		Nil	Nil	-	Nil	Nil	-
Value chain partners		Nil	Nil	-	Nil	Nil	-

24. Overview of material responsible business conduct areas

High Medium Low

Material area identified	Criticality	Mitigating actions
Human resources development		<ul style="list-style-type: none"> • Learning and development initiatives • Performance management quality
Circular economy		<ul style="list-style-type: none"> • Recycle of water • Decrease in emissions, effluent and waste • Recycle of plastic waste • Conversion of domestic waste to manure
Energy efficiency		<ul style="list-style-type: none"> • Energy saving through process efficiency and redesign of equipment
Product stewardship		<ul style="list-style-type: none"> • Decrease in consumption of raw materials
Occupational health and safety		<ul style="list-style-type: none"> • Implementation of ISO 45001:2018 (occupational health and safety management system) • Actions on zero harm • Safety assessments and audits

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

NGRBC principles and core elements

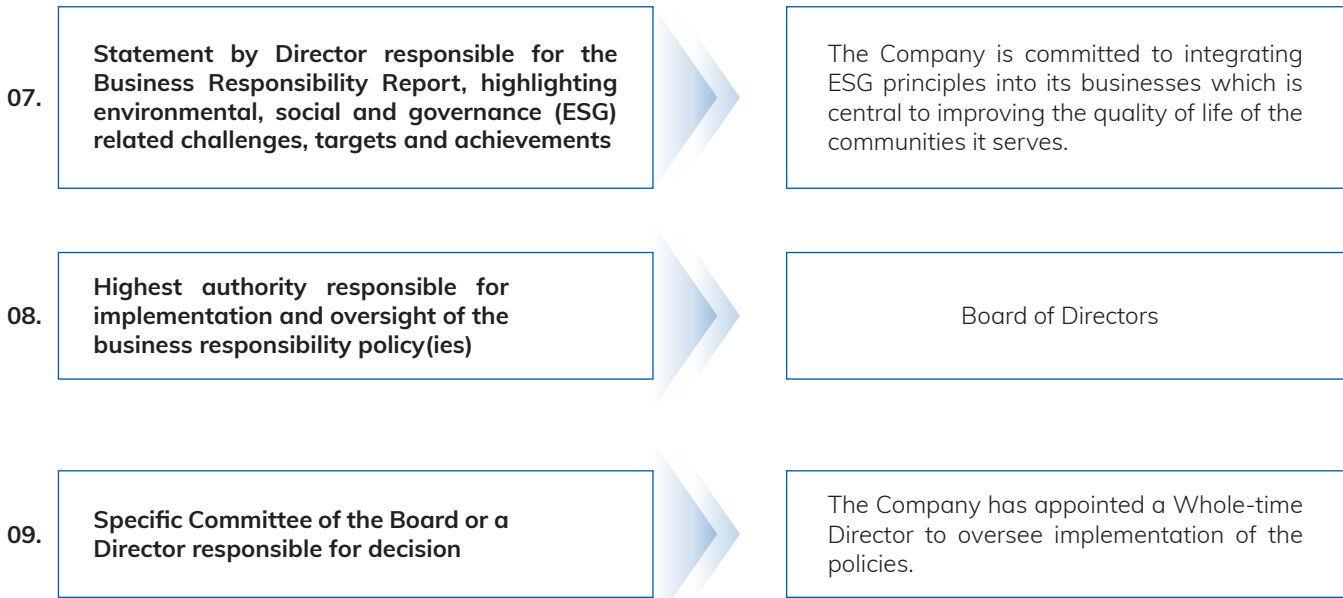
NGRBC released by the Ministry of Corporate Affairs has adopted nine principles related to business responsibility. They are as follows:

- P1** > Businesses will conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.
- P2** > Businesses will provide goods and services in a manner that is sustainable and safe.
- P3** > Businesses will respect and promote the well-being of all employees, including those in their value chains.
- P4** > Businesses will respect the interests of and be responsive to all its stakeholders.
- P5** > Businesses will respect and promote human rights.
- P6** > Businesses will respect and make efforts to protect and restore the environment.
- P7** > Businesses, when engaging in influencing public and regulatory policy, will do so in a manner that is responsible and transparent.
- P8** > Businesses will promote inclusive growth and equitable development.
- P9** > Businesses will engage with and provide value to their consumers in a responsible manner.

✓ Yes ✗ No

Disclosure questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
01.	a) The policy policies cover each principle and its core elements	✓	✓	✓	✓	✓	✓	✓	✓	✓
	b) Policy approved by the Board	✓	✓	✓	✓	✓	✓	✓	✓	✓
	c) URL of the policies	The Company is in the process of publishing these policies on its website.								
02.	The policies are translated into procedures	✓	✓	✓	✓	✓	✓	✓	✓	✓
03.	The enlisted policies extend to the value chain partners	✓	✓	✓	✓	✓	✓	✓	✓	✓
04.	Name of the national and international codes certifications labels standards adopted and mapped against each principle	The Company has developed policies for its significant operations in conformance with the international standards (such as ISO 9000, ISO 14000, OHSAS 18000 ISO 45000), United Nations Global Compact guidelines and principles of International Labour Organisation. The Company is in the process of acquiring the sustainable procurement certification (ISO 20400).								
05.	Specific commitments, goals and targets set with defined timelines, if any	The Company is engaging with subject matter experts and actively pursuing sustainability improvement agenda.								
06.	Performance against the specific commitments, goals and targets along with reasons in case the same are not met	NA								

GOVERNANCE, LEADERSHIP AND OVERSIGHT



10. Details of review of national guidelines for responsible business conduct

Subject for review	Review by Director a Committee of the Board any other committee and its frequency								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Quarterly								
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliance	Quarterly								

11. Independent assessment | evaluation of the working of its policies by an external agency and name of the agency






SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1

Businesses will 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 programs on any of the Principles during the financial year

Segment	Number of programs	Topics Principles	% of persons
 BOARD OF DIRECTORS	4	<ul style="list-style-type: none"> Code of conduct Corporate governance Human rights Prevention of sexual harassment (POSH) 	100%
 KMP	5	<ul style="list-style-type: none"> Code of conduct Human rights POSH Whistleblower 	100%
 EMPLOYEES (excluding Executive Directors and KMP)	7	<ul style="list-style-type: none"> Acceptance of gifts and business courtesies Atul Values Code of conduct Equal employment opportunity and anti-discrimination Human rights POSH Whistleblower 	100%

2. Fines | penalties | punishments | awards | compounding fees | settlement amount paid in proceedings (by the Company or by Directors | KMP) with regulators | law enforcement agencies | judicial institutions, in the financial year

a. Monetary

Type	NGRBC principle	Name of the regulatory enforcement agencies judicial institutions	Amount (₹)	Brief of the case	Has an appeal been preferred?
Penalty fine	NA	NA	Nil		NA
Settlement	NA	NA	Nil		NA
Compounding fee	NA	NA	Nil		NA

b. Non-monetary

Type	NGRBC principle	Name of the regulatory enforcement agencies judicial institutions	Brief of the case	Has an appeal been preferred?
Imprisonment	NA	NA	NA	NA
Punishment	NA	NA	NA	NA

3. Appeal | revision preferred in cases where monetary or non-monetary action has been appealed

Not applicable.

