

File No: 1010/02

June 4, 2026

BSE Limited
P J Tower, Dalal Street,
Fort Mumbai-400001
Scrip Code: 542216

National Stock Exchange of India Limited
“Exchange Plaza”, C-1, Block G
Bandra – Kurla Complex, Bandra (E),
Mumbai – 400 051
Symbol: DALBHARAT

Sub: Business Responsibility and Sustainability Report for FY 2025-26

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Business Responsibility and Sustainability Report (BRSR) for Financial Year 2025-26, along with Independent Assurance Statement on BRSR as well as BRSR Core provided by TUV India Private Limited, which also forms part of the Integrated Annual Report for FY 2025-26.

The BRSR is also available on the website of the Company at www.dalmiabharat.com.

Kindly take the same on record.

Thanking you,

Yours sincerely,
For Dalmia Bharat Limited

Rajeev Kumar
Company Secretary

Encl.: As above



BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the listed entity	L14200TN2013PLC112346
2.	Name of the listed entity	Dalmia Bharat Limited
3.	Year of incorporation	2013
4.	Registered office address	Dalmiapuram, Dist. Tiruchirapalli, Tamil Nadu - 621651
5.	Corporate address	11 th & 12 th Floors, Hansalaya Building, 15, Barakhamba Road, New Delhi - 110 001
6.	Email	corp.sec@dalmiabharat.com
7.	Telephone	011-23465100
8.	Website	www.dalmiabharat.com
9.	Financial year for which reporting is being done	April 01, 2025-March 31, 2026
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11.	Paid-up capital	Rs. 37,51,31,906
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Rajeev Kumar 011-23465100 corp.sec@dalmiabharat.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	Consolidated basis
14.	Name of assurance provider	TUV India Private Limited
15.	Type of assurance obtained	Reasonable Assurance

II. Products/services

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

S. no.	Description of main activity	Description of business activity	% of turnover of the entity
1	Manufacturing	Cement and clinker	98%

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	OPC and blended cements	2523	98%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	15	34	49
International	0	0	0

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

Locations	Number
National (No. of states)	23
International (No. of countries)	0

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

The contribution of exports to the total turnover of the entity is less than 0.1%.

c. A brief on types of customers

The Company's customers include institutional and commercial customers, individual home builders, and government bodies undertaking infrastructure projects.

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

Sr. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1	Permanent (D)	4,435	4,247	96%	188	4%
2	Other than Permanent (E) (interns, trainees, part time employees, etc.)	206	189	92%	17	8%
3	Total employees (D + E)	4,641	4,436	96%	205	4%
Workers						
4	Permanent (F)	1,406	1,304	93%	102	7%
5	Other than permanent (G) (contract)	15,285	14,598	96%	687	5%
6	Total workers (F + G)	16,691	15,902	95.28%	789	5%

b. Differently abled employees and workers:

Sr. no	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled employees						
1.	Permanent (D)	4,435	4	0.09%	1	0.02%
2.	Other than permanent (E)	206	0	0%	0	0%
3.	Total differently abled employees (D + E)	4,641	4	0.09%	1	0.02%
Differently abled workers						
4.	Permanent (F)	1,406	4	0.28%	0	0%
5.	Other than permanent (G)	15,285	0	0%	0	0%
6.	Total differently abled workers (F + G)	16,691	4	0.02%	0	0%

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	8	1	12.5%
Key Management Personnel	2	0	0.00

Note: Managing Director(s) of the Company have been included under the Board category and not under KMP to avoid duplication in the count. Accordingly, only CFO and Company Secretary have been considered as KMP.



22. Turnover rate for permanent employees and workers

	FY 2025-26 (Turnover rate in current FY)			FY 2024-25 (Turnover rate in previous FY)			FY 2023-24 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	16.5%	0.6%	17.1%	17.6%	0.5%	18.2%	18.1%	0.6%	18.6%
Permanent workers	5.8%	0.1%	5.9%	4.7%	0.2%	4.9%	4.5%	0.1%	4.7%

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

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

Sr. 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	Dalmia Cement (Bharat) Limited	Subsidiary	100.00%	Yes
2	Dalmia Power Limited	Subsidiary	100.00%	Yes
3	Dalmia Cement (Northeast) Limited	Subsidiary	95.28%	Yes
4	Alsthom Industries Limited	Subsidiary	100.00%	Yes
5	DPVL Ventures LLP (formerly known as TVS Shriram Growth Fund 1B LLP)	Subsidiary	100.00%	Yes
6	Vinay Cement Limited	Subsidiary	97.21%	Yes
7	RCL Cements Limited	Subsidiary	100.00%	No
8	SCL Cements Limited	Subsidiary	100.00%	No
9	Bangaru Kamakshi Amman Agro Farms Private Limited	Subsidiary	100.00%	No
10	Chandrasekara Agro Farms Private Limited	Subsidiary	100.00%	No
11	Cosmos Cements Limited	Subsidiary	100.00%	No
12	D.I. Properties Limited	Subsidiary	100.00%	No
13	Dalmia Minerals & Properties Limited	Subsidiary	100.00%	No
14	Geetee Estates Limited	Subsidiary	100.00%	No
15	Golden Hills Resort Private Limited	Subsidiary	100.00%	No
16	Hemshila Properties Limited	Subsidiary	100.00%	No
17	Ishita Properties Limited	Subsidiary	100.00%	No
18	Jayevijay Agro Farms Private Limited	Subsidiary	100.00%	No
19	Rajputana Properties Private Limited	Subsidiary	100.00%	No
20	Shri Rangam Properties Limited	Subsidiary	100.00%	No
21	Sri Madhusudana Mines & Properties Limited	Subsidiary	100.00%	No
22	Sri Shanamugha Mines & Minerals Limited	Subsidiary	100.00%	No
23	Sri Subramanya Mines & Minerals Limited	Subsidiary	100.00%	No
24	Sri Swaminatha Mines & Minerals Limited	Subsidiary	100.00%	No

Sr. 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)
25	Sri Trivikrama Mines & Properties Limited	Subsidiary	100.00%	No
26	Sutnga Mines Private Limited	Subsidiary	100.00%	No
27	Hopco Industries Limited	Subsidiary	100.00%	No
28	Ascension Mercantile Private Limited	Subsidiary	100.00%	No
29	Ascension Multiventures Private Limited	Subsidiary	100.00%	No
30	Dalmia Bharat Green Vision Limited	Subsidiary	100.00%	Yes
31	Radhikapur (West) Coal Mining Private Limited	Joint Venture	14.70%	No
32	Khappa Coal Company Private Limited	Joint Venture	36.73%	No

Note

The Group holds more than 20% stake in the companies listed below. However, the Group does not exercise significant influence or control over the decisions of these investee companies.

Accordingly, these entities are not being construed as associate companies. These investments are included under 'Note 6(i) and 9(i) Current and Non-current Investments' as investments measured at fair value through profit and loss in the financial statements.

1. Solarcraft Power India 23 Private Limited
2. O2 Renewable Energy V Private Limited (cease to be an associate company during the year)
3. Bijlee Kandasamy Private Limited
4. Kilavikulam Rajalakshmi Solar Power Developer Private Limited
5. Apple India Solar Products Private Limited
6. TrueRe Surya Private Limited
7. Gee Yess India Engineering Technology Private Limited
8. San Power Generation Transmission Private Limited
9. Arunachalam Solar Power Private Limited

CSR Details

24. i. Whether CSR is applicable as per section 135 of Companies Act, 2013: **(Yes/No):** Yes
- ii. Turnover (in Rs.): 14,804
- iii. Net worth (in Rs.): 16,973

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 2025-26 (Current financial year)			FY 2024-25 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks	Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks
Communities	The grievance redressal policy, which forms part of the Whistle Blower Policy, is available at: https://www.dalmiacement.com/assets/pdf/ir/DBL-Whistleblower-Policy-Vigil-Mechanism.pdf Along with this, there are mechanisms to receive complaints through gate registers, complaint box and meetings.	80	4	NA	9	2	NA
Investors (other than shareholders)	Dalmia Bharat has a dedicated Investor Relations team to address queries from investors. For any grievances, investors may write to the Company at: Investorrelations@dalmiabharat.com	0	0	NA	0	0	NA
Shareholders	Yes. Grievances are received directly by the Company and through Company's RTA. Additionally, grievances can also be lodged using SEBI and Exchange managed portals i.e. SCORES and Smart ODR. All grievances are resolved within stipulated regulatory timelines.	25	26	The complaints resolved were 26, including one pending at the end of FY 2025-26	19	1	The pending complaint was received on March 26, 2025 and was resolved on April 04, 2025.

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 2025-26 (Current financial year)			FY 2024-25 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks	Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks
Employees and workers	The grievance redressal policy, which forms part of the Company's Whistle Blower Policy, is available at: https://www.dalmiacement.com/assets/pdf/ir/DBL-Whistleblower-Policy-Vigil-Mechanism.pdf Suppliers can also reach the Company, for an grievances at grievance@dalmiabharat.com	123	6	NA	13	0	NA
Customers		1,395	89	NA	1,366	73	NA
Value chain partners		12	1	NA	61	08	NA
Other (please specify)		8	0	NA	0	0	NA

*The complaints from last year have gone up as company is strengthening the process of its Grievance Redressal Mechanism across all Plants and Offices, and for all stakeholders.

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	Risk/ 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	GHG and climate change	Opportunity	The Carbon Credit Trading Scheme (CCTS), introduced by the Ministry of Power and the Ministry of Environment, Forest and Climate Change, Government of India, presents a strategic opportunity. As one of the cement manufacturers with a relatively low carbon footprint, the Company is well positioned to generate carbon credits and benefit from the transition towards a low-carbon economy.	–	Positive



S. no.	Material issue identified	Risk/ 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
2	Energy management	Opportunity	The Company's manufacturing facilities are certified under the ISO 50001 Energy Management System (EnMS), supporting efficient energy use and achievement of energy performance targets. This strengthens process efficiency, optimises costs, and contributes to emissions reduction.	–	Positive
3	Waste management	Opportunity	Waste management and circularity remain integral to the Company's operations. By increasing the use of alternative raw materials of waste origin and sustainable biomass fuels in place of conventional inputs, the Company creates value across its operations and the broader value chain.	–	Positive
4	Occupational health & safety	Risk	Workplace incidents may expose the Company to legal proceedings, regulatory penalties, and compensation liabilities. Such incidents may also adversely affect employee wellbeing and create operational disruptions through an unsafe work environment.	The Company has a dedicated Group Safety Head and plant-level safety teams responsible for driving health and safety best practices. It also follows ISO 45001-certified safety management systems based on the PDCA (Plan-Do-Check-Act) framework to proactively manage and mitigate operational safety risks.	Negative
5	Water stewardship	Opportunity	Through its water stewardship initiatives, the Company has developed water harvesting capacity across its plants and neighbouring communities, while also undertaking awareness programmes to encourage responsible water use. Enhanced water-use efficiency supports resource conservation and operational cost optimisation.	–	Positive

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.

Sr. no.	Disclosure questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	c. Web link of the policies, if available	https://www.dalmiacement.com/investor/dalmia-bharat-limited/								
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.	Standards and frameworks followed by the Company, wherever relevant and applicable, include GRIHA, IGBC GreenPro, ISO 9001, ISO 14001, ISO 45001, ISO 50001 Energy Management System, Global Cement and Concrete Association (GCCA), Global Reporting Initiative Standards (GRI Standards), Science Based Targets initiative (SBTi), Sustainability Accounting Standards Board (SASB) Standards, Perform, Achieve and Trade (PAT), and BIS standards for construction materials. In addition, the Company follows ISO 26000 standards and undertakes evaluations of its CSR processes in alignment with the same.								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Please refer to the relevant sections of the Integrated Report.								
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Please refer to the relevant sections of the Integrated Report.								
Governance, leadership and oversight										
7	Statement by the director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) Please refer to the Leadership Message in the Integrated Report									
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	The Board of Directors of the Company is the highest authority responsible for the implementation and oversight of Business Responsibility and Sustainability matters.								
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.	Yes, the Sustainability and Risk Management Committee is responsible for decision-making relating to sustainability matters. Environmental KPIs, including reduction in water consumption across operations, increased utilisation of alternative fuels and raw materials, and mitigation of climate change impacts, form part of the Key Result Areas (KRAs) of senior management. The Committee reviews performance against these KRAs on a 6 monthly basis, while the Board of Directors undertakes an annual review.								



10 Details of Review of NGRBCs by the Company:

Subject for review	Indicate whether the 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	Board Committees									Annually								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Board Committees									Quarterly								

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

Yes, TUV was engaged by Dalmia Bharat Limited ('the Company') to provide independent assurance on its Integrated Report for FY 2025–26, covering the Company's overall non-financial performance for the period from April 01, 2025 to March 31, 2026. The assurance was conducted as a reasonable assurance engagement on a sample basis in accordance with the ISAE 3000 (Revised) standards.

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

Not Applicable

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 categorised 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	Percentage of persons in respective category covered by the awareness programmes
Board of Directors	8	All	100%
Key Managerial Personnel	2		100%
Employees other than BoD and KMPs	83		100%
Workers	35		100%

Note: The Managing Director of the Company is included in the Board, and not in KMP, to avoid duplication of the count.

