

JKCL/35/SE/2024-25

27<sup>th</sup> June 2025

BSE Limited,  
Corporate Relationship Department,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort, Mumbai 400 001  
Scrip Code: 532644  
(ISIN.INE823G01014)  
Through: BSE Listing Centre

The National Stock Exchange of India Ltd,  
Exchange Plaza, Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051  
Scrip Code: JKCEMENT  
(ISIN.INE823G01014)  
Through: NEAPS

REVISED**Sub: Business Responsibility and Sustainability Report for FY 2024-25**

Dear Sir/Madam,

Further to our filing of BRSR of F.Y 2024-25 yesterday i.e. on 26.06.2025, please find attached the weblink verified BRSR of 2024-25 which also forms part of the Integrated Annual Report for F.Y. 2024-25 and available at the weblink

[https://www.jkcement.com/wp-content/uploads/2025/06/JK-Cement-IR\\_2024-25\\_BRSR-2.pdf](https://www.jkcement.com/wp-content/uploads/2025/06/JK-Cement-IR_2024-25_BRSR-2.pdf)

Thanking you,  
Sincerely,



**Shambhu Singh**  
**Company Secretary and Compliance Officer**  
**FCS 5836**  
Encl: As Above

**Corporate Office**

- 📍 Prism Tower, 5th Floor, Ninaniya Estate,  
Gwal Pahari, Gurugram, Haryana-122102  
☎ +0124-6919000  
✉ prismtower@jkcement.com  
🌐 www.jkcement.com

**JK SUPER  
CEMENT**  
BUILD SAFE

**JK SUPER  
STRONG**  
BUILD SAFE

**JK CEMENT  
WallMaxX**  
White Cement Wall Putty

**Manufacturing Units at :**

Nimbahera, Mangrol, Gotan (Rajasthan) | Muddapur (Karnataka)  
Jharli (Haryana) | Ujjain, Katni (M.P.) | Aligarh (U.P.) | Balasinor (Gujarat)



## ANNEXURE-D

## Business Responsibility &amp; Sustainability Report

## SECTION A: GENERAL DISCLOSURES

## I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity	L17229UP1994PLC017199
2. Name of the Listed Entity	JK Cement Limited (JKCL)
3. Year of incorporation	24-Nov-1994
4. Registered office address	Kamla Tower, Kanpur – 208001, Uttar Pradesh, India
5. Corporate address	Prism Tower, Ninaniya Estate, Gwal Pahari, Gurugram - 122102, Haryana
6. E-mail	shambhu.singh@jkcement.com
7. Telephone	0124-6919000
8. Website	<a href="https://www.jkcement.com/">https://www.jkcement.com/</a>
9. Financial year for which reporting is being done	FY 2024-25
10. Name of the Stock Exchange(s) where shares are listed	1. BSE Limited (BSE) 2. National Stock Exchange of India Limited (NSE)
11. Paid-up Capital	₹ 77.27 Cr
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Shambhu Singh Company Secretary +91-512-2371478-81 <a href="mailto:shambhu.singh@jkcement.com">shambhu.singh@jkcement.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).	Disclosures under this report are made on standalone basis for JK Cement Limited
14. Name of assurance provider	TUV India Private Limited
15. Type of assurance obtained	Reasonable assurance on BRSR core Indicators while Limited Assurance on remaining BRSR indicators

## II. Products/services

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

S.No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Cement and cement related products	100

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Grey Cement	3242	81
2	White Cement & Wall Putty (including VAP)	3242, 3244, 23949	19

## 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	13	51	64

## 19. Markets served by the entity:

## a. Number of locations

Locations	Number
National (No. of States)- Grey Cement	22
National (No. of States)- White Cement	Pan India

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

## c. A brief on types of customers

JKCL caters to the demands and needs of various institutional/commercial customers, individual house builders, government bodies for infrastructure projects.

## IV. Employees

## 20. Details as at the end of Financial Year (FY 2024-25):

## 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)	4772	4572	95.8	200	4.2
2	Other than Permanent (E)	1617	1584	98.0	33	2.0
<b>3</b>	<b>Total Employees (D+E)</b>	<b>6389</b>	<b>6156</b>	<b>96.4</b>	<b>233</b>	<b>3.6</b>
<b>WORKERS</b>						
4	Permanent (F)	82	82	100	0	0
5	Other than Permanent (G)	5321	5275	99.1	46	0.9
<b>6</b>	<b>Total workers (F+G)</b>	<b>5403</b>	<b>5357</b>	<b>99.1</b>	<b>46</b>	<b>0.9</b>

## b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1	Permanent (D)	9	9	100	0	0
2	Other than Permanent (E)	0	0	0	0	0
<b>3</b>	<b>Total differently abled employees (D+E)</b>	<b>9</b>	<b>9</b>	<b>100</b>	<b>0</b>	<b>0</b>
<b>DIFFERENTLY ABLED WORKERS</b>						
4	Permanent (F)	0	0	0	0	0
5	Other than permanent (G)	0	0	0	0	0
<b>6</b>	<b>Total differently abled workers (F + G)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	14	3	21.4
Key Management Personnel	4	0	0

## Business Responsibility &amp; Sustainability Report

## 22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2024-25 (Turnover rate in current FY)			FY 2023-24 (Turnover rate in previous FY)			FY 2022-23 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	23.3%	28%	23.5%	21.5%	26%	21.63%	19.2%	0.8%	20%
Permanent Workers	20.7%	0%	20.7%	11%	NA	11%	9%	0	9%

Note: No female permanent workers for FY24-25.

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

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

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding / Subsidiary / Associate / Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Listed entity? (Yes/No)
1	JK Cement (Fujairah) FZC	Wholly Owned Subsidiary	100	No
2	JK Cement Works (Fujairah) FZC	Step-Down Subsidiary	90	No
3	JK White Cement (Africa) Limited	Step-Down Subsidiary	100	No
4	JK Maxx Paints Limited (formerly known as JK Paints and Coatings Limited)	Wholly Owned Subsidiary	100	No
5	Toshali Cements Pvt. limited	Wholly Owned Subsidiary	100	No

## VI. CSR Details

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

(ii) Turnover (in ₹) (FY 24-25): ₹ 11,093 Cr.

(iii) Net worth (in ₹) (FY 24-25): ₹ 6,065 Cr.

## 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 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes	0	0	NA	0	0	NA
Shareholders	Yes	4	0	NA	10	0	NA
Employees and workers	Yes	0	0	NA	0	0	NA
Customers	Yes			NA	1369	27	NA
Value Chain Partners	Yes	1625	26	NA	0	0	NA
Other (please specify)	-	NA	NA	NA	NA	NA	NA

## 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)
<b>Environment</b>					
1	Waste Management	Opportunity	Effective waste management offers opportunities for resource recovery and reuse. Utilising waste materials as alternative fuels or raw materials can reduce reliance on virgin resources and minimise disposal costs, aligning with circular economy principles.		Positive
2	Climate Change	Risk and Opportunity	Risk: Physical impacts (extreme weather), transition risks (carbon pricing, market shifts), supply chain disruptions. Opportunity: Cost savings (efficiency), new markets (low-carbon products), enhanced reputation, investor appeal.	Climate scenario analysis; Investing in climate-resilient operations and supply chains; Developing low-carbon products/services; Setting emission reduction targets; Energy efficiency measures	Positive
<b>Social</b>					
1	Occupational Health & Safety	Risk	Prioritising a safe and healthy work environment is crucial for ensuring workforce well-being, productivity, and attracting talent, while also fulfilling the company's ethical and social responsibilities. Failure to adequately address OHS issues can lead to significant reputational damage, financial burdens from accidents and liabilities, and failure to meet the growing expectations of stakeholders.	Implementing robust safety management systems (e.g., ISO 45001); Regular safety training & audits; Providing adequate PPE; Hazard identification & risk assessment; Promoting strong safety culture.	Negative
2	Employee Management and Labor Relations	Opportunity	Effective employee management, encompassing fair compensation, benefits, training, development, and a positive work environment, is crucial for attracting, retaining, and motivating a skilled workforce. Strong labor relations, characterised by open communication, mutual respect, and constructive dialogue with employees and labor unions, are essential for preventing disputes, ensuring smooth operations, and fostering a stable and productive work environment.		Positive
<b>Governance</b>					
1	Corporate Governance and Ethics	Risk and Opportunity	Strong corporate governance provides the framework for ensuring responsible decision-making, protecting the interests of all stakeholders (shareholders, employees, customers, communities, etc.), and promoting operational efficiency.	Ensuring board independence/expertise; Implementing ethical codes & whistle blower policies; Robust internal controls & audits; Transparent reporting; Effective risk management; Shareholder engagement.	Positive

## Business Responsibility & Sustainability Report

### SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
1 a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c) Web Link of the Policies, if available				<a href="https://www.jkcement.com/policies/">https://www.jkcement.com/policies/</a>					
2 Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3 Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4 Name of the national and international codes/certifications/labels/standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The policies are formulated in accordance with established principles and frameworks like- UNGC Guidelines, UN-SDGs, GRI Standards, CDP Climate & Water, SBTi, TCFD, IIRC, BIS Standards, ILO Principles, WBCSD, IGBC GreenPro, and GreenCo. All our policies are aligned with internationally recognised standards such as ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018 and ISO 27001:2022.								
5 Specific commitments, goals and targets set by the entity with defined timelines, if any.	Absolute Gross GHG Scope-1 & 2 Target 2030: 532 kg CO <sub>2</sub> /t cementitious material (SBTi) Net GHG Scope-1 Target 2030: 465 kg CO <sub>2</sub> /t cementitious material (GCCA), Green Power Mix Target 2030: 75% Water positivity: 5X (Times) by 2030 Diversity and inclusion: 5% women by 2030 Training: 20 hours training per employee by 2030 For further details, refer Integrated Annual Report FY 2025								
6 Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Absolute Gross GHG Scope-1 & 2: 565 kg CO <sub>2</sub> /t cementitious material (SBTi) Net GHG Scope-1 Target 2030: 517 kg CO <sub>2</sub> /t cementitious material (GCCA), Green Power Mix Target 2030: 51% Water positivity: 4.7 X (Times) Diversity and inclusion: 4.2% women Training: 20.5 hours training per employee For further details, Refer Integrated Annual Report FY 2025								

