

June 13, 2024

ज्येष्ठ – शुक्ल पक्ष, सप्तमी  
विक्रम सम्वत् २०८१

**National Stock Exchange of India Limited BSE Limited**

“Exchange Plaza”  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400 051  
**NSE Code: GHCL**

Corporate Relationship Department,  
1<sup>st</sup> Floor, New Trading Ring, Rotunda Building,  
P.J. Towers, Dalal Street, Fort, Mumbai – 400 001  
**BSE Code: 500171**

Dear Sir/Madam,

**Sub: Filing of Business Responsibility and Sustainability Report (BRSR) of the Company for the financial year 2023-24**

We would like to inform that pursuant to requirement of Regulation 34 (2) (f) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and any other applicable provisions if any, please find enclosed herewith copy of Business Responsibility and Sustainability Report for the financial year 2023-24.

Please note that copy of this intimation is also available on the website of BSE Limited ([www.bseindia.com/corporates](http://www.bseindia.com/corporates)), National Stock Exchange of India Limited ([www.nseindia.com/corporates](http://www.nseindia.com/corporates)) and website of the Company ([www.ghcl.co.in](http://www.ghcl.co.in)).

You are requested to kindly take note of the same.

Thanking you

Yours faithfully

**For GHCL Limited**



**Bhwneshwar Mishra**  
**VP-Sustainability & Company Secretary**  
Membership No.: F5330

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1.	<b>Corporate Identity Number (CIN) of the Listed Entity</b>	L24100GJ1983PLC006513
2.	<b>Name of the Listed Entity</b>	GHCL Limited
3.	<b>Year of incorporation</b>	1983
4.	<b>Registered office address</b>	'GHCL House' Opp. Punjabi Hall, Navrangpura, Ahmedabad-380 009 (Gujarat)
5.	<b>Corporate address</b>	GHCL House' B-38, Institutional Area, Sector-1, Noida-201301 (Uttar Pradesh)
6.	<b>E-mail</b>	<a href="mailto:secretarial@ghcl.co.in">secretarial@ghcl.co.in</a>
7.	<b>Telephone</b>	0120-4939900
8.	<b>Website</b>	<a href="https://www.ghcl.co.in/">https://www.ghcl.co.in/</a>
9.	<b>Financial year for which reporting is being done</b>	2023-24
10.	<b>Name of the Stock Exchange(s) where shares are listed</b>	NSE, BSE
11.	<b>Paid-up Capital</b>	INR 95,72,39,860
12.	<b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report</b>	Mr. Bhuvneshwar Mishra, Vice President - Sustainability & Company Secretary <a href="mailto:bmishra@ghcl.co.in">bmishra@ghcl.co.in</a> 0120-4939900/2535335
13.	<b>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).</b>	The (BRSR) Business Responsibility and Sustainability Report provides an all-encompassing review of the company's operations, including those of its manufacturing plants for soda ash, and raw salt production. Over the course of last few years, we have restructured our business and now our reporting boundary for previous year have been adjusted to Soda Ash and CPD (Salt) businesses.
14.	<b>Name of assurance provider</b>	Sustainability Actions Pvt. Ltd.
15.	<b>Type of assurance obtained</b>	Limited Assurance

### II. Products/services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Inorganic Chemicals	Manufacture of chemicals and chemicals products	100

#### 17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Soda ash	24117	100

### III. Operations

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

Location	Number of plants	Number of offices	Total
National	3	2	5
International	0	0	0

#### 19. Markets served by the entity:

##### a. Number of locations

Locations	Number
National (No. of States)	20 states and 5 union territories
International (No. of Countries)	16

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

The contribution of exports as a percentage of the total turnover of GHCL stands at 5.42%

##### c. A brief on types of customers

Our product ranges across two division: chemicals, and raw salt production. We have a broad spectrum of customers i.e., industrial (business to business) and individual clients.

### Employees

#### 20. Details as at the end of Financial Year (FY 2023-24):

##### 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)	478	450	94.14	28	6
2.	Other than permanent (E)	19	19	100	0	0
3.	<b>Total Employees (D+E)</b>	<b>497</b>	<b>469</b>	<b>94.37</b>	<b>28</b>	<b>5.63</b>
<b>Workers</b>						
4.	Permanent (F)	501	487	97.21	14	2.79
5.	Other than Permanent (G)	2449	2372	96.86	77	3.14
6.	<b>Total workers (F+G)</b>	<b>2950</b>	<b>2859</b>	<b>96.92</b>	<b>91</b>	<b>3.08</b>

##### 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)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	<b>Total differently abled employees (D+E)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Differently abled workers</b>						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	8	8	100	0	0
6.	<b>Total differently abled workers (F + G)</b>	<b>8</b>	<b>8</b>	<b>100</b>	<b>0</b>	<b>0</b>

## 21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	1	11.11
Key Management Personnel	3	0	0

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

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	8	21.4	8.7	10	20.69	10.65	6.1	10.2	6.4
Permanent Workers	3.4	14.2	3.7	4.03	8.33	4.14	13.1	46.5	32.5

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

### 23. (a) Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Dan River Properties, USA	Subsidiary	100	No

## V. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- (i) Turnover (in Rs.): INR 3,498 Cr
- (ii) Net worth (in Rs.): INR 2,970 Cr

## VI. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-24			FY 2022-23		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes	14	0	Resolved 15 including 1 complaint of previous year	17	1	-
Investors (other than shareholders)	Yes	0	0	-	0	0	-
Shareholders	Yes	32	0	-	38	0	-
Employees and workers	Yes	0	0	-	2	0	-
Customers	Yes	49	0	-	27	0	-
Value Chain Partners	Yes	0	0	-	0	0	-
Other (please specify)	-	-	-	-	-	-	-

Link to our investor grievance policy - Investor Grievances - GHCL Limited

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
1.	Sustainable Products and Packaging	Opportunity	Adopting sustainable goods and packaging solutions helps preservation of environment. Moreover, it also results in financial savings and augments the use of natural resources efficiently. By shifting towards sustainable practices, we can improve resource distribution, minimize waste, and achieve enduring economic benefits.	-	Positive
2.	Process Improvement and Innovation	Opportunity	We stand ready to reap the benefits of inventive manufacturing processes, resulting in numerous advantages like increased production, reduced time per operation, and more efficient use of personnel. Our goal is to embrace advanced methods and technologies to boost our work efficiency, simplify production processes, and amplify productivity.	-	Positive
3.	Employee Engagement, Training, and Professional Advancement	Opportunity	We recognize the importance of creating a supportive and favorable work atmosphere for all our employees. We strive to adopt a proactive stance by introducing several initiatives that engages our employees. By emphasizing employee contentment and welfare, we succeed in lowering attrition rates and raising productivity levels.	-	Positive
4.	Ethical Supply Chain Management	Opportunity	The inability of suppliers to carry out adequate Environmental and Social (E&S) risk evaluations could pose a substantial risk, possibly leading to shutdowns of production units and negatively affecting our output. It is hence crucial for our suppliers to give E&S assessments their due importance, thereby ensuring adherence to sustainability standards and continuity in operations. Sustaining a	Implementing Environmental and Social (E&S) considerations into our vendor or supplier assessments is a key factor in securing responsible sourcing. The evaluation of suppliers using E&S standards, coupled with consistent checks on their E&S systems' effectiveness, aids in recognizing possible risks and supports ethical business procedures. This preemptive method fortifies	Negative