4. Anti-corruption or bribery policy and URL of the policy

The Company has a dedicated code of conduct covering anti-corruption and anti-bribery aspects. The code of conduct has been published on the Company website: www.atul.co.in/pdf/investors/policies/Code-of-Conduct-18-19.pdf

5. Directors | KMP | employees (other than KMP) against whom disciplinary action was taken by any law enforcement agency for the charges of bribery | corruption

	2022-23	2021-22
Directors	Nil	Nil
KMP	Nil	Nil
Employees (other than KMP)	Nil	Nil

6. Complaints with regard to conflict of interest

	2022-23		2021-22	
	Number	Remarks	Number	Remarks
Conflict of interest of the Directors	Nil	Nil	Nil	Nil
Conflict of interest of KMP	Nil	Nil	Nil	Nil

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

Not applicable

Leadership indicators

1. Training and awareness programs conducted for value chain partners on any of the Principles during the financial year

Number of programs	Topics Principles	% of value chain partners
1	<ul style="list-style-type: none"> Business ethics Capacity utilisation Code of conduct Environment management Labour and human rights Occupational health and safety Plant setup and automation Quality management Supplier and contractor sustainability 	46%

2. Processes to avoid | manage conflict of interest involving members of the Board

The Company has a dedicated code of conduct to manage conflict of interest involving members of the Board. The code of conduct is available on the website of the Company: www.atul.co.in/pdf/investors/policies/Code-of-Conduct-18-19.pdf

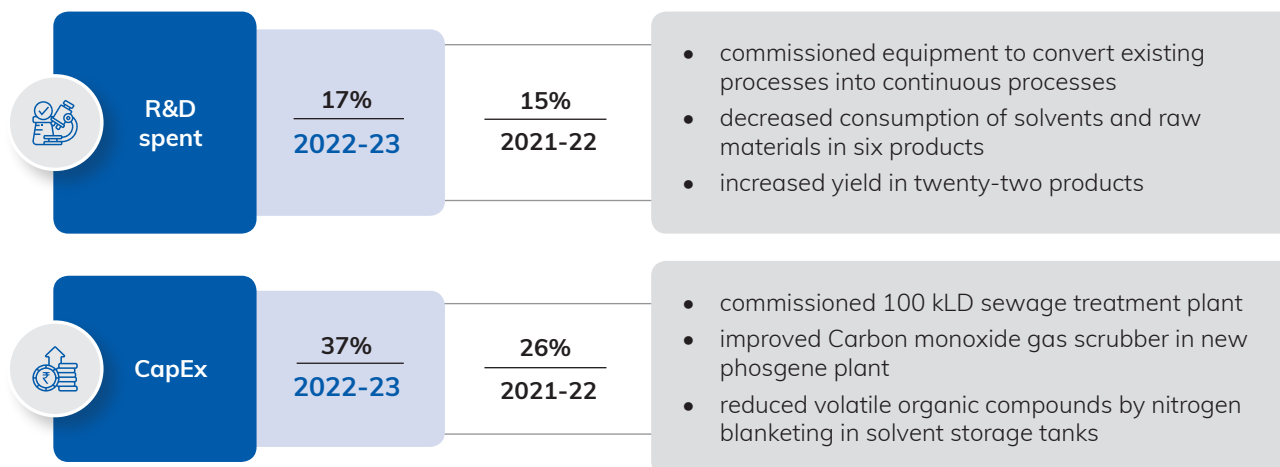
PRINCIPLE 2

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

Essential indicators

1. Percentage of research and development (R&D) spent and capital expenditure (CapEx) in specific technologies to improve environmental and social impacts of products and processes to total R&D spent and CapEx, respectively

Improvements in social and environmental aspects



2. a) Procedures for sustainable sourcing:
 - The Company has procedures in place for sustainable sourcing.
 - The URL to its responsible sourcing policy is: www.atul.co.in/economic-sustainability/responsible-procurement/
- b) Percentage of inputs sourced sustainably:

92%
3. Processes to safely reclaim products for reusing, recycling and disposing of at the end of life, for a) plastics (including packaging), b) e-waste, c) hazardous waste and d) other waste

The Company follows the applicable processes laid down by the regulatory authorities.
4. Applicability of extended producer responsibility (EPR) to the activities of the Company and whether the waste collection plan is in line with EPR plan submitted to pollution control boards

EPR is applicable to the activities of the Company and the waste collection plan is in line with the EPR plan submitted to the Central Pollution Control Board.



Leadership indicators

1. Life cycle perspective | assessment (LCA) for products

The Company has conducted a LCA for four products and product carbon foot printing for six products across Businesses.

2. Significant social or environmental concerns and | or risks arising from production or disposal of products identified in LCA or through any other means and their mitigation:

There were no significant social or environmental concerns and | or risks arising from production or disposal of products.

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

The Company has in-house facilities to recycle its waste and is continuously striving to maximise it. At present, it is recycling 5.50% of its waste.

4. Products and packaging reclaimed at end of life of products and reused, recycled and safely disposed (in metric tons)

	2022-23			2021-22		
	Reused	Recycled	Safely disposed	Reused	Recycled	Safely disposed
Plastics (including packaging)	Nil	Nil	Nil	Nil	Nil	Nil
E-waste						
Hazardous waste						
Other waste						

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

Not applicable

PRINCIPLE 3

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

Essential indicators

01. a) Details of measures for well-being of managers

Category	% of managers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent managers											
Male	1,598	1,598	100%	1,598	100%	-	NA	13	0.81%	-	NA
Female	139	139	100%	139	100%	2	1.5%	-	NA	-	NA
Total	1,737	1,737	100%	1,737	100%	2	0.11%	13	0.75%	-	NA
Other than permanent managers											
Male	35	-	NA	35	100%	-	NA	-	NA	-	NA
Female	8	-	NA	8	100%	-	NA	-	NA	-	NA
Total	43	-	NA	43	100%	-	NA	-	NA	-	NA

b) Measures for the well-being of workers

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent workers											
Male	1,447	1,447	100%	1,447	100%	-	NA	1,447	100%	-	NA
Female	-	-	NA	-	NA	-	NA	-	NA	-	NA
Total	1,447	1,447	100%	1,447	100%	-	NA	1,447	100%	-	NA
Other than permanent workers											
Male	2,520	-	NA	2,520	100%	-	NA	-	NA	-	NA
Female	38	-	NA	38	100%	-	NA	-	NA	-	NA
Total	2,558	-	NA	2,558	100%	-	NA	-	NA	-	NA

