



20<sup>th</sup> July, 2023

STOCK. EXG/ AG/ 2023-24

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

The Listing Department  
National Stock Exchange of  
India Limited  
Exchange Plaza, 5<sup>th</sup> 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: BERGEPAINT Scrip Code : 12529

**Sub: Business Responsibility and Sustainability Report for the financial year 2022-23**

Pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report for the financial year 2022-23, which forms an integral part of the Annual Report for the financial year 2022-23.

Please acknowledge receipt.

Thanking you.

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

**Arunito Ganguly**  
**Vice President & Company Secretary**

Encl: a/a

**BERGER PAINTS INDIA LIMITED**

Berger House, 129, Park Street, Kolkata - 700 017, Phone : 2229 9724-28, 2229 6005-06, Fax : 91-33-2249 9009/9729, www.bergerpaints.com  
CIN - L51434WB1923PLC004793, E-mail : consumerfeedback@bergerindia.com

## 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: 2022-23
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: ₹97.14 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:

Sl. 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	arunitoganguly@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

#### II. Products/Services

14. 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

15. 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

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

Location	Number of plants	Number of offices	Total
National	15	184	199
International	Nil	Nil	Nil

17. Markets served by the entity

a. Number of locations

Location	Number of plants
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? 0.003%

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

### IV. Employees

18. 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)
<b>EMPLOYEES</b>						
1.	Permanent (D)	2973	2915	98.00	58	2.00
2.	Other than Permanent (E)	4909	4687	95.05	222	4.50
3.	Total employees (D + E)	7882	7602	96.45	280	3.55
<b>WORKERS</b>						
4.	Permanent (F)	1115	1096	98.10	19	1.70
5.	Other than Permanent (G)	2819	2738	97.10	81	2.90
6.	Total workers (F + G)	3934	3834	97.50	100	2.52

b. Differently abled Employees and Workers:

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

19. 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	0.00

\* Including Mr Gopal Krishna Pillai (w.e.f. 15.05.2023)

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

	FY 22-23 (Turnover rate in current FY)			FY 21-22 (Turnover rate in previous FY)			FY 20-21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	33.54%	14.72%	33.00%	17.30%	11.77%	17.12%	12.82%	9.09%	12.72%
Permanent Workers	14.18%	12.90%	11.51%	4.05%	0.00%	4.03%	5.61%	0.00%	5.57%

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

21. 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/in the 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

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) Yes  
(ii) Turnover (in ₹): 9,470.62 Crore  
(iii) Net worth (in ₹): 4,163.08 Crore

## VII Transparency and Disclosures Compliances

23. 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) <i>(If Yes, then provide web-link for grievance redress policy)</i>	FY 22-23			FY 21-22		Remarks
		Current Financial Year			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	
Communities	Community beneficiaries can send their complaint to consumerfeedback@bergerindia.com and such complaints when 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	The company has a dedicated complaint/ feedback email id which is consumerfeedback@bergerindia.com. Post such complaints, internal process of resolution is activated.	9	NIL	-	11	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.	Nil	Nil	-	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.	9058	145	-	5876	6	-
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	-

24. 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.	-	Positive. The efforts in reduction of Green House Gas (GHG) shall also enable better usage and thereby impact lowering of cost.
2.	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. This policy is going to evolve into acquisition of best of talents and consequently increase productivity.
3.	Stakeholder Engagement	Opportunity	The Company has begun a planned outreach to value chain partners 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.
4.	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.

**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
<b>Policy and management processes</b>									
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	<a href="https://www.bergerpaints.com/about-us/business-responsibility-and-sustainability-policy.html">https://www.bergerpaints.com/about-us/business-responsibility-and-sustainability-policy.html</a>								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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/IGBC 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							
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)

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.

The Company also strives to inculcate the values of ESG during its constant engagement with Key Stakeholders including Value chain Partners.

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, headed by an Independent Director and where the MD is also a member with other divisional heads as members.

#### 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								

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)
	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	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.	<b>P 1</b>	<b>P 2</b>	<b>P 3</b>	<b>P 4</b>	<b>P 5</b>	<b>P 6</b>	<b>P 7</b>	<b>P 8</b>	<b>P 9</b>
	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: Not Applicable, as we have answered all points above.

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.

#### 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	1	Code of Conduct, Ethics	100
Key Managerial Personnel and HODs	1	Human Rights	100
Employees other than BoD and KMPs	128	1. Business Ethics 2. Human Rights 3. Health & Safety 4. Skill upgradation	69.4 (point nos. 1 & 2) 64.2 - point no. 3 6.4 - point no. 4
Workers	412	1. Business Ethics 2. Human Rights 3. Health & Safety 4. Skill upgradation	47.2 (point nos. 1 & 2) 82.4 - point no. 3 34.7 - point no. 4



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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine	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. Not Applicable

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/code-of-conduct.html>

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

Particular	FY 22-23 (Current Financial Year)	FY 21-22 (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:

Particular	FY 22-23 (Current Financial Year)		FY 21-22 (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

**Leadership Indicators**

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

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
4	Human Rights and Ethics	70%

2. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same. No

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

**Essential Indicators**

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

Particular	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	11%*	10%*	1. Use of environmentally friendly chemicals in designing architectural paints 2. Development of products with lower carbon footprint 3. Development of low temperature curable industrial paints
Capex	8%*	10%*	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.