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
			sustainable supply chain and shielding against potential interruptions can be achieved by taking proactive strategies in the selection and subsequent partnership of suppliers.	supply chain robustness, encourages responsible supplier dealings, and lessens any negative effects on the environment and society.	
5.	Waste Reduction and Management	Risk	It is an organization's sole responsibility to manage the appropriate disposal of all types of waste. Failure in this respect can invite legal action, fines, or other penalties.	We have established an objective of reducing waste generated in our operations and continually strive to lessen its influence on the environment.	Negative
6.	Energy and GHG Emissions Reduction	Risk	Our operations and business activities are at risk to face potential short, medium, and long-term impacts due to the continually changing regulatory environment. Rapid shifts in these regulations demand careful navigation and adherence to fend off potential disruptions. Additionally, the physical manifestations of climate change, including changing rainfall and temperature patterns, coupled with an escalating frequency of severe weather incidents, pose sizeable risks to our operations. It is crucial for us to assess these threats and strategize our responses.	We are determined to reduce our greenhouse gas (GHG) emissions by investing in technologies that enhance efficiency of our operations and reduce negative environmental impact. Further, we aim to understand climate change's broader impacts on our operations and supply chain, evaluating possible risks, and identifying viable solutions for mitigating.	Negative
7.	Water Management	Risk	The amount of water withdrawn in areas experiencing high levels of water stress can significantly impact the needs of the communities nearby. Hence, we understand the importance of managing water responsibly and aim to manage its impact.	We are dedicated to decrease our freshwater intake via adoption of water-saving technologies, optimizing our production processes, and encouraging responsible water usage across all our operations. Our persistent actions demonstrate our commitment to sustainable water management.	Negative
8.	Human Rights and Fair Labour Standards	Risk	Neglecting human rights violations and labor relations can result in protests and strikes, severely impacting our productivity. Such cases often draw concerns from external stakeholders. We strive to take a proactive approach towards human rights issues and promote positive labor relations.	We value the feedback and concerns of our employees, fostering an environment that encourages open dialogue. We actively promote and support employee unions to protect labor rights. By facilitating free expression and endorsing collective negotiations, we are dedicated towards creating an equitable and inclusive workspace.	Negative

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
9.	Corporate Social Responsibility	Opportunity	As a responsible organization, we recognize the need of developing the communities around our area of operations. The implementation of community-oriented programs can benefit society and spur genuine economic growth for our company's continuity.		Positive
10.	Health and Safety	Risk	Injuries sustained in manufacturing facilities can severely affect the physical and mental health of employees and the overall output of the company. We acknowledge the need to reduce such occurrences by establishing a safe workspace.	In our commitment to maintaining the highest standards of health and safety, we continually revise and updates our health and safety policy. We constantly recognize the areas that need improvement. We aim to achieve Zero Accidents and Zero Incidents, which are in line with our wider Sustainability Vision. By diligently working towards these targets, we reaffirm our devotion to creating a work environment that values employees' well-being and mitigates any potential hazards.	Negative

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<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)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	<a href="https://ghcl.co.in/bnr-brsr-policies">https://ghcl.co.in/bnr-brsr-policies</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 9001:2015	ISO 45001: 2018 SA 8000	SA 8000 ISO 9001:2015 ISO 14001: 2015	SA 8000 ISO 9001:2015 ISO 14001: 2015	SA 8000	ISO 14001: 2015	SA 8000	SA 8000	ISO 9001: 2015 HALAL certification ISO 22000: 2018
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Implementation of internal carbon pricing	5% representation of overall female employee. Achieve single digit attrition rate	Zero environmental incidences 30% reduction in GHG emissions Implementation of Internal Carbon Pricing	Evolve into a trusted CSR brand					



Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.		<p>We are proud to announce the successful implementation of our Internal Carbon Price initiative at GHCL. As part of our commitment to sustainable business practices, we have adopted an internal shadow carbon price to guide our investment decisions across all operations. By incorporating a carbon price into our investment evaluation process, we ensure that the financial implications of carbon emissions are adequately considered. This internal mechanism helps us prioritize low-carbon projects, identify opportunities for emission reductions, and drive innovation toward cleaner and more sustainable technologies.</p>	<p>We are proud to report a commendable attrition rate of 8.7% in the executive cadre, maintaining a single-digit attrition since FY'20, reflecting our focus on employee retention and creating a fulfilling work environment. We are pleased to announce that we have achieved a noteworthy overall representation of 3.5% female employees, demonstrating our commitment to gender diversity</p>			<p>To drive our improvement plan, we have implemented emission reduction projects and embracing renewable energy sources for a greener and more sustainable future. Committed to continuous improvement and environmental stewardship.</p>		<p>GHCL Foundation Trust has taken a collaborative approach and believes in acting responsibly for the communities in the areas of our manufacturing facilities</p>	



## 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)

We place a high priority on creating shared value for all stakeholders, including customers, employees, suppliers, and communities. Our vision and mission of responsible business growth, along with maximizing stakeholder value, are underpinned by our core values: Respect, Trust, Ownership, and Integrated Teamwork. Recognizing the importance of measuring, managing, and reporting our environmental impact for both the planet and our business's future growth, we are actively addressing climate change and evaluating climate-related risks to develop a decarbonization plan. Our focus is on generating shared value across the business for customers, suppliers, employees, communities, and all stakeholders. Monitoring, managing, and reporting environmental impact is crucial for the planet and the communities we serve, as well as for the future growth of our business.

### 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).

Mr. R S Jalan, Managing Director (DIN: 00121260)

### 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.

Risk and Sustainability Committee constituted by Board.

### 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	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
	1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
Performance against above policies and follow up action	We carry out performance evaluations against all NGRBC principles. The specifics are as follows: <ul style="list-style-type: none"> <li>Operational Review (OR) meeting: Assessing overall business risks under the direction of the Managing Director.</li> <li>Risk &amp; Sustainability Committee: Evaluating business risk performance against each indicator periodically.</li> <li>CSR Committee: Scrutinizing initiatives undertaken in the realm of CSR.</li> <li>Audit &amp; Compliance Committee: Reviewing matters concerning compliance and internal control risks.</li> <li>Investor Grievance Committee: Examines matters pertaining to investor grievances.</li> <li>Banking &amp; Operations Committee: Reviews issues concerning general authorization for representing the company in various forums and provides authorization for banking transactions.</li> <li>Nomination &amp; Remuneration Committee: Considers matters relating to talent acquisition, Employee Stock Options, Succession Planning, and appointments and nominations at the Board level.</li> </ul>									<ol style="list-style-type: none"> <li>Operational review meeting- Monthly</li> <li>Risk &amp; sustainability Committee- Biannually</li> <li>Audit &amp; compliance committee- Four times a year</li> <li>Stakeholder relationship committee- Need Basis</li> <li>Banking &amp; operations committee- Need basis.</li> <li>Nomination &amp; remuneration committee- Once a year and on need basis</li> </ol>								

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
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Board of Directors and the respective committees evaluate the compliance necessities every quarter. This information is outlined in the corporate governance report under paragraph 19 titled “Compliance Management System.																	

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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.	N	N	N	N	N	N	N	N	N

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

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

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

**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	14	<ol style="list-style-type: none"> <li>1. BRSR Policy 1: Ethics, Transparency and Accountability</li> <li>2. BRSR Policy 2 Product Life Cycle Sustainability</li> <li>3. BRSR Policy 3 Employee Well Being</li> <li>4. BRSR Policy 4 Stakeholders Engagement</li> <li>5. BRSR Policy 5 Policy on Human Rights</li> <li>6. BRSR Policy 6 Preservation of Environment</li> <li>7. BRSR Policy 7 Responsible Advocacy</li> <li>8. BRSR Policy 8 Inclusive Growth &amp; Equitable Development</li> <li>9. BRSR Policy 9 Customer Value</li> <li>10. Code of Conduct For Employees and Other Stakeholders</li> <li>11. Whistle Blower Policy</li> <li>12. Code of Ethics</li> <li>13. Policy for Determination of Materiality</li> <li>14. POSH - Prevention of Sexual Harassment</li> </ol>	100
Key Managerial Personnel	14	<ol style="list-style-type: none"> <li>1. BRSR Policy 1: Ethics, Transparency and Accountability</li> <li>2. BRSR Policy 2 Product Life Cycle Sustainability</li> <li>3. BRSR Policy 3 Employee Well Being</li> <li>4. BRSR Policy 4 Stakeholders Engagement</li> <li>5. BRSR Policy 5 Policy on Human Rights</li> <li>6. BRSR Policy 6 Preservation of Environment</li> <li>7. BRSR Policy 7 Responsible Advocacy</li> <li>8. BRSR Policy 8 Inclusive Growth &amp; Equitable Development</li> <li>9. BRSR Policy 9 Customer Value</li> <li>10. Code of Conduct For Employees and Other Stakeholders</li> <li>11. Whistle Blower Policy</li> <li>12. Code of Ethics</li> <li>13. Policy for Determination of Materiality</li> <li>14. POSH - Prevention of Sexual Harassment</li> </ol>	100