02. Retirement benefits for current financial year and previous financial year

No.	Benefits	2022-23			2021-22		
		Managers	Workers	Deducted and deposited with the authority	Managers	Workers	Deducted and deposited with the authority
1.	Provident fund	100%	100%	Yes	100%	100%	Yes
2.	Gratuity	100%	100%	NA	100%	100%	NA
3.	Employee state insurance	0.5%	16%	Yes	1%	12%	Yes
4.	Others (please specify)	NA	NA	NA	NA	NA	NA

03. Accessibility of workplaces

Most of the working locations are accessible to differently abled persons.

04. Equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016

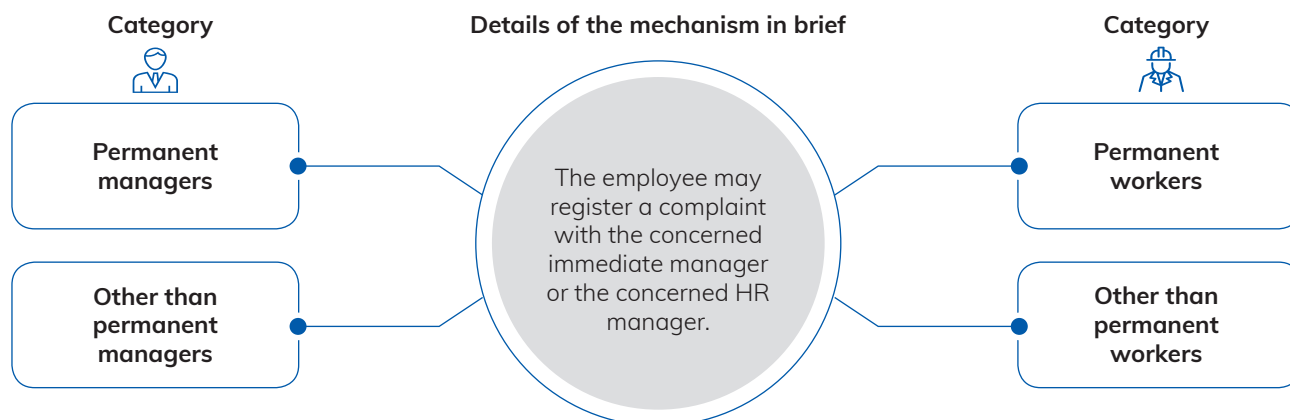
The Company provides equal opportunities to all its employees and to all eligible applicants for employment in the Company.

05. Return to work and retention rates of permanent employees who took parental leave in the financial year

Return to work rate		
Male	Female	Total
100%	100%	100%

Retention rate		
Male	Female	Total
100%	100%	100%

06. Grievance redressal mechanism for employees



07. Membership of employees in recognised association(s) or union(s)

Category	FY 2022-23			FY 2021-22		
	Total employees (A)	Employees who are part of association(s) or unions (B)	% (B/A)	Total employees (C)	Employees who are part of association(s) or unions (D)	% (D/C)
Permanent employees						
Male	3,049	346	11%	2,906	398	14%
Female	139	-	0%	128	-	0%
Total	3,188	346	11%	3,034	398	13%

08. Training given to employees

Category	2022-23					2021-22				
	Total employees (A)	Skill training imparted (B)	% (B/A)	Health and safety training imparted (C)	% (C/A)	Total employees (D)	Skill training imparted (E)	% (E/D)	Health and safety training imparted (F)	% (F/D)
Permanent employees										
Male	3,049	1,337	44%	409	13%	2,906	1,258	43%	2,204	75%
Female	139	19	14%	32	23%	128	87	68%	128	100%
Total	3,188	1,356	43%	441	14%	3,034	1,345	44%	2,332	77%

09. Performance and career development reviews of employees

Category	2022-23			2021-22		
	Total employees (A)	Employees who had a career review (B)	% (B/A)	Total employees (C)	Employees who had a career review (D)	% (D/C)
Permanent employees						
Male	3,049	1,620	53%	2,906	2,097	72%
Female	139	139	100%	128	118	92%
Total	3,188	1,759	55%	3,034	2,215	73%

10. Health and safety management system

Implementation of occupational health and safety management systems

The Company has implemented ISO 45001:2018 management system standard.

Coverage of such a system

100%

Processes used to identify work-related hazards and assess risks on a routine and non-routine basis

- environment, health and safety management system audit procedure
- hazard and operability study procedure
- hazard identification and risk assessment procedure
- management of change procedure
- permit to work system
- safety observation audit system

Processes for workers to report the work-related hazards and to remove themselves from such risks

The Company has requisite processes.

Access to employees to non-occupational medical and healthcare services

The employees have the requisite access.

11. Safety related incidents

Managers
 Workers

Safety incident number	Category	2022-23	2021-22
Lost time injury frequency rate (per one million-person hours worked)		-	-
		0.05	0.06
Total recordable work-related injuries		10	16
		16	20
Number of fatalities		-	-
		1	-
High consequence work-related injury or ill-health (excluding fatalities)		-	-
		-	-

12. Measures taken to ensure a safe and healthy workplace

The Company has environment, health and safety (EHS) policy. To ensure steady improvement in EHS performance, it is adopting voluntary standards such as ISO 45001.