Similarly, the projects mentioned have application in a wide variety of application.

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

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

Yes, 40.37%

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 through company appointed WMA (Waste Management Agencies). Recycling certificates along with EPR credits are being transferred to the company over centralised EPR portal developed by CPCB. For FY 2022-23, in accordance to the guidelines of the Plastic Waste Management rules, the company has fulfilled 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 agencies 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 submitted to SPCB/CPCB as applicable.
- (c) Hazardous Waste is disposed through authorised 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.
4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

EPR applicable for Plastic Packaging Waste and the waste collection is done by company appointed WMA (Waste Management Agencies) who carry the same as per Obligations for plastic waste collection & recycling 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?

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
202	Paints, Varnishes, Enamels or Lacquers	98.42	The system boundary for Berger Paint product represents a Cradle-to-Gate, which covers production Phase. The production phase includes the raw material extraction, production of the raw materials, auxiliary material production, upstream transportation, manufacturing process of the final product and its packaging.	Yes, Thinkstep Sustainability a Sphera Company	No

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.

Not Applicable as there are no concerns.

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

Consistent with a life cycle perspective, BPIL has:

- established controls, as appropriate, to ensure that its environmental requirements are addressed in the design and development process for the paints, considering each life cycle stage;
- determine its environmental requirements for the procurement of products and services, as appropriate;
- communicate its relevant environmental requirements to external providers, including contractors;
- consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of the paints.

BPIL maintains documented information to the extent necessary to have confidence that the processes have been carried out as planned. All related MSDS are available at R&D & distributed across BPIL by sharing the relevant MSDS through Share Point Porta & website of BPIL.

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 22-23 Current Financial Year	FY 21-22 Previous Financial Year
Washing Solvent Recycled	2.5%	4%
Powder RM /Sweeping dust Recovered	0.13%	0.09%

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

Particular	FY 22-23 Current Financial Year			FY 21-22 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	0.000	15458.000	0.000	0.000	0.197	5.200
E-waste (MT)	0.000	0.000	4.120	0.000	0.000	0.090
Hazardous waste (MT)	288.200	924.460	1602.417	104.48	696.140	1910.852
Other waste (MT)	34.596	35.358	2226.768	27.54	31.870	1917.153

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
EPR for entire Plastics	75%

**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)
<b>Permanent employees</b>											
Male	2915	2915	100	2915	100	Nil	Nil	Nil	Nil	Nil	Nil
Female	58	58	100	58	100	58	100	Nil	Nil	Nil	Nil
<b>Total</b>	<b>2973</b>	<b>2973</b>	<b>100</b>	<b>2973</b>	<b>100</b>	<b>58</b>	<b>100</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>
<b>Other than Permanent employees</b>											
Male	4687	*	*	*	*	Nil	Nil	Nil	Nil	Nil	Nil
Female	222	*	*	*	*	222	100	Nil	Nil	Nil	Nil
<b>Total</b>	<b>4909</b>	<b>*</b>	<b>*</b>	<b>*</b>	<b>*</b>	<b>222</b>	<b>100</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>

\*Other than permanent employees are covered under ESIC

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)
<b>Permanent workers</b>											
Male	1096	1096	100	1096	100	Nil	Nil	Nil	Nil	Nil	Nil
Female	19	19	100	19	100	19	100	Nil	Nil	Nil	Nil
<b>Total</b>	<b>1115</b>	<b>1115</b>	<b>100</b>	<b>1115</b>	<b>100</b>	<b>19</b>	<b>100</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>
<b>Other than Permanent workers</b>											
Male	2738	*	*	*	*	Nil	Nil	Nil	Nil	Nil	Nil
Female	81	*	*	*	*	81	100	Nil	Nil	Nil	Nil
<b>Total</b>	<b>2819</b>	<b>*</b>	<b>*</b>	<b>*</b>	<b>*</b>	<b>81</b>	<b>100</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>

\*Other than permanent workers are covered under ESIC

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

Benefits	FY 22-23 Current Financial Year			FY 21-22 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	N.A.**	100	100	N.A.**
ESI	0.75	0.75	Yes	0.75	0.75	Yes
Others – EPS (Employee Pension Scheme)	100	Nil	Yes	Yes	Nil	Yes

\*\* Not Applicable

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.

No, but steps are being considered to align with the requirement.

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. It forms part of the Human Rights policy of the Company.