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
Employees other than BoD and KMPs	80	<ol style="list-style-type: none"> <li>1. BRSR Policy 1: Ethics, Transparency and Accountability</li> <li>2. BRSR Policy 2 Product Life Cycle Sustainability</li> <li>3. BRSR Policy 3 Employee Well Being</li> <li>4. BRSR Policy 4 Stakeholders Engagement</li> <li>5. BRSR Policy 5 Policy on Human Rights</li> <li>6. BRSR Policy 6 Preservation of Environment</li> <li>7. BRSR Policy 7 Responsible Advocacy</li> <li>8. BRSR Policy 8 Inclusive Growth &amp; Equitable Development</li> <li>9. BRSR Policy 9 Customer Value</li> <li>10. Code of Conduct For Employees and Other Stakeholders</li> <li>11. Whistle Blower Policy</li> <li>12. Code of Ethics</li> <li>13. Policy for Determination of Materiality</li> <li>14. POSH - Prevention of Sexual Harassment</li> <li>15. Leadership Transitions: Moving into Senior Leadership</li> <li>16. (ISC) &amp; Security Fundamentals</li> <li>17. Enabling Business Process Improvement</li> <li>18. Psychological Safety: Building a Culture of Inclusion and Innovation</li> <li>19. POSH Internal Complaint Committee Members: Roles &amp; Responsibilities</li> <li>20. Risk Management Policy</li> <li>21. Leveraging the Power of Analogical Thinking</li> <li>22. Evaluating Systems with Data Modeling</li> <li>23. Six Sigma Green Belt: Six Sigma Process Documentation and Analysis</li> <li>24. Code of Conduct for Board of Directors and Senior Management Personnel of the Company</li> <li>25. Data and Analytics for Senior Managers</li> <li>26. Business Analysis Overview</li> <li>27. Six Sigma Yellow Belt: Basic Six Sigma Statistics</li> <li>28. 200-301: Cisco Certified Network Associate (CCNA)- Practice Test</li> <li>29. Big Data Interpretation</li> <li>30. ChatGPT 3.5: ChatGPT &amp; Its Practical Use Cases</li> <li>31. Key Elements of Business Execution</li> <li>32. Project Cost Management Competency (Intermediate Level)</li> </ol>	86.6

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
Employees other than BoD and KMPs		33. Six Sigma Black Belt: Using Lean Control Tools and Maintaining Controls 34. Six Sigma Black Belt: Statistical Process Control (SPC) and Control Charts 35. Six Sigma Black Belt: Lean Improvement Methods and Implementation Planning	
Workers	6	Awareness, Behavioural, KSS, and Statutory	78.5

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	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil

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

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

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

Our company has firm conviction and deep dedication to Ethics, Transparency, and Accountability. This includes stringent measures against corruption and bribery. Our Board of Directors regularly reviews and assesses our policies dealing with corruption and bribery, reinforcing our "no tolerance" stance on such misconduct. Our Anti-corruption and bribery policy can be found here. <https://ghcl.co.in/wp-content/uploads/2024/05/Policy-1-Ethics-Transparency-and-Accountability.pdf>

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

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

Workers	Nil	Nil
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#### 6. Details of complaints with regard to conflict of interest:

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

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

Not Applicable

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	82	63

#### 9. Open-ness of business

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

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	26.77	27.85
	b. Number of trading houses where purchases are made from	114	97
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	25	26
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	54	52
	b. Number of dealers / distributors to whom sales are made	48	48
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	64	66.92
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	-	-
	b. Sales (Sales related parties / Total Sales)	-	-
	c. Loans & advances (Loans & advances given to related parties /Total loans & advances)	-	-
	d. Investments (Investments in related parties / Total Investments made)	-	-

## 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
1 (490 value chain partners participated)	1) Sustainable Supply Chain 2) EHS Compliance 3) Labour & Human Rights 4) Labour working condition 5) GHCL Code of Conduct	64.61

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

Yes. Our approach to dealing with potential conflicts of interest is clearly outlined in our Code of Conduct and specific policy for Board and Senior Management. Additionally, we inform our shareholders about how disputes are resolved via our Grievance Redressal Policy. During this financial year, we addressed 32 shareholder grievances and all are resolved. Generally, we strive to minimize related party transactions except the RPT of routine in nature at Arm's length basis. Nevertheless, in certain scenarios, a robust system is in place to obtain necessary approval from the Board / Audit committee and shareholders. This system is activated as and when required during business operations. Additionally, directors with a vested interest are expressly excluded from decision-making concerning Related Party Transactions (RPT).

## 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.

	FY 2023-24	FY 2022-23	Details of improvements in Environmental and social impacts
R&D	-	-	
Capex	5.97	2.41	The fund was spent in the areas like capacity expansion replacement equipment, infrastructure development & environmental projects like reducing steam consumption by optimizing steam trap use and enhancing process control capital, harmonic filter installation, exhaust air purification system and water management

At present, all our product and process improvement research and development projects are subsumed under CAPEX budget only.

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

Yes. All suppliers and vendors affiliated with GHCL are obligated to adhere to the Supplier Code of Conduct. Moreover, we have recently initiated a supply chain risk mitigation program aimed at reducing supply chain vulnerabilities. This program involves conducting evaluations of suppliers using Environmental, Social,

and Governance (ESG) criteria and subsequently collaborating with them to ensure alignment with GHCL's stipulations and expectations.

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

In the reporting year, GHCL sustainably procured 64.61% of raw materials for its soda ash production.



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.

Our organization is deeply committed to enhancing process efficiency and product stewardship. We place a high value on minimizing waste and augmenting waste utilization, viewing these actions as integral to our mission and drive.

- a) Plastic waste- We are continuously working with M/s Shakti Plastics Industries to collect and dispose off plastic waste as part of our Plastic Waste Management (PWM) Program that has been implemented in several states. This year we have recycled 3369.62 MT of plastic packaging waste.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes. We at GHCL actively comply with Extended Producer Responsibility (EPR), focusing on the sustainable and economical management of product end-of-life scenarios. In line with the EPR strategy, we have implemented a waste collection plan and a thorough program for the collection and disposal of product packaging. To fulfil our EPR obligations, which require producers to account for 100% of the plastic packaging introduced in the market, we have developed and submitted a Brand Owner action plan. This action plan has been subsequently approved by the Central Pollution Control Board (CPCB) for implementation.

## 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.
24117	Soda ash	100	For Soda Ash division - Cradle to Gate	Yes (CII Godrej)	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.

Name of Product /Service	Description of the risk / concern	Action Taken
Limestone mining	Land use, dusting	Mines reclamation, afforestation
Raw material handling/Storage	Air emission, Utilization of energy/natural resources	Compliance with statutory norms, cost reduction project & EHS objective
Utility & Power plant	Air emission, waste generation, energy utilization, natural resource utilization	Compliance with statutory norms and cost reduction project
Packaging & bagging	Plastic waste generation	Utilization of bulkers

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 2023-24	FY 2023-24
Fines (coke, briquette, anthracite)	29.32	28.1*

\*Due to an error in calculation methodology figure has been updated.

