

7<sup>th</sup> July 2024

BSE Limited  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building, P J Towers  
Dalal Street, Fort  
Mumbai 400 001

**Stock Code: 513375**

National Stock Exchange of India Ltd.  
Plot No. C/1, G Block  
Bandra - Kurla Complex, Bandra (E)  
Mumbai 400 051

**Stock Code: CARBORUNIV**

Dear Sir/Madam,

**Sub: Submission of Business Responsibility and Sustainability Report**

Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we submit herewith the Business Responsibility and Sustainability Report for the FY 2023-24.

Thanking you.

Yours faithfully,  
For **Carborundum Universal Limited**

**Rekha Surendhiran**  
**Company Secretary**

**Encl: a/a**

## ANNEXURE C

### BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

#### SECTION A: GENERAL DISCLOSURES

##### I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity	L29224TN1954PLC000318
2. Name of the Listed Entity	Carborundum Universal Limited
3. Year of incorporation	1954
4. Registered office address	43, Parry House, Moore Street, Chennai-600001
5. Corporate address	43, Parry House, Moore Street, Chennai-600001
6. E-mail	<a href="mailto:investorservices@cumi.murugappa.com">investorservices@cumi.murugappa.com</a>
7. Telephone	044-30006161
8. Website	<a href="https://www.cumi-murugappa.com/">https://www.cumi-murugappa.com/</a>
9. Financial year for which reporting is being done	2023-24
10. Name of the Stock Exchange(s) where shares are listed	BSE Limited, National Stock Exchange of India Limited
11. Paid-up Capital	₹190,257,608
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Ms. Rekha Surendhiran, Company Secretary, 044-30006141, <a href="mailto:rekhas@cumi.murugappa.com">rekhas@cumi.murugappa.com</a>
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).	The disclosure in this report is made on a Standalone basis.
14. Name of assurance provider	Not Applicable (NA)
15. Type of assurance obtained	

##### 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	Manufacture of other non-metallic mineral products - Abrasives	Manufacture, Sale, and Marketing of abrasives for various applications including Bonded, Coated & Super Abrasives	44.25%
2	Electrominerals - Abrasives Grains	Manufacture, Sale, and Marketing of abrasives for various applications including Bonded, Coated & Super Abrasives	21.87%
3	Refractories & Ceramics	Design and Manufacturing of Refractories, Ceramics, Anti Corrosives and Polymers	33.88%

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

S.No.	Products/Services	NIC Code	% of total Turnover contributed
1	Abrasives	23993	44.25%
2	Electrominerals	0729	21.87%
3	Refractories & Ceramics	23939	33.88%

### 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	20	10	30
International	Nil	Nil	Nil

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

##### a. Number of locations

Locations	Number
National (No. of States)	Pan India (28 States and 8 Union territories)
International (No. of Countries)	41 Countries (directly) (Multiple countries across Asia/Europe/America. Predominantly Europe, South-East Asia, Middle East, and North America)

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

24%

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

The Company caters to a diverse range of customers across various industries, including Aerospace, Automotive Original Equipment Manufacturer (OEM), Construction, Cement, Food Processing, General Engineering, Iron & Steel, Mining, Mineral Processing, Pharmaceuticals, and Railways. The Company serves both retail and industrial customers through multiple channels across India. The multiple channels include distributors, direct sales, and digital marketing.

### IV. Employees

#### 20. Details as at the end of Financial Year:

##### a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1.	Permanent (D)	1007	924	91.76%	83	8.24%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	1007	924	91.76%	83	8.24%
<b>WORKERS</b>						
4.	Permanent (F)	1231	1211	98.38%	20	1.62%
5.	Other than Permanent (G)	3658	3316	90.65%	342	9.35%
6.	Total workers (F + G)	4889	4527	92.60%	362	7.40%

##### b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1.	Permanent (D)	3	2	66.67%	1	33.33%
2.	Other than Permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	3	2	66.67%	1	33.33%
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	3	1	33.33%	2	66.67%
5.	Other than Permanent (G)	0	0	0%	0	0
6.	Total differently abled workers (F + G)	3	1	33.33%	2	66.67%

**21. Participation/Inclusion/Representation of women:**

	Total (A)	No. and Percentage of Females	
		No. (B)	% (B/A)
Board of Directors	7	1	14
Key Management Personnel	2	1	50

**22. Turnover rate for permanent employees and workers:**

(Disclose trends for the past 3 years)

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	11.34	7.64	11.04	10.47	12.41	10.62	8.04	15.58	11.33
Permanent Workers	4.18	6.25	4.21	4.81	0.00	4.76	4.43	8.00	4.47

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

**23. (a) Name of the holding/subsidiaries/associate companies/joint ventures:**

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Net Access India Limited	Subsidiary	100	No
2	Southern Energy Development Corporation Limited	Subsidiary	84.76	No
3	Pluss Advanced Technologies Limited	Subsidiary	73.42	No
4	Sterling Abrasives Limited	Subsidiary	60	No
5	Cumi (Australia) Private Limited	Subsidiary	51.22	No
6	Cumi International Limited	Subsidiary	100	No
7	Volzhsky Abrasive Works	Subsidiary	98.07	No
8	Foskor Zirconia (Pty) Limited	Subsidiary	51	No
9	Cumi America Inc.	Subsidiary	100	No
10	Cumi Middle East FZE	Subsidiary	100	No
11	Cumi Abrasives & Ceramics Company Limited	Subsidiary	100	No
12	Cumi Europe s.r.o	Subsidiary	100	No
13	Cumi Awuko Abrasives GmbH	Subsidiary	100	No
14	Rhodium Abrasives GmbH	Subsidiary	100	No
15	Pluss Advanced Technologies B.V., Netherlands	Subsidiary	73.42	No
16	Rhodium Nederland B.V	Subsidiary	100	No
17	Rhodium France S.A.R.L.	Subsidiary	100	No
18	Rhodium Korea Inc.	Subsidiary	100	No
19	Rhodium South America Ltd	Subsidiary	100	No
20	Ciria India Limited	Associate	30	No
21	Wendt India Limited	Associate	37.5	No
22	Murugappa Morgan Thermal Ceramics Ltd	Associate	49	No

## VI. CSR Details

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

Yes

(ii) Turnover (in ₹) – 26,332 Million

(iii) Net worth (in ₹) – 22,975 Million

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	-	0	0	-
Investors (other than shareholders)	Yes	0	0	-	0	0	-
Shareholders**	Yes	52	1	-	2	0	-
Employees and workers	Yes	2	0	-	1	0	-
Customers	Yes	1073	16*	-	1022	0	-
Value Chain Partners	Yes	0	0	-	0	0	-
Other (please specify)							

\* Complaints are pending due to ongoing discussions with the customer(s) for additional information and/or return of materials.

\*\* Refer Corporate Governance report for nature of complaints

The stakeholders can use the grievance redressal policy to raise complaints. All the complaints shall be addressed in line with the grievance redressal mechanism. Refer to the grievance redressal policy using the link below.

<https://www.cumi-murugappa.com/wp-content/uploads/2024/04/Stakeholder-Grievance-Redressal-Policy-.pdf>

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

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

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Climate change and Climate action obligation	Risk	<p>Climate change is resulting in increasing frequency and intensity of extreme weather events, which can disrupt operations, damage infrastructure and equipment, and lead to supply chain disruptions. In addition, water scarcity is already a significant concern in India, and climate change is expected to exacerbate this issue, which could lead to production disruptions and increased costs.</p> <p>The Company is in a phase where Climate obligations are rapidly evolving. The Indian government is taking steps to address climate change and can expect more regulations to be introduced in the future. The risk could potentially increase the operating costs through carbon taxes or emissions caps.</p> <p>Additionally, the customers, investors, and other stakeholders are increasingly concerned about climate change and are demanding that the Company take necessary action to address it. Failure to take action may result in reputational damage and loss of business.</p>	<p>To mitigate exposure to these risks, the Company is taking proactive measures such as investing in energy-efficient technologies, reducing greenhouse gas emissions, increasing water efficiency, plan to diversify supply chains, and developing contingency plans for extreme weather events.</p> <p>By implementing these methods, the Company can reduce its exposure to climate change risks and enhance long-term sustainability.</p> <p>As a part of the sustainability efforts, the Company is focusing on a significant reduction in water, energy, and waste in the next few years.</p>	Negative
2.	Environmental risks	Risk	<p>Environmental risks, such as air and water pollution, waste generation and disposal, climate change, and resource scarcity, have the potential to affect operations, reputation, and financial performance.</p> <p>Failure to comply with environmental regulations and standards could result in fines, legal action, and reputational damage.</p> <p>Dependence on fossil fuels and increasing energy costs could affect profitability and competitiveness in the long run.</p>	<p>The Company is making continuous efforts to reduce its exposure to environmental risks by transitioning from fossil fuels from liquid-based to gaseous-based fuels. Also increasing purchase and generation of renewable power sources across plants. The Company has installed Effluent Treatment Plants (ETP) and Sewage Treatment Plants (STP) to treat, reuse, or discharge water in accordance with the norms set by the Pollution Control Board (PCB). As per the obligations under the Extended Producer Responsibility (EPR) regulation, the Company ensures that the collection of waste generated through third-party engagement.</p> <p>To monitor compliance with environmental regulations, the Company uses the KOMRISK tool, which enables tracking and reporting on environmental performance monthly.</p> <p>Additionally, the Company conducts regular environmental monitoring to ensure that no threat to the environment and to prevent any potential disruption to business operations.</p>	Negative