#### Governance, leadership and oversight

7 Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (Listed entity has flexibility regarding the placement of this disclosure) Refer Jt. Managing Director and CEO's message in the IAR 2024-25	Name: Mr. Madhavkrishna Singhania Designation: Joint Managing Director and CEO Telephone Number: +91-512-2371478-81																										
8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility policies.	Yes. CSR & Sustainability Committee																										
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.	<table border="1"> <thead> <tr> <th>S.No.</th> <th>Name of the Director</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mrs. Deepa Gopalan Wadhwa</td> <td>Independent, Non-Executive (Chairperson)</td> </tr> <tr> <td>2</td> <td>Mr. Mudit Aggarwal</td> <td>Independent, Non-Executive</td> </tr> <tr> <td>3</td> <td>Mr. Madhavkrishna Singhania</td> <td>Non-Independent, Executive</td> </tr> <tr> <td>4</td> <td>Ms. Praveen Mahajan</td> <td>Independent, Non-Executive</td> </tr> <tr> <td>5</td> <td>Mr. Ashok Kumar Sharma</td> <td>Independent, Non-Executive</td> </tr> </tbody> </table>									S.No.	Name of the Director	Status	1	Mrs. Deepa Gopalan Wadhwa	Independent, Non-Executive (Chairperson)	2	Mr. Mudit Aggarwal	Independent, Non-Executive	3	Mr. Madhavkrishna Singhania	Non-Independent, Executive	4	Ms. Praveen Mahajan	Independent, Non-Executive	5	Mr. Ashok Kumar Sharma	Independent, Non-Executive
S.No.	Name of the Director	Status																									
1	Mrs. Deepa Gopalan Wadhwa	Independent, Non-Executive (Chairperson)																									
2	Mr. Mudit Aggarwal	Independent, Non-Executive																									
3	Mr. Madhavkrishna Singhania	Non-Independent, Executive																									
4	Ms. Praveen Mahajan	Independent, Non-Executive																									
5	Mr. Ashok Kumar Sharma	Independent, Non-Executive																									

#### 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
Performance against above policies and follow up action	Board Committees								Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Board Committees								Quarterly								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Yes, checks and balances are in place for ensuring strict compliance to various company policies and practices, through proper ISO external & Internal audits. Name of Agency- LRQA								

#### 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)	NA								
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA								
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	4	During the year, the various updates on business, regulatory compliances, ESG, climate change, PoSH, SDGs, data security and privacy, BRSR Principles etc were discussed for business alignment	100
Key Managerial Personnel	4	Code of Conduct, PoSH, regulatory compliances, ESG, climate change, SDGs, data security and privacy	100
Employees other than BoD and KMPs	231	Basic First Aid, Code of Conduct, PoSH, Basic Road Traffic Rules, Electrical Safety, Uses of machines, Hazards Awareness, PF, ESIC, ESG, Climate Change	100
Workers	2869	Safety induction, job specific safety at workplace	100

## Business Responsibility &amp; Sustainability Report

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/ Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine			
Settlement			
Compounding fee			
	NIL		

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

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
NA	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 policy.

JK Cement is committed to conducting its business ethically and with the utmost integrity. Anti-corruption or anti-bribery policy applies to all Directors, Key Managerial Personnel, Officers, Employees, and Third Parties working with JK Cement (collectively referred to as "Employees and Third Parties"). It extends to all units and offices of JK Cement, its subsidiaries, and any other entities operating under its umbrella. The policy can be accessed at <https://www.jkcement.com/frontTheme/pdf/Code-of-Conduct-Policy-15-12-22.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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY 2024-25 (Current Financial Year)		FY 2023-24 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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. NA

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Number of days of accounts payables	64	51

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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0	0
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a. Sales to dealers / distributors as % of total sales (₹)	71%	66.34%
	b. Number of dealers / distributors to whom sales are made	11576	11786
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	5%	3%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	8%	4%
	b. Sales (Sales related parties / Total Sales)	0.01%	0.01%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0.86%	0.05%
	d. Investments (Investments in related parties / Total Investments made)	7%	13%

## 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
3	ESG, Ethics, Human Rights, Governance, Climate Change, health & safety	16%

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 the code of conduct for the Board and senior management pursuant to Regulation 17(5) (a) of SEBI Listing Regulations; as well as for the employees of the Company and its subsidiaries. Our Code of Conduct for Directors and Senior Management outlines the guiding business principles for the Company's leadership. This Code emphasises the responsibility of all Directors and Senior Management to avoid any 'conflicts of interest' with JK Cement. We have an Audit Committee represented by Independent Directors who approves the Related Party Transactions. Hence conflict of interest if any is not possible. Refer to the Corporate Governance Section of the Annual Integrated Report 2025 for more details.

Web link for Code of Conduct for Directors and Senior Management- <https://www.jkcement.com/wp-content/uploads/2023/10/Code-of-Ethics-and-Business-Conduct-Policy.pdf>

## Business Responsibility & Sustainability Report

### 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.**

	Current Financial Year (FY 2024-25)	Previous Financial Year (FY 2023-24)	Details of improvements in Environmental and social impacts
R&D	0.1%	0.2%	Development of green products (Composite cement) that lead to the minimisation of emissions
Capex	0%	18.83%	-

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

Yes, the entity has procedures in place for sustainable sourcing.

JK Cement is deeply committed to sustainable sourcing, embedding this principle throughout our supply chain through a multi-faceted approach. Our well-defined ESG policy serves as the overarching framework, outlining our expectations for environmental, social, and governance responsibility in all our business dealings, including procurement. Complementing this, our Code of Conduct for Suppliers explicitly articulates the specific sustainability standards we require our partners to uphold, encompassing environmental stewardship, ethical labor practices, respect for human rights, and responsible business conduct. Crucially, we have implemented an integrated system that mandates adherence to these ESG guidelines as a fundamental condition for any supplier wishing to engage with JK Cement. Web link- <https://www.jkcement.com/frontTheme/pdf/Supply-Chain-Sustainability-and-Suppliers-Code-of-Conduct-of-JK-Cement.pdf>

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

JKCL ensures sustainable sourcing right from the start by onboarding all new suppliers based on stringent ESG parameters. This commitment to sustainability and responsible business practices is clear in their systematic and thorough supplier evaluation and approval process.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

(a) **Plastics (including packaging):**

- Extended Producer Responsibility (EPR): JKCL, like any other producers or brand owners utilizing plastic packaging, are obligated under the Extended Producer Responsibility (EPR) framework within the Plastic Waste Management (PWM) Rules, 2016, and its subsequent amendments. We have executed long term MOU with MSW authorities for long-term supply of Plastic waste for incineration in our Kilns. We are 6 times plastic negative.
- Minimising Plastic Use: We continuously explore opportunities to reduce the amount of plastic used in our packaging and transition to more sustainable alternatives where feasible.
- Awareness and Channeling: We strive to educate our employees, colony members and end-users about the importance of proper segregation and channelling of plastic waste to authorised recyclers.

(b) **E-waste:**

- Responsible Disposal: As a responsible company, we ensure that any e-waste generated within our facilities (IT equipment, electronic devices, etc.) is handled and disposed of through authorised e-waste recyclers. These recyclers follow environmentally sound practices for dismantling, material recovery, and safe disposal of hazardous components.
- Employee Awareness: We conduct awareness programs for our employees on the proper handling and disposal of e-waste.

(c) **Hazardous waste:**

- Strict Management and Disposal: Hazardous waste generated from our manufacturing processes (e.g. used oil, Waste Oil & Cotton waste etc.) is managed with utmost care and in strict compliance with applicable regulations.
- Waste Minimisation: We continuously strive to minimise the generation of hazardous waste through process optimisation and the adoption of cleaner technologies.

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.**

JK Cement is actively addressing Extended Producer Responsibility (EPR) for the waste generated from our activities, particularly concerning plastic packaging. Our approach is in line with the EPR plans submitted to the relevant Pollution Control Boards. We have signed agreements with several Municipal Corporations to collect, sort and pre-process Refuse-derived Fuel (RDF) and Municipal Solid Waste (MSW) before they are repurposed in our cement kilns.

#### 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.
3242	PPC, PPPC, OPC, PSC	81	Grey Cement Business	Yes	<a href="https://www.jkcement.com/wp-content/uploads/2024/06/JK-Cement-FR2024.pdf">https://www.jkcement.com/wp-content/uploads/2024/06/JK-Cement-FR2024.pdf</a>

JKCL conducted a Life Cycle Assessment (LCA) study using ISO 14040/44 standards for various products at our Nimbahera, Mangrol and Muddapur plants. For further details, refer to Natural Capital in the Annual Integrated Report 2025.

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.**

Blended cement demonstrates the lowest environmental impact due to its reduced carbon footprint while simultaneously offering enhanced durability. Recognising these benefits and the superior quality of blended cement, we are strategically focusing our production and sales efforts on this product line. Furthermore, we are dedicated to optimising its cost structure to ensure it remains an economically viable option for our valued customers.

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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Slag	0.8%	1%
Fly ash	19.7%	22%

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## 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 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	In FY 2024-25, JKCL co-processed ~6 times the amount of plastic waste introduced into the environment by us through plastic packaging bags of our cement. We have successfully co-processed 165 kilo tonnes of plastic waste as Alternative Fuel and Raw material (AFR).			In FY 2023-24, JKCL co-processed 7 times the amount of plastic waste introduced into the environment by us through plastic packaging bags of our cement. We have successfully co-processed 181.99 kilo tonnes of plastic waste as Alternative Fuel and Raw material (AFR).		
E-waste	JKCL doesn't produce any e-waste or hazardous waste in its products. However, waste generated within the plant operations is sent to authorised third party recyclers as per the land of rules.					
Hazardous waste						
Other waste						

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
	Not Applicable, as we produce cement which is used as concrete in the construction projects and is not subject to reclamation

## PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

## Essential Indicators

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

Category	% of employees covered by										
	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities		
	Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)	
<b>Permanent employees</b>											
Male	4572	4572	100	4572	100	NA	NA	4572	100	4572	100
Female	200	200	100	200	100	200	100	0	0	200	100
<b>Total</b>	<b>4772</b>	<b>4772</b>	<b>100</b>	<b>4772</b>	<b>100</b>	<b>200</b>	<b>100</b>	<b>4572</b>	<b>100</b>	<b>4772</b>	<b>100</b>
<b>Other than Permanent employees</b>											
Male	1584	1584	100	1584	100	NA	NA	NA	NA	1584	100
Female	33	33	100	33	100	33	100	NA	NA	33	100
<b>Total</b>	<b>1617</b>	<b>1617</b>	<b>100</b>	<b>1617</b>	<b>100</b>	<b>33</b>	<b>100</b>	<b>NA</b>	<b>NA</b>	<b>1617</b>	<b>100</b>

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

Category	% of workers covered by										
	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities		
	Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)	
<b>Permanent workers</b>											
Male	82	82	100	82	100	NA	NA	0	0	82	100
Female	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>82</b>	<b>82</b>	<b>100</b>	<b>82</b>	<b>100</b>	<b>NA</b>	<b>NA</b>	<b>0</b>	<b>0</b>	<b>82</b>	<b>100</b>
<b>Other than Permanent workers</b>											
Male	5275	5275	100	5275	100	NA	NA	0	0	5275	100
Female	46	46	100	46	100	46	100	0	0	46	100
<b>Total</b>	<b>5321</b>	<b>5321</b>	<b>100</b>	<b>5321</b>	<b>100</b>	<b>46</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>5321</b>	<b>100</b>

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company	0.24	0.11

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

Benefits	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)	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/NA)
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	NA	NA	NA	NA	NA

## 3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently able 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, JK Cement is committed to ensuring accessibility of its premises/offices for differently-abled employees and workers, aligning with the requirements of the Rights of Persons with Disabilities Act, 2016. We have undertaken infrastructural audits and implemented several changes, including Braille markings, accessible washrooms, designated parking, and wheelchair availability. These steps reflect our ongoing efforts to create a more inclusive and accessible work environment for all.