13. Complaints made by employees

Category	2022-23			2021-22		
	Filed	Pending resolution	Remarks	Filed	Pending resolution	Remarks
Working conditions	-	-	NA	-	-	NA
Health and safety	-	-	NA	-	-	NA

14. Plants and offices assessed (by the Company | statutory authorities | third parties)



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 and safety practices and working conditions

- conducted training on scaffolding erection and inspection for targeted employees
- developed in-house process safety laboratory to assess process safety risk
- implemented 'life-saving rules' for the mandatory safety requirement
- implemented 'line breaking work permit'

Leadership indicators

1. Extension of life insurance or other compensatory package in the event of death



2. Measures undertaken to ensure that statutory dues are deducted and deposited by the value chain partners

- conducted quarterly audits of all statutory records and compliances maintained by the contractors
- imposed appropriate penalty on the contractor as per the defined standard operating procedure in case of any non-compliance with reference to provident fund remittance, payment of professional tax, employee compensation, etc

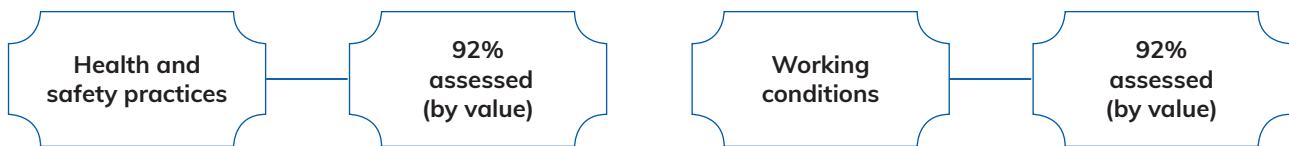
3. Number of managers | workers having suffered high consequence work related injury | ill-health | fatalities (as reported in Q11. of essential indicators, above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment

Category	Affected managers workers		Managers workers who whose family members are rehabilitated	
	2022-23	2021-22	2022-23	2021-22
Managers workers	Nil	Nil	Nil	Nil

4. Transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment

The Company does not have any formal transition assistance program. Support is however provided on case-to-case basis.

5. Assessment of value chain partners



6. 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

For contractors working in Atul premises:

No corrective action plan has been necessitated arising out of the assessment.

PRINCIPLE 4

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

Essential indicators

1. Processes for identifying key stakeholder groups of the Company

Internal and external group of stakeholders have been identified - they comprise employees, customers, suppliers, communities and shareholders.

2. Key stakeholder groups and the frequency of engagement with vulnerable | marginalised groups

Ongoing

Stakeholder group	Vulnerable marginalised group	Channels of communication	Frequency of engagement	Purpose and scope of engagement
 Employees	No	e-mails, goal setting and performance appraisal review, intranet, talks and letters of Senior Management, websites etc		business information and company policies, career progression, performance management, role rotation, training and development, etc
 Customers	No	e-mails, information on packaging, personal meetings, portal, social media, surveys, telephone, website, etc		feedback, launches, products and formulations technical service, etc
 Suppliers	No	e-mails, information on packaging, personal meetings, portal, surveys, telephone, website, social media, etc		feedback, requirement of materials and services, technical service, etc
 Government	No	e-mails, letters, personal meetings, representations, etc		payment to exchequers, policy advocacy, statutory approvals, etc
 Community	No	meetings, projects, visits, etc		education, empowerment, conservation, health, infrastructure, relief, etc
 Shareholders	No	analyst meet, annual general meeting, annual report, stock exchange intimations, newspapers, website, etc		information about business and statutory approvals

> Leadership indicators

1. Processes for consultation between stakeholders and the Board on economic, environmental and social topics or if consultation is delegated

Business | Function heads interact with the aforesaid stakeholders and provide key updates to the Board.

2. Details of instances as to how the inputs received from stakeholders on management of environmental and social topics were incorporated into policies and activities of the Company

Environmental and social topics are reviewed and shortlisted based on the materiality study, and standard operating procedures are updated | introduced.

3. Details of instances of engagement with and actions taken to address the concerns of vulnerable | marginalised stakeholder groups

The concerns of the vulnerable | marginalised stakeholders groups are mainly addressed through six programs, namely, education, empowerment, health, infrastructure, relief and conservation, by Atul Foundation Trust.

PRINCIPLE 5

Businesses will respect and promote human rights.

> Essential indicators

01. Employees who have been trained on human rights issues and policy(ies)

Category	2022-23			2021-22		
	Total (A)	Covered (B)	% (B/A)	Total (C)	Covered (D)	% (D/C)
Employees						
Permanent	3,188	1,537	48%	3,034	967	32%
Other than permanent	2,601	-	0%	3,762	-	0%
Total employees	5,789	1,537	27%	6,796	967	14%

02. Minimum wages paid to employees

Category	2022-23						2021-22					
	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)		
Permanent employees												
Male	3,045	-	NA	3,045	100%	2,906	-	NA	2,906	100%		
Female	139	-	NA	139	100%	128	-	NA	128	100%		
Other than permanent employees												
Male	2,558	2,558	100%	-	NA	3,726	-	NA	3,726	100%		
Female	43	43	100%	-	NA	36	-	NA	36	100%		

03. Remuneration | salary | wages

Category	Male		Female	
	Number	Median remuneration salary wages	Number	Median remuneration salary wages
Board of Directors	11	19,85,000	1	13,45,000
KMP (including Executive Directors)	5	2,17,39,428	-	-
Employees other than Board of Directors and KMP	3,044	3,96,601	139	5,82,025

04.

Focal point (individual | committee) responsible for addressing human rights impacts or issues caused or contributed to by the business:

Under progress

05. Internal mechanisms to redress grievances related to human rights issues

The mechanism to redress grievances under human rights is same as for other grievances. An independent investigation is carried out by gathering, validating and analysing relevant information. Appropriate action(s) is(are) taken based on the recommendations.

06. Complaints made by employees

Category	2022-23			2021-22		
	Filed	Pending resolution	Remarks	Filed	Pending resolution	Remarks
Child labour	-	-	NA	-	-	NA
Discrimination at workplace	-	-	NA	-	-	NA
Forced labour involuntary labour	-	-	NA	-	-	NA
Sexual harassment	-	-	NA	-	-	NA
Wages	-	-	NA	-	-	NA
Other human rights related issues	-	-	NA	-	-	NA

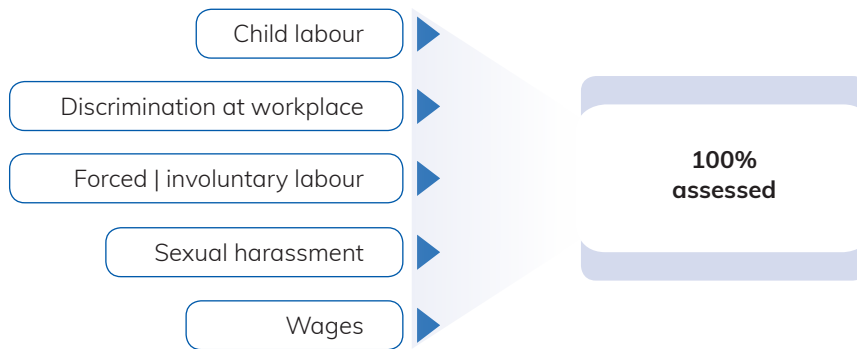
07. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases

Appropriate measures such as confidentiality, protecting the complainant, etc are mentioned in the respective policies.

