GOLDEN JUBILEE YEAR
1973 - 2023

SADHANA NITRO CHEM LIMITED

Date: September 02, 2024

To
BSE Limited
1st Floor, P.J. Towers,
Dalal Street, Mumbai - 400001
Scrip Code: 506642

To
National Stock Exchange of India Limited
Exchange plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (E),
Mumbai - 400051, India
Symbol: SADHNANIQ

Subject: Business Responsibility and Sustainability Report for the Financial Year 2023-24

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, please find enclosed herewith the Business Responsibility and Sustainability Report ("**BRSR**") for Financial Year 2023-24.

Kindly note that the BRSR for the Financial Year 2023-24 also forms part of the Annual Report 2023-24 and has been submitted to the Stock Exchanges as part of the Annual Report.

Kindly take the same on your records.

For SADHANA NITRO CHEM LIMITED

NITIN RAMESHCHANDRA JANI

Digitally signed by NITIN RAMESHCHANDRA JANI
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Date: 2024.09.02 15:34:35 +05'30'

Nitin Rameshchandra Jani
Company Secretary & Compliance Officer
Membership No.: A4757

ANNEXURE - IV

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

SECTION A- GENERAL DISCLOSURES

I. Details of the listed entity

I-1.	**Corporate Identity Number (CIN) of the listed entity-**	L24110MH1973PLC016698
I-2.	**Name of the listed entity-**	SADHANA NITRO CHEM LIMITED
I-3.	**Year of incorporation-**	1973
I-4.	**Registered office address-**	HIRA BAUG, 1st FLOOR KASTURBA CHOWK (C.P. TANK) MUMBAI MH 400004
I-5.	**Corporate address -**	10, Bruce Street, 1st Floor, 8/12, Sir Homi Modi Street, Fort, Mumbai 400001 MH IN
I-6.	**E-mail -**	sadhananitro@sncl.com
I-7.	**Telephone -**	022 68663300
I-8.	**Website -**	https://www.sncl.com
I-9.	**Financial year for which reporting is being done -**	April 01, 2023 to March 31, 2024
I-10.	**Name of the Stock Exchange(s) where shares are listed -**	Bombay Stock Exchange Limited and National Stock Exchange of India Limited
I-11.	**Paid-up Capital -**	Rs. 24,70,58,452/-
I-12.	**Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report. -**	Rakesh Kothari, +91 9820111117 rakesh@sncl.com Nitin Jani +91 9820016445 jani@sncl.com
I-13.	**Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together) -**	Standalone basis

II. Products/services

II-14. Details of business activities (accounting for 90% of the turnover):

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Chemical and chemical product, pharmaceutical, medicinal chemical and Intermediates	95%

II-15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

Sr. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Nitrobenzene	24119	0.35%
2	Meta Amino Phenol	24116	46.32%
3	Para Amino Phenol	24116	12.75%
4	SND - 27 (ODB2)	24299	36.64%

III. Operations

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

Location	Number of Plants	Number of Offices	Total
National	1	2	3
International	0	0	0

III-17. Markets served by the entity:

a. Number of locations

Location	Number
National (No. of States)	10
International (No. of Countries)	17

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

Export - 38.39%

Domestic - 61.61%

c. A brief on types of customers

1. Dye Intermediates: Companies that produce and sell dye intermediates. These companies are typically engaged in the production of chemical compounds used to make dyes for the textile, leather, cosmetic and other industries.
2. Pharmaceuticals Manufacturers: Pharmaceutical companies use chemicals and intermediates to produce various drugs and medicines. These companies require high-quality chemicals and intermediates to ensure the safety and efficacy of their products.
3. Herbicide and Pesticide Manufacturers: Companies that produce herbicides and pesticides. These companies require chemicals and intermediates that are effective in controlling pests and other applications.
4. Chemical Manufactures: Companies that produce chemicals and intermediates for use in various industries, such as textiles, plastics, and rubber, etc These companies require a variety of chemicals and intermediates to produce their products, and they are often looking for high-quality, cost-effective solutions.