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Employee turnover and skills	Risk	<p>High turnover rates can lead to increased recruitment and training costs, loss of knowledge and expertise, reduced productivity, and lower employee morale.</p> <p>Moreover, the Company operates in a highly competitive industry, where access to skilled talent is essential for success.</p> <p>The ability to attract, retain, and develop skilled employees is critical to the ability to innovate, meet customer demands, and achieve business objectives. Failure to do so could result in a shortage of skilled labor, which could limit growth potential and put the Company at a competitive disadvantage.</p>	<p>The Murugappa group considers human capital as being very vital for sustainable business operations and growth. Hence, the Company provides training and development programs to allow employees to enhance and refine their skills. By doing so, employees can pursue career advancement while simultaneously contributing towards the organisation's objectives.</p> <p>Various HR practices/processes/initiatives are part of the employment cycle, which also includes performance-based rewards and recognition mechanisms.</p> <p>Job rotation and training are deployed to develop employee capability besides conducting regular employee engagement initiatives.</p>	Negative
4	Market Preference	Risk/Opportunity	<p>The Company operates in a highly competitive industry space where customer preferences and expectations are constantly evolving. Failure to understand and adapt to these changing market preferences could result in declining sales and market share, impacting overall financial performance and the ability to meet the expectations of its stakeholders.</p> <p>Moreover, the Company operates in a global market where customers are increasingly focused on sustainability and ethical business practices. Failure to align business practices with these changing market preferences could result in reputational damage, lost business opportunities, and legal liabilities.</p>	<p>The Company regularly conducts market research and analysis to understand customer preferences and expectations and adapt the products and services accordingly. Also, it takes steps to strengthen the integration of sustainability aspects in business strategy, operations, and decision-making, reflecting the commitment to responsible and ethical business practices that meet the evolving needs of the stakeholders.</p>	Negative / Positive
5	Technology Risk	Opportunity	<p>Technology plays a vital role in the operations, from process automation and quality control to supply chain management and customer engagement. Failure to keep up with the latest technological trends and innovations could result in a competitive disadvantage and impact the Company's ability to meet customer demands and expectations.</p> <p>Moreover, the operations are becoming increasingly reliant on digital systems and networks, which are vulnerable to cyber threats and disruptions.</p> <p>Cyberattacks and data breaches could result in financial losses, reputational damage, and legal liabilities, which could impact the brand's reputation and stakeholder trust.</p>	<p>The Company has implemented various initiatives to mitigate the risk of technology-related threats. The Company regularly invests in research and development to enhance technological capabilities, improve processes, and develop innovative solutions that meet the evolving needs of the customers. The Company plans to strengthen cybersecurity measures in place to protect its digital assets and ensure the confidentiality, integrity, and availability of data.</p>	Positive

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Data Security	Risk	<p>The Company understands that data security breaches can lead to significant reputational damage, financial losses, and legal penalties. The Company deals with sensitive information such as customer data, supplier information, and intellectual property.</p> <p>If this information is breached or compromised, it can result in a loss of trust with stakeholders and damage to the Company's reputation.</p>	<p>The Company has implemented various measures, such as periodic cybersecurity assessments, data security policies and procedures, and employee awareness to mitigate this risk. By proactively identifying and addressing this risk, the Company is committed to operating in a socially responsible and sustainable manner, protecting reputation, and maintaining the trust of the stakeholders. The Company has planned to deploy a secured data portal which will enhance the security measures besides the deployment of the cyber security framework developed recently.</p>	Negative
7	Data Privacy	Risk	<p>The rapid digitalisation of the economy has made data privacy a significant concern. As a responsible and ethical Company, it is committed to protecting the privacy of the stakeholders and complying with applicable regulations and laws.</p> <p>The unauthorised use or disclosure of personal information can lead to significant reputational damage, financial losses, and legal penalties.</p>	<p>Implementing Access Controls: The Company has implemented access controls to ensure that only authorised personnel have access to sensitive information.</p> <p>Regular Training and Awareness: Conduct regular training and awareness programs for employees to educate them on data privacy best practices, including how to handle sensitive information, how to spot phishing attempts, and how to report suspicious activity. With the advent of the Digital Data Protection laws in the country, employee awareness programs are planned to be conducted besides making process changes to adapt to the requirements of the new law.</p>	Negative
8	Corporate Governance (Transparency and Disclosures)	Opportunity	<p>Corporate governance is a fundamental element of sustainable business operations. The identification of risks and opportunities, policies and operating procedures, implementation, monitoring, checking, and verification of systems and procedures help the organisation to ensure business continuity, and build trust and reputation in the market.</p> <p>Failure to implement adequate Corporate Governance policies can lead to legal and financial penalties, as well as damage the reputation and brand image.</p>	<p>The corporate business conduct policy which encompasses governance principles has been implemented across all operations. The leadership team and operations staff have been trained and continue to be trained. The Company has zero tolerance for any breach of the code of conduct.</p>	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.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management process</b>									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b. Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c. Web Link of the Policies, if available	<a href="https://www.cumi-murugappa.com/policies-disclosure/">https://www.cumi-murugappa.com/policies-disclosure/</a>								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y*	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.			ISO 45001			ISO 14001 & ISO 50001			
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company has set a comprehensive sustainability target to reduce its overall environmental footprint and specific targets for reducing its energy consumption, water consumption, waste generation, and circularity.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<p>The Company has achieved progress with respect to its sustainability targets by carrying out the following activities:</p> <ol style="list-style-type: none"> <li>1) Installation of roof-top solar power across the plants and offices</li> <li>2) Purchase of renewable electricity in manufacturing plants from vendors</li> <li>3) Fuel switch from liquid to gas-based in the boilers and furnaces</li> <li>4) Implementing waste management process - waste collection, segregation, recycling, reuse, and disposal through certified vendors</li> <li>5) Setting up of Zero Liquid Discharge Systems and rainwater collection tanks in addition to percolation pits to reuse water in the production process</li> </ol>								
<b>Governance, leadership and oversight</b>									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	The Company recognizes the importance of Environmental, Social, and Governance (ESG) factors in creating a sustainable future business and society as a whole. The Company believes that by prioritizing ESG considerations, it can better manage risk, drive long-term value creation, and contribute to a more equitable and prosperous world. ESG principles are embedded into every aspect of the operations, right from the business strategy and decision-making processes to the daily practices and interactions with stakeholders. The Board comprises individuals with diverse backgrounds and experiences, including expertise in ESG issues, which enables us to effectively manage these considerations in the decision-making processes.								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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The Company has established multiple committees within the Board, including but not limited to the Audit Committee, Corporate Social Responsibility Committee, ESG Committee, Risk Management Committee, and Stakeholders Relationship Committee. These committees play a vital role in ensuring effective governance, risk management, and sustainable development of the organisation.

The Company is committed to ESG principles, it has adopted a set of policies and practices that align with the Company's values and goals. Anti-corruption and Anti-Bribery, Code of Conduct, CSR Policy, Equal Employment Opportunity Policy, Policy against Human Trafficking and Child Labour, Stakeholder Grievance Redressal Policy, and Whistle Blower Policy and practices are adopted by the Company to ensure its commitment to ESG principles.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name: Mr. Sridharan Rangarajan Designation: Managing Director
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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 Company has an ESG committee responsible for decision-making on sustainability-related issues. The committee comprises members representing all functions and businesses.
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The ESG Committee is responsible for implementing the Company's ESG policies and strategies. This involves coordinating with various departments and stakeholders to ensure that ESG considerations are integrated into business operations and decision-making processes. The committee also monitors progress towards ESG goals and identifies areas for improvement, enabling the Company to continuously enhance its ESG performance.

Besides this, the Board committees like the Audit Committee, Risk Management Committee, and Stakeholder Relationship committee oversee the initiatives implemented by the Company in ESG matters.

Y\* - The Company encourages the value chain partners also to embrace all the principles and incorporate sustainable business practices. The Company's Environmental, Health and Safety practices, Labour and Human Rights, Ethical Business Practices, and Transparency policies apply to the value chain partners.