08. Inclusion of human rights in business agreements and contracts

Adherence to human rights form a part of the business agreements and contracts.

09. Plants and offices assessed (by the Company | statutory authorities | third parties)



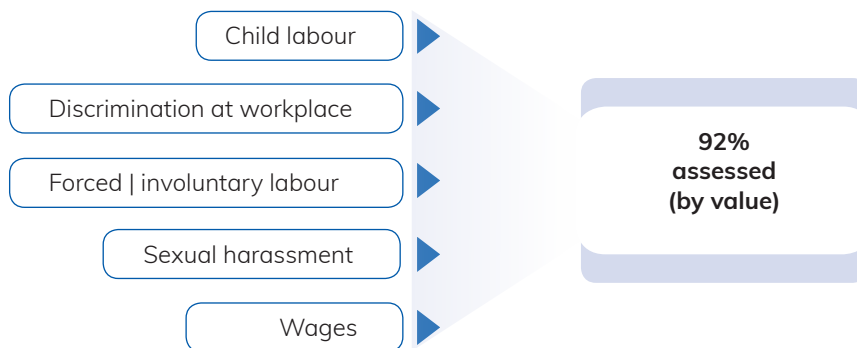
10. Corrective action taken or underway to address significant risks | concerns arising from the assessments mentioned in Q 09. above

There were no significant risks | concerns arising from the human rights assessment.

Leadership indicators

1. **Business processes modified | introduced as a result of addressing human rights grievances | complaints** → The Company has not received any grievance | complaint regarding human rights.
2. **Scope and coverage of human rights due-diligence** → The Company has not conducted human rights due-diligence.
3. **Accessibility of premises | offices to differently abled visitors** → Please refer to Q 03. of Principle 3 above.

4. Assessment of value chain partners (by value):



5. Corrective action taken or underway to address significant risks | concerns arising from the assessments as mentioned in Q 4. above







There were no significant risks | concerns arising from the assessment of value chain partners.

PRINCIPLE 6

Businesses will respect and make efforts to protect and restore the environment.

Essential indicators

01. Total energy consumption (in Gigajoules) and energy intensity

Parameter	2022-23	2021-22
 Total electricity consumption (A)	5,41,227	3,88,971
 Total fuel consumption (B)	84,78,228	94,38,540
 Energy consumption through other sources (C)	1,95,958	1,92,008
 Total energy consumption (A+B+C)	92,15,413	1,00,19,518
 Energy intensity per rupee of turnover (total energy consumption turnover in rupees) Gigajoules per ₹ million	184.23	203.28
 Energy intensity	NA	NA

Independent assessment | evaluation | assurance by an external agency

Escon Tech carried out the evaluation of electricity consumption and Ernst and Young provided methodology for calculation.

02. Sites | facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of Government of India

Power plant and caustic | chlorine plant have been identified as DC under the PAT Scheme. The Company has started disclosing PAT targets from 2020. In the year 2022-23, the Company achieved energy consumption of 0.81 tons of oil equivalent per ton of production against the target of 0.874.

03. Disclosures related to water

Parameter	2022-23	2021-22
Water withdrawal by source (in kL)		
i Surface water	36,24,396	28,31,938
ii Groundwater	2,27,872	1,19,385
iii Third-party water	-	-
iv Seawater desalinated water	-	-
v Others (rainwater storage)	-	-
Total volume of water withdrawal (in kL) (i + ii + iii + iv + v)	38,52,268	29,51,323
Total volume of water consumption (in kL)	38,52,268	29,51,323
Water intensity per rupee of turnover (water consumed/turnover) (kL per ₹ cr of revenue)	770.15	598.77
Water intensity – the relevant metric may be selected by the Company	NA	NA

Independent assessment | evaluation | assurance by an external agency

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

04. Coverage and implementation of zero liquid discharge (ZLD)

ZLD is fully implemented in the Ankleshwar and Tarapur manufacturing sites. Projects are under commissioning to make two of the four areas at Atul site ZLD facilities.

05. Air emissions other than greenhouse gas (GHG) emissions

Parameter	Unit	2022-23	2021-22
NOx	T/year	65.78	76.83
SOx	T/year	62.73	65.05
Particulate matter (PM)	T/year	15.10	10.58
Persistent organic pollutants (POPs)	NA	NA	NA
Volatile organic compounds (VOCs)	NA	NA	NA
Hazardous air pollutants (HAPs)	T/year	5.50	4.25
Others – please specify	T/year	-	-

Independent assessment | evaluation | assurance by an external agency

Independent assessment | evaluation | assurance has been carried out by Pollucon Laboratories Pvt Ltd.

06. GHG emissions (Scope 1 and Scope 2 emissions) and their intensity

Parameter	Unit	2022-23	2021-22
Total Scope 1 emissions	tCO ₂ E	7,73,047	8,56,434
Total Scope 2 emissions	tCO ₂ E	1,06,605	83,179
Total Scope 1 and Scope 2 emissions per million ₹ of turnover	tCO ₂ E	17.59	19.06
Total Scope 1 and Scope 2 emission intensity (optional)	tCO ₂ E/₹	NA	NA

Independent assessment | evaluation | assurance by an external agency

Methodology provided by Ernst and Young.

07. Projects related to reducing GHG emissions

decrease in and arrest of air and nitrogen leakages using ultrasonic leak detection

decrease in steam consumption by isolating steam headers

decrease in water consumption by recycling water for the vacuum pump

installation of variable frequency drive for chilled water supply pumps

optimisation of chiller power by automation

optimisation of pump power by impeller trimming

optimisation of steam pressure for ejectors

recovery of steam condensate from the reactor jacket

replacement of compact fluorescent lamps by light emitting diode fittings

08. Waste management

	2022-23	2021-22
Waste generated (in metric tons)		
Plastic waste (A)	510.30	381.00
E-waste (B)	-	920 numbers
Bio-medical waste (C)	0.60	0.67
Construction and demolition waste (D)	-	-
Battery waste (E)	173 numbers	248 numbers
Radioactive waste (F)	-	-
Other hazardous waste (G)	1,22,818.74	64,497.90
Other non-hazardous waste (H)	41,979.41	80,690.84

	2022-23	2021-22
Waste recovered through recycling, re-using or other recovery operations (in metric tons)		
(i) Recycled	1,15,310.67	1,39,655.84
(ii) Reused	-	-
(iii) Other recovery operations	-	-
+ Total	1,15,310.67	1,39,655.84

	2022-23	2021-22
Waste disposed by nature of disposal method (in metric tons)		
(i) Incineration	205.30	0.67
(ii) Landfilling	7,813.67	5,914.00
(iii) Other disposal operations	-	-
+ Total	8,018.97	5,914.67

Independent assessment | evaluation | assurance by an external agency

No assessment | evaluation | assurance has been carried out by an external agency

09. Waste management practices and strategies adopted to reduce usage of hazardous and toxic chemicals in the products and processes and the practices adopted to manage such wastes

The Company has state-of-the-art research and development laboratories which has, amongst others, mandate to decrease | reuse | recycle hazardous and toxic wastes.