## 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.

JK Cement is committed to being an equal opportunity employer and ensuring an inclusive workplace for all, which aligns with the spirit and principles of the Rights of Persons with Disabilities Act, 2016. Kindly refer

[Code-of-Conduct-Policy-15-12-22.pdf \(jkcement.com\)](#)

## 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%	NA	NA
Female	100%	100%	NA	NA
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>NA</b>	<b>NA</b>

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes
Other than Permanent Workers	Yes
Permanent Employees	Yes
Other than Permanent Employees	Yes

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JK Cement has a robust Grievance Redressal Process designed to address employee concerns promptly, fairly, and transparently. This framework features a clear escalation matrix with defined timelines and intervention levels for both HR-related and managerial/organisational issues. Employees are encouraged to raise grievances concerning policies, working conditions, payroll, health and safety, performance appraisals, interpersonal conflicts, and other matters detailed in the process documentation. If resolution extends beyond the defined timeframe, the employee will receive written or verbal communication. Dissatisfied employees can escalate their grievance within the matrix. Confidentiality, non-retaliation, and employee protection are integral to this process, which also allows bypassing hierarchical levels when the grievance involves a reporting manager. Further details can be found in the Human Capital section of the Integrated Annual Report 2024-25.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of employees/workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	4772	0	0	4097	0	0
Male	4552	0	0	3957	0	0
Female	200	0	0	140	0	0
Total Permanent Workers	82	82	100	99	99	100
Male	82	82	100	99	99	100
Female	0	0	0	0	0	0

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

Category	FY 2024-25 (Current Financial Year)					FY 2023-24 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill Upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	6156	6156	100	4333	70	6031	6031	100	1443	24
Female	233	233	100	205	88	175	175	100	108	62
<b>Total</b>	<b>6389</b>	<b>6389</b>	<b>100</b>	<b>4538</b>	<b>71</b>	<b>6206</b>	<b>6206</b>	<b>100</b>	<b>1551</b>	<b>25</b>
Workers										
Male	5357	5357	100	3358	62	4544	4544	100	227	5
Female	46	46	100	2	4	34	34	100	2	5
<b>Total</b>	<b>5403</b>	<b>5403</b>	<b>100</b>	<b>3360</b>	<b>62</b>	<b>4578</b>	<b>4578</b>	<b>100</b>	<b>229</b>	<b>5</b>

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	6156	6156	100	6031	6031	100
Female	233	233	100	175	175	100
<b>Total</b>	<b>6389</b>	<b>6389</b>	<b>100</b>	<b>6206</b>	<b>6206</b>	<b>100</b>
Workers						
Male	5357	5357	100	4544	4544	100
Female	46	46	100	34	34	100
<b>Total</b>	<b>5403</b>	<b>5403</b>	<b>100</b>	<b>4578</b>	<b>4578</b>	<b>100</b>

## 10. Health and safety management system:

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

Yes, JKCL has implemented a comprehensive occupational health and safety management system that covers all of its manufacturing plants and offices.

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

JKCL employs a robust Hazard Identification and Risk Assessment (HIRA) system. Standard operating procedures are in place to ensure health and safety across all manufacturing sites and offices. To minimise risks, comprehensive health and safety training programs are conducted for all workers, educating them on best practices. Furthermore, all of JKCL's sites are certified to ISO 45001:2018.

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

Yes, JKCL has established procedures that enable employees and workers to promptly report near misses and unsafe conditions to the safety team through both online and offline channels, including the Surksha Portal. In the event of an injury or fatality, reports can also be submitted through these channels. Any reported unsafe incident is immediately communicated to relevant department heads and the safety team. Thorough investigations are conducted for all reported incidents and near misses, and appropriate corrective actions are implemented. The progress of these corrective actions and prevention plans is regularly reviewed and discussed during safety committee meetings.

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

Yes, all employees and workers at JKCL have access to non-occupational medical and healthcare services.

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

Safety Incident/Number	Category*	FY 2024-25	FY 2023-24
		(Current Financial Year)	(Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.09	0.19
Total recordable work-related injuries	Employees	0	0
	Workers	2	4
Number of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	2

\*Including in the contract workforce and excluding third party

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

The Health and Safety team is dedicated to ensuring the safety and occupational health of employees consistently. We maintain the overall effectiveness of our safety and occupational health management system through the implementation of various measures, including establishing standards and procedures, conducting safety observations and audits, providing training and building capabilities, investigating incidents, managing contractor safety, addressing occupational health concerns, ensuring logistics safety, promoting project safety, enforcing fire safety protocols, maintaining workplace safety standards, enhancing driver safety practices, and prioritising social safety initiatives.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	-			
Health & Safety	0	0	-	128	6	NA

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### 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.

Our commitment to fostering a safe and healthy working environment remains paramount, building upon the robust foundation established through comprehensive safety measures and proactive initiatives to address safety-related incidents which mitigate significant risks onsite. To this end, a critical hazard related to hand amputation in the packer's rotating machine has been mitigated by installing a safety mat that immediately stops the packer's rotation when an operator steps out, preventing further injury. Further development of a dedicated Safety Park provide extensive internal and external Safety Training programs for employees and workers which underscore our unwavering commitment to maintain a proactive and robust safety culture, ensuring the well-being of all employees and fostering a secure working environment at JKCL.

#### Leadership Indicators

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

Employee Yes / Worker Yes

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

All contracts entered into with value chain partners explicitly outline their obligations and general conditions regarding compliance with all applicable statutory dues. This includes, but is not limited to, Provident Fund (PF) contributions, gratuity payments, adherence to minimum wage laws, Employees' State Insurance (ESI) contributions, and any other relevant labor laws and social security regulations. The contracts contain specific clauses that clearly mandate the value chain partners' responsibility for the accurate deduction of statutory dues from their employees' wages and their timely deposit with the appropriate government authorities.

#### 3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q 11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
	Employees	0	0	0
Workers	0	0	0	0

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

Yes, we provide Transfer of House holding support and we also reimburse the movement cost of the employee and family.

#### 5. Details on assessment of value chain partners:

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

### 6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

JK Cement is deeply committed to promoting health and safety throughout its value chain, recognising that the well-being of workers at our partners' facilities is integral to our overall sustainability ethos. To address potential risks and concerns related to health and safety practices and working conditions, we employ a multi-faceted approach. This begins with thorough risk assessments and due diligence processes to identify significant areas needing attention within our value chain. We then engage proactively with our partners, clearly communicating our expectations and emphasising the importance of adhering to robust health and safety standards that align with our own stringent policies and relevant regulatory frameworks.

#### 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.

We highly prioritise our interactions with stakeholders, engaging with them regularly to comprehend their expectations and concerns. JK Cement has a structured Materiality Assessment process to identify key stakeholder groups and take their input in identifying material issues. We identified both internal and external stakeholders based on their capacity to impact or influence the organisation.

- External stakeholders- Shareholders, Dealers, Customers, Government, Regulatory & Statutory bodies, Media, Local communities
- Internal stakeholders- Employees

##### 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 Communications (Email, SMS, Newspaper, Pamphlets, Advertisements, Community meeting, Notice board, Website), Others	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and Scope of engagement including key topic and concerns raised during such engagement
Employee	No	<ul style="list-style-type: none"> <li>Training programmes, Events, Seminars, Workshops</li> <li>Awards – Plant level Recognition programmes</li> <li>Surveys, Employee centric applications</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Career growth and progression</li> <li>Performance management</li> <li>Employee motivation</li> <li>Team Building</li> <li>Discussion and Issue resolution</li> <li>Prevention from accidents and health hazards</li> </ul>
Shareholders	No	<ul style="list-style-type: none"> <li>Investor Presentation and Investor calls on quarter basis &amp; meeting in person or virtual with Investors</li> <li>Annual General Meeting</li> <li>Annual Report</li> <li>Shareholder meetings</li> <li>Sustainability report</li> <li>Grievance redressal mechanism</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Timely dividend payments</li> <li>Transparency in reporting</li> <li>Company's financial performance</li> <li>Share strategic insights, new projects, changes in ESG performance</li> </ul>
Dealers	No	<ul style="list-style-type: none"> <li>Emails</li> <li>Annual Dealer Meets</li> <li>Dealer surveys</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Product benefits and features</li> <li>Product quality and feedback</li> <li>Building relationships and trust</li> <li>New product development</li> <li>Feedback related to market to streamline operations, services and build better products</li> </ul>
Customer	Yes	<ul style="list-style-type: none"> <li>Email,</li> <li>Newspaper,</li> <li>SMS,</li> <li>Pamphlets,</li> <li>Websites</li> <li>Advertisements,</li> <li>Customer Care Services to address queries, get feedback, etc.</li> <li>Social media</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Product benefits and features</li> <li>Product quality and feedback</li> <li>Building relationships and trust</li> <li>New product development</li> </ul>

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Stakeholder group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of Communications (Email, SMS, Newspaper, Pamphlets, Advertisements, Community meeting, Notice board, Website), Others	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and Scope of engagement including key topic and concerns raised during such engagement
Regulatory & Statutory Bodies	No	<ul style="list-style-type: none"> <li>Regular compliance reports</li> <li>Statutory audits</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Business ethics and compliance</li> <li>Disclosure on ESG</li> <li>Disclosures on compliance as required by government</li> </ul>
Media	No	<ul style="list-style-type: none"> <li>Newspaper,</li> <li>Management interviews,</li> <li>Social Media</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Transparency</li> <li>Disclosure on compliance</li> <li>Communicate progress made in the financial year, enhance brand perception, etc.</li> </ul>
Local Communities	Yes	<ul style="list-style-type: none"> <li>Newspapers,</li> <li>Field Surveys,</li> <li>Community meeting</li> <li>Website</li> </ul>	Periodically	<ul style="list-style-type: none"> <li>Building relationships</li> <li>Improving living standards</li> <li>Direction and deployment of resources</li> <li>Awareness on social issues</li> </ul>

## Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

JKCL has established a robust framework for stakeholder consultation on critical economic, environmental, and social (ESG) topics. The CSR & Sustainability Committee, chaired by an Independent Woman Director, holds primary responsibility for overseeing ESG governance and monitoring the company's performance in these areas. This committee conducts quarterly reviews and provides detailed performance updates to the Board of Directors during their regular meetings.