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

	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	-	3369.62	-	-	2228	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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
Plastic Packaging	0.31

**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	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	450	450	100	450	100	0	0	0	0	45	10
Female	28	28	100	28	100	28	100	0	0	18	64.29
<b>Total</b>	<b>478</b>	<b>478</b>	<b>100</b>	<b>478</b>	<b>100</b>	<b>28</b>	<b>5.86</b>	<b>0</b>	<b>0</b>	<b>63</b>	<b>13.18</b>
<b>Other than Permanent employees</b>											
Male	19	17	89.47	17	89.47	0	0	0	0	10	52.63
Female	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>19</b>	<b>17</b>	<b>89.47</b>	<b>17</b>	<b>89.47</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>52.63</b>

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent workers</b>											
Male	487	444	91.17	487	100	0	0	0	0	0	0
Female	14	14	100	14	100	14	100	0	0	14	100
<b>Total</b>	<b>501</b>	<b>458</b>	<b>91.42</b>	<b>501</b>	<b>100</b>	<b>14</b>	<b>2.79</b>	<b>0</b>	<b>0</b>	<b>14</b>	<b>2.79</b>
<b>Other than Permanent workers</b>											
Male	2372	81	3.41	2326	98	0	0	0	0	17	0.72
Female	77	4	5.19	77	100	74	96.1	0	0	71	92.21
<b>Total</b>	<b>2449</b>	<b>85</b>	<b>3.47</b>	<b>2403</b>	<b>98.12</b>	<b>74</b>	<b>3.02</b>	<b>0</b>	<b>0</b>	<b>88</b>	<b>3.59</b>

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

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company	0.0083	0.0065

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

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/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	Yes	100	100	Yes
ESI	14	95	Yes	24	-	Yes
Others- please specify						
NPS	21	-	Yes	18	-	Yes
Superannuation	20	-	Yes	22	-	Yes

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

All our sites are equipped with ramps to facilitate mobility for individuals with disabilities. Most of our offices also provide elevators and other disability-friendly features. As part of our dedication to creating a more inclusive environment, we are making improvements to ensure our Ahmedabad office meets the accessibility guidelines of the Rights of Persons with Disabilities Act, 2016. We are actively addressing this and striving to make it more suitable for individuals with different abilities.

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.

In line with the rules set by the Rights of People with Disabilities Act of 2016, our organization has put a non-discrimination policy in place. Committed to equal opportunity, we aim to create an environment that is both welcoming and devoid of discrimination for all our staff members. Our non-discrimination policy is readily accessible to all employees at website of the Company at given link. <https://ghcl.co.in/wp-content/uploads/2022/12/Non-Discrimination-Policy.pdf>

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100	100	100	100
Female	100	100	100	100
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</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, we consistently uphold the importance of honest and direct communication. Our workforce is encouraged to employ the use of trade unions to articulate any issues or worries they might have to business leaders, our human resources team, or upper management.
Other than Permanent Workers	Yes, we consistently uphold the importance of honest and direct communication. Our workforce is encouraged to employ the use of trade unions to articulate any issues or worries they might have to business leaders, our human resources team, or upper management.

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Employees	Yes, we have established a Grievance Redressal Mechanism that allows to receive and address complaints.
Other than Permanent Employees	Yes, we have established a Grievance Redressal Mechanism that allows to receive and address complaints.

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

Benefits	FY 2023-24			FY 2022-23		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	478	0	0	479	0	0
Male	450	0	0	450	0	0
Female	28	0	0	29	0	0
Total Permanent Workers	501	499	99.60	483	483	100
Male	487	485	99.59	471	471	100
Female	14	14	100	12	12	100

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

Category	FY 2023-24					FY 2022-23				
	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	450	427	94.89	373	82.89	450	140	31.11	399	88.67
Female	28	13	46.43	28	100	29	7	24.14	29	100
Others	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>478</b>	<b>440</b>	<b>92.05</b>	<b>401</b>	<b>83.89</b>	<b>479</b>	<b>147</b>	<b>30.69</b>	<b>428</b>	<b>89.35</b>
<b>Workers</b>										
Male	487	487	100	351	72.07	471	274	58.17	458	97.24
Female	14	14	100	14	100	12	12	100	12	100
Others	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>501</b>	<b>501</b>	<b>100</b>	<b>365</b>	<b>72.85</b>	<b>483</b>	<b>286</b>	<b>59.21</b>	<b>470</b>	<b>97.31</b>

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	450	432	96	450	430	95.56
Female	28	24	85.71	29	24	82.76
<b>Total</b>	<b>478</b>	<b>456</b>	<b>95.40</b>	<b>479</b>	<b>454</b>	<b>94.78</b>
<b>Workers</b>						
Male	487	346	71.05	471	378	80.25
Female	14	6	42.86	12	8	66.67
<b>Total</b>	<b>501</b>	<b>352</b>	<b>70.26</b>	<b>483</b>	<b>386</b>	<b>79.92</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, our organization is committed to prioritize health and safety, we have established an occupational health and safety management system which conforms and in line with the internationally renowned ISO 45001:2018 certification. This system is intended to eliminate any occupational hazards and injuries for our employees and contractors. This approach includes an all-inclusive array of health and safety policies, systems, standards, and records that are an integral part of our business operations. We have initiated several steps to ensure the effectiveness of the occupational health and safety management system.

- 1. Management leadership and commitment:** The senior management of the organization showcases leadership and dedication by delivering a definite vision, formulating policies, setting targets, and distributing resources. All these efforts aim to steer and bolster the execution of OHS management procedures and systems.
- 2. Safe work procedures and written instructions:** At GHCL, safely structured processes and practices are implemented to assure all personnel understand their roles and can accomplish their duties efficiently.
- 3. Health and safety training and instruction:** We place emphasis on the need for all staff members, from the top management to the front-line workers, to grasp their responsibilities in fostering and preserving a safe and healthy workspace.
- 4. Identifying hazards and managing risk:** We have put in place systems to oversee risks in the work environment, which include pinpointing, assessing, and managing potential risks and hazards to ensure the well-being of all its employees.
- 5. Investigation of incidents:** A swift incident investigations carries out to understand reasons behind unsafe situations. The team responsible for these investigations collaborates with management

to identify strategies and approaches to prevent such incidents from recurring. The organization also enforces a strict policy for all employees to follow incident investigation documentation and reporting rules, as required by occupational health and safety regulations.

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

At GHCL, we have employed a detailed Safety Management System to enhance Occupational Health and Safety (OHS). To minimize possible hazards, we undertake regular hazard identification and risk evaluations. A daily record-keeping and reporting regime is in place to ensure adherence to our HSE policy. Through a dedicated WhatsApp group, we swiftly report and address near misses, unsafe behaviors, and uncertain conditions, always aiming for corrections within a span of 21 hours to a maximum of seven days. Safeguarding our employees, they are mandated to wear safety belts while operating at heights or with machines. We also issue work permits exclusively via authorized personnel to limit risks related to potentially dangerous tasks. We document and periodically update the Risk Assessment Process of each department's activities, enveloping both regular and non-routine tasks. This process takes into account the identification, evaluation, and control measures.

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

Yes, We cultivate an environment where employees are empowered to report any work-related hazards directly to the production manager present at the production site. Due to the compact size of our unit, the production manager is readily accessible on-site to address any safety-related incidents promptly. Moreover, google forms are also available for all plant members to send observations and report any risks.

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

Yes, every employee and worker in our company is safeguarded under the company's personal accident policy.



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

Safety Incident/Number	Category*	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.93	1.30
	Workers	1.53	0.67
Total recordable work-related injuries	Employees	9	10
	Workers	24	26
Number of fatalities	Employees	0	0
	Workers	1	1
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

\*Including in the contract workforce

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

At GHCL, we prioritize the safety and well-being of our employees, visitors, and the public. We believe that a safe and healthy work environment is a fundamental human right and a key driver of our success as a business. We have instituted robust safety standards and protocols to ensure and uphold the safety of our employees. Our “Zero Harm” objective aims to prevent any reportable injuries across all our operations. In pursuit of this goal, we have rolled out several safety initiatives. We offer fire safety training and install related systems. Furthermore, we have initiated numerous safety promotion programs, including Zero Harm Goal Projects, HSE Stewardship Program, Contractor Safety Performance Evaluation, and Zonal Safety Committees. Employee Participation in Reporting and CAPA Closures is another crucial part of our safety strategy. We keep track of safety program records and host safety awareness events like safety training sessions, toolbox talks, National Safety Week Program, and monthly safety champion programs.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	Nil	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil	Nil	Nil	Nil

### 14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices (By third party i.e. ISO assessment)	100
Working Conditions (By third party i.e. ISO assessment)	100

### 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

Not Applicable

## LEADERSHIP INDICATORS



**1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).**

Employees: Yes, all GHCL employees and workers come under the Group Accident Policy. Moreover, other benefits such as the Medclaim Policy and Group Term Insurance are extended to our employees.

Workers: Yes, all GHCL employees and workers come under the Group Accident Policy.

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

Our administrative department takes charge of supervising contractual employees and guaranteeing that our value chain partners each month deduct and deposit the crucial statutory dues. We utilize a robust system, featuring a compliance tracker tool, to proficiently administer and report on the statutory dues from our value chain partners. To ensure compliance with regulations, our administrative department prioritizes monthly deductions and deposits for statutory dues, including Provident Fund and Gratuity.