Hazardous and toxic wastes management SOP (SOP/INC/11) describes the procedure to collect, store, transport and dispose of hazardous and toxic wastes. Such wastes are dealt with as per the consolidation, consent and authorisation and complying with all requirements of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

10. 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

Not applicable

11. Impact assessments of projects undertaken based on applicable laws in the current financial year

Nil

12. Compliance with the applicable environmental laws | 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

The Company is compliant with the applicable laws | regulations | guidelines.

> **Leadership indicators**

1. Break-up of the total energy consumed (in Gigajoules) from renewable and non-renewable sources

Parameter	2022-23	2021-22
From renewable sources		
Total electricity consumption (A)	90,777	44,557
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	90,777	44,557
From non-renewable sources		
Total electricity consumption (D)	4,50,450	3,44,414
Total fuel consumption (E)	84,78,228	94,38,540
Energy consumption through other sources (F)	1,95,958	1,92,008
Total energy consumed from non-renewable sources (D+E+F)	91,24,636	99,74,962

Independent assessment | evaluation | assurance by an external agency

Assessment | evaluation | assurance has been carried out by Escon Tech and methodology provided by Ernst and Young.

2. Water discharge

Parameter	2022-23	2021-22
Destination and level of treatment (in kL)		
(i) To surface water		
No treatment	-	-
With treatment – level of treatment	-	-
(ii) To groundwater		
No treatment	-	-
With treatment – level of treatment	-	-
(iii) To seawater	33,25,819	35,40,589
No treatment	-	-
With treatment – level of treatment	33,25,819 advanced treatment	35,40,589 advanced treatment
(iv) Sent to third-parties		
No treatment	-	-
With treatment – level of treatment	-	-
(v) Others		
No treatment	-	-
With treatment – level of treatment	-	-
Total water discharged (in kL)	33,25,819	35,40,589

Independent assessment | evaluation | assurance by an external agency

Independent assessment | evaluation | assurance carried out by Gujarat Pollution Control Board (GPCB), scheduled auditors approved by GPCB and Pollucon Laboratories.

3. Water withdrawal, consumption and discharge in areas of water stress (in kL)

Not applicable

Independent assessment | evaluation | assurance by an external agency

Not applicable

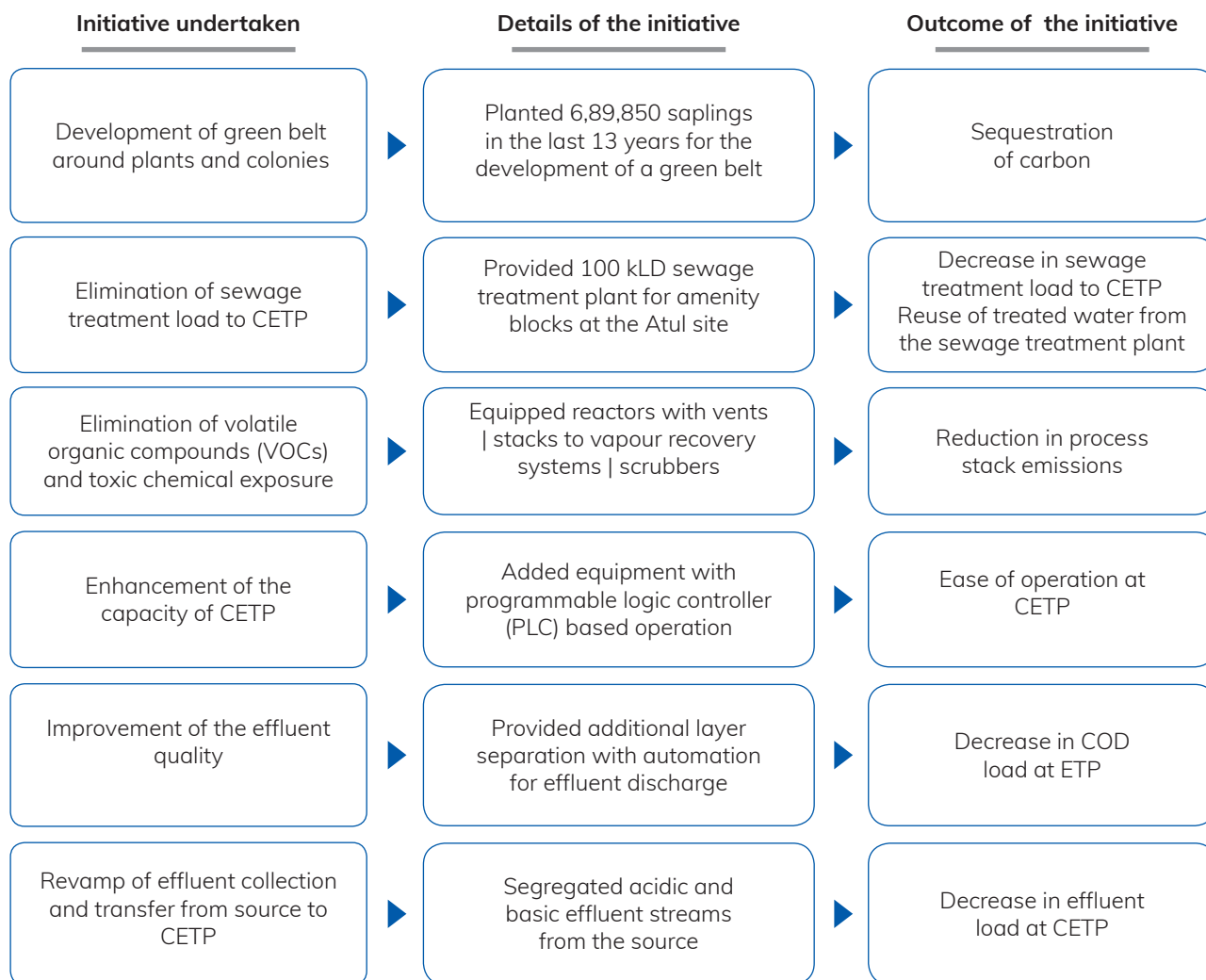
4. Scope 3 emissions and their intensity

The Company has not carried out Scope 3 emissions calculation.