Furthermore, JKCL undertakes periodic stakeholder engagement exercises to gather valuable insights on ESG matters. These engagements follow a well-defined structure that outlines the frequency of consultations, the delegation of responsibilities for conducting them, and the mechanisms for reporting the outcomes. Crucially, feedback received from stakeholders during these consultations is systematically compiled and presented to the Board, ensuring that diverse perspectives inform the Board's strategic decision-making on economic, environmental, and social issues.

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 integral to JKCL's process for identifying and managing environmental and social topics. JKCL conducted comprehensive stakeholder consultations as a foundational step in its materiality assessment. Based on the prioritised material topics, JKCL formulates specific strategies, sets measurable objectives, and establishes targets. Stakeholders are regularly informed about the development and implementation of various policies and initiatives. In essence, stakeholder consultation is not a one-time exercise but an ongoing process that provides JKCL with critical insights, ensuring that its environmental and social policies and activities are relevant, responsive, and aligned with the expectations of its key stakeholders.

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

Acknowledging the socio-economic challenges faced by communities near its operations, JK Cement demonstrates a strong commitment to engaging with and addressing the concerns of vulnerable and marginalised stakeholder groups through targeted community outreach programs. In direct response to specific concerns voiced by these vulnerable groups during ongoing engagement activities, JK Cement has implemented tangible solutions on the ground. This includes the construction of much-needed sanitation facilities to improve hygiene and public health, the provision of clean drinking water to address water scarcity and related health issues, and the enhancement of local infrastructure, such as roads and community centers, to improve overall quality of life and accessibility for these communities. Regular meetings and dialogues with community representatives are integral to this process for ensuring the needs and concerns of vulnerable and marginalised groups are addressed. For more details refer to the Stakeholder Engagement section in Integrated Annual Report 2025.

## 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	Current FY (2024-25)			Previous FY (2023-24)		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	4772	4772	100	4097	4097	100
Other than permanent	1617	1617	100	2109	2109	100
<b>Total Employees</b>	<b>6389</b>	<b>6389</b>	<b>100</b>	<b>6206</b>	<b>6206</b>	<b>100</b>
<b>Workers</b>						
Permanent	82	82	100	99	99	100
Other than permanent	5321	5321	100	4479	4479	100
<b>Total Workers</b>	<b>5403</b>	<b>5403</b>	<b>100</b>	<b>4578</b>	<b>4578</b>	<b>100</b>

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

Category	Current FY (2024-25)					Previous FY (2023-24)				
	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>										
Permanent	4772	0	0	4772	100	4097	0	0	4097	100
Male	4572	0	0	4572	100	3957	0	0	3957	100
Female	200	0	0	200	100	140	0	0	140	100
<b>Other than Permanent</b>	1617	0	0	1617	100	2109	0	0	2109	100
Male	1584	0	0	1584	100	2074	0	0	2074	100
Female	33	0	0	33	100	35	0	0	35	100
<b>Workers</b>										
Permanent	82	0	0	82	100	99	0	0	99	100
Male	82	0	0	82	100	99	0	0	99	100
Female	0	0	0	0	0	0	0	0	0	0
<b>Other than Permanent</b>	5321	0	0	5321	100	4479	0	0	4479	100
Male	5275	0	0	5275	100	4445	0	0	4445	100
Female	46	0	0	46	100	34	0	0	34	100

3. Details of remuneration/salary/wages

- a. Median remuneration/wages:

Particulars	Male		Female	
	Number	Median remuneration/ salary / wages of respective category (in ₹)	Number	Median remuneration/ salary / wages of respective category (in ₹)
Board of Directors (BoD)	11	Refer to Corporate Governance Section of Integrated Annual Report 2025	3	Refer to Corporate Governance Section of Integrated Annual Report 2025
Key Managerial Personnel	4	Refer to Corporate Governance Section of Integrated Annual Report 2025	0	Refer to Corporate Governance Section of Integrated Annual Report 2025
Employees other than BoD and KMP	6141	9.08	230	6.15
Workers	5357	5.28	46	5.4

## Business Responsibility &amp; Sustainability Report

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Gross wages paid to females as % of total wages	3.70%	2.9%

## 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. JK Cement has established clear accountability for addressing human rights impacts and issues.

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

JK Cement has a clearly defined Grievance Redressal Policy specifically designed to address and resolve grievances related to harassment or human rights violations. This policy establishes a structured and confidential mechanism for employees to raise such concerns, ensuring they are effectively addressed in a timely manner. An internal committee is constituted with the responsibility of thoroughly investigating these grievances and facilitating resolution within a stipulated timeframe, ensuring fairness and due process.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	--	0	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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (PoSH)	0	0
Complaints on PoSH as a % of female employees/ workers	0	0
Complaints on PoSH upheld	0	0

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

JK Cement has established robust mechanisms to prevent adverse consequences for complainants in discrimination and harassment cases. Our **POSH (Prevention of Sexual Harassment) Committee and Grievance Committee** are mandated to resolve complaints within a stipulated timeframe, ensuring swift and fair action. Additionally, we provide a dedicated **helpline** that enables all stakeholders to report any issues related to human rights violations or concerns encountered in the workplace. All reported concerns are handled with sensitivity, ensuring prompt attention and resolution. Our meticulous investigation process guarantees fairness for all parties involved, providing a platform to present information and any relevant evidence, thereby safeguarding complainants from potential retaliation or adverse actions.

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

Yes, human rights requirements are integrated into JK Cement's business agreements, including contracts with our employees and workforce members. Specifically, in compliance with Indian Labor Law and the Payment of Minimum Wages Act, we ensure that all employees and workers are remunerated according to their contractual agreements and are provided with humane working conditions.

## 10. Assessments for the year:

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

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

NA

## Leadership Indicators

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

At JK Cement, we uphold a firm zero-tolerance policy towards all forms of discrimination and harassment, underscoring our commitment to a respectful and equitable workplace. To date, we have not received any formal grievances or complaints related to human rights violations that have necessitated the modification or introduction of specific business processes.

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

JK Cement Ltd. (JKCL) is deeply committed to safeguarding the human rights of its entire workforce. To ensure ongoing adherence to human rights standards and identify any potential areas for improvement, JKCL conducts periodic internal and external assessments across all our facilities, including offices. This proactive approach allows us to continuously monitor and strengthen our practices to uphold the human rights of our employees.

## 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, JK Cement is committed to ensuring that our premises and offices across all our locations in India, are accessible to differently-abled visitors, aligning with the requirements of the Rights of Persons with Disabilities Act, 2016.

## 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	100
Discrimination at workplace	100
Child Labour	100
Forced Labour/Involuntary Labour	100
Wages	100
Others- please specify	--

Our Supplier code of conduct addresses all of these aspects. In addition all our suppliers are screened on the basis of ESG Parameters

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

There were no significant risk/concerns arising from the assessments

## Business Responsibility &amp; Sustainability Report

## 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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A) (G.J)	2253315	2041808
Total Fuel (Bio Mass) consumption (B)* (G.J)	502950	1172414
Energy consumption through other sources (C) (G.J)	NA	NA
Total energy consumed from renewable sources (A+B+C)	2756265	3214222
From non-renewable sources		
Total electricity consumption (D) (G.J)	1751658.2	1807669
Total fuel consumption (E) (G.J)	41155441	38743661
Energy consumption through other sources (F) (G.J)	0	0
Total energy consumed from non-renewable sources (D+E+F)	42907100	40551330
Total energy consumed (A+B+C+D+E+F)	45663365	43765552
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations) (MJ/₹)	0.4	0.4
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumption/ Revenue from operations adjusted for PPP) (GJ/Crore)	995	1100
Energy intensity in terms of physical output (GJ/tonne of Cementitious)	2.37	2.32
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

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

TUV India Pvt. Ltd has carried out the independent assessment of the GRI Indicator assurance (Non- Financial) and BRSR core elements. The financial assurance was carried out by S.R Batliboi & Co. LLP.

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

Yes, following units were notified as designated consumers (DCs) under the PAT Scheme of the GOI in the Cycle VII & VIII.:

S. No.	Unit	Cycle Targets (TOE)	Achievement FY 2024-25 (TOE)	Remarks
1	Nimbahera-ICP	0.0975 (Cycle VII)	0.0648	Achieved
2	Mangrol-ICP	0.0854 (Cycle VII)	0.0787	Achieved
3	Muddapur-ICP	0.0885 (Cycle VII)	0.0783	Achieved
4	Gotan (White)-ICP	0.1272 (Cycle VII)	0.1126	Achieved
5	Aligarh-GU	0.0080 (Cycle VIII)	0.0088	In progress

\*ICP- Integrated Cement Plant, GU-Grinding Unit

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	2191478	1766882
(ii) Groundwater	1055735	1008195
(iii) Third party water	4403	0
(iv) Seawater / desalinated water	0	0
(v) Others (Rainwater harvesting)		122589
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	3251598	2897666
Total volume of water consumption (in kilolitres)	2891949	2897666
Water intensity per rupee of turnover (Total Water consumed / Revenue from operations) (KL/₹ Lacs)	2.93	2.65
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/ Revenue from operations adjusted for PPP) (KL/₹ Cr.)	63.02	72.82
Water intensity in terms of physical output (KL/tonne of Cementitious)	0.17	0.15
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

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

TUV India Pvt. Ltd has carried out the independent assessment of the GRI Indicator assurance (Non- Financial) and BRSR core elements. The financial assurance was carried out by S.R Batliboi & Co. LLP.

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	-	-
- No treatment	2,18,037.6*	-
- With treatment – please specify level of treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) To 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	-	-
Total water discharged (in kilolitres)	2,18,037.6	-

\*Excess water accumulated in the minepits through seepage and rainwater which is abstracted to continue the mining activity especially in the post monsoon period and requires no specific treatment.

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

TUV India Pvt. Ltd has carried out the independent assessment of the GRI Indicator assurance (Non- Financial) and BRSR core elements. The financial assurance was carried out by S.R Batliboi & Co. LLP.

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

At JK Cement Limited, all our manufacturing plants are committed to and actively implement the principles of Zero Liquid Discharge (ZLD). Our approach involves comprehensive wastewater management strategies across our facilities in India. Domestic wastewater generated within our premises undergoes treatment in Sewage Treatment Plants (STPs), where it is processed to meet stringent quality standards. The treated water is then prioritised for recycling and reuse within our plant operations, finding applications in areas such as dust suppression and the nurturing of our greenbelt initiatives.