2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by Directors/KMP) 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 Rs.)	Brief of the case	Has an appeal been preferred (Yes/No)
Penalty/fine	NIL	NIL	NIL	NIL	NIL
Settlement	NIL	NIL	NIL	NIL	NIL
Compounding fee	NIL	NIL	NIL	NIL	NIL

Non-Monetary				
	NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred (Yes/No)
Imprisonment	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL

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

Case details	Name of the regulatory/enforcement agencies/judicial institutions
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.

Yes. The Company has an Anti-Bribery and Corruption Policy, duly approved by the Board. The Policy is available at [Anti-Bribery-Corruption-Policy.pdf](#)

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

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Directors	NIL	NIL
KMP	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

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

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NIL
Number of complaints received in relation to issues of Conflict of Interest of the KMP	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 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Number of days of accounts payables	60	48

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 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Concentration of purchases	a. Purchases from trading houses as % of total purchases	11%	9%*
	b. Number of trading houses where purchases are made from	1,605	1,642*
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	40%	50%
Concentration of sales	a. Sales to dealers/distributors as % of total sales	66%	68%*
	b. Number of dealers/distributors to whom sales are made	12,650	13,631*
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	4%	4%
Shares of RPTs in	a. Purchases (Purchases with related parties/Total purchases)	0.2%	0.1%
	b. Sales (Sales to related parties/Total sales)	0.1%	0.1%
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	0%	1%
	d. Investments (Investments in related parties/Total Investments made)	10%	10%

*The figures from last FY have been revised, based on review of the methodology of the KPIs.

Leadership Indicators

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, the Company has established a Code of Conduct for the Board and Senior Management in accordance with Regulation 17(5)(a) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as well as for the employees of the Company and its subsidiaries. Further details are provided in the Corporate Governance section of the report.

Board Members abstain from discussions and voting on matters in which they have, or are deemed to have, a financial or other interest. All Board Members and Senior Management give affirmation on the compliance of "Code of Conduct" on an annual basis.

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 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)	Details of improvements in environmental and social impacts
R&D	100%	100%	R&D-led advancements in cement manufacturing processes, innovative measures to extend the life of limestone reserves, reduction of carbon emissions, increased use of renewable energy and recycled waste, and creation of greater social value through its products.
Capex	6%	6%	

2. **a. Does the entity have procedures in place for sustainable sourcing (Yes/No)**
Yes
- b. If yes, what percentage of inputs were sourced sustainably?**
Yes, More than 90%.
3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**
- a) Cement is conventionally packaged in non-biodegradable plastic bags, which present collection and recovery challenges post-consumption. At Dalmia Bharat, we meet our plastic waste recycling obligations through co-processing municipal and industrial plastic waste in our kilns, currently disposing over 13 times the quantity of plastic used in our packaging.
- b) While our products do not generate E-waste, the limited E-waste arising from office operations is disposed of responsibly through authorised recyclers registered with the relevant regulatory agencies.
- c) Hazardous waste generated during the cement manufacturing process is safely co-processed in kilns or disposed to authorized recyclers in strict adherence to the guidelines prescribed by CPCB/SPCB.
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, the Company has implemented Waste Collection Plans in line with its Extended Producer Responsibility (EPR) framework, and these plans have been submitted to the respective Pollution Control Boards.

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 Lxlife cycle perspective/ assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/ No) If "Yes", provide web-link
23941	Ordinary Portland Cement (OPC)	18%	Cradle to gate	No	Yes
23941	Portland Pozzolana Cement (PPC)	32%	Cradle to gate	No	Yes
23941	Portland Slag Cement (PSC)	5%	Cradle to gate	No	Yes
23941	Portland Composite Cement (PCC)	45%	Cradle to gate	No	Yes

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
Portland Pozzolana Cement (PPC)	High GHG emissions during clinker production, dust exposure to workers, packaging waste at end-of-life, limited availability of fly ash	Reduced clinker factor with fly ash blending, transport through closed containers, use of bulk cement to reduce plastic packaging, real-time dust monitoring systems with pollution control technologies, and PPE for workers, Management System Certification implemented
Portland Slag Cement (PSC)	Energy intensity of slag grinding, emissions during transport, limited availability of granulated slag in some regions, exposure to dust emissions	Increased use of green power for Clinker and grinding, optimisation of logistics routes, supplier engagement for long-term slag and fly ash availability
Portland Composite Cement (PCC)	Complex sourcing due to dual grinding materials, fly ash and slag, high electrical energy consumption in grinding, exposure to dust emissions	Digitised quality control systems, supplier code of conduct implementation, blending optimisation to minimise environmental footprint
Ordinary Portland Cement (OPC)	Highest carbon intensity per tonne, highest land use impacts of more limestone use, high energy and fuel consumption, exposure to dust emissions	Decarbonisation roadmap including AFR and WHR, implementation of green belt buffers, Shift toward blended cement offerings, targeted 100% blended cement production, Water positive operations, plastic waste recycling positive

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 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Fly ash (recycled)	21.87%	22.1%
Slag (recycled)	14.92%	15.5%
Red mud	0.00%	1.9%
Chemical gypsum	0.22%	0.8%

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 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Re-used	Recycled	Safely disposed	Re-used	Recycled	Safely disposed
Plastics (including packaging)	0	283 Tons	0	0	0	0
E-waste	NA			NA		
Hazardous waste (Solid)	NA			NA		
Other waste	NA			NA		

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in the respective category
NA	NA

PRINCIPLE 3: BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS.

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	4,247	4,247	100%	4,247	100%	NA	NA	4,247	100%	921	22%
Female	188	188	100%	188	100%	188	100%	NA	NA	31	16%
Total	4,435	4,435	100%	4,435	100%	188	100%	4,247	100%	952	21%
Other than permanent employees											
Male	189	141	75%	141	75%	NA	NA	0	0%	63	33%
Female	17	13	76%	13	76%	17	100%	NA	NA	7	41%
Total	206	154	75%	154	75%	15	100%	0	0%	70	34%

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent workers											
Male	1,304	1,304	100%	1,304	100%	NA	NA	0	0%	727	56%
Female	102	102	100%	102	100%	102	100%	NA	NA	10	10%
Total	1,406	1,406	100%	1,406	100%	102	100%	0	0%	737	52%
Other than permanent workers											
Male	14,598	14,598	100%	14,457	99%	NA	NA	0	0%	6,310	43%
Female	687	687	100%	677	99%	687	100%	NA	NA	515	75%
Total	15,285	15,285	100%	15,134	99%	687	100%	0	0%	6,825	45%

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

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Cost incurred on well-being measures as a % of total revenue of the Company	0.41%	0.43%

2. Details of retirement benefits, for current financial year and previous financial year

Benefits	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with 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 authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y

Benefits	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with 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 authority (Y/N/N.A.)
ESI	0%	3%	Y	2%	3%	Y
Others – please specify	100%	100%	Y	100%	100%	Y

Note: The Company provides Employees' Pension Scheme (EPS) benefits to all eligible employees/workers in accordance with applicable government guidelines. However, the following categories of employees/workers are not eligible for EPS deductions as per the prescribed guidelines:

1. Employees/workers above 58 years of age.
2. Employees/workers whose first salary exceeds Rs. 15,000 (w.e.f. September 01, 2014).

For the purpose of this disclosure, 'workers' refers to permanent workers.

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.

Yes, the Company has undertaken measures to improve accessibility across its premises and offices for differently abled employees and workers, in alignment with the requirements of the Rights of Persons with Disabilities Act, 2016.

The Company continues to strengthen an inclusive workplace environment through the provision of accessibility-enabling infrastructure and facilities, such as ramps, elevators, wheelchair access, and other supporting amenities, wherever applicable, to facilitate ease of movement and enhance workplace accessibility.

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

Yes, as part of the fair employment policy under the Dalmia Way of Life (DWL), the Company's internal policy framework, equal opportunities and fair treatment are ensured for all employees and eligible applicants for employment, without any discrimination based on caste, creed, religion, origin, gender, disability, marital status, age, or nationality. This commitment is followed across the employee lifecycle, from recruitment to full and final settlement. The same is also covered under the Company's Anti-Harassment and Discrimination Policy, available at: <https://www.dalmiacement.com/assets/pdf/ir/Anti-Harassment-and-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%	85%	NA	NA
Female	100%	100%	100%	100%
Total	100%	87%	100%	100%

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, Complaint mechanisms like grievance register, SPOCS, complaint box at Plant level and Ethics Helpline
Other than permanent workers	
Permanent employees	
Other than permanent employees	

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

Category	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Total employees/ workers in the respective category (A)	No. of employees/ workers in the respective category who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in the respective category (C)	No. of employees/ workers in the respective category who are part of association(s) or Union (D)	% (D/C)
Total permanent employees	4,435	0	0%	4,317	0	0%
Male	4,247	0	0%	4,168	0	0%
Female	188	0	0%	149	0	0%
Total permanent workers	1,406	933	66%	1,446	970	67%
Male	1,304	922	71%	1,347	960	71%
Female	102	11	11%	99	10	10%

*Union related numbers pertain only to 'recognised' unions.

8. Details of training given to employees and workers:

Category	FY 2025-26 (Current financial year)					FY 2024-25 (Previous financial year)				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	4,247	3,174	75%	3,553	84%	4,168	2,991	72%	3,527	85%
Female	188	218	116%	177	94%	149	73	49%	134	90%
Total	4,435	3,392	76%	3,730	84%	4,317	3,064	71%	3,661	85%
Workers										
Male	15,902	33,291	209%	1,614	10%	17,317	27,044	156%	3,418	20%
Female	789	1,798	228%	105	13%	756	1258	166%	136	18%
Total	16,691	35,089	210%	1,719	10%	1,8073	28,302	157%	3,554	20%

Note:

- For employees, the count represents unique individuals, whereas for contract workmen, the count is non-unique.
- Employees include executives only. Workers include staff, workmen, contract workers, and off-roll employees.
- The reported training coverage percentage exceeds 100% due to the inclusion of contract workers (floating workforce) who underwent training during the financial year but subsequently exited the organisation.

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

Category	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	4,247	3,969	93%	4,168	4,096	98%
Female	188	139	74%	149	148	99%
Total	4,435	4,108	93%	4,317	4,244	98%
Workers						
Male	1,304	1,304	100%	1,347	1,347	100%
Female	102	102	100%	99	99	100%
Total	1,406	1,406	100%	1,446	1,446	100%

Note: Performance and career development reviews are conducted for all employees. However, employees under probation, on unsuccessful PIP as of March 31, under fixed-term CTC arrangements (where applicable), or those joining on or before December 31 of the respective financial year are excluded from the annual increment process.

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 of such system?

Yes, the sites have implemented an Occupational Health and Safety Management System in accordance with ISO 45001, which is periodically evaluated and certified by third-party agencies.

The following are the key elements covered under the system:

- A safety governance structure has been established and implemented with strong commitment from leadership.
- The organisation has developed its own safety standards, procedures, and guidelines, which have been implemented across sites.
- A training roadmap has been developed and implemented to enhance employee competency and capability.
- A robust Permit-to-Work (PTW) system has been implemented across sites and is being effectively followed for all activities.
- A contractor safety management system has been established to ensure the occupational health and safety of contractor employees.
- Risk assessments and effective control measures are implemented for both routine and non-routine activities.
- Management of Change (MoC) procedures have been implemented to manage risks associated with changes.
- Audits, inspections, and walkthrough inspections are conducted to monitor the effectiveness of the implemented Occupational Health and Safety Management System.

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

- HIRA (Hazard Identification and Risk Assessment) and JSA (Job Safety Analysis) are conducted for all routine and non-routine activities to identify work-related hazards.
- Each unit maintains a risk register, which is periodically monitored and reviewed.
- A combined Permit-to-Work (PTW) system has been implemented across sites and is being effectively followed.
- WPRA (Workplace Risk Assessment) is conducted at the workplace prior to commencement of any activity to identify hazards. The identified hazards and corresponding control measures are communicated to the workers involved in the job.

c) Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No)

Yes, the Company has established robust mechanisms for reporting work-related hazards for workers, which include the following:

1. Daily toolbox talks
2. Grassroots team meetings
3. Departmental meetings conducted on a monthly basis
4. Availability of hard-copy reporting formats at sites for workmen
5. Suggestion boxes installed at sites
6. Reporting through the KAVACH application via designated departmental SPOCs (Single Point of Contact)

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

Yes, we have Occupational health centre in the plant premises, in which they are getting medical assistance for non-occupational medical issues.

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

Safety incident/Number	Category	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Lost Time Injury Frequency Rate (LTIFR) (per one million person-hours worked)	Employees	0	0
	Workers	0.12	0.16
Total recordable work-related injuries	Employees	0	0
	Workers	12	7
No. of fatalities	Employees	0	0
	Workers	5*	3
High-consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

*Analysis of these unfortunate incidents underscores the need to intensify efforts in risk identification, strengthen contractor safety management, and reinforce a culture of uncompromising safe behaviour.