#Certain policies of the Company are only available to internal stakeholders, employees and workers.

## 10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Y	Y	Y	Y	Y	Y	Y	Y	Y	Q	Q	Q	Q	Q	Q	Q	Q	Q
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Y	Y	Y	Y	Y	Y	Y	Y	Y	Q	Q	Q	Q	Q	Q	Q	Q	Q

Note: As part of a regular process, the department heads, business leaders, functional heads and senior management staff review the Company's policies to ensure their continued relevance and effectiveness. Any necessary adjustments to the policies and processes are made during this assessment, and the policies are presented to the Board of Directors as needed. The Company and its subsidiaries ensure adherence to applicable regulations and have established a compliance management system to this effect.

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
No, the entity has not carried out an independent assessment/ evaluation of the working of its policies by an external agency. Although the Company has not undergone any specific external assessment on the working of its policies, many of which have been in place even before the BRR/BRSR reporting was introduced. The Company has established a robust internal mechanism to ensure compliance with standards and laws. This mechanism will include site-level audits by internal and external persons including in the areas of environment, health, safety, and quality management. The adoption of standards like ISO 9001 for quality management, ISO 45001 for occupational health and safety management, and ISO 50001 for energy management are validated by the agencies outside the entity. The Company has partnered with ESG specialists to assess existing maturity levels and aid in strategy adoption to benchmarked practices and processes. The Company also undergoes validation by its customers on these parameters.									

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/ No)									
Any other reason (please specify)									

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is 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	%age of persons in respective category covered by the awareness programmes
Board of Directors	7	Anti-Corruption Practices, BRSR Principles, Business Plan and Long-term Strategy, Code of Conduct, Conflict of Interest, Corporate Governance, CSR Activities, Risk Assessment, Regulatory Changes, Safety Training.	100%
Key Managerial Personnel	8	Anti-Corruption Practices, BRSR principles, Business Plan and Long-term Strategy, Code of Conduct, Conflict of Interest, Corporate Governance, CSR Activities, Grievance Mechanism, Occupational Health and Safety Aspects, Prevention of Sexual Harassment (POSH) Policy, Regulatory changes, and Risk Assessment.	100%
Employees	51	Anti-Corruption Practices, Code of Conduct, Diversity Policy, Environment Health and Safety Policy, Ethics and Integrity, Equal Opportunity Policy, Prevention of Sexual Harassment (POSH) Policy, Safe Workplace Practices and Whistleblower Policy. Value workshops on Personal Values, Social Responsibility, Environment Conservation Practices.	48.76%
Workers	87	Anti-Corruption Practices, Code of Conduct, Diversity Policy, Environment Health and Safety Policy, Ethics and Integrity, Equal Opportunity Policy, Prevention of Sexual Harassment (POSH) Policy, Safe Workplace Practices, and Whistleblower Policy.	22.6%

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

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

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	
Punishment				

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
	NA

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 policies.

Yes, the Company has an anti-corruption / anti-bribery policy. The Company strictly prohibits its employees from engaging in any form of bribery and corruption in any business dealings. The anti-corruption and anti-bribery policy, prohibit employees from making any payments, directly or indirectly to any employees or individuals or entity in exchange for business or any other favourable action. The policy is also incorporated as part of contractual agreements with its vendors and suppliers etc. In addition, all the employees of the Company are required to adhere to the Company's code of conduct and confirm the same annually.

<https://www.cumi-murugappa.com/wp-content/uploads/2024/04/Anti-Bribery-and-Anti-Corruption-Policy.pdf>

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

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

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

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

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

No correction actions were taken since no issues related to fines/penalties/actions were taken by the regulators/law enforcement agencies/judicial institutions in case of corruption and conflict of interest during the financial year.

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	40 days	43 days

9. Open-ness of business.

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

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	11.1%	9.8%
	b. Number of trading houses where purchases are made from	95	71
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	67.8%	76.4%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	42.3%	41.8%
	b. Number of dealers / distributors to whom sales are made	909	1004
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	21.6%	19.9%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	8.2%	7.8%
	b. Sales (Sales to related parties / Total Sales)	9.3%	8.5%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	Nil	Nil
	d. Investments (Investments in related parties / Total Investments made)	100%	100%

#The company has considered the following definition for a Trading house. A trading house (trader), is an entity that specializes in facilitating trade between manufacturers and customers across different regions and countries. The company has considered raw materials purchased from traders within India and globally for completing the details of the above table. Also, the raw materials purchased from related parties are used for quantification in the RPT Section of the above table.

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Nil	Nil	Nil

Though the Company did not conduct any direct awareness or training program for value chain partners on the 9 principles of NGRBC, the Company has created an ESG awareness flyer for its value chain partners and the same was shared with the majority of suppliers. The key aspects covered in the flyer are:

- Environment
- Health and Safety
- Labour
- Human Rights
- Ethical business practice
- Transparency

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 a code of conduct for its board of directors and senior management, which contains clear provisions governing actual or potential conflicts of interest, that may arise in connection with the Company's business operations. The Company mandates an annual disclosure from its board of directors and senior management, disclosing any interests that they may hold in any other entities. Additionally, the Company undertakes necessary measures to get requisite approvals, in compliance with the relevant laws and regulations, before entering into any transactions with such entities.

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

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

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
<b>R&amp;D</b>	2.53%	4.25%	<ul style="list-style-type: none"> <li>a) Towards the development of electrolysers for green hydrogen production</li> <li>b) Research on the cold sintering process of ceramics</li> </ul>
<b>Capex</b>	8.9%	2.8%	<ul style="list-style-type: none"> <li>a) Replacement of burners for fuel switch from liquid to gaseous fuels</li> <li>b) Implementation of a dust collection system to reduce dust pollution</li> <li>c) Setting up of solar power generation systems</li> <li>d) Optimisation of fuel use in boilers, kilns, and furnaces</li> <li>e) Installation of LED lights</li> <li>f) Implementation of Energy saving initiatives across all the locations</li> </ul>

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

No, the Company has not identified and laid down procedures in place for measuring sustainable sourcing as of yet. The selection of suppliers/contractors/others is a starting process in the sourcing and the Company ensures that it ties up with those persons who are aligned with its value system. The business of the Company is focused on harnessing the properties of rare resources of nature to maximize efficiencies for the best possible material science solutions to its customers across varied industries. While the Company does incorporate the processes in a small way in terms of seeking the energy management initiatives of suppliers, sourcing from certified vendors, etc., the long-term plans to support certified vendors in the supply chain, engaging with marginalised suppliers, etc. would further strengthen the ESG framework and aid in establishing robust procedures in place.

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

Not Applicable.

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.**

The Company under EPR regulation is required to manage its e-waste and plastic waste generated from the products. Waste generated from the products and their packaging is safely managed under EPR obligation through third-party engagement which undertakes recycling and coprocessing to manage effectively.

Most of the Company's products before and after use do not contribute to the Hazardous waste. However, the usage of Prodorite leads to the generation of hazardous chemicals. The customers are informed about safety aspects related to its handling and management by providing the Material Safety Data Sheet (MSDS) along with the product.

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

Yes, EPR for plastic and e-waste applies to the Company. Yes, the waste collection plan is in line with the EPR plan submitted to the Pollution Control Board. Refer to the leadership indicator Question 4, on the EPR plan and the Company's progress toward achieving the target.

## Leadership Indicators

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

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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Nil

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
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NA

No, the organisation did not conduct Life Cycle Assessments (LCA) for any of its products.

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24	FY 2022-23
Abrasive grains waste	0.28%	0.19%
Ceramics scrap	0.82%	1.03%
Ceramics sludge	0.13%	0.10%
Reclaimed in-house materials	0.45%	0.33%
Refractory waste	0.09%	0.07%

The above table has been quantified based on recycled input material and total material used in production based on the quantity of materials used in production in tonnes. Since the majority of recycled inputs are generated in-house from various divisions and reused within the Company, a financial value has not been ascertained.

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

	FY 2023-24			FY 2022-23		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	Nil	495 MT	Nil	Nil	313 MT	Nil
E-waste	Nil	65 MT	Nil	Nil	Nil	Nil
Hazardous waste	Nil	Nil	Nil	Nil	Nil	Nil
Other waste	Nil	Nil	Nil	Nil	Nil	Nil

The Company has achieved its E-waste EPR target and is aligned with achieving the EPR target for plastic waste based on its commitment to the Central Pollution Control Board (CPCB), India for the financial year 2023-24. The EPR for E-waste applies to the Company from the financial year 2023-24.