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	Nil	Nil	Nil	Nil
Female	Nil	Nil	Nil	Nil
<b>Total</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, 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 complain 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, Complain 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 recognised by the listed entity:

Category	FY 22-23 (Current Financial Year)			FY 21-22 (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	2973	Nil	Nil	2874	Nil	Nil
- Male	2915	Nil	Nil	2810	Nil	Nil
- Female	58	Nil	Nil	64	Nil	Nil
Total Permanent Workers	1115	319	28.61	1057	331	31.32
- Male	1096	319	29.11	1042	331	31.77
- Female	19	Nil	Nil	15	Nil	Nil

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

Category	FY 22-23 Current Financial Year					FY 21-22 Previous Financial Year				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Male	2915	1873	64.25	996	34.17	2810	1620	57.65	164	6
Female	58	36	62.10	14	24.10	64	48	75	13	27
<b>Total</b>	<b>2973</b>	<b>1909</b>	<b>64.21</b>	<b>1010</b>	<b>33.97</b>	<b>2874</b>	<b>1668</b>	<b>58.03</b>	<b>177</b>	<b>6</b>
<b>Workers</b>										
Male	1096	900	82.12	376	34.31	1042	765	73.42	343	32.91
Female	19	19	100	11	57.89	15	8	53.33	4	26.67
<b>Total</b>	<b>1115</b>	<b>919</b>	<b>82.42</b>	<b>387</b>	<b>34.71</b>	<b>1057</b>	<b>773</b>	<b>73.13</b>	<b>347</b>	<b>32.83</b>

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

Category	FY 22-23 Current Financial Year			FY 21-22 Previous Financial Year		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	2915	1732	59.42	2810	2295	81.67
Female	58	36	62.10	64	59	92.19
<b>Total</b>	<b>2973</b>	<b>1768</b>	<b>59.47</b>	<b>2874</b>	<b>2354</b>	<b>81.91</b>
<b>Workers</b>						
Male	1096	602	54.93	1042	765	73.42
Female	19	15	78.95	15	8	53.33
<b>Total</b>	<b>1115</b>	<b>617</b>	<b>55.34</b>	<b>1057</b>	<b>773</b>	<b>73.13</b>

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, and it covers all employees.

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

Hazard Identification and Risk Assessment (HIRA) is carried out for each activity/process and for any green/brown field project and critical changes PHA (HAZOP) study is being carried out by competent professionals. This involves identifying potential hazards in the workplace, assessing/analysing the associated risks, and determining the necessary control measures to reduce or eliminate the risks. Hazop is being done across all unit to mitigate the risk through improvement in process/system and by implementing additional safety measures time to time to reduce or eliminate the risk involved in the process/operation.

In addition to this based on requirement various studies such as Hazardous Area Classification, ATEX Study, Chemical Process safety assessment, Fire & Life Safety Assessment, Electrical safety assessment is being carried out by competent and renowned agencies & consultants. For any non-routine works like construction, hot work, etc. is carried out through BPIL Permit system, LOTO system and after proper Job Safety analysis & work area assessment. Identification and Analysis of potential hazards to assess the associated risks is done before start of the jobs on regular basis, a check list is being followed across all locations.

Risk assessment matrix is available for each activity which involves assessing the likelihood and severity of potential hazards and risks associated with a particular job or task. Regular necessary training is provided to the employees to ensure they understand the risks associated with their job and how to safely perform their tasks.

Regular Audit is being conducted internally as well as through outside competent agency/consultants to identify any potential hazards or risks and accordingly corrective/preventive actions are being taken across all locations. Regular workplace monitoring is in place to ensure that any identified hazards and risks are being properly managed at the Shop Floor.

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

Yes

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:

An accidental fire had broken out at the Company's Howrah Factory on 8th June, 2022 affecting the exit gate and the raw material handling area. 23 employees had received injuries in an attempt to douse the fire. 5 out of the total injured persons expired due to their critical condition later while under the best medical treatment possible.

The operation, which had caused the incident, has completely been stopped at the unit.

Safety Incident/Number	Category	FY 22-23 Current Financial Year	FY 21-22 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1.26	0
	Workers	6.62	0.94
Total recordable work-related injuries	Employees	6	0
	Workers	76	43
No. of fatalities	Employees	1	0
	Workers	5	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	1	0
	Workers	16	0



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

The safety and well-being of the Company's employees remain the first and foremost and non-negotiable. The Company follows industry accredited best practices and protocols on health and safety across the operations and conducts all processes in a responsible manner to safeguard its employees. All legal and statutory requirements are fully complied.

We are duly committed to take care of the 4 E's – Environment, Employee, Employer and Esteemed customer.

The company has implemented a comprehensive safety and Environment policy that outlines the company's commitment to providing a safe and healthy work environment. This policy includes measures such as providing personal protective equipment (PPE) to employees, conducting regular safety inspections and audits/health check – ups/providing training/doing mock drill at regular interval and education on health and safety topics. Company has appointed EHS Manager/Officer across all its location to ensure implementation of the health and safety policy of the Company to provide safe and healthy work environment.