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

- ISO 45001 has been implemented across all 15 units, and the same has been certified by external agencies.
- A safety policy has been developed, approved by the Managing Director, and implemented across DCBL.
- Twenty safety standards and procedures, along with 13 guidelines, have been developed and implemented across sites.
- A safety governance structure has been established and implemented with strong commitment from leadership.
- Hazard Identification and Risk Assessment (HIRA) standards have been developed and implemented for all routine and non-routine activities. The identified risks, control measures, and outcomes are recorded and implemented prior to commencement of work.
- Safety committee meetings are conducted at sites in accordance with legal requirements, with equal participation from management and non-management personnel.
- A training roadmap has been developed and implemented to enhance employee competency and capability.
- A robust Permit-to-Work (PTW) system has been implemented across sites and is being effectively followed.
- A contractor safety management system has been established to ensure occupational health and safety of contractors and their workforce.
- Management of Change (MoC) procedures have been implemented to manage risks associated with permanent and temporary changes.
- To monitor the effectiveness of the implemented Occupational Health and Safety Management System, various audits and inspections are conducted across sites, including:
 - a) Daily zone-wise and area-wise safety inspections conducted by internal teams within the units
 - b) Annual second-party safety audits conducted by cross-functional units
 - c) Annual audits conducted by external agencies



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

	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working conditions	495	82	The complaints are pending resolution as higher number were received during last quarter.	605	0	NA
Health & safety	253	25	The complaints are pending resolution as higher number were received during last quarter.	230	0	NA

14. Assessments for the year:

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

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.

- Deployment of safety standards, procedures, and guidelines
- Improvement in the quality of daily safety observations and area-based checklists
- Removal of vacant or temporary sheds located below static loads
- Strengthening of structural stability concerns identified during audits
- Periodic structural inspections and maintenance activities
- Job-specific training for critical activities such as rigging, welding, and scaffolding
- Trade-wise training programmes for critical roles, including electricians, fitters, and supervisors

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of the death of (A) Employees (Yes/No) (B) Workers (Yes/No).

- (A) Employees (Y/N) - Yes
(B) Permanent Workers (Y/N) – Yes

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

In all contractual arrangements with value chain partners, statutory dues such as provident fund, gratuity, and other applicable contributions are deducted and deposited in accordance with statutory requirements. Specific contractual provisions are incorporated to ensure adherence to such obligations.

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 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Employees	0	0	0	0
Workers	5	3	5	3

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100%
Working conditions	100%

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.

- Scheduled safety observation and inspection rounds
- Daily toolbox talks and meetings conducted at the grassroots team level
- Contractor field safety audits
- Meetings with contractors and their supervisors
- Issuance of work-stop safety notices
- Penalty matrix and progressive consequence management framework for very high and high-severity violations

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL THEIR STAKEHOLDERS.

Essential Indicators

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

Stakeholders are identified and prioritised based on their level of influence on the organisation and the extent to which they are impacted by the Company's actions. This approach enables effective allocation of resources and focussed engagement with key stakeholder groups.

Based on the identified priorities, relevant department-wise stakeholder engagements are undertaken at both corporate and plant levels, depending on the nature, objectives, and requirements of the engagement. Appropriate channels and frequencies are adopted to ensure structured and meaningful engagement aligned with organisational goals.

The modes of engagement include face-to-face meetings, surveys, focus group discussions, public consultations, trade association engagements, interactions with government representatives and think tanks, social media, mainstream media, conferences, seminars, investor meetings, and other similar platforms.

In addition, materiality assessments are conducted internally or through reputed third-party agencies to capture stakeholder feedback, concerns, and suggestions. Such inputs are compiled by the relevant departments and subsequently communicated to the Corporate Executive Group or Plant Executive Team for further action.

The information gathered through these engagements forms part of the organisation's integrated decision-making processes, strategies, and operational practices, ensuring that stakeholder interests are considered and addressed based on their significance.

Further details on stakeholder engagement are available in the Stakeholder Engagement section of the Integrated Report.



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

Stakeholder Group	Identified as Vulnerable or Marginalised Group (Yes/No)	Channels of Communication	Frequency of Engagement	Purpose and Scope of Engagement / Key Topics and Concerns
Investors	No	Earnings calls, investor meetings (physical/virtual), investor conferences, Company website, emails, and social media platforms	Monthly, quarterly, annually, and as required	Engagements are undertaken to strengthen business relationships through a better understanding of investor priorities and expectations. Discussions focus on transparent communication of business performance, addressing investor queries, sharing insights on business strategy and market dynamics, and reinforcing sound corporate governance practices.
Community	Yes	CSR reports, quarterly newsletters, meetings, pamphlets, websites, group discussions, and social media platforms	Throughout the year	Engagements are aimed at fostering meaningful dialogue and collaboration with communities to create sustainable social, environmental, and economic impact. Key areas of discussion include local growth, development priorities, and community-related concerns.
Media	No	Emails, newspapers, advertisements, website, and social media platforms	Monthly, quarterly, and as required	The objective is to build and maintain a positive corporate reputation while ensuring timely and accurate communication through media coverage, news articles, and advertisements.
Trade Associations	No	Industry forums and other relevant engagement platforms	As per relevance and requirements	Engagements focus on sector-wide discussions and knowledge sharing on topics such as sustainability, green procurement, GHG emissions, energy efficiency, technology roadmaps, disclosures, innovation, climate mitigation and adaptation, carbon markets, ESG matters, and awareness building.
Academic Institutions	No	Other relevant platforms and collaborative engagements	As per relevance and requirements	Engagements are undertaken to encourage collaboration, exchange knowledge, and support initiatives related to research, innovation, and sectoral development.
Public Sector	No	Other relevant channels and institutional forums	As per relevance and requirements	Interactions are focused on policy discussions, regulatory developments, and collaborative initiatives supporting business and sustainability objectives.
ESG Analysts and Rating Agencies	No	Emails, direct meetings and other communication channels	As per relevance and requirements	Engagements are conducted to provide relevant disclosures and sustainability-related information, support assessment processes, and strengthen transparency on ESG performance.
Civil Society Groups (NGOs)	No	Other relevant engagement platforms	As per relevance and requirements	Engagements focus on collaborative initiatives and discussions around social development, sustainability priorities, and community impact areas.

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.

Feedback, concerns, and suggestions, wherever received, are consolidated by the relevant departments and escalated to the Executive Committee or the Plant Executive Team for appropriate action. The flow of such information to the Board is facilitated through the Board-level Sustainability & Risk Management Committee.

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

Yes, stakeholder consultations play an important role in supporting the identification and management of environmental and social issues. Inputs are gathered through multiple channels, including:

- Proceedings from conferences, seminars, and workshops attended
- Meetings and feedback received from government and regulatory authorities
- Participation in working groups and committees constituted by trade associations on various sustainability-related matters
- Materiality assessments and stakeholder engagement exercises
- Investor meetings and interactions
- Meetings and engagements with ESG rating agencies
- Assurance exercises undertaken for sustainability disclosures and reporting processes
- Internal and external audits covering environmental, social, and governance aspects
- Communications received through digital and print media
- Corporate Social Responsibility (CSR) initiatives and stakeholder engagements

These inputs support the Company's approach towards sustainability and help ensure alignment with stakeholder expectations.

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

Dalmia Bharat remains committed to its role as a responsible corporate citizen by actively engaging with marginalised and vulnerable sections of society. Key engagement channels include communities covered under the Company's CSR initiatives, as well as its dealer network.

The Company adopts participatory approaches, including need assessment exercises, to develop a comprehensive understanding of stakeholder requirements and assess the effectiveness of its interventions. In addition, the Company engages with its dealer network and key influencers, including masons and construction workers, through structured loyalty programmes and incentive-based reward mechanisms.

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 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	4,435	4,447	100%	4,317	3,887	90%
Other than permanent	206	0	0%	189	0	0%
Total employees	4,641	4,447	96%	4,506	3,887	86%

Category	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Workers						
Permanent	1,406	1,409	100%	1,446	1,448	100%
Other than permanent	15,285	0	0%	16,627	0	0%
Total workers	16,691	1,409	8%	18,073	1,448	8%

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

Category	FY 2025-26 (Current financial year)					FY 2024-25 (Previous financial year)				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent										
Male	4,247	0	0%	4,247	100%	4,168	0	0	4,168	100%
Female	188	0	0%	188	100%	149	0	0	149	100%
Other than permanent										
Male	189	NA	NA	NA	NA	164	NA	NA	NA	NA
Female	17	NA	NA	NA	NA	25	NA	NA	NA	NA
Workers										
Permanent										
Male	1,304	27	2%	1,277	98%	1,347	58	4%	1,289	96%
Female	102	9	9%	93	91%	99	37	37%	62	63%
Other than permanent										
Male	14,598	6,725	46%	7,873	54%	15,970	7,641	48%	8,329	52%
Female	687	304	44%	383	56%	657	291	44%	366	56%

*Other than permanent employees includes predominantly apprentices apart from advisors/consultants etc who are not covered under minimum wages act.

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/wages of the respective category (in Rs. lakh)	Number	Median remuneration/ salary/ wages of the respective category (in Rs. lakh)
Board of Directors (BoD)	7	29,50,000	1	30,05,000
Key Managerial Personnel	2	2,95,75,350	0	0
Employees other than BoD and KMP	4,243	11,14,596	188	9,39,972
Workers	1,304	5,19,900	102	2,74,860

*Managing Director(s) of the Company have been included in the Board, and not in KMP category, to avoid duplication of the count.

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

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Gross wages paid to females as % of total wages	3.01%	2.72%

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

Yes, HR Head

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

Dalmia Bharat has established a third-party Ethics Helpline that enables stakeholders to report issues relating to human rights violations. The details of the mechanism are also provided in the Company's Whistle-blower Policy. The Policy ensures complete protection to whistleblowers against any form of discrimination, harassment, victimisation, or unfair employment practices.

Toll-free no.: 1800 572 5242 Email: dalmiaethicscomplaints@ethicshelpline.org

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

	FY 2025-26 (Current financial year)			FY 2024-25 (Previous financial year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual harassment	1	0	NIL	4	0	NIL
Discrimination at workplace	13	1	NIL	0	0	NIL
Child labour	0	0	NIL	0	0	NIL
Forced labour/Involuntary labour	0	0	NIL	0	0	NIL
Wages	7	0	NIL	0	0	NIL
Other human rights-related issues	131	2	NIL	0	0	NIL

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

	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Total complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	1	4
Complaints on POSH as a % of female employees /workers	0.34%	1.61%
Complaints on POSH upheld	1*	4

*Employee was separated from employment with immediate effect, and the individual's rehire eligibility status was recorded as "Not Eligible for Rehire" in the Company's HR system.

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

Under the Company's Whistle-blower Policy, protection is extended to whistleblowers as well as individuals assisting in investigations. Such protection includes fair treatment and maintenance of confidentiality relating to the individual's identity. These safeguards also extend to reports concerning sexual harassment.

Whistle-blower complaints are managed through an independently monitored third-party Ethics Helpline, the details of which are available on the Company's website.

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

Yes, Dalmia Bharat has established stringent guidelines relating to human rights issues across all external contracts. In addition, internal control mechanisms are in place to ensure human rights due diligence. All contracts are subject to continuous monitoring to ensure compliance with the prescribed guidelines.

10. Assessments for the year:

	% of your plants and offices that were assessed (by the entity or statutory authorities or third parties)
Child Labour	14%*
Forced/Involuntary Labour	14%*
Sexual Harassment	14%*
Discrimination at Workplace	14%*
Wages	14%*
Others – please specify	14%*

*Third party assessment took place in 2 plants.

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

No significant risks/concerns were raised by the third party.

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

Dalmia Bharat maintains a strict policy of zero-tolerance towards any form of discrimination or harassment. All the complaints received are analysed for requirement of any changes in processes or SOPs and are incorporated as required.

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

Dalmia Bharat has implemented internal control mechanisms to uphold human rights due diligence across its operations. In relation to external contracts, stringent guidelines relating to human rights issues are incorporated into contractual agreements, and continuous monitoring is undertaken to ensure compliance.

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

The majority of the Company's offices and plants are accessible to differently abled visitors.

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT.**Essential Indicators****1. Details of total energy consumption (in joules or multiples) and energy intensity in the following format:**

Particulars	Unit	FY 2025-26	FY 2024-25
Energy Consumption from Renewable Sources			
Total Electricity Consumption (Non-fossil fuel-based Grid + WHRS + Solar) (A)	TJ	3,501	2,640
Total Fuel Consumption (Biomass sources in cement plants, captive power plants and biodiesel) (B)	TJ	1,065	1,716
Energy Consumption through Other Sources (C)	TJ	0	0
Total Energy Consumption from Renewable Sources (A+B+C)	TJ	4,566	4,355
Energy Consumption from Non-renewable Sources			
Total Electricity Consumption (D)	TJ	2,501	2,361
Total Fuel Consumption (Kiln fuels, CPP, material drying and on-site vehicles/equipment excluding AFR and biomass) (E)	TJ	57,136	58,274
Energy Consumption through Other Sources (Alternative fuel sources used in kiln operations, CPP, material drying and on-site vehicles/equipment) (F)	TJ	13,027	11,404
Total Energy Consumption from Non-renewable Sources (D+E+F)	TJ	72,664	72,038

Particulars	Unit	FY 2025-26	FY 2024-25
Total Energy Consumption (A+B+C+D+E+F)	TJ	77,230	76,394
Energy Intensity Metrics			
Energy intensity per rupee of turnover	TJ/million Rs.	0.52	0.55
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	TJ/million Rs.	0.11	0.13
Energy intensity in terms of physical output	TJ/KMT of cementitious material	2.57	2.47
Energy intensity (other relevant metric)	NIL	NIL	NIL

Note: *CPP Electricity consumption not considered in point (D) as CPP Fuel consumption has been considered in Point E to avoid double accounting

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd.

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? (Yes/No) 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.WW**

Yes, Dalmia's Banjari, Rohtas unit is under PAT Cycle - VIII, the cycle has just completed, achievement of target is under assessment.