5. With respect to the ecologically sensitive areas reported in Q 10. of essential indicators above, details of significant direct and indirect impact on biodiversity in such areas along with prevention and remediation activities

Not applicable.

6. Specific initiatives or innovative technologies or solutions undertaken to improve resource efficiency or reduce impact due to emissions | effluent discharge | waste generation



7. Business continuity and disaster management plan

The Company has a disaster management plan included in the offsite and onsite emergency plan.

Offsite emergency rehearsals as per the plan are conducted at periodic intervals decided by external authorities at Ankleshwar, Atul and Tarapur sites.

8. Significant adverse impact to the environment, arising from the value chain and their mitigation or adaptation measures

There is no significant adverse impact to the environment arising from the value chain of the Company.

9. Percentage of value chain partners (by value) that were assessed for environmental impact

92%

**PRINCIPLE 7**

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

> **Essential indicators**

1. Affiliations with trade and industry chambers | associations

Membership of | affiliation to 10 trade and industry chambers | associations

No.	Name	Reach
01.	Alkali Manufacturers Association of India	National
02.	Basic Chemicals, Cosmetics and Dyes Export Promotion Council of India	National
03.	Bombay Chamber of Commerce and Industry	National
04.	Federation of Indian Export Organisations	National
05.	Fragrances and Flavours Association of India	National
06.	Indian Chemical Council	National
07.	Indian Resins Manufacturers Association	National
08.	The Federation of Indian Chambers of Commerce and Industry	National
09.	The Indian Pest Control Association	National
10.	The Pesticides Manufacturers and Formulators Association of India	National

2. Corrective action taken or underway on any issue related to anti-competitive conduct, based on adverse orders from regulatory authorities

Not applicable

> **Leadership indicators**

1. Advocacy of public policy positions

Not applicable.

PRINCIPLE 8

Businesses will promote inclusive growth and equitable development.

> Essential indicators

1. Social Impact Assessments (SIAs) of projects undertaken based on applicable laws

Not applicable

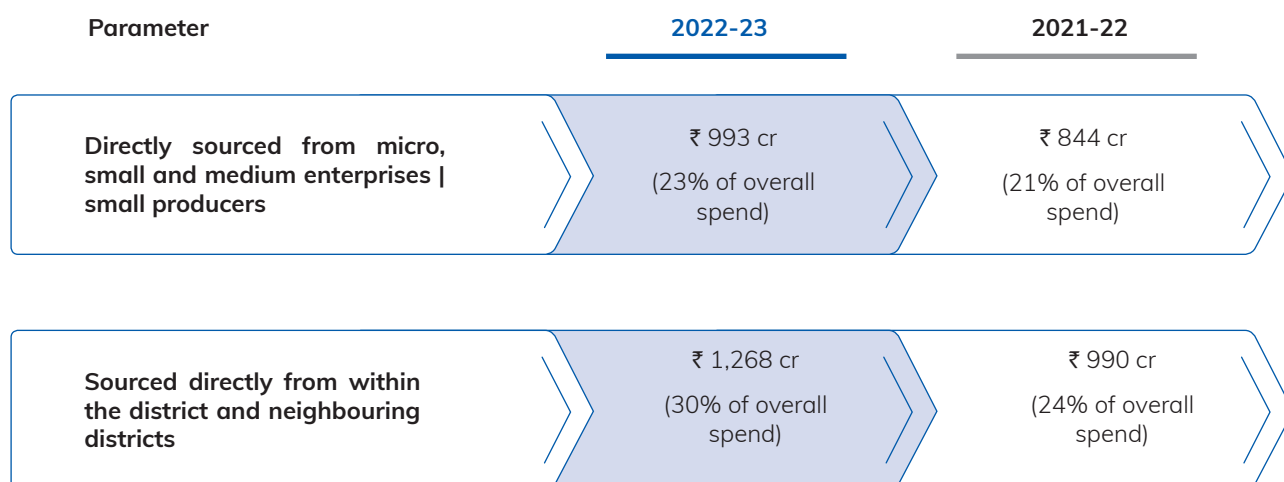
2. Projects for which ongoing rehabilitation and resettlement is being undertaken

Not applicable

3. Mechanisms to receive and redress grievances of the community

The Company has a process to receive and redress concerns received from the community. A site-level committee consisting of members from various departments is formed which receives the concerns and works towards its redressal.

4. Input material (inputs to total inputs by value) sourced from local or small scale suppliers

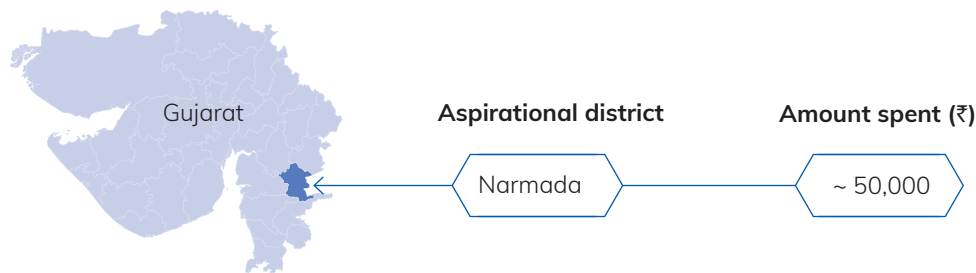


> Leadership indicators

1. Actions taken to mitigate any negative social impacts identified in the SIAs (Q 1. of essential indicators above)

Not applicable

2. CSR projects undertaken in designated aspirational districts as identified by government bodies



3. **Preferential procurement policy to give preference to purchase from suppliers comprising vulnerable | marginalised groups** ▶ Internal guidelines for preferential procurement from marginalised | vulnerable groups are in place. The URL to the policy is: www.atul.co.in/economic-sustainability/responsible-procurement

Vulnerable | marginalised groups from where the Company procures ▶ MSMEs and women-owned enterprises

Percentage of such procurement of the total (by value) ▶ 23% of overall spend

4. **Benefits derived and shared from the intellectual properties owned or acquired based on traditional knowledge**
Not applicable

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

6. **Beneficiaries of CSR projects**

No.	CSR project	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalised groups
01.	Improvement of teaching methodology for primary school children – Atul Adhyapika	8,410 students	100%
02.	Provision of education kits to children	4,323 students	100%
03.	Enhancement of educational practices in Kalyani Shala	1,729 students	100%
04.	Promotion of learning and life skills among children	400 students	100%