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

Parameter	Please specify unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
NO <sub>x</sub>	MT/Annum	11182	9118
SO <sub>2</sub>	MT/Annum	1583	1515
Particulate Matter (PM)	MT/Annum	778	692
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	MT/Annum	89.27	50.28
Hazardous air pollutants (HAP)	MT/Annum	2.66	-
Others- please specify	-	-	-

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

TUV India Pvt. Ltd has carried out the independent assessment of the GRI Indicator assurance (Non- Financial) and BRSR core elements. The financial assurance was carried out by S.R Batliboi & Co. LLP.

## Business Responsibility &amp; Sustainability Report

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	10472587	10334366
Total Scope 2 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	420227	368584
Total Scope 1 and Scope 2 emissions intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO <sub>2</sub> equivalent / ₹ Lacs	9.8	9.8
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations adjusted for PPP)	MT of CO <sub>2</sub> / ₹ Cr	237.36	269
Total Scope 1 and Scope 2 emission intensity in terms of physical output (MT of CO <sub>2</sub> /tonne of Cementitious)	MT of CO <sub>2</sub> /tonne of Cementitious Material	0.565	0.565
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	-	-

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

TUV India Pvt. Ltd has carried out the independent assessment of the GRI Indicator assurance (Non- Financial) and BRSR core elements. The financial assurance was carried out by S,R Batliboi & Co. LLP.

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

Yes, JK Cement has implemented several projects and has a strong commitment towards reducing Green House Gas (GHG) emissions across its operations. There are four major strategies to reduce the carbon footprint:

- Integrations of advanced technologies and practices to enhance energy efficiency.
- Transitioning from fossil fuels to cleaner alternatives such as AFR
- Increasing the use of renewable energy and waste heat recovery systems (WHRS) to reduce reliance on fossil power.
- Lowering the proportion of clinker in cement by producing more blended cement.

JK Cement's near-term science-based GHG emission reduction targets have been validated by SBTi, aligning with a 1.5-degree trajectory. The company commits to reducing Scope 1 GHG emission intensity by 20.4% and Scope 2 GHG intensity by 44.7% per tonne of cementitious products by 2030, using 2020 as the base year.

JK Cement is participating in a DST-approved, PPP-based CCU initiative. In collaboration with NCCBM and IIT Roorkee, we will establish a pilot plant at our Mangrol site for carbon capture (~2 TPD) using an oxygen-based calciner. The captured CO<sub>2</sub> will be used in lightweight concrete and olefins, supporting decarbonisation and wider industry adoption. These projects and commitments demonstrate JK Cement's proactive approach to mitigating its environmental impact and contributing to a lower-carbon future in the cement industry.

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	1341	1020
E-waste (B)	0	28
Bio-medical waste (C)	0.34	2
Construction and demolition waste (D)	0	0
Battery waste (E)	15.83	26
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	94.71	100
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	9089	8865
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>10540</b>	<b>10041</b>
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) (Kg/₹ Lacs)	9.5	9.19
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (MT/₹ Cr.)	0.23	0.25
Waste intensity in terms of physical output (Kg/tonne of Cementitious)	0.546	0.531
Waste intensity (optional) – the relevant metric may be selected by the entity	-	-
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	10936	9640
(ii) Re-used	3	-
(iii) Other recovery operations	-	-
<b>Total</b>	<b>10939</b>	<b>9640</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	-	-
(ii) Landfilling	-	-
(iii) Other disposal operations	-	1126
<b>Total</b>	<b>-</b>	<b>1126</b>

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

TUV India Private Limited has carried out the independent assessment of the GRI Indicator assurance (Non- Financial) and BRSR core elements. The financial assurance was carried out by S,R Batliboi & Co. LLP.

## 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.

JK Cement is committed to responsible waste management across its establishments. Our circular economy strategy is based on Ellen Mac Arthur Foundation principles, embedded across three core areas: resource substitution through blended cement, co-processing of waste as alternative fuel, and responsible end-of-life material management. Regarding the reduction of hazardous and toxic chemicals, our strategy involves:

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
			None

## Business Responsibility &amp; Sustainability Report

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

Sr. No.	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
1	Ongoing Brownfield Expansion at Buxar (Bihar)	EIA Notification 2006 and its subsequent amendments	14 <sup>th</sup> September 2006	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=51A%2FBR%2FIND1%2F503117%2F2024&amp;proposal=110358315">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=51A%2FBR%2FIND1%2F503117%2F2024&amp;proposal=110358315</a>
2	Proposed IU Greenfield Exapnsion at Jaisalmer (Rajasthan)	EIA Notification 2006 and its subsequent amendments	14 <sup>th</sup> September 2006	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=1A%2FBJ%2FIND1%2F438401%2F2023&amp;proposal=7172261">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=1A%2FBJ%2FIND1%2F438401%2F2023&amp;proposal=7172261</a>
3	Ongoing Expansion at Hamirpur (U.P)	EIA Notification 2006 and its subsequent amendments	14 <sup>th</sup> September 2006	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=1A%2FBJP%2FIND1%2F498051%2F2024&amp;proposal=105202031">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=1A%2FBJP%2FIND1%2F498051%2F2024&amp;proposal=105202031</a>
4	Proposed Exapnsion of Karunda Limestone Mines from 3.45 Million TPA to 4.05 Million TPA at Nimbaheera (Rajasthan)	EIA Notification 2006 and its subsequent amendments	14 <sup>th</sup> September 2006	Yes	Yes	<a href="https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=51A%2FBJ%2FMIN%2F492665%2F2024&amp;proposal=93067094">https://parivesh.nic.in/newupgrade/#/trackYourProposal/proposal-details?proposalId=51A%2FBJ%2FMIN%2F492665%2F2024&amp;proposal=93067094</a>

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

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
	None	-	-	-

## Leadership Indicators

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

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

- Name of the area: Rajasthan (Mangrol and Nimbaheera, (Chittorgarh) & Gotan, (Nagaur), Rajasthan)
- Nature of operations: Integrated Cement Plants
- Water withdrawal, consumption and discharge in the following format:

## Water withdrawal by source (in kilolitres): Gotan Integrated Cement Plant

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	396845	415122
(iii) Third party water	2886	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (In kilolitres)	399731	415122
Total volume of water consumption (In kilolitres)	399071	415122
Water intensity per rupee of turnover (Water consumed / turnover) (Kl/₹ Lacs)	0.36	0.38
Water intensity (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>	-	-

## Water withdrawal by source (in kilolitres): Mangrol, Integrated Cement Plant

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	353250	321582.14
(ii) Groundwater	197568.5	188062.07
(iii) Third party water	-	0
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
Total volume of water withdrawal (In kilolitres)	550819	509644.21
Total volume of water consumption (In kilolitres)	550819	509644.21
Water intensity per rupee of turnover (Water consumed / turnover) (Kl/₹ Lacs)	0.50	0.47
Water intensity (optional) – the relevant metric may be selected by the entity	-	0
<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	-	-

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Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
(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>	<b>-</b>	<b>-</b>

## Water withdrawal by source (in kilolitres): Nimbahera, Integrated Cement Plant

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	680609.8	639594
(ii) Groundwater	165146	173567
(iii) Third party water	-	-
(iv) Seawater / desalinated water	-	-
(v) Others	-	120930
Total volume of water withdrawal (In kilolitres)	845756	934091
Total volume of water consumption (In kilolitres)	838459	934091
Water intensity per rupee of turnover (Water consumed / turnover) (Kl/₹ Lacs)	0.76	0.85
Water intensity (optional) – the relevant metric may be selected by the entity	-	-

## Water discharge by destination and level of treatment (in kilolitres)

(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) Into Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) Into Seawater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
<b>Total water discharged (in kilolitres)</b>	<b>-</b>	<b>-</b>

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

TUV India Private Limited has carried out the independent assessment of the GRI Indicator assurance (Non-Financial) and BRSR core elements. The financial assurance was carried out by S.R Batliboi & Co. LLP.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	1452883	2529576
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO <sub>2</sub> eq/₹ lacs	1.31	2.3
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO <sub>2</sub> eq/tonne of Cementitious	0.08	0.13

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

TUV India Private Limited has carried out the independent assessment of the GRI Indicator assurance (Non-Financial) and BRSR core elements. The financial assurance was carried out by S.R Batliboi & Co. LLP.

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

Not Applicable.

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of initiative
1	Replacement of fossil fuel with AFR	AFR processing facilities have been installed across all the integrated Cement Plants	Reduced dependency on conventional fossil fuels
2	Replacement of fossil fuel with clean power	1. Installation & upgradation of Waste heat recovery system. 2. Enhancing the capacity of RE power.	Reduced our power cost Reduced GHG emissions Reduced overall carbon footprint of the product
3	Energy efficiency & advanced technologies	Reduction in SHC & SPC of ongoing plants with adoption of energy efficient technology like Process Optimization, modification like VFD installation.	Reduced power and fuel consumption Reduced carbon footprint of the product
4	Maintaining Zero Liquid Discharge	We are maintaining ZLD status in our all cement manufacturing units.	Improved water efficiency Reduced water consumption
5	Implementation of water efficient technologies	Water cooling systems replaced with air cooling such as condensers in power plant.	Reduction in water consumption
6	2030-Nature positive	Development of Biodiversity park located at Ahirpura limestone mine, Chittorgarh, Rajasthan	Improved ecological footprint Safe flora and fauna

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

Yes, JK Cement has a comprehensive Business Continuity and Disaster Management Plan in place across all its plants. This plan encompasses both onsite and offsite emergency protocols to address various potential disruptions, including natural disasters, industrial accidents, and other unforeseen events. Our strategy involves risk assessment, clearly defined roles and responsibilities for emergency response teams, communication protocols, evacuation procedures, and resource mobilisation. We conduct regular mock drills and disaster management exercises to ensure our workforce is adequately trained and prepared to handle emergency situations effectively, minimising potential impact on our operations and ensuring the safety of our employees and surrounding communities in all locations.

## 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.

JK Cement acknowledges the environmental considerations associated with its value chain and is actively implementing various measures to mitigate potential adverse impacts at each stage. These efforts include supply chain optimisation, energy efficiency initiatives, the promotion of sustainable materials and processes, and ensuring regulatory compliance. Furthermore, training programs are arranged for value chain partners to enhance their understanding of environmental issues and broader societal impacts, fostering a more efficient, cost-effective, and environmentally responsible supply chain. We strive for continuous improvement in our environmental performance across our operations and throughout our value chain.