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

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Water withdrawal by source (in million m³)		
(i) Surface water	2.69	2.98
(ii) Groundwater	1.01	0.86
(iii) Third-party water	0.066	0.09
(iv) Seawater/Desalinated water	0.00	0.00
(v) Others	0.98	0.97
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	4.74	4.90
Total volume of water consumption (in kilolitres)	4.74	4.90
Water intensity per rupee of turnover (Total water consumption/Revenue from operations)	32.01	35.06
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	6.80	8.57
Water intensity in terms of physical output	157	167
Water intensity (optional) – the entity may select the relevant metric	NIL	NIL

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd.

4. Provide the following details related to water discharged:

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To surface water	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
(ii) To groundwater	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
(iii) To seawater	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
(v) Others	0	0
No treatment	0	0
With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd.

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

Yes. The Company has successfully implemented Zero Liquid Discharge (ZLD) across 100% of its cement manufacturing units. As a result, no wastewater or treated wastewater is discharged outside the plant premises.

The Company's commitment to environmental sustainability is reflected through this initiative, wherein all water used in operations is recycled, reused, or evaporated within the plant boundaries. By implementing ZLD across all manufacturing locations, the Company not only ensures compliance with applicable environmental regulations but also contributes towards water conservation and pollution prevention.

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

Parameter	Please specify unit	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
NOx	Tonnes	14,085	16,884
SOx	Tonnes	4,164	5,178
Particulate matter (PM)	Tonnes	1,610	1,767
Persistent organic pollutants (POP)	Ng. TEQ	BDL	BDL
Volatile organic compounds (VOC)	Ng. TEQ	BDL	BDL
Hazardous air pollutants (HAP)	-	BDL	BDL
Others – please specify	-	NIL	NIL

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd

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

Parameter	Unit	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	million Metric tonnes of CO ₂ equivalent	15.75	15.33
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	million Metric tonnes of CO ₂ equivalent	0.48	0.41
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	Metric tonnes of CO ₂ equivalent /rupee of turnover	110	113
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent /rupee of turnover adjusted for PPP	23	27.53
Total Scope 1 and Scope 2 emission intensity in terms of physical output	(kg/tonnes of cementitious material)	539.5	538
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		NIL	NIL

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd

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

Yes, the Company has ongoing emission reduction projects.

12 Cement plants of Dalmia Cement are already under CCTS cycle and implementing the emissions reduction projects. In addition, the Company is also assessing the feasibility of voluntary projects for Article 6.2 and 6.4 of the Paris Agreement.

Project Name	Description	GHG Reduction Approach	Status
Clinker Factor Optimisation	Optimisation of clinker content by increased use of blended cement and new cement chemistry	Process optimisation and raw material substitution (Scope 1 & 2)	Operational, scaling up further
Waste Heat Recovery Systems (WHRS)	Capturing heat from kiln and clinker cooler exhaust gases to generate non-fossil electricity	Increasing the use of non-fossil electricity (Scope 1&2)	Operational, scaling up further
Use of recycled waste and sustainable biomass	Co-processing of biomass, industrial wastes, and RDF in kilns	Substitution of fossil fuels (Scope 1, 2 & 3)	Operational, scaling up further
Solar and Wind Power Integration, purchase	Installation of captive renewable energy sources and third party RE purchase	Increasing the use of renewable electricity (Scope 1 & 2)	Operational, scaling up further
Carbon Capture and Utilisation (CCU)	Demonstration test-beds to evaluate capture and utilisation of CO ₂ from flue gas	Precursor to large-scale CCUS (industrial test beds)	Feasibility stage
Biofuels, Green Logistics Optimisation	Modal shift to rail and use of electric trucks, biofuels for cement transport	Reduction of emissions from liquid biofuels and electric trucks (Scope 3)	Starting the scalable deployment

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

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Total waste generated (in metric tonnes)		
Plastic waste (A)	8,625	191
E-waste (B)	33	79
Bio-medical waste (C)	0.50	0.50
Construction and demolition waste (D)	0	0
Battery waste (E)	11	24
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	- Used Grease: 8 - Used Oil: 74 - Waste Containing Oil: 62	- Used Grease: 18 - Used Oil: 106
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	- Metal Scrap: 67,664 - Refractory: 2,726 - Iron Dust Scrap: 2,958 - Conveyor Belt: 27,164 - STP Sludge: 3.6 - Misc: 1,703	- Metal Scrap: 14,713 - Refractory: 2,517 - Iron Dust Scrap: 2,892 - STP Sludge: 4 - Misc: 3,716
Total (A+B + C + D + E + F + G + H)* The increase in waste generation is temporary and attributable to ongoing capacity expansion efforts.	1,11,032	24,260
Waste intensity per rupee of turnover (MT/million Rs.)	0.75	017
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (MT/million Rs.)	0.16	0.04
Waste intensity in terms of physical output (Kg/Tonne of)	3.69	0.83
Waste intensity (optional) – the relevant metric may be selected by the entity	NIL	NIL
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	0	0
(ii) Re-used	18	4
(iii) Other recovery operations	0	0
Total	18	4
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	64	16
(ii) Landfilling	0	0
(iii) Other disposal operations	1,10,950	24,240
Total	1,11,014	24,256

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd

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.

The Company follows a structured waste management approach supported by ISO 14001-certified facilities and guided by circular economy principles embedded across its operations. Its strategy focuses on reducing waste generation at source, enhancing resource recovery through co-processing, and ensuring environmentally sound management of hazardous materials through kiln operations. These initiatives contribute to the Company's decarbonisation journey and support its commitment towards achieving zero-waste-to-landfill goals.

Waste Type	Waste Management Practice
Solid Process Waste (e.g., kiln dust, clinker spillage)	Recovered and reintroduced into the manufacturing cycle through internal recycling practices or reused as feedstock in cement production processes.
Fly Ash, Slag, and Synthetic Gypsum	Utilised as alternative inputs in blended cement products including PPC, PSC, and PCC, supporting waste reduction at source and minimising landfill requirements across industries.
Plastic and Paper Packaging Waste	Routed through authorised recycling channels, while bulk cement distribution is encouraged to reduce dependence on packaging materials. The Company also maintains a plastic waste recycling positive status through co-processing of non-fossil fuel.
E-waste, Used Oil, Medical Waste, Metal Scrap, and Other Recyclable Waste	Managed through authorised CPCB/SPCB-approved recyclers and disposal agencies in line with applicable hazardous and biomedical waste regulations.
Municipal and Sanitary Waste	Segregated at source and managed through composting or disposed of through scientifically managed systems at designated locations.
Incinerable Hazardous and Non-hazardous Waste from Other Industries/Local Bodies	Safely managed through co-processing, a globally accepted approach recognised as an efficient and sustainable disposal pathway.
Waste water	Wastewater generated from process and domestic activities is treated, recycled, and reused within operations to maintain zero liquid discharge practices.

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	Cement Plant at Rohtas, Bihar of DCBL nearby Kaimur Wildlife Sanctuary	Clinkerisation and Cement Manufacturing plant	Yes
2	Murli Pahari Limestone Mine at Rohtas, Bihar nearby Kaimur Wildlife Sanctuary of DCBL	Opencast Limestone Mine	Yes
3	New Umrongso Limestone Mine (Forest Land) of DBNEL at Dima Hasao (earlier N.C. Hills), Assam of DCNEL erstwhile CCIL. Complete ML area i.e., 417.5 ha is Forest Land.	Opencast Limestone Mine	Yes
4	Lanjiberna Limestone & Dolomite Mine (Forest Land) at Rajgangpur, Odisha of DCBL. Out to total ML area i.e., 873.057 ha 62.56 ha is Forest land.	Opencast Limestone Mine	Yes
5	RCW 6 Mining Leases nearby Kaimur Wildlife Sanctuary	Opencast Limestone Mine	No, EC under progress, mines not under operation

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.
6	Gojoli-Somanpalli-Dongargaon Limestone Block (Auctioned Block) (Area: 646.55 ha), Chandrapur, Maharashtra of DCBL near Kanhargaon WLS (~450 m, W). Out to total ML area i.e., 646.55 ha, 185.83 Ha is Forest land.	Opencast Limestone Mine	No, EC and SBWL/NBWL clearance is under progress, mines not under operation
7	Kottameta Limestone Mine (Auctioned Block) (ML Area: 802.25 ha), Malkangiri, Odisha of DCBL. Out to total ML area i.e., 802.25 ha, 575.16 Ha is Forest land.	Opencast Limestone Mine	Yes, In-Principle approval (Stage-I) obtained
8	Naranda Limestone Mines ML area 71.01 ha, Chandrapur, Maharashtra of DCBL. Out to total ML area i.e., 71.01 ha, 17 Ha is Forest land.	Opencast Limestone Mine	Yes, In-Principle approval (Stage-I) obtained

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 an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
Proposed Stand-alone Grinding Unit at Pahur, Bindki, Fatehpur, Uttar Pradesh of DBGVL	EIA Notification, 2006-S.O 1533	August 20, 2025	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=5IA%2FUP%2FIND1%2F459537%2F2024&proposal=40527756
Proposed Ramgarh Auctioned Block Ramgarh, Jaisalmer, Rajasthan of DBGVL	EIA Notification, 2006-S.O 1533	November 04, 2026	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FRJ%2FMIN%2F565760%2F2026&proposal=1216919767
Establishment of Clinkerisation and Cement Manufacturing Plant at Ramgarh, Jaisalmer, Rajasthan of DBGVL	EIA Notification, 2006-S.O 1533	November 04, 2025	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FRJ%2FIND1%2F542141%2F2025&proposal=130371395

Name and brief details of project	EIA notification no.	Date	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
Expansion of limestone production capacity of Yadwad & Kunnal Limestone Mine (ML Area - 1048.24 ha of DCBL	EIA Notification, 2006-S.O 1533	February 12, 2026	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FKA%2FMIN%2F473350%2F2024&proposal=68752259
Proposed Stand-alone Grinding Unit at Sasroli & Jharli, Matanhail, Jhajjar, Haryana of DBGVL	EIA Notification, 2006-S.O 1533	April 28, 2026	Yes	Yes	https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=IA%2FHR%2FIND1%2F538766%2F2025&proposal=127754328

- 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

Leadership Indicators

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

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

- (i) Name of the area: Kadapa (Andhra Pradesh)
- (ii) Nature of operations: Integrated Cement Plant
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Water withdrawal by source (in million m³)		
(i) Surface water	0	0
(ii) Groundwater	86	12.52
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others (Harvested Rain Water)	424	451.74
Total volume of water withdrawal (in million m³)	510	464.26
Total volume of water consumption (in million m³)	510	464.26
Water intensity per rupee of turnover (m³/million Rs.)	3.44	3.3
Water discharge by destination and level of treatment (in million m³)		
(i) Into surface water	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(ii) Into groundwater	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
(iii) Into seawater	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(iv) Sent to third parties	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(v) Others	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd

- (i) Name of the area: Belgaum (Karnataka)
- (ii) Nature of operations: Integrated Cement Plant
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Water withdrawal by source (in million m³)		
(i) Surface water	0	0
(ii) Groundwater	178	160.78
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others (Harvested Rain Water)	0	69.81
Total volume of water withdrawal (in million m³)	178	230.59
Total volume of water consumption (in million m³)	178	230.59
Water intensity per rupee of turnover (m³/million Rs.)	1.20	1.65
Water discharge by destination and level of treatment (in million m³)		
(i) Into surface water	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(ii) Into groundwater	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(iii) Into seawater	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(iv) Sent to third parties	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
(v) Others	0	0
No treatment	0	0
With treatment – please specify the level of treatment	0	0
Total water discharged (in kilolitres)	0	0

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd

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

Parameter	Unit	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1.48	1.47
Total Scope 3 emissions per rupee of turnover (KG/Rs.)	Kg/Rs.	0.01	0.01
Total Scope 3 emission intensity (optional) – (MT/Tonne of Cementitious Material)	MT/tonnes of cementitious material	0.05	0.05

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

Yes, third party reasonable assurance is conducted by TUV India Pvt Ltd

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

S. No.	Biodiversity Impact & Management Summary – Ecologically Sensitive Areas				
	Impact Type	Significant Impacts on Biodiversity	Prevention / Avoidance Strategy	Remediation & Management Actions	Governing Framework
1	DIRECT: Land & Vegetation	1. Land use change from limestone mining and cement plant operations 2. Potential disturbance of native vegetation	Site selection excludes core wildlife habitats & designated critical biodiversity hotspots (Govt. of India regulations and practice followed)	1. Native species plantations in mined-out areas 2. Greenbelt development around plant boundaries 3. Site-specific mining plans developed with experts and approved by the Govt.	1. ISO 14001 EMS 2. Biodiversity Management Programme 3. Various regulations from State and Central Govt.
2	DIRECT: Fauna & Noise	1. Noise, dust, and vibration affecting local fauna 2. Potential impact on avifauna during blasting / plant or mining operations	1. Controlled blasting schedules to reduce wildlife disturbance 2. Use of non-blasting technologies & low-noise equipment	1. Dust suppression through water spraying 2. Periodic third-party audits & assessments	1. ISO 14001 EMS 2. Biodiversity Action Plans 3. Various regulations from State and Central Govt.