The Company has year the round trainings planned for different functions which are organized as per the needs and business requirement with renowned learning partners/certified and accredited professionals and also by our experienced employees. The Company's policy prohibits engaging of any child labour or involuntary labour.

The Company has in its staff, specially trained safety professionals along with trained line personnel. Health and Safety aspects are also covered in all its agreements with unions and contractors and are a part of the same. Safety related initiatives taken in the area of Health and Safety are in the manufacturing units of the Company which follow the Berger Paints Safety Guidelines and Manual which is based on country's Legal Framework and International Standards for Fire Safety, Industrial Safety, Health and Hygiene and Environmental Protection. The Occupational Health Centres at Company's manufacturing locations are in line with the regulatory requirements and the Company takes all possible measures to keep these up-to-date with latest devices, facilities and trained professionals. Adequate isolation facility with oxygen concentrators made available during the Covid-19 pandemic period.

Excellence in EHS is targeted with No Major Fire, No Major Accident and 100 % compliance in Water, Air and Environment monitoring. Hazard and Operating Study/Risk Assessment is an integral part of any new and expansion Project/Activity.

Each plant has safety committee in place to ensure implementation of all good safety practices/safety improvement at the workplace and also to increase awareness of all the employees regarding any changes to health and safety policies/procedures through regular safety committee meeting.

For Safe unloading of monomers, 5 Tier Safety system is being followed to ensure each and every step is being monitored and mistake proofing measures are in place through visual identification. For safe unloading of solvents and other hazardous/flammable Raw materials, 3 Tier Safety system is put in place. Additionally, Smart Earth rite relay system automatically ensures No Earthing, No Unloading along with dry run protector for Solvent transfer pumps. Different POKA-YOKE measures have been put across our plants with additional layer of protection and administration control.

Our upcoming plants and brown field projects at exiting units are designed with State of the Art technological set-up for production and handling of such hazardous material & designed to operate on closed charging principle. This ensures least exposure to manpower due to minimum dust inside the plant.

Charging of liquid raw materials are also done through Automatic & closed loop charging in the batches which is controlled by mass flow meters to avoid any spillage and wastage of material. Plants are designed with recommendations put forward in HAZOP study for safe handling and storage of such chemicals. Dust & Fume Extraction system are installed to capture fugitive emissions.

All fittings and fixtures at Shop Floor are FLP type and Fire retardant wherever applicable. Spill proof kits, Diphotherine kits, safety showers are installed at shop floor to counter any First aid situation at site. All personnel are trained and awareness is spread amongst the workforce regarding the hazards. Early Suppression Fast Release Sprinkler for SADT capable chemicals with response time within 3-7 seconds. For Hazardous area such as Resin and Solvent based manufacturing, conventional concept of linear heat sensors or beam detection has been replaced with advanced IR3 Flame detector and Quartzoid Bulb detector.

For Fire-fighting arrangement, premises security, compliance management and emergency preparedness, latest automations and error proofing measures have been implemented at our manufacturing locations, depots and offices. Safety awareness programmes and trainings are conducted to increase safety awareness amongst the employees. Proper training for Work permit system, Hot work, Manual material handling, Lock out Tag Out, Fire prevention and Fire-fighting, Confined space entry, Emergency evacuation, and Electrical safety is given to all employees with proper PPE compliance and awareness. Safety Mock Drills are conducted and GAP is analysed for continual improvement. SMS/Call intimation & Cloud based safety management in connection with detection system installed in all our plants, depots, warehouse and offices.

Third party certified auditors engaged with best in class and world renowned Safety & Risk management consultancies have been appointed by the company to carry out Fire & Life Safety, Chemical process safety and Electrical safety risk assessments and audits. The observations by these safety experts are being considered and all such useful recommendations are taken forward for implementation.

For the plants as well as depots, National Safety Day/Week campaigns, World Environment Day, periodic fire mock drills as a part of emergency preparedness, electrical system health assessments, electrical safety trainings, safety campaigns, periodical Fire and safety audits and environmental monitoring are organized to aware employees about environment, health and safety. The units and sales depots are graded on annual safety performance based on legal and statutory compliance, score of electrical health assessment, Fire & safety audit, Kaizen, emergency preparedness and response and overall EHS awareness. Annual award is presented based on their excellence in EHS practices.

Wellness Initiatives taken at our Factories & offices;

Yoga Sessions;

Work life balance at work place by magical Saturday;

Training on Behaviour Based Safety (BBS);

Training to nearby school and college students on Environment and Safety awareness on occasion of World Environment Day and National Safety Day;

Training to employee families on household safety;

Employee and transporters training on defensive driving techniques;

Awareness training session with units and sales depots on COVID-19 precautions by Medical professionals and others.

Online training and interactions with industry professionals for gaining knowledge on various topics.

Employee Welfare programmes such as Sports Tournament, Group Picnics, celebrating Independence day, Republic day, factory inauguration day, employee birthdays, work achievements and excellent performances, etc.