## Business Responsibility &amp; Sustainability Report

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

16% of value chain partners (by value of business done with such partners) were assessed for environmental impacts

## 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.

12

## 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	Cement Manufacturers' Association	National
2	Confederation of Indian Industry (CII)	National
3	Confederation of Indian Industry's India Business and Biodiversity Initiative	National
4	UN Energy Compact	International
5	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
6	Global Cement and Concrete Association (GCCA)	National & International
7	Member of JK Organisation	National
8	Merchants Chamber of UP	State
9	Science Based Targets Initiative	International
10	United Nation Global Compact	National & International

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

Name of authority	Brief of the case	Corrective action taken
NA	NA	NA

## 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
1	Green power Procurement policies	National and international platforms, meeting with BEE, MNRE, CII	Yes	As and when required	Not available
2	Carbon markets	Seminars, conferences and Forums	Platforms of CII, BEE, CMA, MoEF & CC	As and when required	Not available
3	Fly Ash regulations and market dynamics	Seminars, conference	Platforms of CMA and MoEF & CC	As and when required	Not available
4	Decarbonisation and Net Zero	National and international conferences, Meetings, seminars	Platforms of Bureau of Energy Efficiency, MoEF & CC, GCCA, SBTi, TERI, FICCI, CDP, CMA	As and when required	Not available
5	Cement sector alignment with SDGs	Conference, seminars	Platform of GCCA	As and when required	Not available

## 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
None	–	–	–	–	–

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

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

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

JK Cement actively promotes local communities to share their suggestions and concerns through a robust grievance mechanism. This enables individuals to express any issues they may have through various channels, including formal letters and direct one-to-one meetings with our designated community relations teams. Our CSR committee consistently engages with local communities to facilitate the raising of complaints. All complaints received undergo a thorough investigation process, and appropriate actions are promptly taken to address and resolve the concerns raised in a fair and transparent manner. We are committed to maintaining open communication and ensuring that the grievances of the community are heard and effectively redressed.

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

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	5%	6.09%
Directly from within India	81%	91.23%

## 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 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Rural	6%	6%
Semi-urban	5%	7%
Urban	27%	25%
Metropolitan	62%	62%

(Place to be 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
In the impact assessment studies, there has been no negative impacts associated.	NA

## Business Responsibility &amp; Sustainability Report

## 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 ₹)
	None	--	--

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

JKCL promotes procurement of materials from suppliers who are compliant to ESG principles. JKCL prefers local suppliers as it helps in creating livelihood opportunities for the locals.

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

We have not segregated the vendors based on the marginalised /vulnerable group

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

Not applicable

## 4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge.

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
	NIL	--	--	--

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

Name of authority	Brief of the Case	Corrective Action Taken
NA	--	--

## 6. Details of beneficiaries of CSR Projects

S. No.	CSR Project	No. of persons benefited from CSR projects
1	Healthcare	63997
2	Education	97770
3	Livelihood	63313
4	Rural Transformation	222450
5	Environment	81723
6	Others	33588
	<b>Total nos. of beneficiaries</b>	<b>562841</b>

## 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.

JK Cement has established a multi-channel mechanism to effectively receive and respond to consumer complaints and feedback. Customers can directly submit their feedback or raise concerns through a dedicated section on the JK Cement website. For immediate assistance, they can also reach out via email at [consumer.care@jkcement.com](mailto:consumer.care@jkcement.com) and [customer.care.white@jkcement.com](mailto:customer.care.white@jkcement.com) or call our toll-free number, 1800 266 2606.

Furthermore, our extensive network of marketing offices across 21 states ensures regular interaction and direct engagement with customers and dealers on the ground. Regardless of the channel through which a complaint is raised it is promptly directed to our dedicated customer service team for swift resolution. We are committed to addressing each concern within 24 hours and diligently working towards a resolution within 3 working days,

except in cases requiring extensive testing. Our Business Development MIS team meticulously maintains records of all feedback and complaints, which form the basis for insightful analysis and constructive discussions during our internal review meetings. Collaborating closely with our Quality, Manufacturing, and Marketing teams, we make informed decisions aimed at continuous product enhancement and ensuring utmost customer satisfaction. Additionally, we provide training to customers on the proper usage and disposal of our products. To offer on-site support and address specific product-related queries, we have a dedicated team of technical engineers who regularly visit customer sites to gather feedback, build capacity, and provide expert solutions.

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

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

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

	FY 2024-25			FY 2023-24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Others	1625	26	-	1369	27	-

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

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

## 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, JK Cement has implemented robust cybersecurity procedures and IT security practices to ensure the confidentiality, integrity, and availability of our information assets and to prevent data leaks or breaches of data privacy. While we are in the process of releasing an exclusive cyber security policy, our existing Code of Conduct addresses data security and privacy risks. We conduct regular and comprehensive risk assessments to identify vulnerabilities and implement necessary controls. Additionally, we provide awareness and training programs for our employees on data breach prevention.

You can find our Privacy Policy, which outlines our practices regarding data collection, usage, and protection, at the following link:

<https://www.jkcement.com/privacy-policy/>

This policy provides details on how we manage and protect user data. As mentioned in the reference, we are also in the process of releasing a dedicated cybersecurity policy which will further detail our framework in this critical area.

## 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.

Since there are no complaints, there was no need for any corrective action

## Business Responsibility & Sustainability Report

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

- Number of instances of data breaches along-with impact - 0
- Percentage of data breaches involving personally identifiable information of customers - 0
- Impact, if any, of the data breaches - 0

### Leadership Indicators

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

Products can be referred on the website- <https://www.jkcement.com>

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

JK Cement actively informs and educates consumers on the safe and responsible usage of our products through various channels. This includes providing clear and comprehensive usage instructions and safety guidelines on our product packaging. We also develop informative content, such as application guides and best practices, which are readily available on our website and through our dealer network. Furthermore, our dedicated team of technical engineers conducts on-site visits to provide guidance, address queries, and build capacity among our customers regarding the correct and safe application of our cement and related products. We also organise training sessions and workshops for contractors, builders, and other stakeholders to promote responsible usage and ensure optimal performance and safety.

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

Our Company doesn't fall under 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. JK Cement strives to provide comprehensive product information that often goes beyond the minimum requirements stipulated by local laws. This includes detailed usage instructions, safety guidelines, composition details, and best practices for application, ensuring consumers have complete information for safe and effective use. Our company follows BIS regulations for the product packaging and information to be contained in the product packaging.

Yes. We have a robust system of taking customer feedback on product quality and issues, our website also has a customer feedback page where our customers can provide their feedback in case of any concern. Link is given for reference: <https://www.jkcement.com/customer-feedback/>.



## INDEPENDENT ASSURANCE STATEMENT

To,  
The Board of Directors,  
JK Cement Limited (JKCL),  
Prism Tower, Niraniya Estate,  
Gwal Pahari, Gurugram - 122102, Haryana

JK Cement Limited (JKCL) (hereinafter referred to as "JKCL" or "Reporting Organization") engaged TÜV India Private Limited (TUVI) to perform an independent external assurance of the Business Responsibility and Sustainability Report (hereinafter "the BRSR") Core and Global Reporting Initiative ("GRI") disclosures. JKCL developed the Integrated Annual Report which also contains the disclosures of BRSR Core ("the 09 attributes"), all the nine BRSR principles, including Essential and Leadership Indicators and GRI disclosures (hereinafter together referred to as "Sustainability Information") for the period April 01, 2024 to March 31, 2025. Following frameworks and guidelines are referred during assurance process:

- The Industry Standards on Reporting of BRSR Core, as per SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CR/2024/177, dated 20 December 2024;
- SEBI circular SEBI/HO/CFD/CMD-2/P/CR/2021/562, dated 10 May 2021;
- The SEBI notification SEBI/LAD-NRO/GN/2023/131, dated 14 June 2023, related to BRSR reporting requirements;
- The BRSR Core - Framework for Assurance and ESG Disclosures for the Value Chain, as stipulated by SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CR/2023/122, dated 12 July 2023;
- GRI 2021

The assurance engagement for BRSR Core disclosures was conducted with reasonable assurance and (GR) disclosures were subjected to a limited assurance engagement, following the requirements of International Standard on Assurance Engagements ISAE 3000 (Revised).

### Management's Responsibility

JKCL developed the content of its integrated report, covering the BRSR Core disclosures (comprising nine attributes, as per Annexure I - Format of BRSR Core) and disclosures based on the Global Reporting Initiative (GRI) framework. The management of JKCL holds full responsibility for the collection, analysis, preparation and disclosure of the information presented in the BRSR, including its availability in both web-based and printed formats. This responsibility also extends to the maintenance and integrity of the website where the integrated report is published. Management is further accountable for ensuring that the disclosed data is of high quality, accurate, and free from material misstatements, whether due to fraud or error, in line with the applied criteria referenced in the BRSR and GRI 2021. Additionally, JKCL is responsible for the archiving and reproduction of the disclosed information and for ensuring that such data is made available to relevant stakeholders and regulatory authorities upon request.

### Scope and Boundary of Assurance Engagement

The scope of this assurance engagement conducted by TÜV India Private Limited (TUVI) covered the verification of disclosures made by JKCL in its integrated report, specifically focusing on the nine attributes outlined in Annexure I - Format of BRSR Core and the GRI 2021 disclosures. The BRSR Core requirements represent key disclosures related to the organization's Environmental, Social, and Governance (ESG) performance, as mandated by the Securities and Exchange Board of India (SEBI).

The assurance engagement included the following activities:

- Review of General Disclosures, Management and Process Disclosures, and JKCL's responses to all nine BRSR principles;
- Review and evaluation of the nine attributes specified under Annexure I - Format of BRSR Core, as disclosed in the BRSR;
- Assessment of the quality, clarity, and completeness of the reported information;
- Verification of supporting evidence on a sample basis, involving:
  - Limited assurance for GRI-based disclosures, and
  - Reasonable assurance for the nine core attributes as per the BRSR Core framework.

This approach ensured an assessment aligned with the principles of ISAE 3000 (Revised), providing an independent and objective evaluation of the reliability and accuracy of JKCL's ESG disclosures.