S. No.	Biodiversity Impact & Management Summary – Ecologically Sensitive Areas				
	Impact Type	Significant Impacts on Biodiversity	Prevention / Avoidance Strategy	Remediation & Management Actions	Governing Framework
3	INDIRECT: Water & Ecosystems	1. Water abstraction from local streams & aquifers 2. Stress on natural ecosystems from community reliance	1. Zero-liquid discharge systems 2. Rainwater harvesting initiatives 3. Water use efficiency through recycling	1. Aquifer recharge initiatives 2. Community forest regeneration support 3. Alternative livelihood programs (social responsibility)	1. ISO 14001 EMS 2. Water Stewardship Programme
4	INDIRECT: Habitat & Wildlife	1. Light sources disrupting wildlife activity near plant sites 2. Habitat fragmentation due to plant infrastructure (roads, conveyors)	1. Site selection avoids designated biodiversity hotspots; 2. Infrastructure planning with ecological input	1. Biodiversity Action Plans (ecologist-led, site-specific) 2. Ecological monitoring 3. Third-party assessments	1. ISO 14001 EMS 2. Ecological Monitoring Programme 3. Various regulations from State and Central Govt
	OVERALL APPROACH	Mitigation Hierarchy: AVOID MINIMIZE RESTORE OFFSET Taken an aspirational goal to achieving 'no net loss' of biodiversity across all operations by 2040. Biodiversity Management Programme is integrated into the ISO 14001 Environment Management System (EMS) under the PDCA cycle, covering both plant sites and associated mining areas.			

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Carbon Capture and Utilisation (CCU)	In collaboration with IIT Bombay, the Company has proposed the establishment of an industrial test bed for Carbon Capture and Utilisation (CCU) at one of Dalmia Cement facilities. The project has been approved by the Department of Science and Technology (DST), Government of India, and execution will commence upon disbursement of the sanctioned funds from DST.	The initiative aims to establish an industrial-scale CCUS test bed at one of the Company's facilities, generating insights to enable the scalability and broader adoption of CCU technologies within the cement sector.

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

Yes. Dalmia Bharat Limited has established an Onsite Emergency and Disaster Recovery Plan. The plan focusses on ensuring business continuity in the event of disruptive incidents such as explosions, fire, natural calamities, cyber-attacks, acts of terror, and other emergencies.

Considering the geographic spread of DCBL's manufacturing units across multiple locations, the Disaster Recovery Plan also incorporates location-specific emergency response measures. The Company's Onsite Emergency and Disaster Recovery Plan has been developed through benchmarking against industry best practices and organisations with mature Business Continuity Management systems, with reference to the ISO 22301 Business Continuity Management System standard.

The plan clearly defines the roles and responsibilities of various groups and individuals involved in handling emergencies and ensuring effective response and recovery measures.

PRINCIPLE 7: BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/associations.

10

- 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	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
2	Confederation of Indian Industry (CII)	National
3	The Associated Chambers of Commerce & Industry of India (ASSOCHAM)	National
4	PHD Chamber and Commerce and Industry	National
5	Cement Manufacturer's Association (CMA)	National
6	Public Affairs Forum of India (PAFI)	National
7	Indian Chamber of Commerce (ICC)	National
8	Federation of Indian Mineral Industries (FIMI)	National
9	Federation of Industry & Commerce of Northeastern Region (FINER)	State
10	Global Cement and Concrete Association (GCCA)	India

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

NIL

Leadership Indicators

1. Details of public policy positions advocated by the entity :

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of review by board (annually/half yearly/quarterly/ others – please specify)	Weblink, if available
1	Representated to GoTN for reconsidering the tax under the newly notified Tamil Nadu Mineral Bearing Land Tax Act, 2024	Through Industry Associations	No	No	No
2	Representated for the directions to State Governments for appointment of an authorised officer for determination of Annual Surface Compensation (ASC) for Coal Mineral Bearing Lands.				
3	Represented for relaxation of area limit under Section 6 of the MMDR Act.				
4	Representated Rationalisation of Average Sale Price of Cement Grade Limestone.				



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 the project	SIA notification no.	Date of notification	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
No Social Impact Assessments were carried out during the reporting period.					

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

S. No.	Name of the 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 Rs.)
No Rehabilitation and Resettlement (R&R) was carried out during the reporting period.						

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

Dalmia Bharat has established multiple channels for receiving and addressing community grievances. At the plant level, complaint registers are maintained to record and address concerns raised by the community. In addition, communities are encouraged to share feedback through both formal and informal mechanisms, including direct engagement with the Company's CSR teams, external stakeholder groups, and other accessible communication channels.

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Directly sourced from MSMEs/Small producers	12%	12%
Directly from within India	93%	93%

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 2025-26 (Current financial year)	FY 2024-25 (Previous financial year)
Rural	8%	7%
Semi-urban	27%	23%
Urban	26%	27%
Metropolitan	40%	44%

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 Rs.)
1	Andhra Pradesh	Kadapa	57,12,927
2	Jharkhand	Bokaro	48,11,013
3	Tamil Nadu	Virrudhnagar (Sattur)	29,35,705

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

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

Name of authority	Brief of the case	Corrective action taken
NIL		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% Beneficiaries from vulnerable & marginalised groups
1	New SHG Member	56	NA
2	SHG Members credit linked	3,157	NA
3	DIKSHa Trainees	5,456	NA
4	Farmer Producers Organisation Members	3,382	NA
5	Gram Parivartan Project (1 person/Household) - Household Covered	32,933	NA
6	IGP Trainings (ITIs/LEDP/MEDP/ SRI/ Silai School/ Bamboo Plantation /100SHGs initiative)	3,614	NA
7	Goatry	2,338	NA
8	Supporting Micro Enterprises	506	NA
9	Integrated Farming System Ariyalur	70	NA
10	Bamboo Cultivation Project	700	NA
11	WADI Development Project	500	NA
12	Livestock Camps - HHs benefitted	443	NA
13	Village Pond	9,895	NA
14	Other Drinking water initiatives	14,588	NA
15	Infrastructure - Community / School / Rural Haat	1,17,119	NA
16	HP WoW	2,622	NA
17	Education	8,142	NA
18	Health Care	36,758	NA
19	Blanket Distribution	2,000	NA



PRINCIPLE 9: BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER.

Essential Indicators

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

The Company follows a structured mechanism for receiving, recording, and responding to customer complaints and feedback. The process ensures that all essential details are documented, including the date of receipt, product type, brand, manufacturing date, quantity supplied and consumed, invoice number, dealer and location details, nature of the complaint, application area, detailed description of the issue, prior support provided, and testing requirements.

The Company has established a robust complaint resolution process that begins with the formal registration of the complaint and aims to resolve the issue within 48 hours. The process includes identification of the root cause, sample testing at the manufacturing facility or through an accredited third-party laboratory, wherever required, communication of findings to the customer, and formal closure of the complaint.

An escalation matrix is in place to ensure that unresolved or critical issues are addressed at appropriate higher levels. To minimise recurrence, the Company undertakes corrective and preventive actions, which may include advising customers on improved construction practices and product usage, recommending enhancements to mix design, conducting performance evaluations, and involving the plant team throughout the resolution process to support long-term corrective measures.

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

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

*Information available on website, brochure, etc.

3. Number of consumer complaints in respect of the following

	FY 2025-26 (Current Financial Year)		Remarks	FY 2024-25 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at the end of the year		Received during the year	Pending resolution at the end of the year	
Data privacy	0	0	NIL	0	0	NIL
Advertising	0	0	NIL	0	0	NIL
Cyber-security	2	0	NIL	0	0	NIL
Delivery of essential services	0	0	NIL	0	0	NIL
Restrictive trade practices	0	0	NIL	0	0	NIL
Unfair trade practices	0	0	NIL	0	0	NIL
Other	1,393	89	NIL	1,347	73	NIL

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

	Number	Reasons for recall
Voluntary recalls	0	NIL
Forced recalls	0	NIL

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

Yes. Dalmia Bharat Group follows a comprehensive NIST Cybersecurity Framework and has deployed security controls across multiple layers of defence. The Group has established various cybersecurity policies and protocols, including policies relating to antivirus protection on endpoints, password complexity, user access management, minimum baseline security standards, and network security.

In addition, the Group is in the process of implementing a privacy programme designed to comply with the requirements of the Digital Personal Data Protection Act, 2023 (DPDPA).

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

No such specific action was required.

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches 0
- b. Percentage of data breaches involving personally identifiable information of customers NA
- c. Impact, if any, of the data breaches NA

Leadership Indicators

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

Information relating to the Company's products and services can be accessed through the Company's website at: <https://www.dalmiacement.com/products/>

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

The Company has undertaken the following steps to inform and educate consumers about the safe and responsible usage of its products and/or services:

- a) A toll-free number is provided for customers to report any discrepancies or raise concerns.
- b) Customers may also reach out to the Company through the designated customer care email ID.
- c) A 'No Hook Usage' symbol is displayed on the bags to ensure safe handling and proper product care.
- d) The bags are designed to be completely pilfer-proof to prevent product pilferage.
- e) Information relating to product usage within three months is printed on the bags.
- f) The BIS website address is printed on the bags for reference to BIS certification details.

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

The Company does not fall under the purview of Essential Services Maintenance.

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

The Company displays product-related information as mandated under applicable local laws.

The Company carried out Customer Satisfaction Survey in FY 2025-26 coverings its major products, significant locations of operations and the entity as a whole. Details are mentioned in the Marketing section of the report.

Independent Assurance Statement

To the Directors and Management
Dalmia Bharat Limited (DBL),
11th & 12th Floor, Hansalaya Building,
15 Barakhamba Road,
New Delhi -110001

Dalmia Bharat Ltd (hereafter 'DBL') commissioned TUV India Private Limited (TUVI) to conduct independent external assurance of BRSR Core disclosures ([09 attributes as per Annexure I - Format of BRSR Core](#)), KPIs of BRSR Core placed under (Annexure II- BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING FORMAT) following the ([BRSR Core -Framework for assurance and ESG disclosures for value chain](#) stipulated in SEBI [circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, Para 6 & Annexure II, dated 12/07/2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024](#) and the [MASTER CIRCULAR: HO/49/14/14\(7\)2025-CFD-POD2/I/3762/2026, Last updated on: January 30, 2026](#)). DBL developed Business Responsibility and Sustainability Report (hereinafter 'the BRSR') for the period 01/04/2025 to 31/03/2026. The BRSR is based on the National Guidelines on Responsible Business Conduct (NGRBC), [SEBI circular: SEBI/HO/CFD/CMD-2/P/CIR/2021/562, dated 10/05/2021](#) followed by the [notification number SEBI/LAD-NRO/GN/2023/131, dated 14/06/2023](#) pertaining to BRSR requirement. This engagement was conducted as a reasonable assurance engagement in accordance with ISAE 3000 (Revised) and is specifically aligned with the SEBI BRSR Core – Framework for Assurance and ESG Disclosures for Value Chain, as stipulated under SEBI Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 and the [Industry Standards on Reporting of BRSR Core](#).

Applicable Assurance Criteria

The assurance engagement was conducted against the following applicable assurance criteria:

- i. BRSR Core Key Performance Indicators (KPIs) as prescribed under Annexure I – Format of BRSR Core
- ii. SEBI Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12 July 2023
- iii. Industry Standard on Reporting of BRSR Core SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated 20 December 2024
- iv. ESG disclosures for Value chain and disclosures on green credits SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dated 28 March 2025
- v. Master Circular LoDR regulations HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated 30 January 2026
- vi. DBL's internal data definitions, measurement protocols, and calculation methodologies applied consistently for the reporting period

These criteria were applied to assess the completeness, accuracy, consistency, and reliability of the BRSR Core disclosures.

Management's Responsibility

DBL developed the BRSR's content pertaining to the Core disclosures (09 attributes as per Annexure I – Format of BRSR Core). DBL's management holds responsibility for the collection, analysis, and disclosure of the information presented in both the BRSR (web-based and print versions). This includes maintaining the integrity of the associated website and ensuring that all disclosed information is accurate, complete, and aligned with the applicable criteria outlined in the BRSR requirements, and is free from intended or unintended material misstatements. Furthermore, DBL is accountable for the archiving, storage, and reproduction of the reported data and information, and for making it available to stakeholders and regulators upon request.

Scope and Boundary

The scope of work includes the assurance of the following [09 attributes as per Annexure I - Format of BRSR Core](#) disclosed in the BRSR report. The BRSR core requirements encompass essential disclosures pertaining to organization's Environmental, Social and Governance (ESG). In particular, the assurance engagement included the following:

- i. Review of [09 attributes as per Annexure I - Format of BRSR Core](#) submitted by DBL (refer Annexure-1 of this statement),
- ii. Evaluation of the quality, completeness, and consistency of disclosures
- iii. Review of evidence (on a risk-based sample basis) for [09 attributes as per Annexure I - Format of BRSR Core](#),
- iv. KPI-level verification of supporting evidence using a risk-based sampling approach, including review of data from selected sites, functions, and data owners. A KPI evidence traceability matrix has been maintained by DBL, mapping each BRSR Core KPI to its primary source evidence (meter logs, SAP reports, HR systems, invoices, and third-party certifications). TUVI verified the adequacy of source-to-disclosure traceability for each assured KPI during the engagement. Evidence Reference Index: The KPI evidence traceability matrix is cross-referenced in Annexure 1 of this statement against each of the nine BRSR Core attributes and their corresponding KPIs. For each

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KPI, the primary evidence source type is identified. The full evidence traceability register is maintained by DBL and made available to TUVI as part of the engagement documentation.