We have a robust Health monitoring plan for our employees where periodical checks and emergency preliminary response/First Aid is available at OHC department across our factories/depots and offices. Health monitoring plan for our employees where periodical checks and emergency preliminary response/ First Aid is available all across our factories/depots and offices. Eye check-up, pulmonary function test, audiometry test, blood examination, Chest X-ray, ECG, etc. are conducted for all the employees.

Entire workforce and their families are double vaccinated. To handle the pandemic situation, all our OHCs have been equipped with medical grade Oxygen Concentrators and COVID-19 Care KIT.

During the Covid-19 pandemic, our Puducherry plant have supported 1200 families in and around the locality by providing them staple food to each such economically challenged households.

As a company and one of the largest recruiters in paint sector, local employment at the plants is focused upon helping localities to earn their livelihood. At local schools, projects have been taken up for making necessary arrangements towards proper sanitation and also installation of drinking water facilities.

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

	FY 22-23 (Current Financial Year)			FY 21-22 (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, M/s Elion, M/s Anubhav Fire Safety, M/s Excel EHS Services, 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, M/s Elion, M/s Anubhav Fire Safety, M/s Excel EHS Services, 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.

Significant risks/concerns arising from assessments of health & safety practices are mitigated and preventive measures are put in place along with horizontal deployment as necessary. These are recorded on the company's internal portal which is accessible to all plants and any CAPA/KAIZEN which is uploaded on this portal is horizontally deployed at all locations as applicable.

Corrective action for any safety related concern is being addressed through detailed incident investigation report based on which Management committee reviews the specific concern for relevant actions such as Installation of safety devices, monitoring and assessment procedures, if required the activity is suspended until proper measures are ensured.

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 organisation to ensure that safety is given the highest priority.

Taking learnings from the Styrene gas leakage in Vizag, additional safety POKA-YOKE measures were put for monomer handling

at the units like 5 Tier safety system for unloading of monomers, regular testing of polymerisation, automatic changeover for chilling units, alarm and visual indication for styrene tank temperature, etc.

The fire which broke at our Howrah based unit was also taken as a learning and for all Air conditioning units at other factories were ensured to be of FLP type with automatic changeover relay between two units and continuous room temperature monitoring with SMS detection features.

Similar to this the accident which occurred at our Jejuri plant invoked many further safety measures to ensure that systems are mistake proofed for any human error. Ball Mill interlock for charging was innovatively developed and deployed at all locations with existing controls for static discharging and administrative control over deploying workers inside factory & visual identification based access control to work being deployed.

### Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) - Yes (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 Question 11 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 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Employees	2	0	1	0
Workers	21	0	17	0

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

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

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

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.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
1.Shareholder	NO	Done through Annual General Meeting/ Stock Exchange Disclosures/ Half yearly Results Publication/Quarterly Results Publication/ Complaints and Resolutions.	AGM- Annual 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 behaviour), ISO and OHSAS standards, Introduction of ESG qualities.
5.Government	NO	Advocacy meetings with local / state / national government ministries, authorities, seminars, media releases, Taxation 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 Goals (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.

Not Applicable

### 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 22-23 Current Financial Year			FY 21-22 Previous Financial Year		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	2973	1825	61.3	2874	Nil	Nil
Other than permanent	4909	Nil	Nil	783	Nil	Nil
<b>Total Employees</b>	<b>7882</b>	<b>1825</b>	<b>23.2</b>	<b>3657</b>	<b>Nil</b>	<b>Nil</b>
<b>Workers</b>						
Permanent	1115	376	33.72	1057	Nil	Nil
Other than permanent	2819	Nil	Nil	2175	Nil	Nil
<b>Total Workers</b>	<b>3934</b>	<b>376</b>	<b>9.56</b>	<b>3232</b>	<b>Nil</b>	<b>Nil</b>

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

Category	FY 22-23 Current Financial Year					FY 21-22 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
<b>Permanent</b>										
Male	2915	*NA	*NA	2915	100	2810	*NA	*NA	2810	100
Female	58	*NA	*NA	58	100	64	*NA	*NA	64	100
<b>Other than Permanent</b>										
Male	4687	2355	50.2	2332	50	783	*NA	*NA	*NA	*NA
Female	222	96	43.2	126	57	0	*NA	*NA	*NA	*NA
<b>Workers</b>										
<b>Permanent</b>										
Male	1096	*NA	*NA	1096	100	1042	*NA	*NA	1042	100
Female	19	*NA	*NA	19	100	15	*NA	*NA	15	100
<b>Other than Permanent</b>										
Male	2738	1820	66.4	918	33.53	2175	1880	86.43	295	13.57
Female	81	67	82.7	14	17.29	65	38	58.46	27	41.54

\* Not Applicable

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	8	10,00,000	2	36,01,534
Key Managerial Personnel	3	1,55,27,556	0	0
Employees other than BoD and KMP	3731	43,12,028	76	36,66,626
Workers	280	7,86,523	1	4,94,851

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 22-23 Current Financial Year			FY 21-22 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	Nil	Nil	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child Labour	Nil	Nil	Nil	Nil	Nil	Nil
Forced Labour/Involuntary Labour	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil

7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.  
Any such matters are referred to Human Resource Department for appropriate action.