No.	CSR project	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalised groups
05.	Support to tribal children in Atul Vidyamandir	349 students	100%
06.	Development of a computer laboratory in a school	300 students	100%
07.	Support to develop a school in a tribal area	269 students	100%
08.	Provision of scholarships to needy and meritorious students	34 students	100%
09.	Support to develop a library	30 students	100%
10.	Conservation of manuscripts	80,000 manuscripts	100%
11.	Contribution to publish books on Indian culture ecology philosophy	4 books	100%
12.	Support to Industrial Training Institute	8,116 students	100%
13.	Empowerment of women youth through various vocational training courses	781 students	100%
14.	Empowerment of women through self-help groups	723 women	100%
15.	Skill training to youth as apprentices	95 students	100%
16.	Development of micro-entrepreneurs to provide sustainable livelihood	52 Students	100%
17.	Creation of livelihood opportunities for tribal families by providing cows	25 families	100%
18.	Setting up of health camps in remote villages	19,046 patients	100%
19.	Establishment of Atul Medical Diagnostic Centre	4,616 patients	100%
20.	Promotion of health and well-being of adolescents and women	3,755 adolescent girls and women	100%
21.	Provision of blood units to the needy and deserted patients	84 patents	100%
22.	Support to meet the treatment costs for needy patients	48 patients	100%
23.	Promotion of Fit@50+ Women's Trans Himalayan Expedition	11 women	100%
24.	Support to flood-affected people in Valsad	10,364 individuals	100%
25.	Support to needy special children	186 students	100%
26.	Support to children with special needs	46 students	100%
27.	Construction of walkway and streetlights	Atul and nearby villages	100%
28.	Development of infrastructure in villages	Atul and nearby villages	100%
29.	Construction of toilet blocks in a school	687 students	100%
30.	Renovation of toilets and boundary wall in a school	250 students	100%
31.	Establishment of solid waste management system in eight villages	23,704 individuals	100%
32.	Conservation of energy through solar energy project	4,208 individuals	100%
33.	Development of nature-based wastewater recycling project	3,364 students	100%
34.	Conservation of energy through biogas project	200 families	100%
35.	Conservation of water through various interventions	38 farmers	100%
36.	Conservation of soil and water	1 village	100%
37.	Enhancement of green cover - tree plantation project	52,190 trees	100%
38.	Protection of animals	348 animals	100%

PRINCIPLE 9

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

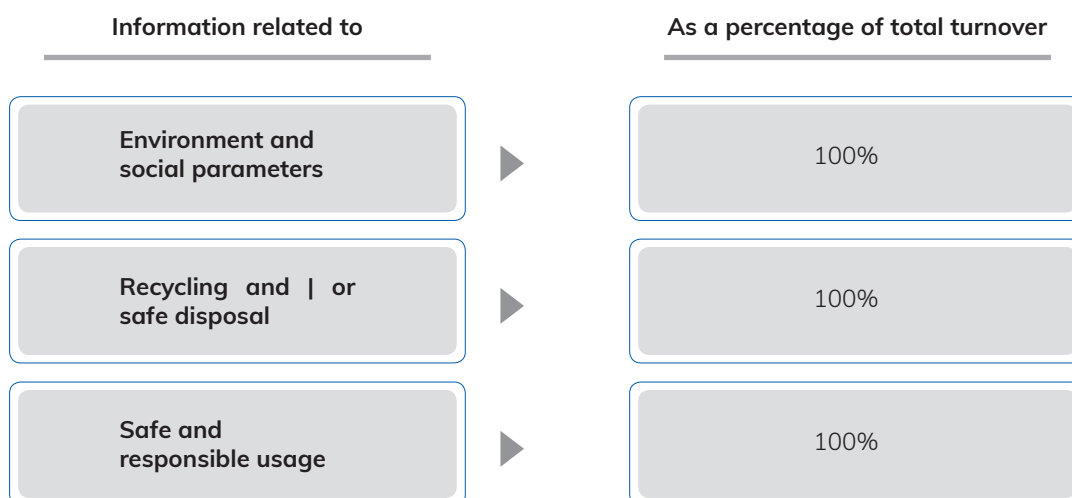
Essential indicators

1. Mechanisms to receive and respond to consumer complaints and feedback

Customer complaint portal is in place. All customer complaints are logged into 'customer complaint module'. Based on the nature of complaints, auto e-mails are triggered for action. The root cause and corrective and preventive actions are conveyed to customers. The complaint is closed after feedback (by phone | e-mail) from the customer.

Complaints are acknowledged within 48 hours and feedback is provided within seven working days.

2. Turnover of products | services as a percentage of turnover from all products | services that carry information



3. Consumer complaints

Category	2022-23		2021-22	
	Received	Pending resolution	Received	Pending resolution
Advertising	-	-	-	-
Cyber security	-	-	-	-
Data privacy	-	-	-	-
Delivery of essential services	1	-	1	-
Restrictive trade practices	-	-	-	-
Unfair trade practices	-	-	-	-
Others	355	36	247	-

4. Product recalls on account of safety issues

	Number	Reason
Forced recalls	-	NA
Voluntary recalls	-	NA

5. Framework | policy on cyber security and risks related to data privacy

The Company has Information Security Policy in place to ensure that the data stored in the end user devices is protected.

6. Corrective action 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

There were no issues relating to advertising, delivery of essential services, cyber security and data privacy of customers. There was no re-occurrence of product recall. No penalty was levied or action was taken by any regulatory authority on account of any deficiency relating to safety of products | services in the financial year.



Leadership indicators

1. Channels, platforms and URL where information on products and services can be accessed

www.atul.co.in

2. Steps taken to inform and educate consumers about safe and responsible use of products and (or) services

The Company shares material safety data sheets, technical data sheets and product labels on packaging in accordance with globally harmonised system regulations. For liquid chemicals, transport emergency cards are provided to transporters and training is imparted periodically to them and customers on safe handling. Interactions with farmers are arranged through Krishi Vigyan Kendras, farmer field days training sessions, etc.

3. Mechanisms to inform consumers of any risk of disruption | discontinuation of essential services

The customers are intimated regarding scheduled annual maintenance shutdown a few weeks in advance. For key customers, tentative schedules of annual maintenance shutdown are shared at least three months in advance. In case of any unforeseen disruptions in supply, information is conveyed through e-mail and telephone.

4. Display of product information and customer satisfaction survey

The Company provides information related to Chemical Abstracts Service number, European Community number, synonyms, hazard statement, precautionary statements, etc over and above what local law mandates.

The Company has a practice to carry out customer satisfaction surveys for major products at regular intervals.

5. Data breaches

a. Number of instances of data breaches along with impact: nil

b. Percentage of data breaches involving personally identifiable information of customers: not applicable

Note: Serial numbers are in accordance with Annexure-1 of notification of SEBI on Business Responsibility and Sustainability Report.