Sampling was designed to provide reasonable assurance at the **individual KPI level**, taking into consideration inherent risk, estimation uncertainty, and data materiality.

ESG consolidation follows the operational control approach, wherein all operations under DBL's operational control are included within the reporting boundary. The reporting boundaries for the above attributes include DBL Integrated services for the operations of 15 manufacturing locations (Dalmiapuram, Ariyalur, Kadappa, Belgaum, Rajgangpur, Kapilas, Mednipur, Bokaro, Meghalaya, Umrangshu, Lanka, Morigaon, Jagiroad, Chandrapur, Sattur and Banjari), the associated limestone mines and office location in India, which are serving 23 states / UTs. On-site verifications were conducted at two manufacturing plants and Corporate Office between 06/01/2026 to 07/05/2026.

Onsite Verification

1. Dalmia Cement Bharat Ltd., Ariyalur – 06/01/2026 & 07/01/2026
2. Dalmia Bharat Ltd., Sattur – 09/01/2026
3. Dalmia Bharat Limited, Corporate Office, 11th & 12th floor, Hansalaya Building, 15 Barakhamba Road, New Delhi – 110001. – 06/05/2026 & 07/05/2026

The assurance activities were carried out together with a desk review of entire plants and offices as per reporting boundary.

Limitations

Inherent Limitations: TUVI did not perform any assurance procedures on the prospective information disclosed in the Report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information, Value-chain KPIs or any disclosure other than BRSR Core disclosures. All other BRSR Core KPIs covered under the nine attributes are included within the assured scope as detailed in Annexure 1 of this statement. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI did not verify any ESG goals and claim through this assignment. TUVI verified data on a sample basis; the responsibility for the authenticity of data entirely lies with DBL.

Out of Scope Items: For the avoidance of doubt, the following disclosures in the BRSR are explicitly outside the scope of this assurance engagement and carry no assurance conclusion: (i) Scope 3 GHG emission disclosures and value-chain related environmental or social data — these disclosures are explicitly NOT assured under this engagement and carry no assurance conclusion, readers should not place reliance on these disclosures as assured information.

A KPI-specific materiality approach was applied comprising two tiers: (i) a 5% quantitative threshold relative to the applicable KPI base value for volume-based KPIs (GHG emissions, energy, water, waste); and (ii) a qualitative zero-tolerance threshold for high-risk ESG indicators — fatalities, permanent disabilities, POSH complaints upheld, regulatory non-compliances, and customer data breaches — where any occurrence is treated as material irrespective of magnitude.

Materiality Approval Record: KPI-level materiality thresholds were formally approved by the Engagement Partner prior to fieldwork and documented in the engagement file per ISAE 3000 (Revised). A 5% quantitative threshold was applied to volume-based KPIs, reflecting measurement and aggregation tolerance across emission sources, meter readings, water supply data, and waste weighbridges. For estimated KPIs, a $\pm 10\%$ confidence range applies. This assurance statement is not intended to support, and should not be used in connection with, any greenwashing or misleading environmental or social or product level claims. This assurance statement should be read in its entirety and does not cover value chain disclosures unless specifically included within the defined scope.

Any dependence of person or third party may place on the BRSR Report is entirely at its own risk. TUVI has taken reference of the financial figures from the audited financial reports and financial figures are not assured under this engagement. DBL will be responsible for the appropriate application of the financial data. The application of this assurance statement is limited w.r.t [SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated Jul 12, 2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024](#). This assurance statement does not endorse any environmental and social claims (related to the product, manufacturing process, packaging, disposal of product etc.) as well as advertisements by the reporting organization. TUVI does not permit use of this statement for Greenwashing or misleading claims. This assurance statement has been prepared solely to meet the requirements of SEBI BRSR Core assurance and shall not be used or relied upon for any other purpose.

Our Responsibility

TUVI's responsibility in relation to this engagement is to perform a reasonable level of assurance and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of DBL's strategy, management of ESG-related issues or the sufficiency of the Report against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information ([09 attributes as per Annexure I - Format of BRSR Core](#)) disclosed by DBL. Reporting Organization is responsible for archiving the related data for a reasonable time period. The intended users of this assurance statement are the management of 'DBL'. The data is verified on a sample basis, the responsibility for the authenticity of data lies

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with the reporting organization. Reporting Organization is responsible for archiving the related data for a reasonable time period. TUVI expressly disclaims any liability or co-responsibility 1) for any decision a person or entity would make based on this assurance statement and 2) for any damages in case of erroneous data is reported. This assurance engagement is based on the assumption that the data and information provided to TUVI by DBL are complete and true.

Assurance Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing on verification efforts with respect to disclosures. The GHG emission factor hierarchy applied by DBL and verified by TUVI is as follows: (i) Tier 1 – Site-specific measured factors (fuel calorific value analysis, bomb calorimeter results with calibration certificates); (ii) Tier 2 – Industry-specific published factors (IPCC Guidelines for National Greenhouse Gas Inventories 2006/2019 Refinement; GCCA CO₂ Accounting Protocol for the Cement Industry); (iii) Tier 3 – National factors (Central Electricity Authority (CEA) India grid emission factor for Scope 2 market-based; CPCB/BEE published factors where applicable); (iv) Tier 4 – International published factors (DEFRA greenhouse gas conversion factors applied selectively for vehicle and refrigerant emissions). Site-specific factors were applied where available and validated; published factors were applied with version control documentation maintained by DBL. TUVI has verified the disclosures and assessed the robustness of the underlying data management system, information flows, and controls. In doing so:

- a) TUVI examined and reviewed the documents, data, and other information made available by DBL for non-financial [09 attributes as per Annexure I- Format of BRSR Core](#) (non-financial disclosures)
- b) TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of DBL,
- c) Sampling was performed using a risk-based and judgmental approach to obtain sufficient and appropriate evidence to support a reasonable assurance conclusion.
- d) TUVI performed sample-based reviews of the mechanisms for implementing the sustainability-related policies and data management (qualitative and quantitative)
- e) TUVI adopted a risk-based assurance approach, identifying key assurance risks such as estimation risk, boundary definition risk, and data completeness risk, which informed the nature, timing, and extent of assurance procedures, including sampling.
- f) The nature and extent of procedures included inquiries, analytical procedures, and selective testing of supporting documentation for selected ESG disclosures and KPIs.
- g) The sample selection and sample size were determined using professional judgment, taking into account factors such as the nature of the disclosure, data availability, prior-year observations, and perceived risk, within the constraints of a reasonable assurance engagement.
- h) TUVI reviewed the adherence to reporting requirements of "BRSR"

TUVI maintains appropriate documentation of all assurance procedures performed, evidence obtained, and conclusions reached in accordance with the requirements of ISAE 3000.

Such records are securely stored and retained for a minimum period of Five years from the date of issuance of the assurance statement (or longer, where required by applicable laws or regulations), to support the basis of our conclusions and enable appropriate quality reviews.

Opportunities for Improvement

The following are the opportunities for improvement reported to DBL. However, they are generally consistent with DBL management's objectives and programs. DBL already identified below topics and Assurance team endorse the same to achieve the Sustainable Goals of organization.

1. **Safety Adherence:** In lieu of the rise in both LTIs and fatalities that occurred across the reporting boundary during FY 2025-26, DBL should strengthen existing safety procedures and develop targeted strategies to ensure the safety of contractual workers. Root cause analysis conducted by DBL identified the primary causal factors as inadequate adherence to Permit-to-Work (PTW) controls, insufficient HIRA review for pre-commissioning activities, and gaps in contractor safety supervision. DBL has initiated the following corrective actions: (i) mandatory revision of PTW and WPRA checklists incorporating associated activities; (ii) review and update of HIRA and SOPs for spillage, stacking, and shifting operations with caution boards displayed; (iii) enhanced contractor safety induction and toolbox talk frequency; (iv) structured handover/takeover processes during pre-commissioning stages; and (v) time-bound risk mitigation plans for structural deviations against design drawings. A declining trend in LTIFR is targeted for FY 2026-27, with quarterly safety performance reviews under the Board Safety Committee. Governance Accountability: The Chief Sustainability Officer (CSO) and Head – Safety is the designated KPI owner for monitoring safety performance targets for FY 2026-27. Zero fatalities and LTIFR reduction targets are standing agenda items at each quarterly Board Safety Committee meeting, with progress disclosed in the FY 2026-27 BRSR.
2. **Mentoring:** DBL may consider imparting dedicated ESG training modules or certifications for identified personnel responsible for data monitoring to ensure consistent reporting.

Conflict of Interest

In the context of BRSR requirements set by SEBI, addressing conflict of interest is crucial to maintain high integrity and independence of assurance engagements. As per SEBI guidelines, assurance providers need to disclose any potential conflict of interest that could compromise the independence or neutrality of their assessments. TUVI diligently identifies



any relationships, affiliations, or financial interests that could potentially cause conflict of interest. We proactively implement measures to mitigate or manage these conflicts, ensuring independence and impartiality in our assurance engagements. We provide clear and transparent disclosures about any identified conflicts of interest in our assurance statement. We recognize that failure to address conflict of interest adequately could undermine the creditability of the assurance process and the reliability of the reported information. Therefore, we strictly adhere to SEBI guidelines and take necessary measures to avoid, disclose, or mitigate conflicts of interest effectively. Please refer para “**Independence and Code of Conduct**” below.

Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPI described in the BRSR report along with the referenced information complies with BRSR Core requirements as per Annexure I for the 9 attributes, and meets the general content and quality requirements of the BRSR. TUVI confirms its competency to conduct the assurance engagement for the BRSR as per SEBI guidelines. Our team possesses expertise in ESG verification, assurance methodologies, and regulatory frameworks. We ensure independence, employ robust methodologies, and maintain continuous improvement to deliver reliable assessments. Based on our procedures, we did not identify any material changes in the methodologies applied for the preparation of the selected BRSR KPIs during the reporting period. DBL has established a policy-led data control framework for BRSR disclosures, with documented processes and defined roles and responsibilities. The Company has established key data controls for BRSR reporting that are designed in accordance with its internal control framework. The operating effectiveness of these controls was not assessed as part of this engagement. Design of relevant controls was reviewed for planning purposes only. Operating effectiveness was not tested; no reliance is placed on controls.

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the BRSR requirements. DBL refers to general disclosure to report contextual information about DBL, while the Management & Process disclosures the management approach for each indicator ([09 attributes as per Annexure I - Format of BRSR Core](#)).

Reasonable Assurance Opinion: Based on the procedures performed and evidence obtained as described in this statement, and subject to the limitations set out above, in our opinion, for each of the nine BRSR Core attributes, the disclosed information complies with BRSR Core requirements as per Annexure I for BRSR Core criteria, in all material respects, for the reporting period 01/04/2025 to 31/03/2026. Operational Commentary (separate from the assurance opinion above): DBL has maintained structured data management controls, evidence archives, documented estimation methodologies, and defined data ownership across its manufacturing boundary. This commentary is contextual only and does not modify the assurance opinion above. BRSR complies with the below requirements:

- a) Governance, leadership and oversight: The messages of top management, the business model to promote inclusive growth and equitable development, action and strategies, focus on services, risk management, protection and restoration of environment, and priorities are disclosed appropriately.
- b) Connectivity of information: DBL discloses [09 attributes as per Annexure I - Format of BRSR Core](#) and their inter-relatedness and dependencies with factors that affect the organization's ability to create value over time.
- c) Stakeholder responsiveness: The Report covers mechanisms of communication with key stakeholders to identify major concerns to derive and prioritize the short, medium and long-term strategies. The Report provides insights into the organization's relationships (nature and quality) with its key stakeholders. In addition, the Report provides a fair representation of the extent to which the organization understands, takes into account and responds to the legitimate needs and interests of key stakeholders.
- d) Materiality: The material issues within 9 attributes and corresponding KPI as per BRSR requirement are reported properly.
- e) Conciseness: The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to the point sentences, graphs, pictorial, tabular representation is applied. At the same time, due care is taken to maintain continuity of information flow in the BRSR.
- f) Reliability and completeness: DBL has established internal data aggregation and evaluation systems to derive the performance. DBL confirms that, all data provided to TUVI, has been passed through QA/QC function. The majority of the data and information was verified by TUVI's assurance team (on sample basis) during the BRSR verification and found to be fairly accurate. All data, is reported transparently, in a neutral tone and without material error.
- g) Consistency and comparability: The information presented in the BRSR is on yearly basis and found reliable and complete manner. Thus, the principle of consistency and comparability is established.

Independence and Code of Conduct: TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which, adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI [circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023](#) and [Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177, dated 20/12/2024](#).

TUVI confirms that during the reporting period:

- a. No consulting, advisory, system design, data preparation, or implementation services related to ESG or BRSR were provided to DBL,
- b. TUVI was not involved in the preparation of the BRSR or underlying data,

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c. No relationships or circumstances exist that could create a conflict of interest or impair independence,

Appropriate safeguards were applied to ensure objectivity, impartiality, and professional judgment throughout the assurance engagement.

TUVI solely focuses on delivering verification and assurance services and does not engage in the sale of service or the provision of any non-audit/non-assurance services, including consulting.

Quality control: The assurance team complies with quality control standards, ensuring that the engagement partner possesses requisite expertise and the assigned team collectively has the necessary competence to perform engagements in reference with standards and regulations. Assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Control, TUVI 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 Assurance Team and Independence

TUVI is an independent, neutral third-party providing ESG Assurance services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "no conflict of interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with DBL on any engagement that could compromise the independence or impartiality of our findings, conclusions, and observations. TUVI was not involved in the preparation of any content or data included in the BRSR, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement.