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

9. Assessments for the year:

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

Not done by any external party. Internal assessment is done.

10. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 9 above. Not Applicable

### Leadership Indicators

1. Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.  
No such case warranted action.

2. 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.

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

No

4. Details on assessment of value chain partners:



	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual Harassment	The company has just undertaken Value Chain Outreach in 22-23, disseminating information on ESG matters and encouraging the latter to walk the ESG path. The matter of assessment will take place some place time in 23-24 to understand how much ESG factor has been adopted.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others – please specify	

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

<b>Parameter</b>	<b>FY 22-23 (Current Financial Year)</b>	<b>FY 21-22 (Previous Financial Year)</b>
Total electricity consumption (A)	12,63,70,595 MJ	12,28,60,544 MJ
Total fuel consumption (B)	22,89,62,302 MJ	17,92,47,164.79 MJ
Energy consumption through other sources (C)	2,39,08,147 MJ	1,77,22,371.6 MJ
<b>Total energy consumption (A+B+C)</b>	<b>37,92,41,044 MJ</b>	<b>31,98,30,080 MJ</b>
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	40,043.95	33,770.76
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

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:

<b>Parameter</b>	<b>FY 22-23 (Current Financial Year)</b>	<b>FY 21-22 (Previous Financial Year)</b>
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	92356	80081.3
(ii) Groundwater	300375	315626
(iii) Third party water	8512	8895
(iv) Seawater/desalinated water	-	-
(v) Others	5373	2635
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	406616	407237.3

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
Total volume of water consumption (in kilolitres)	404321	404809.3
Water intensity per rupee of turnover (Water consumed / turnover)	0.000004	0.000005
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. N

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation. Yes, 40% manufacturing locations have been covered and operating successfully. Two more plants will be covered with ZLD installations by FY 23-24.

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

Parameter	Please specify unit	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
NOx	mg/m3 (Average)	29.780	24.845
SOx	mg/m3 (Average)	18.835	16.490
Particulate matter (PM)	mg/m3 (Average)	49.785	49.655
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)	ppm (Average)	4.900	5.201
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

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 and others as approved by local PCBs. Apart from Quarterly work place monitoring there are CPCB authorised audits from Industry experts and competent bodies which are conducted on surprise/planned basis and no non-conformance observed in last FY.

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

Parameter	Unit	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Total Scope 1</b> emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	2484.73	2259.73
<b>Total Scope 2</b> emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	29837.5	29008.74
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>	-	0.0000003	0.0000004
<b>Total Scope 1 and Scope 2 emission intensity</b> (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. N

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

Project Name	Project Cost (INR)	When implemented	Cost Benefit (INR)	GHG Emission reduction in FY 22-23
Bio-Briquette Installation - Puducherry	1.1 Crores	2015	-	383.26 MT
Roof Top Solar Power Plant - Puducherry	3.32 Crores	July-22	-	175.8 MT
Bio-Briquette Installation - Goa	3.53 Crores	Oct-21	1.3 Crores	209.3 MT
Roof Top Solar Power Plant - Goa	2.05 Crores	Dec-21	51.0 Lacs	496.3 MT
Bio-Briquette Installation - Rishra	1.5 Crores	Feb-20	1.0 Crores	387.7 MT
Roof Top Solar Power Plant - Rishra	1.9 Crores	Jun-21	81.54 Lacs	443.1 MT
Bio-Briquette Installation - Jammu	2.0 Lacs	Apr-22	23.32 Lacs	1108.4 MT
Roof Top Solar Power Plant – Jammu	2.21 Crores	Dec-22	4.73 Lacs	103.63 MT
Bio-Briquette Installation – Jejuri	1.63 Crores	Oct-20	-	371.5 MT
Roof Top Solar Power Plant – Jejuri	3.1 Crores	Mar-21	-	932.4 MT
Roof Top Solar Power Plant – Hindupur	3.65 Crores	Feb-20	1.2 Crores	1219.7 MT
Bio-Briquette Installation – Naltali	-	May-18	-	252.3 MT
Roof Top Solar Power Plant – Naltali	1.8 Crores	Oct-20	76 Lacs	339.5 MT
Bio-Briquette Installation – Sandila	1.02 Crores	Feb-23	-	29.1 MT
Roof Top Solar Power Plant – Sandila	6.89 Crores	Oct-22	-	366.16 MT
Roof Top Solar Power Plant – Hindupur	3.53 Crores	Aug-21	96.56 Lacs / Annum	1110.14 MT
Roof Top Solar Power Plant – Sikandrabad	1.35 Crores	June'21	25.15 Lacs / Annum	246.11 MT
Roof Top Solar Power Plant – Assam -Nalbari	0.95 Crores	June'21	15.50 Lacs / Annum	212.23 MT
PNG (Cleaner Fuel) System for Operation of Thermopac & Steam Boiler at Sikandrabad	0.56 Crores	Mar'22	Cleaner Fuel having very less carbon emission and PM	43.8 MT
DUAL FUEL KIT PNG OPERATION FOR DG SET (Cleaner Fuel) at Sikandrabad	0.06 Crores	Sep'22	Cleaner Fuel having very less carbon emission and PM (Saving 2.5 Lacs / Annum)	0.42 MT
<b>Total</b>				<b>8430.85 MT</b>