**3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	Nil	Nil	Nil	Nil
Workers	01	01	Nil	Nil

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

Yes, we offer assistance programs to support our retired employees during their transition, often engaging them as short-term consultants if they desire and when their expertise is needed.

**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	6.45
Working Conditions`	6.45

**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.**

At the core of our business success are our employees, and their health and safety remain our top priority. Over recent years, we have focused on enhancing the capabilities of our civil contractors, with a particular emphasis on educating them about safety standards, including the imperative use of safety belts. Additionally, we have facilitated workshops led by team members to tackle work-related injuries. These sessions have provided valuable insights into the root causes of injuries, enabling us to implement necessary corrective measures and improve our overall safety protocols.

## 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.

At GHCL, we recognize the pivotal role stakeholders play in driving our business responsibly, while harmonizing our economic, environmental, and societal objectives. Our corporate governance principles are grounded in the ethos of inclusive growth, emphasizing transparency, responsiveness, and accountability in all our business endeavors. To effectively engage with our stakeholders, we analyze our value chain to identify those influenced by our operations or impacting our growth trajectory. Internal stakeholders, particularly employees, are our primary focus concerning welfare, wellness, health, and working conditions. External stakeholders encompass a diverse group, including customers, investors, governmental and regulatory bodies, knowledge partners, and various associations. We utilize a stakeholder matrix to manage these relationships, outlining each stakeholder's engagement method, frequency, and communication channels.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors	No	<ul style="list-style-type: none"> <li>Annual General Meeting</li> <li>Quarterly earning calls and presentation</li> <li>Investor conferences</li> <li>Press releases and newsletters</li> <li>Regular disclosures to stock Exchange</li> <li>Updates on website of the Company</li> </ul>	Quarterly and event based	<ul style="list-style-type: none"> <li>Establishing long communication channel with our investor</li> <li>Providing updates in our key strategic decision and also updates our annual performances</li> <li>Taking feedback for improving our services</li> </ul>
Suppliers	No	<ul style="list-style-type: none"> <li>Suppliers / Vendors meet</li> <li>Suppliers' feedback and periodic site visits</li> <li>VENDX portal</li> </ul>	Monthly and need-based	<ul style="list-style-type: none"> <li>Payment terms</li> <li>Growth of suppliers</li> <li>Fair and transparent dealing</li> <li>Loading/ unloading infrastructure</li> <li>Hygiene and sanitation infrastructure</li> <li>Safety system and performance</li> </ul>
Employees	No	<ul style="list-style-type: none"> <li>MD Speaks Town Hall Meeting Shop floor meeting</li> <li>GHCL TEA (Think, Experiment and Adopt)</li> <li>MILAP (Medium for interactive, Lateral, and Actionable Partnership)</li> </ul>	Quarterly and need-based	<ul style="list-style-type: none"> <li>Providing updates on our quarterly financial performance</li> <li>Taking feedback for system improvement</li> <li>Exploring new ideas for business opportunity</li> </ul>



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
		<ul style="list-style-type: none"> <li>• DISHA meeting</li> <li>• Engagement survey</li> <li>• Monthly and quarterly publications and newsletter</li> </ul>		<ul style="list-style-type: none"> <li>• Develop a culture of learning organization</li> <li>• Resolving grievances if any</li> </ul>
Community	No	<ul style="list-style-type: none"> <li>• Community meetings and visits</li> <li>• Participatory rural appraisals including focus group discussion, awareness camps, exposure, and training visits for beneficiaries</li> <li>• Interaction with local bodies</li> </ul>		<ul style="list-style-type: none"> <li>• Livelihood support</li> <li>• Hygiene and sanitation facilities</li> <li>• Healthcare facilities</li> <li>• Education</li> <li>• Local employment</li> <li>• Infrastructure development</li> <li>• Air and water pollution</li> <li>• Resource optimization</li> </ul>
Customers	No	<ul style="list-style-type: none"> <li>• Customer satisfaction surveys</li> <li>• Direct customer Relationship management satisfaction initiatives</li> <li>• Regular customer / distributor notes</li> </ul>	Ongoing	<ul style="list-style-type: none"> <li>• Product quality</li> <li>• Delivery</li> <li>• Customers connect</li> <li>• Credit period and transparent payment terms</li> <li>• Packaging</li> <li>• Health and safety aspects</li> <li>• Innovation</li> </ul>

## 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.

We embrace a collaborative approach that actively engages all stakeholders in value creation. Stakeholder concerns, whether expressed or perceived, are regularly communicated to our executive committee for thorough consideration. Similarly, we provide stakeholders with insights into the company's policies and initiatives, valuing their input. We view these concerns as potential risks and opportunities, guiding us to develop strategies that not only mitigate risks but also capitalize on favorable opportunities. In line with our commitment to Environmental, Social, and Corporate Governance (ESG) principles, we have established a high-level committee to oversee all ESG-related matters.

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, we place great emphasis on stakeholder consultation to identify and address environmental and social challenges. We facilitate discussions with our stakeholders through various channels- meetings, consultation sessions, and digital communication, to understand a broad spectrum of economic, environmental, and societal matters. Continual interaction with internal and external stakeholders bolsters transparency, reactivity, compliance, organizational learning, quality management, accountability, and sustainability.

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

At GHCL, we have made significant progress in identifying and supporting vulnerable and marginalized stakeholders through our Corporate Social Responsibility (CSR) endeavors. These programs aim to uplift communities in areas such as animal husbandry, agriculture, healthcare, and education. We employ various approaches, including desktop research, focused group discussions, and social needs assessments, to identify these stakeholder groups. Engagement with these stakeholders occurs through our primary channels, particularly the communities benefiting from our CSR initiatives.

## PRINCIPLE 5 Businesses should respect and promote human rights

### ESSENTIAL INDICATORS

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees workers covered (B)	% (B/A)	Total (C)	No. employees workers covered (D)	%(D/C)
<b>Employees</b>						
Permanent	478	402	84.10	479	479	100
Other than permanent	19	2	10.53	23	23	100
<b>Total Employees</b>	<b>497</b>	<b>404</b>	<b>81.29</b>	<b>502</b>	<b>502</b>	<b>100</b>
<b>Workers</b>						
Permanent	501	0	0	486	0	0
Other than permanent	2449	0	0	2649	0	0
<b>Total Workers</b>	<b>2950</b>	<b>0</b>	<b>0</b>	<b>3135</b>	<b>0</b>	<b>0</b>

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
<b>Permanent</b>										
Male	450	0	0	450	100	450	0	0	450	100
Female	28	0	0	28	100	29	0	0	29	100
<b>Other than Permanent</b>										
Male	19	11	57.89	8	42.11	23	0	0	23	100
Female	0	0	0	0	0	0	0	0	0	0
<b>Workers</b>										
<b>Permanent</b>										
Male	487	0	0	487	100	474	0	0	474	100
Female	14	0	0	14	100	12	0	0	12	100
<b>Other than Permanent</b>										
Male	2372	2256	95.11	116	4.89	2584	32	1.24	2552	98.76
Female	77	71	92.21	6	7.79	65	4	6.15	61	93.85

### 3. Details of remuneration/salary/wages

#### a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary / wages of respective category (in INR)	Number	Median remuneration/ salary/ wages of respective category (in INR)
Board of Directors (BoD)	9	43,40,000	1	42,70,000
Key Managerial Personnel (including two KMP)	3	7,88,48,377	0	-
Employees other than BoD and KMP	446	9,13,613	28	6,93,306
Workers	487	3,26,672	14	1,93,870

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	3.13	2.87

#### 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)

We've instituted a complaints resolution panel and a POSH team to address any human rights issues that may arise during our operations. Our employees are actively encouraged to report instances of harassment, victimization, intimidation, or bias without fear of retaliation or unfair treatment. Upon receiving a complaint, the committee undertakes a comprehensive investigation and takes necessary actions to resolve the issue to the satisfaction of all parties involved.