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

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



**PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains****Essential Indicators****1. a. Details of measures for the well-being of employees:**

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
<b>Permanent Employees</b>											
Male	924	924	100%	924	100%	0	0	924	100%	924	100%
Female	83	83	100%	83	100%	83	100%	0	0	83	100%
<b>Total</b>	<b>1007</b>	<b>1007</b>	<b>100%</b>	<b>1007</b>	<b>100%</b>	<b>83</b>	<b>8.2%</b>	<b>924</b>	<b>91.8%</b>	<b>1007</b>	<b>100%</b>
<b>Other than Permanent Employees</b>											
Male											
Female	NA										
<b>Total</b>											

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

Category	% of workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
<b>Permanent Workers</b>											
Male	1211	1211	100%	1211	100%	0	0	1211	100%	1211	100%
Female	20	20	100%	20	100%	20	100%	0	0	20	100%
<b>Total</b>	<b>1231</b>	<b>1231</b>	<b>100%</b>	<b>1231</b>	<b>100%</b>	<b>20</b>	<b>1.6%</b>	<b>1211</b>	<b>98.4%</b>	<b>1231</b>	<b>100%</b>
<b>Other than Permanent Workers</b>											
Male	3316	3316	100%	3316	100%	0	0	0	0	0	0
Female	342	342	100%	342	100%	342	100%	0	0	342	100%
<b>Total</b>	<b>3658</b>	<b>3658</b>	<b>100%</b>	<b>3658</b>	<b>100%</b>	<b>342</b>	<b>9%</b>	<b>0</b>	<b>0</b>	<b>342</b>	<b>9%</b>

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

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company	0.40%	0.45%

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

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI#	100%	100%	Y	100%	100%	Y
Others - please specify	NA					

#ESI Act 1948 describes that all the establishments covered under the ESI Act and all factories that employ more than 10 employees and pay wages below or up to ₹21,000 per month (₹25,000 for employees with disability) must register with the Employees State Insurance Corporation (ESIC) and contribute towards the ESI scheme. All the employees earning more than ₹21,000 per month are exempted from the ESI contribution. All eligible employees and workers are covered under the Act.

**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, most of the plants and offices of the entity are accessible to differently-abled employees and workers as per the requirements of the Rights of Persons with Disabilities Act, 2016. The Company has created the following infrastructure such as accessible restrooms, adjustable chairs, elevators, and ramps facilities in the majority of plants and offices. The Company is making efforts in other locations to create infrastructures to accommodate the requirements of differently abled employees and workers.

**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. The Company has an equal opportunity policy and it prohibits discrimination in any form. The policy applies to recruitment, training, working conditions, salary, transfers, employee benefits, and career advancement.

The Company does not discriminate against the employees or workers and job applicants on aspects such as sex, caste, community, religion, age, disability sexual orientation, etc. The Company encourages inclusive growth and supports equal employment opportunity for all job applicants. The requirement criteria for the job applicant are solely based on the merit for selection.

The Company also encourages its employees, contractors, subcontractors, vendors, suppliers, and partners, not engage in any practice that contributes to discrimination in any form.

Please access to the equal opportunity policy through the below link.

<https://www.cumi-murugappa.com/wp-content/uploads/2024/04/Equal-Employment-Opportunity-Policy.pdf>

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	100%	100%	100%
Female	100%	100%	0%	0%
<b>Total</b>	100%	100%	94%*	100%

\*One permanent female worker is currently on maternity leave.

**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, the Company has a grievance redressal mechanism in place to receive and redress grievances promptly and effectively. The Company ensures that the employees and workers feel valued and heard, and also, they can freely express their concerns.
Other than Permanent Workers	
Permanent Employees	The grievance can be raised with the Human Resources team at the unit level or corporate level or unit-level grievance committees established by the Company.  Also, the workers can contact their contractors for any grievances and they shall escalate to the HR team or Grievance Committee.  For any sexual harassment-related grievances, any employee can approach the Internal Complaints Committee (ICC) under POSH. They can also approach the ombudsman under the whistleblower mechanism.  All the complaints are addressed as per the Grievance Handling Mechanism mentioned in the Grievance Redressal Policy.
Other than Permanent Employees	

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

Category	FY 2023-24			FY 2022-23		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
<b>Total Permanent Employees</b>	1007	0	0	967	0	0
- Male	924	0	0	893	0	0
- Female	83	0	0	74	0	0
<b>Total Permanent Workers</b>	1231	592	48%	1191	544	46%
- Male	1211	592	49%	1179	544	46%
- Female	20	0	0	12	0	0

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Male	924	331	35.8%	434	46.9%	893	447	50.1%	504	56.4%
Female	83	60	72.3%	52	62.7%	74	58	78.4%	41	55.4%
<b>Total</b>	1007	391	38.8%	486	48.3%	967	505	52.2%	545	56.4%
<b>Workers</b>										
Male	4527	2047	45.2%	951	21%	4250	1130	26.6%	800	18.8%
Female	362	269	74.3%	154	42.5%	283	178	62.9%	147	51.9%
<b>Total</b>	4889	2316	47.4%	1105	22.6%	4533	1308	28.8%	947	20.9%

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	924	798	86.4%	893	772	86.4%
Female	83	67	80.7%	74	60	81.1%
<b>Total</b>	1007	865	85.9%	967	832	86.1%
<b>Workers</b>						
Male	1211	455	37.6%	1179	913	77.4%
Female	20	19	95.0%	12	10	83.3%
<b>Total</b>	1231	474	38.5%	1191	923	77.5%

#While performance and career development reviews and discussions are held every year for all permanent employees and permanent workers, the above table depicts the actual number of employees and workers eligible for annual appraisal reviews.

10. Health and safety management system:

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

Yes, an occupational health and safety management system has been implemented by the entity. In addition to that, most of the manufacturing plants are ISO 45001 certified. The Company has recognised all possible safety hazards and risks arising from the business activities by conducting both internal and external safety audits.

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

Hazard identification and Risk assessment is the basic tool used to identify work-related hazards for both routine and non-routine activities. Job safety analysis is done for high-risk activity and all the control measures are implemented before starting the work. Ergonomics assessments like Rapid Entire Body Assessment (REBA) and Rapid Upper Limb Assessment (RULA) being conducted to assess zero related hazards.

**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 actively promoted a culture of reporting near-miss incidents/unsafe acts among the employees through various digital platforms (safety tree). These incidents are analysed from a central repository to identify potential hazards and take appropriate corrective measures. All sites have well-defined procedures in place for reporting work-related hazards, injuries, unsafe conditions, and unsafe acts. By encouraging reporting and maintaining strict procedures for identifying and reporting incidents, risks related to occupational health and safety are effectively managed and mitigated across the organisation. Safety forums are formulated for each plant comprising of employees and workers. The forum provides an avenue for employees and workers to raise any work-related hazards, and identify corrective measures.

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

Yes, the employees/ workers of the entity have access to non-occupational medical and healthcare services.

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

Safety Incident/Number	Category*	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	2.29	1.87
Total recordable work-related injuries	Employees	0	0
	Workers	27	22
No. of fatalities	Employees	0	0
	Workers	1	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	1	0

\*Including in the contract workforce

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

The health and safety of employees and workers are of utmost importance to the Company, and it has implemented a comprehensive safety management system to ensure a safe working environment at all locations. The measures are summarised below:

- The Company has implemented ISO 45001 PDCA to continuously improve the health and safety management system.
- Safety hazards: The Company has identified all the potential risks and hazards that can emerge from business operations through internal and external safety audits.
- The Company has implemented the following risk mitigation measures such as machinery and equipment safety provisions, only authorised entry to hazard areas, and supply of Personnel Protective Equipment (PPEs).
- Safety SOPs covering procedures to adhere to safe work practices.
- Training and awareness: Various training programs were conducted to create awareness on Health and Safety. Programs such as Fire safety, Emergency preparedness, First aid, Hazard Identification and Risk assessment, PPE awareness, and Behaviour safety were conducted.

The Company has established a safety committee at each location, comprising representatives from employees and workers to oversee safety practices and raise concerns regarding any work-related hazards.

Potential incidents are reported to the Corporate EHS Head by Plant Safety officers and it is being reviewed and the learnings are shared among plants to prevent recurrence.

The Company actively promotes a culture of reporting near-miss incidents/unsafe acts among employees and workers through various digital platforms (safety tree). To prioritise safety at the management level, the Board reviews safety tracks and corrective actions as the first item in each Board meeting. In the event of an accident, a root-cause analysis is conducted and corrective actions are taken to prevent future incidents. Safety training is provided to all employees and workers before they enter the plant premises. Also, a behavior-based safety training to install safety practices as a culture among the workforce is implemented.