For and on behalf of TUV India Private Limited
Manojkumar Borekar
Product Head-Sustainability Assurance Services



Date: 19/05/2026
Place: Mumbai, India
Project Reference No: 8124483231

Annexure 1: TUVI has verified the below [09 attributes as per Annexure I - Format of BRSR Core](#) disclosed in the BRSR

Attributes	KPI
Green-house gas (GHG) footprint <i>Boundary:</i> <i>All domestic and international operations.</i>	Total Scope 1 emissions (with breakup by type) - GHG (CO ₂ e) Emission in MT - Direct emissions from organization's owned- or controlled sources
	Total Scope 2 emissions in MT - Indirect emissions from the generation of energy that is purchased from a utility provider
	GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT) / Total Revenue from Operations adjusted for PPP
	GHG Emission Intensity (Scope 1+2), (Total Scope 1 and Scope 2 emissions (MT)/Cargo Handled (MMT)
Water footprint <i>Boundary:</i> <i>All domestic and international operations.</i>	Total water consumption (in kL)
	Water consumption intensity - kL / Total Revenue from Operations adjusted for PPP
	Water consumption intensity - kL /Product Output (MMT)
	Water Discharge by destination and levels of Treatment (kL)
Energy footprint <i>Boundary:</i> <i>All domestic and international operations.</i>	Total energy consumed in GJ
	% of energy consumed from renewable sources - In % terms
	Energy intensity -GJ/ Rupee adjusted for PPP
	Energy intensity -GJ/Product Output (MMT)
Embracing circularity - details related to waste management by the entity <i>Boundary:</i> <i>All domestic and international operations.</i>	Plastic waste (A) (MT)
	E-waste (B) (MT)
	Bio-medical waste (C) (MT)
	Battery waste (D) (MT)
	Engine oil (E)
	Oil containers (F)
	Engineering spares (G) (MT)
	Mixed metal (H) (MT)
	Mixed Organic (I) (MT)
	Total waste generated (A + B + C + D + E + F+G+H+I) (MT)
	Waste intensity
	- MT / Rupee adjusted for PPP - MT /Product Output (MMT)
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT)
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity)
	Waste Recycled Recovered /Total Waste generated
	For each category of waste generated, total waste disposed by nature of disposal method (MT)
	For each category of waste generated, total waste disposed by nature of disposal method (Intensity)
	Waste Recycled Recovered /Total Waste generated
Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company - In % terms
	Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites)
	- Number of Permanent Disabilities - Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) - No. of fatalities
Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid - In % terms
	Complaints on POSH
	- Total Complaints on Sexual Harassment (POSH) reported - Complaints on POSH as a % of female employees / workers - Complaints on POSH upheld
Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India - In % terms – As % of total purchases by value
	Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost - In % terms – As % of total wage cost
Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events - In % terms
	Number of days of accounts payable - (Accounts payable *365) / Cost of goods/services procured
Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties
	- Purchases from trading houses as % of total purchases - Number of trading houses where purchases are made from - Purchases from top 10 trading houses as % of total purchases from trading houses
	- Sales to dealers / distributors as % of total sales - Number of dealers / distributors to whom sales are made - Sales to top 10 dealers / distributors as % of total sales to dealers / distributors
	Share of RPTs (as respective %age) in -
	- Purchases - Sales - Loans & advances - Investments

Notes:

Energy: For all offices, in absence of monitoring of actual vehicular fuel consumption (i.e., Petrol/Diesel/CNG) data attributable to owned vehicle for employees, the GHG emissions are estimated by calculating the fuel consumption in liters using the formula, (Distance Travelled in KM / Fuel efficiency of the vehicle).

Waste: The data of total waste recovered through recycling, re-using or other recovery operations or total waste disposed by nature of disposal method could be assessed based on interviews and sample records as presented during the onsite visit.

Use of Estimates: Certain BRSR Core KPIs, including energy consumption, water withdrawal, waste generation, and energy usage and corresponding GHG emissions for leased offices and employee-related activities, are based on estimates due to limitations in direct measurement. These estimates were derived using reasonable assumptions, headcount-based methodologies, [Industry Standards on Reporting of BRSR Core](#) and industry-accepted factors.

For such KPIs, our assurance procedures focused on evaluating the appropriateness and consistent application of estimation methodologies, the reasonableness of key assumptions, and the reliability of supporting data. The use of estimated data did not affect our reasonable assurance conclusion on the selected KPIs as a whole. Estimation Uncertainty Assessment: Estimated KPIs (energy, water, GHG for leased offices and employee activities) were validated through: (i) cross-check against BRSR Core Industry Standards benchmark factors; (ii) sensitivity test – $\pm 10\%$ variation in key inputs produced no change to the assurance conclusion; and (iii) data owner sign-off on all estimated values. The applicable confidence range is $\pm 10\%$, consistent with IPCC Good Practice Guidance Tier 1 uncertainty ranges (5–15%) for activity data where direct measurement is absent.



Independent Assurance Statement

To,
The Directors and Management,
Dalmia Bharat Limited
11th & 12th Floor, Hansalaya Building,
15 Barakhamba Road
New Delhi -110001, India.

'Dalmia Bharat Ltd.,' (hereafter DBL) engaged TUV India Private Limited (TUVI) to conduct the independent external assurance of non-financial disclosures reported in 'DBL' Sustainability Report (hereinafter the 'Report') based on the principles of GRI Standards 2021 (hereafter 'GRI') and IIRC Integrated Reporting (<IR>) Framework.

Supplementary Assurance Criteria: GCCA Sustainability Guidelines — applied specifically to cement sector-specific environmental performance disclosures including CO₂ emissions accounting. (i) GCCA Guidelines: Limited to verification of CO₂ accounting methodology, co-processing disclosures, and quarry rehabilitation per GCCA CO₂ Protocol; other GCCA indicators are consistency-reviewed only, with no separate assurance conclusion.

(ii) Water Positivity: Limited to verification of the water positivity ratio (recharged/withdrawn) based on provided evidence; no assurance on hydrological assumptions or third-party recharge outcomes.

This assurance engagement was conducted in accordance with ISAE 3000 (Revised) with "reasonable level". The ESG report covers DBL's ESG KPIs for the period of 01/04/2025 to 31/03/2026 and the verification was conducted within the reporting boundary during January 2026 to May 2026.

Management's Responsibility

DBL has developed the Report content and is responsible for the identification of materiality through appropriate materiality test, corresponding ESG issues, identifying, establishing, and reporting performance management, data management, and quality. The management team at DBL is accountable for the accuracy of the information provided in the Report and the process of collecting, analyzing and reporting that information in both web-based and printed Report. This includes the maintenance and integrity of the company's website. Furthermore, DBL's management team takes responsibility for the accurate preparation of the Report in reference to the applied criteria of GRI Standards and <IR> framework. They ensure that the Report is free of any intended or unintended material misstatements, so stakeholders can trust the information provided. DBL will be responsible for archiving and reproducing the disclosed data for the stakeholders upon request.

Scope and Boundary

The scope of work for the assurance engagement of the following non-financial performance / KPI disclosures as disclosed in the Report. In particular, the assurance engagement included the following:

- Verification of the application of the Report content according to material topics identified based on the materiality, and principles as mentioned in the Global Reporting Initiative (GRI) Standards, the principles of IIRC Integrated Reporting (<IR>) and the quality of information presented in the Report over the reporting period;
- Review of the policies, initiatives, practices and performance as per the GRI standards;
- Review of the non-financial disclosures against the requirements of the GRI Standards and <IR> framework;
- Verification of the reliability of the GRI Standards Disclosure on environmental and social topics;
- Specified information was selected based on the materiality determination and needs to be meaningful to the intended users.

TUVI has verified the below-mentioned disclosures given in the Report:

Topic	GRI Disclosure
GRI 201: Economic Performance	201-1, 201-2, 201-3, 201-4
GRI 203: Indirect Economic Impacts	203-1, 203-2
GRI 301: Materials	301-1, 301-2, 301-3
GRI 302: Energy	302-1, 302-2, 302-3, 302-4, 302-5
GRI 303: Water and Effluents	303-1, 303-2, 303-3, 303-4, 303-5
GRI 304: Biodiversity	304-1, 304-2, 304-3, 304-4
GRI 305: Emissions	305-1 to 305-7
GRI 306: Waste	306-1, 306-2, 306-3, 306-4, 306-5
GRI 401: Employment	401-1, 401-2, 401-3
GRI 402: Labor/Management Relations	402-1
GRI 403: Occupational Health and Safety	403-1 to 403-8, 403-9, 403-10
GRI 404: Training and Education	404-1, 404-2, 404-3
GRI 405: Diversity and Equal Opportunity	405-1, 405-2
GRI 406: Non-discrimination	406-1
GRI 407: Freedom of Association and Collective Bargaining	407-1
GRI 408: Child Labor	408-1

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GRI 409: Forced or Compulsory Labor	409-1
GRI 413: Local Communities	413-1, 413-2
GRI 417: Marketing and Labeling	417-1, 417-2, 417-3

GCCA Sustainability Guidelines: Monitoring and reporting of CO₂ emissions from cement manufacturing, safety in cement and concrete manufacturing, co-processing fuels and raw materials in cement manufacturing, quarry rehabilitation and biodiversity management, reducing and controlling emissions of mercury compounds in the cement industry.

Water Positivity Assurance: As per Dalmia Bharat Limited Internal Assurance Criteria.

Value Chain Partner assessment: As per Dalmia Bharat Ltd Supplier Code of Conduct. The supplier ESG screening methodology applied by DBL encompasses: (i) risk-based vendor prioritization based on spend value, operational proximity, and nature of services; (ii) on-site assessment of selected vendors against DBL Supplier Code of Conduct covering labour practices, wages, working hours, occupational health and safety, and environmental practices; (iii) documentary evidence review including statutory licenses (CLRA, ISMW), ESI/PF registration, FSSAI certification (where applicable), PPE provision records, and minimum wage compliance; and (iv) structured corrective action follow-up for gaps identified. For FY 2025-26, five value chain partners were assessed across Ariyalur and Sattur locations.

The reporting boundaries for the above attributes include DBL Integrated services for the operations of 15 manufacturing locations (Dalmiapuram, Ariyalur, Kadappa, Belgaum, Rajgangpur, Kapilas, Mednipur, Bokaro, Meghalaya, Umrangshu, Lanka, Morigaon, Jagiroad, Chandrapur, Sattur and Banjari), the associated limestone mines and office location in India, which are serving 23 states / UTs. On-site verifications were conducted at two manufacturing plants and Corporate Office between 06/01/2026 to 07/05/2026.

Onsite Verification

The onsite verification was conducted at below mentioned locations:

1. Dalmia Cement Bharat Ltd., Ariyalur – 06/01/2026 & 07/01/2026
2. Dalmia Bharat Ltd., Sattur – 09/01/2026
3. Dalmia Bharat Limited, Corporate Office, 11th & 12th floor, Hansalaya Building, 15 Barakhamba Road, New Delhi – 110001. – 06/05/2026 & 07/05/2026

The organizational boundary for this Report follows the operational control approach as defined under GRI 2: General Disclosures 2021. Under this approach, DBL consolidates all entities — including wholly owned subsidiaries and joint ventures — over which it exercises operational control, defined as the authority to introduce and implement operating policies.

Entities included within the reporting boundary are those where DBL holds direct operational management authority over day-to-day ESG performance, including environmental compliance, occupational health and safety management, and workforce practices. Entities where DBL holds only financial interest without operational control are excluded from the ESG reporting boundary.

The geographic boundary covers DBL's manufacturing plants, mines, and corporate offices across India.

The assurance activities were carried out together with a desk review as per reporting boundary.

Our Responsibility

TUVI's responsibility as per the assurance engagement is to perform independent assurance and to express a conclusion based on the work performed. We conducted our engagement in reference with ISAE 3000 (Revised) limited to non-financial ESG indicators. Our engagement did not include an assessment of the adequacy or effectiveness of DBLs' strategy or management of sustainability-related issues or the sufficiency of the Report against the principles of GRI Standards, IIRC Integrated Reporting (<IR>) framework and ISAE 3000 (Revised) other than those mentioned in the scope of the assurance. The data is verified on a sample basis, the responsibility for the authenticity of data lies with the reporting organization. The reporting organization is responsible for archiving the related data for a reasonable period of time. TUV does not take any liability or co-responsibility 1) for any damages in the case of erroneous data reported. 2) for any decision a person or entity would make based on this assurance statement. This assurance engagement is based on the assumption that the data and information provided to TUVI by DBL are complete and true.

Verification Methodology

TUVI adopted a risk-based approach, focusing on verification efforts on issues of high material relevance to DBL business and its stakeholders. TUVI has verified the statements and claims made in the Report and assessed the robustness of the underlying data management system, information flows, and controls. In doing so,

- i. TUVI reviewed the approach adopted by DBL for the stakeholder engagement and materiality determination process (based on the principle of double materiality and the requirements of the GRI Standards). TUVI verified the disclosures and claims made in the Report and assessed the robustness of the data management system, information flow, and controls;
- ii. TUVI examined and reviewed the documents, data, and other information made available by DBL for the reported disclosures, including the disclosure on management approach and performance disclosures;
- iii. TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of the DBL, during the remote assessments;
- iv. TUVI performed sample-based reviews of the mechanisms for implementing the ESG related policies, as described in the DBL Report;



- v. TUVI verified sample-based checks of the processes for generating, gathering, and managing the quantitative data and qualitative information included in the Report for the reporting period.