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	124.630	99.570
E-waste (B)	4.000	1.000
Bio-medical waste (C)	0.008	0.007
Construction and demolition waste (D)	0.000	0.000
Battery waste (E)	4.000	2.000
Radioactive waste (F)	0.000	0.000
Other Hazardous waste. Please specify, if any. (G)	2301.880	2840.092
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	2278.280	1947.763
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>4711.799</b>	<b>4890.425</b>
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	942.358	700.881
(ii) Re-used	308.596	117.685
(iii) Other recovery operations	47.027	42.051
<b>Total</b>	<b>1297.98</b>	<b>859.62</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	5.000	8.000
(ii) Landfilling	264.000	268.920
(iii) Other disposal operations	3548.818	3550.890
<b>Total</b>	<b>3816.818</b>	<b>3827.810</b>

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. N

9. 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 authorised 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 2.88 lac Litres 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.

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.

10. 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 are located in ecologically sensitive areas and hence not applicable

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.
-	-	-	-
-	-	-	-

11. 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
Sandila Project, UP	S.O. 1533 (E) dated 14.09.2006	21.02.2022	Yes	Yes	<a href="https://www.bergerpaints.com/about-us/new-projects.html">https://www.bergerpaints.com/about-us/new-projects.html</a>
Panagarh Project, WB	S.O. 1533 (E) dated 14.09.2006	20.04.2022	Yes	No	Not Available

12. 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. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>From renewable sources</b>		
Total electricity consumption (A)	2,39,08,147 MJ	1,77,22,371.6 MJ
Total fuel consumption (B)	12,43,70,049.7 MJ	7,77,41,822.8 MJ
Energy consumption through other sources (C)	0	0
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>14,82,78,197 MJ</b>	<b>9,54,64,194.4 MJ</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	12,63,70,595 MJ	12,28,60,544 MJ
Total fuel consumption (E)	7,36,95,358.85 MJ	7,83,60,146.8 MJ
Energy consumption through other sources (F)	3,08,96,893.7 MJ	2,31,45,195.3 MJ
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>23,09,62,848 MJ</b>	<b>22,43,65,886 MJ</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

2. Provide the following details related to water discharged:

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	8668.25	118562
(ii) To Groundwater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
(iii) To Sea water	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	2855	3547
(v) Others	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	32047	29454
<b>Total water discharged (in kilolitres)</b>	<b>43570.25</b>	<b>151563</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

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

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

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	40656	37862
(ii) Groundwater	Nil	Nil
(iii) Third party water	3640	1765
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	38	1975
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>44334</b>	<b>41602</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>44334</b>	<b>41602</b>
<b>Water intensity per rupee of turnover (Water consumed/turnover)</b>	<b>4.68</b>	<b>4.39</b>
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>	-	-
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
(iv) Sent to third-parties	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(v) Others (ZLD/Gardening/Firewater tank top-up/process)	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	4235	5739
<b>Total water discharged (in kilolitres)</b>	<b>4235</b>	<b>5739</b>

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, Environ India

Name of the area – British Paints, Hindupur

(ii) Nature of operations – Liquid Paints Manufacturing

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	Nil	Nil
(ii) Groundwater	17073	14650
(iii) Third party water	Nil	Nil
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	476	1910
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>17549</b>	<b>16560</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>16353</b>	<b>15988</b>
<b>Water intensity per rupee of turnover (Water consumed/turnover)</b>	<b>1.73</b>	<b>1.69</b>
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>	-	-
(i) To Surface water	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	720	572
(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	Nil	Nil
(v) Others (ZLD/Gardening/Firewater tank top-up/process)	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
<b>Total water discharged (in kilolitres)</b>	<b>720</b>	<b>572</b>



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, Environ India

Name of the area – British Paints, Sikandrabad

(ii) Nature of operations – Liquid Paints Manufacturing

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

Parameter	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	Nil	Nil
(ii) Groundwater	16059	19039
(iii) Third party water	Nil	Nil
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>16059</b>	<b>19039</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>15785</b>	<b>18271</b>
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>	<b>1.67</b>	<b>1.98</b>
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>	-	-
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	750	768
(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	Nil	Nil
(v) Others (ZLD/Gardening/Firewater tank top-up/process)	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
<b>Total water discharged (in kilolitres)</b>	<b>750</b>	<b>768</b>

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

Parameter	Unit	FY 22-23 (Current Financial Year)	FY 21-22 (Previous Financial Year)
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	NA*	NA*
<b>Total Scope 3 emissions per rupee of turnover</b>	-	NA*	NA*
<b>Total Scope 3 emission intensity</b> (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.