Additionally, Hazard Identification and Risk Assessment (HIRA) and working condition assessments are conducted based on the Rapid Entire Body Assessment (REBA) model at select units to identify potential hazards and improve working conditions for employees. To effectively manage and mitigate risks related to occupational health and safety, potential risks identified during the HIRA and REBA assessments. By promoting a culture of reporting near-miss incidents and maintaining strict procedures for identifying and reporting hazards and unsafe conditions, the Company can effectively manage and mitigate risks across the organisation. The Company has also participated in the best safety practices competition and won awards for safety practices, which is a testament to the Company's commitment to ensuring the safety and well-being of employees.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	No complaints reported	0	0	No complaints reported
Health & Safety	0	0	No complaints reported	0	0	No complaints reported

**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.**

The organisation takes necessary safety measures to prevent incidents and address any incidents in a systematic manner as per the Occupational Health and Management System.

**Leadership Indicators**

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

Yes, all employees are covered through the Employee Deposit Linked Insurance as part of the Provident Fund scheme. The Company provides coverage for all its workers by the regulations stated in the Factories Act. Additionally, all the other permanent workers hired by the Company are covered by the ESI scheme. As per the Employee Deposit Linked Insurance scheme, in the event of the death of an employee, the family will continue to get the last drawn salary of the employee for up to 48 months and continued health insurance coverage for 2 years.

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

The contract agreements contain all the requirements including a payment clause towards the deduction of statutory dues of the value chain partners. The Company expects all its value chain partners to adhere to the contract agreement. The suppliers are requested to submit proof of remittance of statutory dues (i.e., PF and ESI, etc.) from the previous month along with their invoice. Failure to provide this proof will result in their service payment being withheld until the compliances are met.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	0	0	0
Workers	2	0	1	0

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

No, the Company does not have specific transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

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	The Company has developed a 'supplier assessment form', which is used for onboarding new direct material, external providers, or manufacturers. According to the supplier assessment form, the suppliers are assessed on the parameters of health and safety practices and working conditions.
Working Conditions	

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.

No serious risks or concerns were observed during the financial year.

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

**Essential Indicators**

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

The Company places a strong emphasis on stakeholder engagement as a means of delivering relevant services to the market. It believes that responsiveness to stakeholder requirements is fundamental to success, as reflected in the Values and Beliefs Spirit of Murugappa Group – The FIVE LIGHTS - Integrity, Passion, Quality, Respect, and Responsibility. The key stakeholders include shareholders and investors, employees, customers, suppliers, local communities, regulators, and government agencies. The Company defines stakeholders as the people who can have an impact on the business, as well as the business having an impact on them. The Company has implemented a stakeholder engagement process to identify and classify the major stakeholders.

To lead the stakeholder engagement efforts, the Company has established a Stakeholder Relationship Committee at the Board level. The Management team regularly engages with key stakeholders, and different organisational functions are responsible for facilitating consultation with the Board on important stakeholder concerns. The Board conducts regular reviews of stakeholder engagement activities at least once every quarter.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	Annual General Meeting, Shareholder meets, Email, Stock Exchange (SE) intimations, investor/analysts meet/ conference calls, annual report, quarterly results, media releases, Company/SE website etc.	Ongoing	Share price appreciation, dividends, Profitability and financial stability, Robust governance growth prospects and shareholder value creation.
Employees	No	Senior leader's communication/ talk/ forum, periodic communication meetings, goal setting, and performance appraisal meetings/ review, exit interviews, arbitration/ union meetings, wellness initiatives, engagement surveys, email, intranet, flat screens, websites, poster campaigns, inhouse magazines, circulars, quarterly publications and newsletters etc.	Ongoing	Operational efficiencies, improvement areas, long-term strategy plans, training and awareness, responsible marketing, brand communication, health, safety and engagement initiatives, women empowerment and leadership programmes.
Customers	No	Website, distributor/retailer/ direct customer/achievers meet, senior leader customer meets/ visits, customer plant visits, customer audits, club, key account management, trade body membership, exhibitions, complaints management, help desk, plans, customer surveys etc.	Ongoing	Product quality and availability, responsiveness to needs, after sales service, responsible guidelines/manufacturing, customisation, alignment with the mission/vision/ goals of the Company.
Suppliers/ Partners	No	Prequalification/vetting/ introduction/ communication and the partnership meets, plant visits, MoU and framework agreements, trade association meets/seminars, professional networks, contract management/review, product workshops/on-site presentations, and satisfaction surveys.	Ongoing	Quality, timely delivery and payments, (sustainability, safety checks, compliances, ethical behaviour), ISO and OHSAS standards, collaboration and opportunities, effective supply chain management.
Government (MCA, SEBI, PCB, Ministry of Labour and Employment)	No	Advocacy meetings with local state/national government and ministries, seminars, media releases, conferences, and membership with industry bodies (CII, SICCI etc).	Ongoing	Changes in regulatory frameworks, skill and capacity building, employment, environmental measures, policy advocacy, timely contribution to exchequer/ local infrastructure, proactive engagement.

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Communities	No	Meets (of community/local authority and town council/committee/location head), community visits and project partnerships with local charities, volunteerism, seminars/conferences.	Ongoing	Communication of Disaster Management Program and Emergency response plan. Also, the Company has discussed monitoring plans to minimise environmental impact in nearby villages/ locations. The Company has consulted with the community to establish various CSR programs such as Social welfare activities, Waste management, integrated water management, clean water, climate change impacts, community development, self-sustainability, livelihood support, and disaster relief.

#### 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.**

Various organisational functions in the Company are responsible for different stakeholders, and they facilitate the consultation process with the Board regarding key stakeholder concerns. This process involves periodic Board reviews that are held at least once every quarter, during which the Board engages in discussions with the Managing Director and other senior leaders who represent these functions. This approach ensures that the Board is informed about important stakeholder issues and can provide input and guidance on how the Company can best address them. A brief of items that are being discussed in the meetings are listed below.

- Investors: Earnings calls are organised every quarter once the financial results of the Company is published. Periodic investor calls/meetings are also conducted. This provides a platform for the investor community to engage with the Management matters concerning the business including economic backdrop, environmental concerns, and social topics. There is also a dedicated ESG link on the website of the Company collating all the relevant ESG disclosures made by the Company across multiple forums for a consolidated viewing by the stakeholders. The Company also in its Annual Report provides a detailed overview of each business and the external topics that are concerning the business and the ESG goals set by the Company. Feedback to the Board is provided during the BRSR report consideration.
- Leadership team and employees: Consultation revolves around ESG/Sustainability implementation aspects and ongoing activities to keep the team informed and involved in the Company's efforts to improve its ESG performance.
- Contractors: Consultation on OHS (Occupational Health and Safety) requirements at the site, as well as facility environmental requirements on waste handling and disposal, to ensure that the Contractors are aware of their responsibilities towards ESG.
- Channel partners: Consultation on product delivery standards and requirements, market requirements, and other relevant inputs to ensure that the channel partners are aware of the Company's ESG expectations.
- Community: Consultation on disaster management plans, environmental monitoring plans, etc. The Company has installed display boards at the entrance gate to ensure transparent communication of environmental information to the community. This helps the Company to build trust and demonstrates its commitment to environmental and social responsibility.



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

Yes, stakeholder consultation is used to support the identification and management of environmental and social topics. The Company is in the process of conducting a materiality assessment to identify ESG-related material topics and to develop a sustainability comprehensive roadmap and strategy. Through the materiality assessment, the stakeholder's interests and priorities shall translate into shaping and developing the sustainability strategy of the Company.

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

The Company engages with the community through its NGO partners to access the needs of the community, especially from the vulnerable or marginalised stakeholder groups. The insights from the engagement help in shaping the Corporate Social Responsibility (CSR) programs and initiatives to meet the needs of vulnerable or marginalised stakeholder groups.

#### PRINCIPLE 5: Businesses should respect and promote human rights

##### Essential Indicators

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	1007	1007	100%	967	967	100%
Other than permanent	0	0	0%	0	0	0%
<b>Total Employees</b>	<b>1007</b>	<b>1007</b>	<b>100%</b>	<b>967</b>	<b>967</b>	<b>100%</b>
<b>Workers</b>						
Permanent	1231	1231	100%	1191	1191	100%
Other than permanent	3658	3658	100%	3342	3342	100%
<b>Total Workers</b>	<b>4889</b>	<b>4889</b>	<b>100%</b>	<b>4533</b>	<b>4533</b>	<b>100%</b>

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
<b>Permanent</b>	1007	0	0	1007	100%	967	0	0	967	100%
Male	924	0	0	924	100%	893	0	0	893	100%
Female	83	0	0	83	100%	74	0	0	74	100%
<b>Other than Permanent</b>	0	0	0	0	0	0	0	0	0	0%
Male	0	0	0	0	0	0	0	0	0	0%
Female	0	0	0	0	0	0	0	0	0	0%
<b>Workers</b>										
<b>Permanent</b>	1231	0	0	1231	100%	1191	4	0.3%	1187	99.7%
Male	1211	0	0	1211	100%	1179	0	0.00%	1179	100%
Female	20	0	0	20	100%	12	4	33.3%	8	66.7%
<b>Other than Permanent</b>	3658	1128	30.84%	2530	69.2%	3342	1114	33.3%	2228	66.7%
Male	3316	1027	30.97%	2289	69%	3071	1018	33.2%	2053	66.8%
Female	342	101	29.53%	241	70.5%	271	96	35.4%	175	64.6%

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

**a. Median remuneration / wages:**

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	6	25,25,000	1	21,50,000
Key Managerial Personnel	1	89,85,005	1	87,92,040
Employees other than BoD and KMP	761	9,91,085	62	9,12,118
Workers	1,126	4,71,731	1	2,96,916

#The permanent employees and workers employed for the entire FY 2023-24, were only considered for median remuneration calculation.