The Report was evaluated against the following criteria: adherence to the principles of stakeholder inclusiveness, materiality, responsiveness, completeness, neutrality, relevance, sustainability context, accuracy, reliability, comparability, clarity, and timeliness, as prescribed in the GRI Standards, IIRC Integrated Reporting (<IR>), GCCA standards and ISAE 3000 (revised) standard.

Opportunities for Improvement

The following are the opportunities for improvement reported to DBL. However, they are generally consistent with DBL management's objectives and programs. DBL already identified below topics and Assurance team endorse the same to achieve the Sustainable Goals of organization.

1. **SAFETY ADHERENCE:** In lieu of the rise in fatalities that occurred across the reporting boundary during FY 2025–26, DBL is strengthening existing safety procedures and targeted strategies to ensure the safety of contractual workers. DBL has initiated the following actions: (i) Mandatory revision of PTW and WPRA checklists incorporating associated activities; (ii) Review and update of HIRA and SOPs for spillage, stacking, and shifting operations with caution boards displayed; (iii) Enhanced contractor safety induction and toolbox talk frequency; (iv) Structured handover/takeover processes during pre-commissioning stages; and (v) Time-bound risk mitigation plans for structural deviations against design drawings. A declining trend in LTIFR is targeted, with quarterly safety performance reviews under the Board Safety Committee. Governance accountability: The Chief Sustainability Officer (CSO) and Head – Safety are the designated KPI owners for monitoring safety performance targets. Zero fatalities and LTIFR reduction targets are standing agenda items at each quarterly Board Safety Committee meeting.
2. **EVALUATION OF VALUE CHAIN:** DBL may initiate the process of evaluating their value chain partners based on their operations and business contribution. the evaluation criteria can further be extended as per the SEBI guidelines, once mandatory assessment of value chain partners starts.

Our Conclusion

In our opinion, based on the scope of this assurance engagement, the ESG disclosures and reference information provide a fair representation of the material topics and meet the general content and quality requirements of the applied standards.

DBL appropriately discloses the KPIs and actions that focus on the creation of value over the short, medium, and long term. The selected KPIs disclosed by DBL are fairly represented. TUVI did not perform any assurance procedures on the prospective information, such as targets, expectations, and ambitions, disclosed in the Report. Consequently, TUVI draws no conclusion from the prospective information. This assurance statement has been prepared in reference to the terms of our engagement.

Forward-Looking Statements Disclaimer: The Report contains forward-looking statements, including targets, ambitions, expectations, and projections relating to DBL's sustainability strategy and ESG performance. These statements reflect management's current intentions, assumptions, and estimates as at the reporting date and are subject to known and unknown risks, uncertainties, and other factors that may cause actual results, performance, or achievements to differ materially from those expressed or implied.

TUVI did not perform any assurance procedures on such prospective information. Accordingly, no assurance conclusion is expressed on forward-looking statements, targets, or ambitions disclosed in the Report. These statements shall not be construed as assured commitments or guarantees of future performance. Stakeholders are advised to exercise due caution when placing reliance on forward-looking information disclosed in the Report.

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the GRI Standards reporting requirements. DBL refers to universal disclosure to Report contextual information about DBL, while the 'Management Approach' is discussed to Report the management approach for each material topic.

TUVI verified that DBL's material topics, as determined through the double materiality process, are mapped to corresponding GRI topic-specific standards, management approach disclosures, and quantitative KPIs reported in the Report.

Material Topic	GRI Standard	Key Disclosures / KPIs
Climate Change & Emissions	GRI 305	Scope 1, 2, 3 ; CO ₂ intensity per tonne of cement
Energy Management	GRI 302	Total energy consumption; thermal & electrical specific consumption
Water Stewardship	GRI 303	Water withdrawal
Waste & Circular Economy	GRI 306, GCCA	Waste generated; co-processing rate;

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Occupational Health & Safety	GRI 403	LTIFR; fatalities; near-miss reporting rate
Employment & Diversity	GRI 401, 405	Attrition; gender diversity ratio; new hires
Training & Development	GRI 404	Avg. training hours per employee
Local Communities & CSR	GRI 413, 203	CSR expenditure; beneficiaries reached
Economic Performance	GRI 201	Revenue

Universal Standard: DBL followed GRI 1 Foundation 2021: Requirements and Principles for using the GRI Standards; GRI 2: General Disclosures 2021: Disclosures about the reporting organization. General Disclosures were followed when reporting information about an organization's profile, strategy, ethics and integrity, governance, stakeholder engagement practices, and reporting process, and GRI 3: Material Topics 2021: Disclosures and guidance about the organization's material topics. GRI3 was selected for management's approach to reporting information about how an organization manages a material topic.

Assurance Conclusion: Based on the procedures performed and evidence obtained, in our opinion, the information subject to the applied assurance engagement has been prepared in all material respects in accordance with GRI Standards 2021 and the IIRC Integrated Reporting (<IR>) Framework, for the reporting period 01/04/2025 to 31/03/2026. TÜV found the ESG information to be reliable in all respects, with regards to the reporting criteria of the GRI Standards and <IR> framework. TÜV is of the opinion that this report has been prepared in reference to the GRI Standards and <IR> framework.

Financial Capital: DBL creates value and drives growth by optimal utilization of funds raised from various providers of capital. It is linked to revenue performance, ROCE, and capital allocation disclosures (GRI 201-1, 201-2, 201-3, 201-4), demonstrating how financial resources are deployed to generate short, medium, and long-term value.

Manufactured Capital: DBL focuses on operational excellence and continuous improvement and innovation in manufacturing processes through its manufacturing facilities and infrastructure. It is connected to capacity utilization, clinker factor, and specific heat consumption KPIs (GRI 302-1 to 302-5), reflecting operational efficiency outcomes across DBL's manufacturing boundary.

Intellectual Capital: DBL invests in Research and Development (R&D), innovation, design and engineering, which form the basis of product development efforts. It is linked to R&D investments, process innovation metrics, and product development outcomes, demonstrating how knowledge assets translate into competitive advantage.

Human Capital: DBL focuses on attracting, developing and retaining the best talent by providing training and ensuring over all safety and well-being. It also promotes inclusion and diversity throughout the business. It is tied to measurable workforce KPIs including total training hours, attrition rate, diversity ratios, and OHS performance indicators (GRI 401-1, 403-9, 404-1, 405-1), evidencing DBL's people strategy outcomes. Additional human capital capability indicators reported by DBL and verified in this engagement include: employee retention rate (permanent workforce); leadership pipeline coverage (% of senior roles filled internally); average competency assessment scores for safety-critical roles; female representation in management roles; and training effectiveness measurement through post-training assessments for technical and safety modules. Workforce Capability Trend (FY 2024-25 vs FY 2025-26, verified by TÜV): (i) Avg. training hours per employee: 16.9 hrs (FY 2024-25, per DBL Integrated Annual Report) — FY 2025-26 actual verified and reported in BRSR/Sustainability Report; (ii) Employee retention rate: 85% (FY 2024-25).

Social and Relationship Capital: DBL creates value beyond boundaries by cultivating an ethos of 'giving back to the society' through its CSR initiative and building a sustainable, resilient value chain. It is connected to CSR expenditure (GRI 203-1, 413-1), supplier assessment coverage under DBL's Supplier Code of Conduct, and community engagement outcomes.

Natural Capital: DBL emphasizes on operational eco-efficiency, principles of circularity and resource efficiency and product stewardship standards for being environmentally responsible throughout its value chain. Biodiversity impact indicators reported and verified under GRI 304 include: land rehabilitated as a percentage of land disturbed under mining operations; number of IUCN Red List species identified within or adjacent to operational boundaries; area under active biodiversity management plans; and quarry rehabilitation completion milestones. These quantified indicators supplement the qualitative biodiversity narrative and provide measurable evidence of DBL's biodiversity dependency assessment and mitigation commitment. The aim to be carbon negative by 2040, backed by SBTi-approved targets, is contextual and not independently assured under this engagement. It is quantifiably linked to CO₂ emissions intensity (Scope 1, 2, 3), water withdrawal and positivity ratios, waste utilization rates, and biodiversity management disclosures (GRI 302 to 306, GCCA guidelines), reflecting DBL's environmental stewardship commitments.

Climate Related Disclosure: TÜV verified DBL's climate-related disclosures against GRI 305 requirements and reviewed the alignment of climate risk disclosure with the recommendations of the Task Force on Climate-related Financial Disclosures

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(TCFD). DBL has integrated climate-related risks and opportunities within its enterprise risk management (ERM) framework, under the oversight of the Board of Directors and its designated sustainability governance structure.

This assurance statement has been prepared in accordance with the terms of our engagement and ISAE 3000 (revised) requirements.

Independence: TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which, adopts a threats and safeguards approach to independence. It is confirmed that the Assurance Team is selected to avoid situations of self-interest, self-review, advocacy and familiarity. The Assessment Team was safeguarded from any type of intimidation.

Quality control: The Assurance Team complies with the Code of Ethics for Professional Accountants issued by the IESBA, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. In accordance with International Standard on Quality Control, TUVI 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.

In the context of Assurance, the following contemporary principles has been observed:

Evaluation of the adherence to other contemporary Principles

Stakeholder Inclusiveness: Stakeholder identification and engagement is carried out by DBL on a periodic basis to bring out key stakeholder concerns as material topics of significant stakeholders. In our view, the Report meets the requirements.

DBL has identified its key stakeholder groups — including investors and shareholders, employees and contractual workers, customers, local communities, suppliers and value chain partners, regulators and government bodies, and industry associations — based on a stakeholder mapping exercise that considered the nature of dependency, influence, and impact relevance of each group.

Engagement mechanisms deployed by DBL include: annual general meetings and investor calls (investors); employee satisfaction surveys, town halls, and grievance mechanisms (employees); community needs assessments and CSR consultations (local communities); supplier audits and code of conduct assessments (value chain partners); and regulatory filings and industry body participation (regulators and associations).

Sustainability Context: DBL established the relationship between ESG and organizational strategy within the Report, as well as the context in which disclosures are made. In our view, the Report meets the requirements with regards to the sustainability Context.

Materiality: The materiality determination process has been conducted and reviewed based on the principle of double materiality and the requirements of the GRI Standards, considering involvement of internal and external stakeholders in upstream and downstream value chain in identifying the material issues to the DBL range of businesses. The Report fairly brings out the aspects, topics, and their respective boundaries of the diverse operations of DBL. In our view, the Report meets the requirements.

Responsiveness: TUVI believes that the responses to the material aspects (identified through the Double Materiality Test) are fairly articulated in the report, i.e., disclosures on DBL policies and management systems, including governance. In our view, the Report meets the requirements.

Impact: DBL communicates its sustainability performance through regular, transparent internal and external reporting throughout the year, aligned with GRI, IIRC Integrated Reporting (<IR>), TCFD and CDP as part of its policy framework encompassing environmental, social, ethical, and other policies. DBL reports on sustainability performance to the Board of Directors, who oversees and monitors the implementation and performance of objectives, as well as progress against goals and targets for addressing sustainability-related issues.

Completeness: The Report has fairly disclosed the selected non-financial KPIs, as per GRI Standards. In our view, the Report meets the requirements.

Reporting Principles for defining report quality: The majority of the data and information were verified by TUVI's assurance team during the remote assessment and found to be fairly accurate. The disclosures related to ESG issues and performances are reported in a balanced manner and are clear in terms of content and presentation. In our view, the Report meets the requirements.

Reliability: The majority of the data and information were verified by TUVI's assurance team and found to be fairly accurate. Some inaccuracies in the data identified during the verification process were found to be attributable to transcription, interpretation, and aggregation errors, and these errors have been corrected. Therefore, in reference to the GRI Standards and <IR> framework, TUVI concludes that the ESG data and information presented in the Report are fairly reliable and acceptable. In our view, the Report meets the requirements.

TUVI's assurance team conducted sample-based verification of quantitative ESG data and qualitative disclosures included in the Report across all verified GRI topic disclosures listed in the Scope section of this statement. Verified datasets include environmental performance data (energy, emissions, water, waste, materials), social performance data (employment, OHS, training, diversity), and economic performance data — covering the full operational boundary of DBL as defined in this statement.

The verification methodology included review of primary data sources, data aggregation trails, internal calculation methodologies, supporting documentation, and interviews with data owners across functions and reporting locations,

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including onsite verification at Ariyalur, Sattur, and the Corporate Office. TUVI identified certain data corrections arising from transcription errors, unit conversion discrepancies, and aggregation inconsistencies in specific environmental and social datasets. Each correction was reviewed and subjected to a materiality assessment. All identified corrections were determined to be non-material in nature — individually and in aggregate — and did not result in any change to the overall assurance conclusion or the reliability of the reported KPIs at the boundary level.

Neutrality: The disclosures related to ESG issues and performance are reported in a neutral tone, in terms of content and presentation. In our view, the Report meets the requirements.

Our Assurance Team and Independence

TUVI is an independent, neutral third party providing sustainability services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "No Conflict of Interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with DBL on any engagement that could compromise the independence or impartiality of our findings, conclusions, and recommendations. TUVI was not involved in the preparation of any content or data included in the Report, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement.



For and on behalf of TUV India Private Limited
Manojkumar Borekar
Product Head – Sustainability Assurance Service



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