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

At GHCL, we are deeply committed to upholding human rights, and to this end, we have implemented a policy to ensure our adherence to this principle. We have established

two essential committees: the POSH (Prevention of Sexual Harassment) Committee and the Grievance Redressal Committee, tasked with addressing potential human rights issues. The POSH Committee is responsible for identifying and preventing instances of sexual harassment in the workplace, operating in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, which applies to all GHCL employees and workers. Additionally, the Grievance Redressal Committee follows our Executive Grievance Redressal Policy and manages issues through the GHCL Employee Management System (GEMS), ensuring that grievances are handled in accordance with established procedures. The committee operates at two levels, allowing for escalation to the next level if the initial response is deemed inadequate, provided with a thorough justification. We are dedicated to addressing and resolving complaints promptly, committing to providing a comprehensive response within a 30-day timeframe.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil	Nil	Nil	Nil	Nil
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil
Child Labour	Nil	Nil	Nil	Nil	Nil	Nil
Forced Labour/ Involuntary Labour	Nil	Nil	Nil	Nil	Nil	Nil
Wages	Nil	Nil	Nil	Nil	Nil	Nil
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil



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

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

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

At GHCL, we strongly believe in providing equal opportunities to all individuals and firmly oppose any form of discrimination or harassment based on characteristics such as race, gender, nationality, ethnicity, origin, religion, age, disability, or sexual orientation. To uphold this principle, we have implemented various policies concerning non-discrimination, prevention of sexual harassment (POSH), whistleblowing, and grievance redressal. These policies demonstrate our commitment to our employees and ensure compliance with relevant regulations. Our GHCL Employee Management System (GEMS) provides a platform for employees to raise concerns at any time. Additionally, we regularly conduct workshops,

group meetings, online modules, and awareness campaigns to educate our teams on preventing sexual harassment in the workplace.

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

Yes. Our organization strictly enforces a policy requiring all external party contracts to meet human rights standards and address related issues. To ensure these standards are being met, we've put into place internal controls and surveillance procedures. Regular reviews of these contracts are conducted to confirm adherence to our regulations. We are also in the process of creating an oversight mechanism to guarantee our business partners' compliance with these human rights norms.

**10. Assessments for the year:**

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

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

Not applicable

**LEADERSHIP INDICATORS**



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

We have made enhancements to our grievance redressal process by forming three new committees: the grievances redressal committee, the safety committee, and the VISAKA committee. Additionally, we ensure compliance with human rights policies by routinely engaging with our value chain partners through programs like educational seminars and policy evaluations. Specific strategies have also been developed to handle any possible breaches of our human rights guidelines.

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

At GHCL, upholding human rights and complying with our human rights policy is paramount. This policy is deeply ingrained in our Company's Code of Conduct. Moving ahead, we plan to conduct due diligence on human rights aspects pertaining to both our operations and our partners.

**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?**

GHCL is committed to cultivating a diverse and inclusive workplace, embracing individuals from various cultural and social backgrounds. We endeavor to create a working environment that values and celebrates the diversity within our team. Through the provision of ramps and appropriate infrastructure, including elevators, we have ensured ease of access for differently abled individuals across most of our locations. By making our Ahmedabad office more accessible, we are fostering and making our workplace more diverse for people with disabilities.

**4. Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	6.45
Discrimination at workplace	6.45
Child Labour	6.45
Forced Labour/Involuntary Labour	6.45
Wages	6.45
Others- please specify	6.45

**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



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

**ESSENTIAL INDICATORS**



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

Parameter	FY 2023-24	FY 2022-23
From renewable sources		
Total electricity consumption (A) (GJ)	-	-
Total fuel consumption (B) (GJ)	53,16,229	-
Energy consumption through other sources (C) (GJ)	-	-
Total energy consumed from renewable sources (A+B+C)	53,16,229	-
From non-renewable sources		
Total electricity consumption (D) (GJ)	23,976	18,472
Total fuel consumption (E) (GJ)	1,14,24,080	1,19,10,782
Energy consumption through other sources (F) (GJ)	-	-
Total energy consumed from non-renewable sources (D+E+F) (GJ)	1,14,48,056	1,19,29,254
Total energy consumed (A+B+C+D+E+F) (GJ)	1,67,64,285	1,19,29,254
Energy intensity per rupee of turnover	0.00004792534	0.0000260237
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	0.00001370389	0.00000755434
Energy intensity in terms of physical output (GJ/MT)	14.11	9.58
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Limited assurance has been carried out by sustainability Actions Private Limited.

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

Not applicable

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

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	20,68,797	21,42,498
(ii) Groundwater	24,807	26,801
(iii) Third party water	4,314	4,624
(iv) Seawater / desalinated water	10,92,11,400	10,89,04,268
(v) Others (Rainwater harvesting)	-	-
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	11,13,09,318	11,10,78,191
Total volume of water consumption (in kilolitres)	62,97,957*	21,73,923
Water intensity per rupee of turnover (L/Rs)	0.00001800	0.00000470689
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	0.00000514824	0.0000013663
Water intensity in terms of physical output	5.3	1.73
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

Note: Limited assurance has been carried out by sustainability Actions Private Limited.

\*We have changed the methodology to calculate water consumption to align with BRSR requirements.

### 4. Provided the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) To Seawater	-	-
- No treatment	10,50,11,361	10,89,04,268
- With treatment – please specify level of treatment	-	-
(iv) Sent to third parties	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	<b>10,50,11,361</b>	<b>10,89,04,268</b>

Note: Limited assurance has been carried out by sustainability Actions Private Limited.

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

Currently, none of our facilities are a Zero Liquid Discharge site. However, we have implemented wastewater purification systems across all our manufacturing sites to maintain the quality of discharged wastewater within the permissible limits set by CPCB or the SPCBs.

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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx	kg	2985.98	1492.99
SOx	kg	8605.44	6946.56
Particulate Matter (PM)	kg	1492.99	1389.31
Persistent organic pollutants (POP)	Not applicable	Not applicable	Not applicable
Volatile organic compounds (VOC)	Not applicable	Not applicable	Not applicable

Parameter	Please specify unit	FY 2023-24	FY 2022-23
Hazardous air pollutants (HAP)	Not applicable	Not applicable	Not applicable
Others- please specify	Not applicable	Not applicable	Not applicable

Note: Limited assurance has been carried out by Sustainability Actions Private Limited.

\*The deviation in values from previous year is due to the type of fuel mix used in the boiler. However, the values are within the permissible limit set by Pollution Control Board (PCB).

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 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	11,77,019	12,39,585
Total Scope 2 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	4,832	4,053
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover		0.000003378	0.00000271299
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)		0.000000966099	0.0000007875485
Total Scope 1 and Scope 2 emission intensity in terms of physical output		1.08	1.00
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

Note: Limited assurance has been carried out by Sustainability Actions Private Limited.

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

We are dedicated to reducing our carbon footprint through various initiatives, including the implementation of advanced technology, energy-efficient upgrades, and renewable energy adoption like wind and solar power. Despite our energy-intensive manufacturing processes, we continuously monitor and manage emissions to minimize environmental impact. Please find below some of the initiatives taken by us during the reporting year:

- To reduce energy consumption, our soda ash facility installed eight Variable Frequency Drives (VFDs) in centrifugal pumps, allowing adjustable fan speeds to meet operational needs. This innovation curbed unnecessary power use, minimized power surges, and significantly reduced specific power consumption, demonstrating the effectiveness of VFDs in enhancing operational efficiency and sustainability.
- The Dense Ash Plant implemented strategies to reduce steam consumption by optimizing steam trap use and enhancing process control. Through rigorous inspections, preventive maintenance, and measures like steam pipe insulation, steam demand was reduced. This resulted in decreased energy costs, prolonged equipment life, and a smaller environmental footprint, highlighting the potential for energy savings and operational efficiency.
- GHCL launched a 150 TPD energy-efficient Rotating Biological Contactor (RBC) plant with cutting-edge technology for wastewater treatment and energy savings. This reflects our dedication to sustainability and environmental responsibility. The plant's innovative features allow us to recover valuable resources from wastewater, supporting our circular economy initiatives and promoting sustainable growth.