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	5.03%	4.25%

#The gross wages paid to females as % of total wages paid by the entity has been considered for all on-roll permanent employees and permanent workers. The Company did not include other than permanent workers in the calculation, since the other than permanent workers are hired and the wages are paid by third party contractors.

**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, the Company has appointed a Human Resources Single Point of Contact (HRSPoCs) at each site. Employees can reach out to the HRSPoCs for any complaints related to human rights, discrimination, etc. The Company has dedicated policies to address the same. The Corporate HR shall conduct a thorough fact-finding investigation and take appropriate action based on the findings. The complainant will be informed of any actions taken as a result of the investigation.

- For any sexual Harassment grievance, the Internal Complaints Committee (ICC) under POSH exists for redressal.
- A dedicated email ID: [cumiposhcomplaints@cumi.murugappa.com](mailto:cumiposhcomplaints@cumi.murugappa.com) is available to receive and resolve grievances relating to POSH.
- Workers can raise their grievances through the contractor. If not resolved, can be escalated to the Unit HR.
- Unit-level grievance committees exist at each location.
- Workers can also reach out to the Ombudsman for any whistle-blower matters at [ombudsperson@corp.murugappa.com](mailto:ombudsperson@corp.murugappa.com).

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

Employees can reach out to the Ombudsman for any complaints related to human rights, discrimination, etc., under whistleblower mechanism or even to the Corporate HR/Unit HR. Absolute confidentiality shall be maintained for all complaints. Ombudsman can set up an enquiry to find out the facts and violations, if any. Based on the enquiry report, appropriate action will be taken by the Company.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	2	0	The complaint was addressed as per the POSH policy.	1	0	
Discrimination at Workplace	0	0		0	0	
Child Labour	0	0		0	0	
Forced Labour/Involuntary Labour	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

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

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	2	1
Complaints on POSH as a % of female employees / workers	0.45%	0.28%
Complaints on POSH upheld	2	1

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

The Company has several mechanisms to prevent discrimination and harassment in the workplace. The code of conduct policy defines the Company's commitment to providing a safe and inclusive workplace for all employees. The HR policies also aim to eliminate discrimination and harassment in the workplace. Regular training and awareness programs on topics such as the Prevention of Sexual Harassment (POSH) and work-related HR policies are conducted. In case any employees face any discrimination, they can approach HR or the ombudsman for assistance. The Company has a POSH policy and an Internal Complaints Committee (ICC) to address any such issues and will conduct a detailed investigation of any such issues.

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

Yes, the Company as a part of The Murugappa group adheres to the five lights principles i.e. Integrity, Quality, Passion, Respect, and Responsibility. The Company's business agreements and contacts contain clauses related to compliance concerning human rights.

**10. Assessments for the year:**

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	
Forced/Involuntary Labour	
Sexual Harassment	100%
Discrimination at Workplace	
Wages	
Others – please specify	-

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

No serious risks or concerns were observed during the financial year.

## Leadership Indicators

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

The Company has adopted the various measures and processes over the years to address human rights grievances and complaints. During the financial year 2023-24, the Company has adopted the Policy against Human trafficking and Child labour with an objective to protect and advance human dignity and human rights in business practices.

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

No, the Company did not conduct any human rights due-diligence during the financial year.

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

Yes, most of the premises/offices of the entity are accessible to differently-abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016 and efforts are being taken to make all plants/offices accessible.

### 4. Details on assessment of value chain partners

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	The Company has developed a 'supplier assessment form', which is used for onboarding new direct material, external providers, or manufacturers. According to the supplier assessment form, the suppliers are assessed on the human rights parameters.
Discrimination at Workplace	
Child Labour	
Forced/Involuntary Labour	
Wages	
Others – please specify	

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

No serious risks or concerns were observed during the financial year.

## PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

### Essential Indicators

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

Parameter	FY 2023-24	FY 2022-23
<b>From renewable sources</b>		
Total electricity consumption (A) (Tera Joules or TJ)	114	145
Total fuel consumption (B) (TJ)	0	0
Energy consumption through other sources (C)	0	0
<b>Total energy consumed from renewable sources (A+B+C) (TJ)</b>	<b>114</b>	<b>145</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D) (TJ)	694	585
Total fuel consumption (E) (TJ)	512	671
Energy consumption through other sources (F)	0	0
<b>Total energy consumed from non-renewable sources (D+E+F) (TJ)</b>	<b>1206</b>	<b>1256</b>
<b>Total energy consumed (A+B+C+D+E+F) (TJ)</b>	<b>1320</b>	<b>1401</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumed / Revenue from operations) (TJ/ Rupees in million)	0.05	0.06
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP) (TJ/ Rupees in million USD)	4.28	4.65
Energy intensity in terms of physical output	NA	NA
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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

No, the organisation did not carry out any external assurance for its energy consumption.

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.

No, the Company does not have any sites or facilities that have been identified as designated consumers (DCs) under the Performance, Achieve, and Trade (PAT) Scheme of the Government of India.

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

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	88363	93079
(ii) Groundwater	137758	153434
(iii) Third-party water	145537	128716
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>371658</b>	<b>375229</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>371658</b>	<b>375229</b>
<b>Water intensity per rupee of turnover</b>		
(Total water consumption / Revenue from operations) (Kilolitres/ Rupees in million)	14.33	15.17
<b>Water intensity per Rupee of turnover adjusted for Purchasing Power Parity (PPP)</b>		
(Total water consumption / Revenue from operations adjusted for PPP) (Kilolitres/ Rupees in million USD)	1205.46	1246.67
<b>Water intensity in terms of physical output</b>	NA	NA
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>	NA	NA

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

No, the organisation did not carry out any external assurance for its water consumption.

4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – Tertiary Treatment	0	0
<b>Total water discharged* (in kilolitres)</b>	<b>0</b>	<b>0</b>

\*The Company does not discharge any water outside its facility. The treated wastewater is reused for manufacturing process and gardening purposes within the facilities.

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

No, the organisation did not carry out any external assurance for its water discharge.

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

Yes, most manufacturing plants have operational Effluent Treatment Plants (ETP) and Sewage Treatment Plant within its premises for management of effluent and domestic wastewater. In few manufacturing plants within the SEZ, the wastewater generated is provided to Common Effluent Treatment (CETPs) for treatment.

The treated wastewater is reused within the respective plants and the Company does not discharge treated wastewater outside the facility.

The wastewater infrastructure and management process details are provided below;

The Company has obtained valid Consent to Operate (CTO) under the Water Prevention and Control Act, 1974, for all the sites. To ensure precise measurement of water flow, flow meters have been installed at both the inlet and outlet lines. These flow meters undergo regular calibration to uphold their accuracy and reliability. The Company's wastewater generation is well within the consented levels and steps are being taken to decrease freshwater usage by implementing water reuse practices.

Wastewater treatment infrastructure for Effluents consists of Effluent Treatment Plant (ETP) Primary treatment, ETP Secondary treatment, Ultra Filtration, Reverse Osmosis, and Multi-effect evaporator with ATFD technology. After treatment, the water is reused in the production process.

Wastewater treatment infrastructure for Sewage consists of a Sewage Treatment Plant with Primary treatment, Secondary Treatment, and Tertiary treatment. After treatment, the water is reused within the plant boundary for gardening.

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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx	tonnes/year	44	36
SOx	tonnes/year	39	45
Particulate Matter (PM)	tonnes/year	109	99
Persistent organic pollutants (POP)	tonnes/year	NA	NA
Volatile organic compounds (VOC)	tonnes/year	NA	NA
Hazardous air pollutants (HAP)	tonnes/year	NA	NA
Others – please specify	tonnes/year	NA	NA

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

No, the organisation did not carry out any external assurance for its air emissions.