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

5. With respect to the ecologically sensitive areas reported at Question 10 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
6. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	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). 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.	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.
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	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. 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. 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. 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.	1) Reduction of huge amount carbon foot print. 2) Reduction of Green House gas emission.

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
5	Usage of energy efficient, automatic Dust Extraction systems in Paint Plants	During manufacturing of Paints, Putty & allied products, lot of dusts are generated inside shop floor during Powder Raw material charging in the equipment, which is not hygienic for the shop floor environment. To arrest the same, we have implemented automatic, energy efficient Dust Extraction systems along with suitable Bag Filters to control the Dust emission to the atmosphere also within the prescribed limit of PCB.	1) Clean shop floor environment 2) Controlled Dust emission within the prescribed limit by PCB.
6	Usage of energy efficient, automatic Fume Extraction systems in Resin Plants	During manufacturing of Resins, at different stages of the process, fumes are generated during charging of Raw Materials, which makes the environment difficult for the operators. To capture these fumes, we have installed automatic, energy efficient Fume Extraction systems in all of our Resin Plants along with Counter Current Water Scrubber. The effluent water from the Scrubber is sent to ETP for further treatment.	1) Reduced VOC levels in the shop floor. 2) Healthy Work environment.
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.	1) 2.88 Lac Litres of water saved daily 2) No need to enhance ETP capacity with increase in production load
8	Installation of Roof Top Solar Power Plant	<a href="https://www.bergerpaints.com/investors/annual-reports.html">https://www.bergerpaints.com/investors/annual-reports.html</a>	66,41,152 kWh generated in FY 22-23
9	Many products have been developed with zero heavy metal content.	<a href="https://www.bergerpaints.com/investors/annual-reports.html">https://www.bergerpaints.com/investors/annual-reports.html</a> <a href="https://www.bergerpaints.com/about-us/green-horizon.html">https://www.bergerpaints.com/about-us/green-horizon.html</a>	Lead, Chrome, Mercury Free products

7. 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.

8. 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

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

None in the current year.

**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.

- Corporate Manufacturing Excellence team has won the “Special Jury” award in CII External Regional Productivity Awards 2022.
- Berger Paints won Deloitte India’s Best Managed Companies 2021 Award.
- Corporate Engineering and VVN unit won Greentech Energy Conservation Award 2021.
- Corporate TQM won Golden Peacock Award in National Quality Competition by IOD (Institute Of Directors)
- 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

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
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	No	Nil	-

The Company has not enunciated any public policy on its domain matter.

**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
Sandila Project, UP	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 –		Yes	Yes	<a href="https://www.bergerpaints.com/about-us/new-projects.html">https://www.bergerpaints.com/about-us/new-projects.html</a>
Additional Capacity Expansion at Jejuri Plant	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 Social management plan is accordingly developed.		Yes	Yes	<a href="https://www.bergerpaints.com/about-us/new-projects.html">https://www.bergerpaints.com/about-us/new-projects.html</a>

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

None, as all projects are built up on industrial land.

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 22-23 Current Financial Year	FY 21-22 Previous Financial Year
Directly sourced from MSMEs/small producers	22%	15%
Sourced directly from within the district and neighbouring districts*	21%	18%

\* The input material purchases from within the same state have been considered for sourcing from within the district and neighbouring districts.

**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	64910
2.	Assam	Barpeta	32536
3.	Bihar	Gaya	78697
4.	Bihar	Muzaffarpur	149708
5.	Bihar	Sitamarhi	48482
6.	Chhattisgarh	Korba	111727
7.	Chhattisgarh	Rajnandgaon	38976
8.	Jharkhand	Bokaro	29983
9.	Jharkhand	Chatra	70375
10.	Jharkhand	Godda	17841
11.	Jharkhand	Palamu	102094
12.	Jharkhand	Purbi Singhbhum	67401
13.	Karnataka	Raichur	3453
14.	Odisha	Dhenkanal	24166
15.	Odisha	Kalahandi	27347

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? Consequent to answer in (b)- 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, as the Company is not involved in such trade.

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	1,32,727 across all locations	Not Applicable as The Company does not have information on marginalized/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](mailto: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/customer-service/contact-details.html>
- 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](mailto: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

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

	FY 22-23 (Current Financial Year)		Remarks	FY 21-22 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	-	3	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	NA					
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	Reasons for recall
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/resources/pdf/quality-policy/Cyber-Security-Policy.pdf>

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

### Leadership Indicators

1. Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available). [www.bergerpaints.com](http://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](http://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.

5. Provide the following information relating to data breaches:

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