TUVI has verified the below *09 attributes as per Annexure I - Format of BRSR Core* disclosed in the BRSR

Attributes	KPI
Green-house gas (GHG) footprint	Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) + GHG (CO <sub>2</sub> e) Emission in MT - Direct emissions from organization's owned- or controlled sources - Monitored Total Scope 2 emissions (Break-up of the GHG (CO <sub>2</sub> e) into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) - Indirect emissions from the generation of energy that is purchased from a utility provider - Monitored GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT) / Total Revenue from Operations adjusted for PPP - Calculated

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	GHG Emission Intensity (Scope 1 +2), Total Scope 1 and Scope 2 emissions (MT) / Total Output of Product or Services - Calculated	
Water footprint	Total water consumption (in KL) - Monitored and estimated Water consumption intensity - KL / Total Revenue from Operations adjusted for PPP - Calculated Water Discharge by destination and levels of Treatment (KL) - Monitored	
Energy footprint	Total energy consumed in GJ - Monitored % of energy consumed from renewable sources - in % terms - Monitored Energy intensity - Joules or multiples / Rupee adjusted for PPP - Calculated Energy intensity - Product or Service - Calculated	
Embracing circularity - details related to waste management by the entity	Plastic waste (A) - Monitored, E-waste (B) - Monitored, Bio-medical waste (C) - Monitored, Construction and demolition waste (D) - Monitored, Battery waste (E) - Monitored, Radioactive waste (F) - NA Other Hazardous waste (G) - see the list below Used Oil, Waste Oil, Oil storage barrels, Paint drums, Oil filters, Oil-soaked cotton - Monitored Other Non-hazardous waste generated (H) - see the list below Organic waste: SLP sludge, Wood waste - Monitored; Inorganic Waste: Mixed paper/Newspaper/Magazine, Glass waste, Waste tissue paper, office stationery, Packaging Waste: Cardboard, scrap metal, refractory scrap - Monitored; Total waste generated (A + B + C + D + E + F + G + H) in MT - Monitored; Waste intensity - Kg or MT / Unit of Product or Service - Calculated Waste intensity - Kg or MT / Rupee adjusted for PPP - Calculated Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT) - Monitored Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity), Kg of Waste Recycled/Recovered/ Total Waste generated - Calculated For each category of waste generated, total waste disposed by nature of disposal method (MT) - Monitored For each category of waste generated, total waste disposed by nature of disposal method (Intensity) kg of Waste disposed / Total Waste generated - Calculated	
Enhancing Employee Wellbeing and Safety	Spending on measures towards wellbeing of employees and workers - cost incurred as a % of total revenue of the company - in % terms - Monitored and calculated Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites) i. Number of Permanent Disabilities - Monitored ii. Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) - Monitored iii. No. of fatalities - Monitored	
Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid - in % terms - Calculated Complaints on POSH 1) Total Complaints on Sexual Harassment (POSH) reported - Monitored 2) Complaints on POSH as a % of female employees / workers - Monitored 3) Complaints on POSH upheld - Monitored	
Enabling Inclusive Development	Input material sourced from following sources as % of total purchases - Directly sourced from MSMEs / small producers and from within India - in % terms - As % of total purchases by value - Monitored Job creation in smaller towns - Wages paid to persons employed in smaller towns (permanent or non-permanent / on contract) as % of total wage cost - in % terms - As % of total wage cost - Monitored Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events - in % terms - Monitored	
Fairness in Engaging with Customers and Suppliers	Number of days of accounts payable - (Accounts payable '965) / Cost of goods/services procured - Calculated	
Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties 1) Purchases from trading houses as % of total purchases 2) Number of trading houses where purchases are made from 3) Purchases from top 10 trading houses as % of total purchases from trading houses 1) Sales to dealers / distributors as % of total sales 2) Number of dealers / distributors to whom sales are made 3) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors Share of RPIs (as respective %age) - Calculated Purchases, Sales, Loans & advances, Investments - Calculated	

TUVI has verified the below-mentioned GRI disclosures given in the Report 'Limited Level' assurance engagement in-line with (SAE 3000 (Revised) Assurance Standard:

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Topic	Indicator	GRI Disclosure
Anti-competitive behavior	Legal actions for anti-competitive behavior, anti-trust and monopoly practices	204-1
Tax	Approach to tax Tax governance, control and risk management Stakeholder engagement and management related to tax	207-1 207-2 207-3
Material	Country-by-country reporting	207-4
Energy	Materials used by weight or volume Recycled input materials used Energy consumption within the organization Energy Intensity Reduction of energy consumption	301-1 301-2 302-1 302-2 302-3
Water	Interactions with water as a shared resource Water withdrawal Water discharge Water consumption	303-1 303-2 303-3 303-4 303-5
Biodiversity and land use	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	304-1
Emissions	Direct (Scope 1) GHG emissions Energy indirect (Scope 2) GHG emissions Other indirect (Scope 3) GHG emissions GHG Emission Intensity Reduction of GHG Emissions Emissions of ODS	305-1 305-2 305-3 305-4 305-5 305-6
Waste	Nitrogen oxides, sulfur oxides and other significant air emissions Waste generation and significant waste-related impacts Management of significant waste related impacts Waste generated Waste diverted from disposal Waste diverted to disposal	306-1 306-2 306-3 306-4 306-5
Supplier Environmental Assessment	New suppliers that were screened using environmental criteria Negative environmental impacts in the supply chain and actions	308-1 308-2
Employment	New Employee Hire & Turnover Details Benefits provided to full-time employees that are not provided to temporary or part-time employees Parental leaves Minimum notice periods regarding operational changes	401-1 401-2 401-3 402-1
Labor/Management Relations	Occupational health and safety management system Hazard identification, risk assessment and incident investigation Occupational health services Worker participation, consultation, and communication on occupational health and safety Worker training on occupational health and safety Promotion of worker health Prevention and mitigation of occupational health and safety impacts directly linked by business relationships Workers covered by an occupational health and safety management system Work-related injuries Work-related ill health	403-1 403-2 403-3 403-4 403-5 403-6 403-7 403-8 403-9 403-10
Training and Education	Average hours of training per year per employee Programs for upgrading employee skills and transition assistance programs Percentage of employees receiving regular performance and career development reviews	404-1 404-2 404-3
Diversity and Equal Opportunity	Diversity of governance bodies and employees Ratio of basic salary and remuneration of women to men Incidents of discrimination and corrective actions taken	405-1 405-2 406-1
Freedom of Association and Collective Bargaining	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	407-1
Child Labour Forced or Compulsory Labor	Operations and suppliers at significant risk for incidents of child labour Operations and suppliers at significant risk for incidents of forced or compulsory labour	408-1 409-1
Security Practices	Security personnel trained in human rights policies or procedures	410-1
Local Communities	Operations with local community engagement, impact assessments, and development programs Operations with significant actual and potential negative impacts on local communities	413-1 413-2
Supplier Social Assessment	New suppliers that were screened using social criteria Negative social impacts in the supply chain and actions taken	414-1 414-2
Public Policy	Political contributions	415-1
Customer Health and Safety services	Assessment of the health and safety impacts of product and service categories Incidents of non-compliance concerning the health and safety impacts of products and services	416-1 416-2
Marketing and Labelling	Requirements for product and service information and labelling Incidents of non-compliance concerning product and service information and labelling Incidents of non-compliance concerning marketing communications	417-1 417-2 417-3
Customer Privacy	Substantiated complaints concerning breaches of customer privacy and losses of customer data	418-1

The reporting boundary includes 13 standalone units of JK Cement including the integrated cement plants at Nimbaraha, Gotan, Muddapur, Panna, Mangrol and grinding units located in Ailgarh, Hajjar, Balasnor, Hampir, Ujjain and Prayagraj. The onsite and remote verification was done at below mentioned sites between 19<sup>th</sup> February 2025 to 25<sup>th</sup> April 2025.

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#### Onsite Verification

J.K. Cement Ltd., Aligarh GU located at Village- Sathia, Tehsil- Koli, Aligarh Uttar Pradesh 202127, India dated -19 <sup>th</sup> February 2025.	J.K. Cement Ltd., Nimbahera ICP located at Nimbahera, District - Chittorgarh, Rajasthan, 312617, India dated -20 <sup>th</sup> February 2025.
J.K. Cement Ltd., Mangrol ICP located at Mangrol, Distt: Chittorgarh, Rajasthan, 312620, India dated -21 <sup>st</sup> February 2025.	J.K. Cement Ltd., GL-1 & GL-2 ICP located at Gotan, District Nagaur, Rajasthan, 342902, India dated -24 <sup>th</sup> and 25 <sup>th</sup> February 2025.
J.K. Cement Ltd., Corporate Office, Gurugram located at Prism Tower, 5th Floor, Niranjya Estate, Gwal Pahari, Gurugram, 122002, Haryana, India dated -24 <sup>th</sup> and 25 <sup>th</sup> April 2025.	

#### Remote Verification

J.K. Cement Ltd., Panna ICP located at Harduwaken, Madhya Pradesh 488441, India dated -17 <sup>th</sup> April 2025.	J.K. Cement Ltd., Muddapur ICP located at Muddapur, Taluka - Muddol, District - Bagalkot, Karnataka, 587122, India dated -23 <sup>rd</sup> April 2025.
J.K. Cement Ltd., Hamirpur GU located at Hamirpur, Uttar Pradesh, India dated -22 <sup>nd</sup> April 2025.	J.K. Cement Ltd., Balasinor GU located at Tahsil- Balasinor, Ahmedabad Indore Highway, Village- Vadadola, Balasinor, Mahisagar 388255, India dated -23 <sup>rd</sup> April 2025.
J.K. Cement Ltd., Jharli GU located at Village- Jharli, Tehsil- Matanhail, Jhajjar, Haryana 124106, India dated -22 <sup>nd</sup> April 2025.	J.K. Cement Ltd., Katni Wall Putty GU located at Katni Village- Rupaund, Tehsil- Badwara, District Katni, 483773, India dated -21 <sup>st</sup> April 2025.
J.K. Cement Ltd., Ujain GU located at Ujain, Madhya Pradesh 496550, India dated -23 <sup>rd</sup> April 2025.	J.K. Cement Ltd., Prayagraj GU located at Prayagraj, Uttar Pradesh 211001, India dated -22 <sup>nd</sup> April 2025.

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

#### Limitations

TUVI did not perform any assurance procedures on the prospective information disclosed in the Report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI did not verify any ESG goals and claim through this assignment. TUVI has taken reference of the financial figures from the audited financial statements. JKCL will be responsible for the appropriate application of the financial data. The application of this assurance statement is limited w.r.t [SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/10/2019/192 dated Jul 19, 2019 and Industry Standards on Reporting of BRSR Core Circular SEBI/HO/CFD/CFD-SEC-2/P/10/2024/177 dated 20/10/2024](#). TUVI disclaims liability for decisions or consequences arising from this assurance statement or from inaccurate data, relying on the completeness and accuracy of information provided by JKCL. The responsibility for the authenticity of the data is confirmed by JKCL. Any reliance placed by any person or third party on disclosed KPI is entirely at their own risk. This assurance statement does not validate any environmental or social claims, nor it's intended to mislead or contribute to greenwashing.

#### TUVI's Responsibility

TUVI's responsibility in relation to this engagement is to perform a reasonable level of BRSR Core assurance and limited level GRI assurance 2021 and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of JKCL's strategy, management of ESG-related issues or the sufficiency of the Report against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information disclosed by JKCL. Reporting Organization is responsible for archiving the related data for a reasonable time period. The primary intended user of this assurance statement is JKCL; however, the client may use it at their own discretion in accordance with their specific requirements. This assurance engagement is based on the assumption that the data and information provided to TUVI by JKCL are complete and true.