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

Parameter	Unit	FY 2023-24	FY 2022-23
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	48246	58815
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	134185	131041
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO2 equivalent/ Rupees in Million	7.03	7.68
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO2 equivalent/ Rupees in Million USD	591.71	630.78
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>		NA	NA
<b>Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity</b>		NA	NA

The Company used the globally-accepted methods based on the GHG protocol to calculate its emission footprint resulting from consumption of fossil fuels, electricity, and refrigeration, under its Scope 1 and Scope 2 emissions. Emission factors have been taken from recognised sources such as the India-based benchmarks (Ex: CEA), and global benchmarks (Ex: Defra and IPCC).

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

No, the organisation did not carry out any external assurance for its Scope 1 and Scope 2 emissions.

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

The Company has implemented multiple initiatives to reduce GHG emissions across its plants and offices.

Fuel-related GHG emission reduction initiatives

- a) Optimisation of fuel use in boilers, kilns, and furnaces
- b) Implementation of waste heat recovery process
- c) Fuel switch from liquid-based to gaseous-based fuel in operations

Energy-related GHG emission reduction initiatives

- a) Renewable Energy Generation through the setting up of solar power generation systems
- b) Installation of LED Lights and other energy-saving devices
- c) Installation of energy-efficient pumps and motors
- d) Purchase of Solar energy for use in operations
- e) Purchase of Gas based energy for use in operations

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

Parameter	FY 2023-24	FY 2022-23
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	492	473
E-waste (B)	4	4
Bio-medical waste (C)	0.1	0.2
Construction and demolition waste (D)	8	25
Battery waste (E)	5	15
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (Category 5.1, 5.2, 21.1, 33.1, 35.3) (G)	146	145
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) (Wet and Dry waste)	6434	5544
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>7090</b>	<b>6206</b>
<b>Waste intensity per rupee of turnover</b> (Total waste Generated / Revenue from operations) (MT/ Rupees in Million)	0.27	0.25
<b>Waste intensity per rupee of Turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP) (MT/Rupees in Million USD)	23.55	20.12
<b>Waste intensity in terms of physical output</b>	NA	NA
<b>Waste intensity (optional) – The relevant metric may be selected by the entity</b>	NA	NA
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	6930	6021
(ii) Re-used	5	15
(iii) Other recovery operations	0	0
<b>Total</b>	<b>6935</b>	<b>6036</b>

Parameter	FY 2023-24	FY 2022-23
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	146	141
(ii) Landfilling	8	25
(iii) Other disposal operations	0	0
<b>Total</b>	<b>154</b>	<b>166</b>

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

No, the organisation did not carry out any external assurance for its waste management.

**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 has adopted various waste management practices to ensure proper handling and disposal of different types of waste. The waste management strategy focuses on classifying all the waste generated by the company in line with various Waste Management Rules in India and ensures compliance. The strategy involves collecting, handling, storing, and disposing of waste.

- **Waste Inventory Process:** A waste inventory process has been implemented with following ISO 14001-2015 standards. This process allows the Company to track and document the type and quantity of waste generated in the facilities.
- **Battery Waste:** Battery waste is segregated separately and disposed of through authorised vendors using the buyback options with the vendors. This helps in adherence to Battery Waste Management Rules, 2022, and prevents any potential harm from battery waste.
- **Bio-Medical Waste:** Bio-medical waste generated from the diagnosis or treatment of employees or workers at the facilities is segregated and provided to authorised vendors for safe disposal. The Company ensures that it complies with the requirements of the Bio-medical Waste Management Rules, 2016.
- **Construction and Demolition Waste:** The C&D waste generated from the demolition activities is utilised within the site for raising the low-lying areas. No waste was disposed of outside the facilities. The Company complies with the Construction and Demolition Waste Management Rules, 2016.
- **E-Waste:** Electronic waste (e-waste) is segregated and disposed of through authorised vendors/dismantlers specializing in e-waste recycling and proper disposal methods. This helps in adherence to E-waste Management Rules (EWM) 2022 and prevents any potential harm from improper electronic waste disposal.
- **Hazardous Waste:** Hazardous waste is segregated, stored, and disposed of effectively as per the guidelines outlined in the Hazardous Waste Management (HWM) 2016 Regulations. This ensures that hazardous waste is properly isolated and handled to prevent any adverse environmental impact. A dedicated covered shed having impervious flooring for storage of hazardous is established within the facilities.
- **Municipal Solid Waste:** Solid waste generated is collected and categorised into two parts: wet waste and dry waste. Wet waste, such as canteen waste, is sent for composting, while other solid waste is disposed of through authorised recycling vendors to ensure proper waste management practices. This helps in adherence to Solid Waste Management Rules (SWM) 2016 and can contribute towards a circular economy.
- **Plastic Waste Management:** To manage plastic waste, the Company follows the guidelines provided by the Central Pollution Control Board (CPCB) in the Plastic Waste Management Rules (PWM) 2022, and the Extended Producer Responsibility (EPR) framework. This includes proper collection, segregation, and disposal of plastic waste through authorised recycling channels.



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? (Yes/No) If no, the reasons thereof and corrective action taken, if any.
1.	Tiruvottiyur Chennai	Bonded Abrasives	The facility does not attract the provisions of environmental approvals/clearances. The ecologically sensitive areas such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, and forests are located far away from the facility. Thus, the Forest Clearance and Wildlife Clearance do not apply to the facility. The facility is located near to coastal zone, however, it was established before the CRZ Notification. Thus, the existing facility does not attract any provisions under the CRZ Notification.

Other than the Tiruvottiyur Unit, no other plants and offices of the Company are in or around ecologically sensitive areas such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, and coastal regulation zones.

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

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

The Company did not engage in any expansion-related activities other than approved existing operations, and hence no additional environmental impact was created by the plant operations. Hence, the Company did not conduct an Environment Impact Assessment (EIA).

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 (Yes/No). If not, provide details of all such non-compliances, in the following format:

S.No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Nil				

Yes, the organisation complies with the applicable environmental laws /regulators /guidelines in India. The business units operate under the purview of the Environmental Protection Act and hold valid consent to establish and consent to operate issued by the Pollution Control Boards (PCBs). The certificates are regularly renewed as per the PCB's directives and the conditions stipulated in the consent orders are complied. All environmental monitoring reports are submitted within the timelines and reported to the Board of Directors on a quarterly basis.

#### 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
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Not applicable. The Company's plant and office locations are not located within the area of water-stressed districts designated by the Central Ground Water Board, India.

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water		
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
<b>Total volume of water withdrawal (in kilolitres)</b>		
<b>Total volume of water consumption (in kilolitres)</b>		
<b>Water intensity per rupee of turnover</b> (Water consumed / Turnover)		
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity		
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water		
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>		

Not Applicable

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

No, the organisation did not carry out any external assurance for its water consumption and discharge.

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

Parameter	Unit	FY 2023-24	FY 2022-23
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	Nil	Nil
<b>Total Scope 3 emissions per rupee of turnover</b>		Nil	Nil
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity Adjusted for PPP		Nil	Nil

The Company has initiated its Scope 3 GHG emission accounting process and has started collating data on applicable Scope 3 emission categories.

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

No, the organisation did not carry out any external assurance for its GHG emissions.

**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.**

The Bonded Abrasives Unit in Tiruvottiyur, Chennai is located near to coastal zone. However, the facility was established before the CRZ Notification. Thus, the existing facility does not attract the provisions under the CRZ Notification. Also, the existing facility was accorded with renewal of consent by the Tamil Nadu Pollution Control Board (TNPCB).

As a responsible Company, it has planted trees to improve the green cover on the sea-facing side. Also, the Company is committed to monitoring the quality of the air and water in and around the plant. Necessary steps are undertaken to ensure that there is no discharge of any untreated water into the coastal zone, which helps to minimise any potential impact on the biodiversity of marine habitats.

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Abrasives	Emission Reduction and Energy Management	a) Optimisation of fuel use in boilers, and furnaces b) Fuel switch from liquid-based to gaseous-based fuel in operations	Energy optimisation, reduction in emissions, and promoting a cleaner and more sustainable energy source
	Water and Wastewater Management	Zero liquid discharge system is currently under implementation at two plants	Improve water reuse and enable better water management strategy and conservation
	Waste Management and Circularity	Redesign the packaging of products	Reduce waste generation and cost savings in material procurement
Electrominerals	Emission Reduction and Energy Management	a) Implementation of Solar energy generation plants b) Implementation of Solar water heater for boiler operations c) Fuel switch from liquid-based to gaseous-based fuel in operations d) Installation of energy-efficient pumps e) Installation of energy-efficient motor	Energy optimisation, reduction in emissions, and promoting a cleaner and more sustainable energy source
	Water and Wastewater Management	a) Establishment of rainwater collection tanks storage and use b) Wastewater recycling and reuse by optimizing water management within the plants	Water optimisation and better water management and conservation
	Waste Management and Circularity	a) Waste collection, segregation, and disposal to certified vendors b) Installation of organic waste composting machine for canteen waste management	Effective waste management and enabling waste circularity
Ceramics and Super Refractories	Emission Reduction and Energy Management	a) Implementation of Solar energy generation plants b) Implementation of waste heat recovery process c) Fuel switch from liquid-based to gaseous-based fuel in operations d) Optimisation of fuel use in kilns, and furnaces	Reduction in emissions and promoting a cleaner and more sustainable energy source
	Waste Management and Circularity	Ceramic waste recycling and reuse	Effective waste management and enabling waste circularity

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

The Company has a business continuity and disaster management plan for operations. The Company has developed detailed Standard Operating Procedures (SOPs) and guidelines for various scenarios, including natural disasters, fires, chemical spills, and other emergencies. Critical business functions have been identified and backup plans have been established to minimise

downtime and ensure continuity of operations, in case of any disruptions. Tie up with local emergency response agencies like Fire departments and medical services/hospitals to ensure timely and effective response in case of any emergency.