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

Parameter	FY 2023-24	FY 2022-23
Total Waste generated (in metric tonnes)		
Plastic waste (A)	192.68	125.00
E-waste (B)	2.57	4.99
Bio-medical waste (C)	0.06	0.07
Construction and demolition waste (D)		-
Battery waste (E)	2.90	3.18



Parameter	FY 2023-24	FY 2022-23
Radioactive waste (F)	-	-
Other Hazardous waste. Please specify, if any. (G)	18.65	1.99
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	2,23,992.39	1,42,020
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>2,24,209.25</b>	<b>1,42,155.23</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0000006410	0.0000003
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.0000001833	0.000000900214
Waste intensity in terms of physical output	0.19	0.13
Waste intensity (optional) – the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	3369.62	2,228
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
<b>Total</b>	<b>3369.62</b>	<b>2228</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	-
<b>Total</b>	<b>-</b>	<b>-</b>

Note: Limited assurance has been carried out by Sustainability Actions Private Limited.

\*Waste produced by GHCL is accumulated and sent to the recycler. Therefore, there is a deviation in values as compared from the previous reporting year.

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

As a sector utilizing diverse resources, we strive to incorporate material efficiency measures into our operational processes to maximize the utilization of raw materials while minimizing waste generation. This includes reuse of input materials in our production process. This approach has led to effective utilization of by-products and an increase in our material efficiency rate. Both hazardous and non-hazardous waste generated by our operations are disposed of efficiently to mitigate environmental impacts.

Our organization is deeply committed to enhancing process efficiency and product stewardship. We place a high value on minimizing waste and augmenting waste utilization, viewing these actions as integral to our mission and drive.

1. Plastic waste- We are continuously working with M/s Shakti Plastics Industries to collect and dispose off plastic waste as part of our Plastic Waste Management (PWM) Program that has been implemented in several states. This year we have recycled 3369.62 MT of plastic packaging waste.
2. E-waste- We adopt the practice of collecting and sorting garbage on-site, which is then transported and sold to certified, authorized recycling facilities.
3. Other waste- We reuse fly ash waste from boilers to manufacture bricks and paver blocks.

**11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:**

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.
1	CRZ clearance obtained for Soda Ash division	Soda Ash Manufacturing	Yes



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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public Domain (Yes / No)	Relevant Web link
Nil					

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

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
Nil				

## LEADERSHIP INDICATORS



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

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

- Name of the area: All the plants of GHCL are located in water stress areas
- Nature of operations Soda Ash production
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	20,68,797	21,42,498
(ii) Groundwater	24,807	26,801
(iii) Third party water	4,314	4,624
(iv) Seawater / desalinated water	10,92,11,400	10,89,04,268
(v) Others	-	-
<i>Total volume of water withdrawal (In kilolitres)</i>	11,13,09,318	11,10,78,191
Total volume of water consumption (In kilolitres)	62,97,957*	21,73,923
Water intensity per rupee of turnover (Water consumed / turnover)	0.00001800	0.00000470689
Water intensity (optional) – the relevant metric may be selected by the entity	-	-
Water discharge by destination and level of treatment (in kilolitres)	-	-
(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) Into Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) Into Seawater	-	-
- No treatment	10,50,11,361	10,89,04,268
- With treatment – please specify level of treatment	-	-
(iv) Sent to third parties	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
Total water discharged (in kilolitres)	10,50,11,361	10,89,04,268

Note: Limited assurance has been carried out by Sustainability Actions Private Limited.



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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up of the GHG into CO <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	8,31,837	8,25,669
Total Scope 3 emissions per rupee of turnover		0.0000023780	0.0000018
Total Scope 3 emission intensity (optional) - the relevant metric may be selected by the entity			

Note: Limited assurance has been carried out by Sustainability Actions Private Limited.

**3. 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.**

Our soda ash plant is in Coastal Regulation Zone (CRZ), owing to the raw material requirements of the manufacturing process. We strive to implement initiatives to reduce the negative impacts of our manufacturing process. One such initiative is development of agriculture lands on the areas from where we no longer conducting mining process to obtain limestone.

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

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of initiative (Savings in Rs. Million)
1	Adoption of VFDs in centrifugal pumps	To reduce energy consumption, our soda ash facility installed eight Variable Frequency Drives (VFDs) in centrifugal pumps, allowing adjustable fan speeds to meet operational needs. This innovation curbed unnecessary power use, minimized power surges, and significantly reduced specific power consumption, demonstrating the effectiveness of VFDs in enhancing operational efficiency and sustainability.	11.6
2	Adoption of steam traps and control process	The Dense Ash Plant implemented strategies to reduce steam consumption by optimizing steam trap use and enhancing process control. Through rigorous inspections, preventive maintenance, and measures like steam pipe insulation, steam demand was reduced. This resulted in decreased energy costs, prolonged equipment life, and a smaller environmental footprint, highlighting the potential for energy savings and operational efficiency.	
3	RBC plant innovation	GHCL launched a 150 TPD energy-efficient Rotating Biological Contactor (RBC) plant with cutting-edge technology for wastewater treatment and energy savings. This reflects our dedication to sustainability and environmental responsibility. The plant's innovative features allow us to recover valuable resources from wastewater, supporting our circular economy initiatives and promoting sustainable growth.	

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

We have a comprehensive business continuity and disaster management plan in place, which includes regular training and drills at our manufacturing plants and corporate offices to address potential disruptions or emergencies. This plan covers services like rescue, firefighting, and first aid, ensuring consumer access to essential supplies. It prioritizes safeguarding corporate data, operational integrity, infrastructure security, and personnel safety. The strategy also aims to contain incidents, minimize casualties, and facilitate rapid relief and recovery operations. A detailed Business Impact Analysis (BIA) has been conducted, identifying core business functions and critical sites, with IT resilience playing a crucial role in our contingency plan.

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

The entity's value chain does not pose any significant adverse environmental impacts. We are mindful of environmental considerations throughout our value chain. All suppliers and vendors partnering with GHCL are required to commit to and comply with a supplier code of conduct. This code encompasses not only quality standards but also environmental, health, and safety guidelines that suppliers must adhere to.

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

6.45%



**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.**

6

**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	Alkali Manufacturers Association of India	National
2	Indian Chemical Council	National
3	The All-India Glass Manufacturer's Federation	National
4	Confederation of Indian Industry (CII)	National
5	PHD Chambers	National
6	Federation of Indian Chambers of Commerce and Industry (FICCI)	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
Not applicable		

**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
Not applicable					

## 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
Not applicable					

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

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)
Not applicable						

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

At GHCL, we consistently communicate with the communities in which it operates, leveraging a range of methods such as face-to-face meetings, written communication, and email. These mechanisms are used to update community members on the resolution of any grievances or complaints.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	46	14
Sourced directly from within India	21	13

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

Location	FY 2023-24	FY 2022-23
Rural	-	-
Semi-urban	57.5	54.3
Urban	-	-
Metropolitan	42.5	45.6

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

## LEADERSHIP INDICATORS

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

Details of negative social impact identified	Corrective action taken
Not applicable	

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)
Not applicable			

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

No, we do not have a preferential procurement policy.

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

Not applicable

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

Not applicable

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.

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/ No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not applicable				

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

Name of authority	Brief of the Case	Brief of the Case
Not applicable		

6. Details of beneficiaries of CSR Projects

S. No.	CSR Project	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalised groups
1.	Agrobased livelihood	19,264	70
2.	Animal husbandry	20,064	60
3.	Health	83,537	75
4.	Education	7,545	85
5.	Skill Development (NSDC)	1,933	85
6.	Water Resource Development	127	70
7.	Women Empowerment	2,759	80



## 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.

We have put in place a system to address customer complaints promptly and effectively, managed by a devoted team. To ensure seamless user experience, a thorough procedure to resolve complaints has been formulated. If customers express issues with wet bags, logistics, or the quality of materials upon delivery, these are meticulously evaluated by our marketing, logistics, and quality departments. In coordination with this, a fresh sales document is produced to monitor the complaint's progress.

Complaints are grouped into two key categories:

- ZRCL - Related to logistics
- ZRCQ - Pertaining to quality

After categorizing the issue, the following procedures are carried out:

- The Marketing department identifies the nature of the complaint, formulates a return sales order, and includes all relevant details of the complaint.