#### Assurance Methodology

During the assurance engagement, TÜV India Private Limited (TUVI) adopted a risk-based approach, focusing verification efforts on disclosures and issues of high material relevance to JKCL and its stakeholders. The objective was to assess the reliability and accuracy of the non-financial information disclosed, with emphasis on the robustness of data management systems, internal controls, and information flows.

TUVI's assurance activities included:

1. Document and Data Review
  - Examination of documents, datasets, and supporting evidence provided by JKCL for the nine attributes listed in Annexure I – Format of BRSR Core (non-financial disclosures).
  - Evaluation of disclosures related to Management Approach and performance indicators.
2. Stakeholder Interviews
  - Conducted interviews with key representatives, including data owners, process managers, and decision-makers across various departments.
  - Reviewed JKCL's approach to stakeholder engagement and materiality determination to validate qualitative statements included in the Report.
  - Interviews were conducted through both onsite visits and remote assessments, as applicable.

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#### 3. Process and System Assessment

- Sample-based review of systems and processes for:
  - Implementing ESG and sustainability-related policies, as described in the BRSR.
  - Collecting, managing, and reporting both quantitative data and qualitative information for the reporting period.
- Assessment of the internal controls supporting data accuracy, traceability, and consistency.

#### 4. Reporting Framework Adherence

- Verified JKCL's adherence to reporting requirements under:
  - SEBI's BRSR guidelines, and
  - GRI Standards (Global Reporting Initiative).

GRI Evaluation Criteria: TUVI evaluated the GRI-based disclosures against the following GRI principles: Stakeholder Inclusiveness, Materiality, Responsiveness, Completeness, Neutrality, Relevance, Sustainability Context, Accuracy, Reliability, Comparability, Clarity, Timeliness.

This methodology enabled TUVI to provide a balanced and evidence-based assurance on the information disclosed, while maintaining alignment with ISAE 3000 (Revised) standards for non-financial assurance.

#### Action Plan

The following improvement areas were identified and shared with JKCL. These recommendations are aligned with the existing objectives and initiatives of JKCL management. The assurance team endorses the continued implementation of these initiatives to support the advancement of the organization's sustainability goals:

1. **Double Materiality Assessment (DMA):** The reporting organization may consider conducting a Double Materiality Assessment in accordance with the Corporate Sustainability Reporting Directive (CSRD).
2. **Green Mobility – Company-Owned Vehicles:** The organization can increase the share of green mobility solutions (e.g., electric or hybrid vehicles) in its mines and other company-owned vehicle fleets.
3. **Green Mobility – Outbound Logistics:** The organization may encourage its suppliers, particularly those involved in outbound cement logistics, to adopt green mobility options to reduce the environmental impact of transportation.

#### Conflict of Interest

In accordance with the Business Responsibility and Sustainability Report (BRSR) requirements prescribed by SEBI, addressing conflicts of interest is fundamental to ensuring the integrity, independence, and credibility of assurance engagements. As mandated by SEBI guidelines, assurance providers are required to disclose any actual or potential conflicts of interest that may compromise the objectivity or impartiality of their assessments. TÜV India Private Limited (TUVI) rigorously identifies and evaluates any relationships, affiliations, or financial interests that could give rise to conflicts of interest during the assurance process. We proactively implement robust measures to mitigate or manage such conflicts, thereby safeguarding our independence and neutrality. We commit to providing clear and transparent disclosures of any identified conflicts of interest in our assurance statement. We acknowledge that any failure to adequately address conflicts of interest could undermine the credibility of the assurance process and the reliability of the reported information. Accordingly, TUVI strictly complies with SEBI's guidelines and adopts all necessary steps to avoid, disclose, or mitigate conflicts of interest effectively throughout the engagement.

#### Assurance Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures related to the BRSR Core Key Performance Indicators (KPIs) presented in the BRSR report, along with the referenced supporting information, provide a fair representation of the nine attributes as per Annexure I and meet the general content and quality requirements outlined in the BRSR framework.

Competency and Independence: TÜV India Private Limited (TUVI) confirms its competence to conduct this assurance engagement in accordance with SEBI guidelines. Our assurance team possesses the necessary expertise in ESG verification, assurance methodologies, and applicable regulatory frameworks. We uphold strict independence, apply robust assurance methodologies, and continuously improve our processes to deliver reliable and credible assessments.

Disclosures: TUVI is of the opinion that the reported disclosures generally comply with the requirements of the BRSR. JKCL's General Disclosures provide appropriate contextual information about the organization, while the Management & Process Disclosures adequately describe the management approach for the nine attributes as per Annexure I – Format of BRSR Core.

**Limited Assurance Conclusion:** Based on the procedures performed, nothing has come to our attention that causes us to believe that the information subject to the limited assurance engagement was not prepared, in all material respects, in accordance with the applicable reporting criteria. TUVI found the information to be reliable with reference to GRI 2021 reporting criteria.

**Reasonable Assurance Conclusion:** In line with SEBI's reasonable assurance requirements—including the defined scope of assurance, application of risk-based methodologies and data validation techniques, conflict of interest mitigation, documentation of evidence, and communication of findings—TUVI has effectively validated the accuracy and reliability of the information presented in the BRSR. This provides stakeholders with enhanced confidence and promotes transparency and credibility in JKCL's ESG reporting practices.

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#### Evaluation of BRSR Core

a) **Governance, Leadership, and Oversight:** The integrated report appropriately discloses messages from top management, the business model aimed at promoting inclusive growth and equitable development, along with related actions and strategies. It highlights JKCL's focus on services, risk management practices, environmental protection and restoration efforts, and organizational priorities.

b) **Connectivity of Information:** JKCL discloses the nine attributes as per Annexure I - Format of BRSR Core. The report effectively demonstrates the inter-relatedness and dependencies of these principles with factors influencing the organization's ability to create value over time.

c) **Stakeholder Responsiveness:** The report details mechanisms for engaging key stakeholders to identify major concerns and to derive and prioritize short-, medium-, and long-term strategies. It provides valuable insights into the nature and quality of JKCL's relationships with its stakeholders and fairly represents how the organization understands, considers, and responds to their legitimate needs and interests.

d) **Materiality:** Material issues related to the nine attributes and corresponding KPIs, as required by the BRSR framework, are adequately identified and reported.

e) **Conciseness:** The report communicates the required information clearly and succinctly, using brief and to-the-point sentences. Effective use of graphs, pictorials, and tabular representations enhances clarity while maintaining the continuity of information flow throughout the report.

f) **Reliability and Completeness:** JKCL has established robust internal systems for data aggregation and evaluation. All data provided to TUVI underwent a QA/QC process. TUVI's assurance team verified the majority of data on a sample basis during the assurance process and found it to be fairly accurate. The information is reported transparently, neutrally, and free of material error.

g) **Consistency and Comparability:** Information in the BRSR is presented on an annual basis and was found to be reliable and complete. This supports adherence to the principles of consistency and comparability in reporting.

**Independence and Code of Conduct:** TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which, adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI [circular SEBI/HO/CFD/CFD-SEC-2/P-C/P/2023/109, dated 12/07/2023 and Industry Standards on Reporting of BRSR Core, circular SEBI/HO/CFD/CFD-PoD-P/P-C/P/2024/177, dated 20/12/2024.](#)

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

**Quality control:** The assurance team complies with quality control standards, ensuring that the engagement partner possesses requisite expertise and the assigned team collectively has the necessary competence to perform engagements in reference with standards and regulations. Assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Control, TUVI maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### GRI Report

In our opinion, based on the scope of this assurance engagement, the disclosures on ESG performance and the reference information provide a fair representation of the material topics and related strategies, and meet the general content and quality requirements of the GRI Standards. JKCL appropriately discloses the KPIs and actions that focus on value creation over the short, medium, and long term. The KPIs selected and disclosed by JKCL are fairly represented. Based on the procedures we have performed, nothing has come to our attention that causes us to believe that the information subject to the limited assurance engagement was not prepared, in all material respects, in accordance with the identified ESG reporting criteria. TUVI did not perform any assurance procedures on prospective information such as targets, expectations, and ambitions disclosed in the ESG information. Consequently, TUVI expresses no conclusion on such prospective information. This assurance statement has been prepared in accordance with the terms of our engagement.

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

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

TUVI is of the opinion that this report has been prepared in reference with the GRI Standards.

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**Topic Specific Standard:** 200 series (Economic topics) (limited to scope of work, financial figures as disclosed in JKCL's audited financial statements), 300 series (Environmental topics), and 400 series (Social topics); These Topic-specific Standards were used to Report information on the organization's impacts related to environmental and social topics. TUVI is of the opinion that the reported material topics and Topic-specific Standards that JKCL used to prepare its Report are appropriately identified and addressed.

**Limited Assurance Conclusion:** Based on the procedures we have performed; nothing has come to our attention that causes us to believe that the information subject to the limited assurance engagement was not prepared in all material respects. TUVI found the ESG information to be reliable in all principles, with regards to the reporting criteria of the GRI Standards.

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

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

**Materiality:** The materiality assessment process has been carried out, based on the requirements of the GRI Standards, considering topics that are internal and external to the JKCL's range of businesses. The Report fairly brings out the aspects and topics (KPI's), and its respective boundaries of the diverse operations of JKCL. In our view, the Report meets the requirements.

**Responsiveness:** TUVI believes that the responses to the material aspects are fairly articulated in the report, i.e. disclosures on JKCL policies and management systems including governance. In our view, the Report meets the requirements.

**Impact:** JKCL communicates its ESG performance through regular, transparent internal and external reporting throughout the year, aligned with BRSR, GRESB, GRI as part of its policy framework that include POSH, ESG, Code of Conduct Policy, Whistle Blower Policy etc. JKCL Reports on ESG performance to Board of Directors, who oversees and monitors the implementation and performance of objectives, as well as progress against goals and targets for addressing ESG related issues. JKCL completed the process of establishing contemporary goals and targets against which performance will be monitored and disclosed periodically.

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

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

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

#### Independence and Impartiality Statement

TUVI is an independent and neutral third-party provider of ESG assurance services, supported by a team of qualified environmental and social specialists. We affirm our independence and impartiality in conducting this assurance engagement and confirm that there is no conflict of interest with JKCL. During the reporting period, TUVI did not undertake any assignments with JKCL that could compromise the integrity, independence, or objectivity of our findings, conclusions, or observations. TUVI was not involved in the preparation of any content or data presented in the BRSR, other than this assurance statement. Throughout the assurance process, TUVI remained fully impartial and objective, including during all interviews conducted as part of the engagement.

For and on behalf of TUV India Private Limited



Manojkumar Borekar  
Product Head – Sustainability Assurance Service  
TUV India Private Limited



Date: 19/06/2025  
Place: Mumbai, India  
Project Reference No: 8123408539  
Revision: 01

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