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

Not applicable, since no assessment was carried out on the environmental impacts of the value chain partners of the organisation.

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

The organisation did not assess the environmental impacts of its value chain partners during the year. The organisation shall consider environmental impacts as one of the criteria in the vendor evaluation process moving forward.

**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.**

The Company is an active member of twenty trade and industry chambers and associations in India and globally.

**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	Kerala Management Association	State
2	Madras Management Association	State
3	National Safety Council – Kerala Chapter	State
4	Confederation of Indian Industry	National
5	Indian Ceramic Society	National
6	Indian Carbon Society	National
7	Indo-Australian Chamber of Commerce	National
8	Indo-German Chamber of Commerce	National
9	South India Chamber of Commerce	National
10	SICMA – Europe	International

**2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities**

Name of Authority	Brief of the case	Corrective action taken
Nil	Nil	Nil

The Company did not receive any adverse orders and no corrective action was necessitated during the financial year.

**Leadership Indicators**

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

S.No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
Nil	Nil	Nil	Nil	Nil	Nil

The Company did not engage in public policy advocacy during the financial year. However, it is an active member of several national and international trade and industry chambers and associations. As part of these groups, it provides recommendations and representations to regulators and associations to advance and improve the industrial climate in India. Additionally, the Company regularly participates in forums and discussions related to energy security and management, water and food security, and sustainable business practices to share its views and opinions.

**PRINCIPLE 8: Businesses should promote inclusive growth and equitable development****Essential Indicators**

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
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NA

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 Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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NA

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

The Company has a grievance redressal policy in place that provides a detailed mechanism for the community to report any complaints. Based on the nature of the complaints, appropriate measures shall be taken. Also, the Company engages with various stakeholders including the community, through Stakeholder forums to discuss their needs and concerns.

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	13%	13%
Directly from within India	55%	54%

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

Location	FY 2023-24	FY 2022-23
Rural	7.2%	7.3%
Semi-urban	16.8%	15.9%
Urban	43.8%	44.3%
Metropolitan	32.2%	32.5%

(Place categorised as per RBI Classification System - rural / semi-urban / urban / metropolitan)

**Leadership Indicators**

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

Details of negative social impact identified	Corrective action taken
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NA

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

S.No.	State	Aspirational District	Amount Spent (in INR)
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NA

No, the Company did not undertake any CSR projects in designated aspirational districts identified by government bodies.

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

No, the organisation does not have a preferential procurement policy to purchase from suppliers comprising marginalised or vulnerable groups. Though the Company does not have a preferential procurement policy, it hires local people from nearby communities of the plants for work. Through the skill development center, which is part of CSR activity the

Company identifies students from marginalised/ vulnerable groups to provide necessary education and training to improve employment opportunities. Further, considering the nature of products, the raw materials and other input materials such as power or fuel cannot be sourced from marginalised groups. However, the Company encourages the contractors to provide manpower from the local community including people belonging to marginalised groups. The objective of such an initiative is to ensure that the local community is involved in the manufacturing process and earn livelihood.

**(b) From which marginalized /vulnerable groups do you procure?**

NA

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

NA

**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
None				

**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
NA		

**6. Details of beneficiaries of CSR Projects:**

S.No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Anbalaya: A development education centre for differently abled children	50	100%
2	CCTV Infrastructure Set for Community in Hosur	10500	NA
3	CUMI Centre for Skill Development	84	100%
4	Education Support to Vellayan Chettiar Higher Secondary School	2000	100%
5	GKNM Hospital support for Cancer treatment of children from economically weaker section	25	100%
6	Green Initiative: Coconut Tree Saplings Distribution	500	NA
7	Murugappa Chettiar Research Centre (MCRC)*	NA	NA
8	Sri Sathyasai Sanjeevani Hospital	24	100%

\*The MCRC is an ongoing research and development project to study the impact of Climate Change on Biodiversity. The objectives of the project are to study a) the Impact of Climate change on the marine ecosystem in Lakshadweep, b) the Impact of Climate change on the marine ecosystem research in the Andaman Islands, and c) the Cultivation and conservation practices of Traditional rice varieties. The target group beneficiaries are tribals, farmers, and fishermen in the Chengalpattu, Villupuram, Sivaganga, Cuddalore, Tiruvallur, Coimbatore districts of Tamil Nadu and Islands of Lakshadweep and Andaman Nicobar.

**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 believes that commitment to transparency is vital to building trust and credibility with the customers, by demonstrating honesty and openness in handling complaints. The customers can communicate their complaints via email or phone calls to the regional salesperson. The regional salesperson upon receipt of a complaint provides an immediate acknowledgement email to the customer. All the complaints are registered in the Enterprise Resource Planning (ERP) system.

The complaints are addressed based on the grievance-handling mechanism. Based on the nature of the complaint, the quality control team takes the technical complaints and commercial complaints by the marketing teams. The Company has set a target to resolve all the complaints within 30 days.

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

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

The Company will be initiating an evaluation process to understand the product labelling information related to environmental and social parameters, recycling, and safe disposal.

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

	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0		0	0	
Advertising	0	0		0	0	
Cyber-security	0	0		0	0	
Delivery of essential services	1073 <sup>#</sup>	16 <sup>*</sup>		1022 <sup>#</sup>	0	
Restrictive Trade Practices	0	0		0	0	
Unfair Trade Practices	0	0		0	0	
Other	NA	NA		NA	NA	

\*It indicates the complaints are pending as of 31<sup>st</sup> March 2024, due to pending discussion with the customer(s) for additional information and/ or return of materials.

#The consumer complaints data are tracked and addressed through the ERP tool and customer complaints are dealt by the respective business functions separately.

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

	Number	Reasons for recall
Voluntary recalls	Nil	NA
Forced recalls	Nil	NA

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

Yes, the Company has developed a Cyber security framework as a risk mitigation for cyber security and risks related to data privacy. The cyber security risk is considered a material issue under the technology risk. The Company regularly conducts penetration assessments on all the applications as mitigation measures to counter cyber security risks. This will be deployed in the next financial year.

Also, the Company has placed sufficient mechanisms to protect from cyber-attacks through the following mechanisms;

1. Full-fledged Data Center Disaster Recovery setup
2. SIEM log monitoring
3. Fire Wall/Management Switches
4. Online/Offline BackUp

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

NA

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

**a. Number of instances of data breaches**

Nil, no specific instances of data breach or privacy were observed during the financial year by the Company.

**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 web link, if available).**

The information on the products and services of the entity can be accessed at

<https://www.cumi-murugappa.com/abrasives/>

<https://www.cumi-murugappa.com/emd/>

<https://www.cumi-murugappa.com/ceramics/ic/>

<https://www.cumi-murugappa.com/super-refractories/>

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

The Company prioritizes customer safety and responsible usage of its products by ensuring that it provides clear instructions on the handling, storage, use, and disposal of products as per local laws. The Company is compliant with the regulations of the European Union i.e., RoHS (Restriction of Hazardous Substances) and REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) that applies to exporters of products to the EU. Also, the Company provides Material Safety Data Sheets (MSDS) that contain detailed information about the potential hazards associated with the products and guides on how to handle, store, and safely dispose after use of the products.

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

The Company through its channel partners and email informs consumers of any risk of disruption/discontinuation of essential services.

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

Yes, the Company displays product information on the product over and above the mandated statutory requirement as per the local laws. The Company provides Material Safety Data Sheets (MSDS) that contain detailed information about the potential hazards associated with the products and guides on how to handle, store, and safely dispose of the products. The MSDS is provided along with the products to the customers for safe and responsible usage. The Company conducts surveys and monitors customer satisfaction trends periodically relating to its products.

On behalf of the Board

Chennai  
May 3, 2024

**M M Murugappan**  
Chairman