- The compiled specific of the complaint is sent via a customer complaint form to the logistics/quality team for their approval.
- Arriving at a stage of a new transaction approval, the logistics/quality team includes details on corrective and preventive actions (CAPA) along with a root cause analysis (RCA).
- As a final step, the marketing department handles the return process, issuing a refundable credit note to the customer.

Our various departmental teams maintain a harmonious relationship with management, consistently updating them about processes, policies, and customer complaints, paving the way for improvements and a substantial decrease in grievances. Every customer complaint received is carefully recorded in our SAP system for future reference.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	100
Safe and responsible usage	100
Recycling and/or safe disposal	0

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

	FY 2023-24			FY 2022-23		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	Nil	0	0	Nil
Advertising	0	0	Nil	0	0	Nil
Cyber-security	0	0	Nil	0	0	Nil
Delivery of essential services	0	0	Nil	0	0	Nil
Restrictive Trade practices	0	0	Nil	29	0	Nil
Unfair Trade Practices	0	0	Nil	0	0	Nil
Others	0	0	Nil	0	0	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

**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, we recognize data privacy as a vital component in safeguarding customer information. Our technical infrastructure and physical asset management are designed to preserve the integrity of customer data. We understand that the loss, misuse, or disclosure of sensitive information to external parties, including competitors or business partners, could adversely affect our operations and potentially lead to legal issues, both financial and otherwise. Our IT Security policy, which is accessible to all our internal stakeholders, provides clear guidance on our approach concerning data privacy.

**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.**

Not applicable

**7. Provide the following information relating to data breaches:**

- a. Number of instances of data breaches along-with impact

None

- b. Percentage of data breaches involving personally identifiable information of customers  
None
- c. Impact, if any, of the data breaches-  
None

## LEADERSHIP INDICATORS



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

We maintain high ethical and environmental standards in our manufacturing practices while providing customers with all essential information. Detailed information concerning our products and services can be found on our corporate website. Furthermore, we use various other channels to disseminate information about our goods, including:

- a. **Face to face communication** - Through dealer and customer meets, one-on-one discussions with customers or distributors, participation in various events and exhibitions, and contributions to national and international forums.
- b. **Broadcast & Media Communications** - Through press releases and interviews with senior officials published in print and electronic media.
- c. **Electronic communications** - Via our website, e-brochures, product films, and social media platforms.
- d. **Internal Communications** - Through internal newsletters, email broadcasts, PowerPoint presentations, addresses from the Managing Director, town hall meetings, and intranet access.

We maintain constant communication with relevant stakeholders, keeping them informed about any potential risks to production or service disruptions. We continually forecast any future obstacles and duly inform our client base through email, phone calls, or both, as per their preference. We diligently record all complaints received, and work towards promptly addressing and resolving these issues.

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

We place great importance on customer safety and takes measures to ensure consumers are well-informed about safe and responsible usage of our products. We're actively involved in spreading awareness and educating customers about responsible product and service use. We ensure

product labelling includes complete instructions for safe and responsible handling. For added convenience, we publish materials safety data sheets on our website [www.ghcl.co.in](http://www.ghcl.co.in) and provide them upon request. Furthermore, we develop chemicals in compliance with the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulations, emphasizing environmental stewardship and societal safety.

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

In any unexpected event or potential disruption to our production or services, we commit to promptly and properly informing all relevant stakeholders. We retain regular communication with necessary parties to apprise them of any risk to our operations. We constantly evaluate any possible future disruptions and relay this information to our customers through their chosen communication method, be it via email or a phone call. We also proactively document any complaints we receive and prioritize their timely resolution.

### 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, we go the extra mile by exceeding local legal obligations, choosing to include supplementary information on the products. This highlights our dedication to transparency and supplying customers with thorough details. To support this, we have made key documents such as safety data sheets available on the company's website, offering significant information about our products. Also, we've structured a satisfaction survey mechanism to gather customer feedback on our product quality and other services. Furthermore, complaints are registered with our sales and quality teams to ensure all grievances are addressed, thereby enhancing the efficiency of our products. In addition, we cater to customer requirements by providing standard information as needed.



## Sustainability Actions

To,  
The Management Committee  
GHCL Limited  
GHCL House, B-38  
Institutional Area, Sector-1  
Noida – 201301 (INDIA)

### Independent Assurance Statement

#### Scope and Approach

Sustainability Actions Private Limited (“SAPL”) has been engaged by management of GHCL Limited (“GHCL” or “the Company”, to perform an independent limited assurance engagement of the Company’s Business Responsibility and Sustainability Report (BRSR) Core Matrices for the FY23-24.

#### Reporting Criteria

The Report is prepared based on BRSR Core Framework (Annexure I of the SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR2023/122 dated July12, 2023 and “Guidance Note for Business Responsibility and Sustainability Reporting Format” by Securities and Exchange Board of India (SEBI)

#### Management Responsibilities

The Company's Management is responsible for identification of key aspects,, content and presentation of the Business Responsibility and Sustainability Report in accordance with the Criteria mentioned above. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation of the Business Responsibility and Sustainability Report and measurement of BRSR Core Matrices which are free from material misstatement, whether due to fraud or error.

#### Independence and Quality Control

We are independent from the entity in accordance with the requirements of independence and quality assurance set out in BRSR provisions and professional pronouncements and have fulfilled our additional professional obligations in accordance with these requirements.

Our assurance engagements are based on the assumption that the data and information provided by GHCL to us as part of our review have been provided in good faith and free from material misstatements. We were not involved in the preparation of any statements or data included in the Report except for Assurance Statement.

Our firm applies International Standard on Quality Management and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



## Our Responsibility

Our responsibility is to express a limited assurance conclusion on the Identified Sustainability Indicators, based on the procedures we have performed and the evidence we have obtained. We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ('ISAE 3000'), and the terms of reference for this engagement as agreed with GHCL. Those standards require that we plan and perform our engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

## Basis of our Opinion

We planned and performed our work to obtain the evidence we considered necessary to provide a basis for our assurance opinion and the process did not involve engagement with external stakeholders. We carried out one-to-one discussions, onsite and remote assessments.

As part of our assurance process, a multi-disciplinary team of sustainability and assurance specialists reviewed the disclosures presented within the Report and referenced information, and sampled the disclosures and were reviewed through the GHCL's customised sustainability information management system.

We undertook the following activities:

- Obtained an understanding of the BRSR core matrices ;
- Interviewed selected senior managers responsible for management of sustainability topics and reviewed selected evidences to support issues disclosed in the Report. We were free to choose interviewees and interviewed those with overall responsibility to deliver GHCL's sustainability objectives;
- Reviewed processes and systems for aggregating site level sustainability information, that is, reviewed sustainability disclosures for selected sites as well as the overall data aggregated and consolidated at the Corporate level from the Company's sustainability management system;
- Review of the processes for gathering and consolidating the selected performance data related to identified material topics and, for a sample, checking the data consolidation in context under the Principle of Completeness.

Based on the above understanding and the risks that the matrices may be materially misstated, determined the nature, timing and the extent of further procedures, reviewed records and performed testing including recalculation of sample data to establish an audit trail.

## Opinion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the company's identified sustainability criteria as per BRSR core framework for the year ended 31<sup>st</sup> March 2024 are not prepared, in all material respects, in accordance with the Reporting Criteria.

## Inherent Limitations

We have relied on the information, documents, records, data, and explanations provided to us by the Company for the purpose of our review. The assurance scope excludes:

- Any disclosure other than those mentioned in the scope section above
- Data and information outside the defined reporting period
- Data related to Company's financial performance, strategy and other related linkages expressed in the Report.
- The reported financial data are based on audited financial statements issued by the Company's statutory auditors which is subject to a separate audit process. We were not involved in the review of financial data from the Annual Report.
- The Company's statements that describe expression of opinion, belief, aspiration, expectation, forward looking statements provided by the Company and assertions related to Intellectual Property Rights and other competitive issues.
- Mapping of the Report with reporting frameworks other than those mentioned in Reporting Criteria above.
- While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls.
- The procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

**For and behalf of Sustainability Actions Pvt. Ltd.**

(CIN – U74999HR2021PTC093811)

  
**Sustainability Actions (P) Ltd.**  
**Authorised Signatory**

**Saket Sinha**

**(Director)**

**Dt:- 2<sup>nd</sup> May'24**

**Gurgaon, India**