IV. Employees

IV-18. Details as at the end of Financial Year :

a. Employees and workers (including differently abled):

No	Particulars	Total (A)	Male		Female	
			No (B)	% (B/A)	No (C)	% (C/A)
	Employees					
1	Permanent (D)	208	197	94.71%	11	5.29%
2	Other than Permanent (E)	18	18	100.00%	0	0.00%
3	Total employees (D + E)	226	215	95.13%	11	4.87%
	Workers					
1	Permanent (F)	39	39	100.00%	0	0.00%
2	Other than Permanent (G)	14	14	100.00%	0	0.00%
3	Total Workers (F + G)	53	53	100.00%	0	0.00%

IV-18. Details as at the end of Financial Year:

b. Differently abled Employees and workers:

No	Particulars	Total (A)	Male		Female	
			No (B)	% (B/A)	No (C)	% (C/A)
	Differently Abled Employees					
1	Permanent (D)	0	0	0.0%	0	0.0%
2	Other than Permanent (E)	0	0	0.0%	0	0.0%
3	Total differently abled employees (D + E)	0	0	0.0%	0	0.0%
	Differently Abled Workers					
1	Permanent (F)	0	0	0.0%	0	0.0%
2	Other than Permanent (G)	0	0	0.0%	0	0.0%
3	Total Workers (F + G)	0	0	0.0%	0	0.0%

IV-19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No (B)	% (B/A)
Board of Directors	7	2	28.57%
Key Management Personnel	3	0	0.00%

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

	(Turnover rate in current FY)			(Turnover rate in previous FY)			(Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	1.11%	25.00%	2.61%	10%	0%	10%	4.59%	0%	4.59%
Permanent Workers	2.56%	0.00%	2.56%	5%	0%	5%	8.33%	0%	8.33%

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

V-21. (a) Names of holding / subsidiary / associate companies / joint ventures.

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/Subsidiary/ Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity ? (Yes/No)
1	MANEKCHAND PANACHAND TRADING INVESTMENT CO PVT LTD	Holding	0	NO
2	ANUCHEM B V B A	Subsidiary	100	NO

VI. CSR Details

VI-22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) - Yes
VI-22. (ii) Turnover (in Rs.) - Rs. 1,92,85,66,592/-
VI-22. (iii) Net worth (in Rs.) - Rs. 2,32,28,91,502/-

VII. Transparency and Disclosures Compliances

VII-23. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-2024			FY 2022-2023		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	No	0	0	-	0	0	-
Investors (other than shareholders)	No	0	0	-	0	0	-
Shareholders	Yes, a mechanism is in place to interact with the employees and workers https://drive.google.com/file/d/1IRD0Mc7_535wZ5lu2guOAGGVfl4oTAc7/view?pli=1	2	0	2 complaints solved, 1 pending	5 0	1 0	Pending Due to legal & regulator Constraint
Employees and workers	Yes, a mechanism is in place to interact with the employees and workers https://drive.google.com/file/d/	0	1	The complaint is going on in Court	1	1	The complaint is going on in Court

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-2024			FY 2022-2023		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of com-plaints filed during the year	Number of com-plaints pending resolu-tion at close of the year	Remarks
	1IRD0Mc7_535wZ5lu2guOA GGVfl4oTAc7/view?pli=1						
Customers	Yes, a mechanism is in place to interact with the employees and workers https://drive.google.com/file/d/ 1IRD0Mc7_535wZ5lu2guOA GGVfl4oTAc7/view?pli=1	2	0	-	6	1	Case pending in Court
Value Chain partners	Yes, a mechanism is in place to interact with the employees and worker https://drive.google.com/file/d/ 1IRD0Mc7_535wZ5lu2guOA GGVfl4oTAc7/view?pli=1	0	0	-	0	0	-
Other (please specify)	NA	0	0	-	0	0	-

VII-24. Overview of the entity's material responsible business conduct issues. Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Hazardous waste Management	risk	Risk, because it entails an additional cost for safe disposal. In addition, if the waste isn't disposed of as per our SOPs and regulatory norms, it can lead to legal and reputational risk for us.	Disposing according to the Maharashtra Pollution Control Board consent conditions. Maintaining stringent SOPs and monitoring procedures.	Negative
2	Water Management	risk	Risk, because it entails additional cost for effluent treatment. In addition, due to water scarcity concerns in the future, this topic is a risk.	SNCL hasan effluent treatment plant where the effluent water is treated and discharged to the common ETP of Roha Division. We have stringent SOPs to ensure that only the required amount of water is utilized in our operations.	Negative

SECTION B - MANAGEMENT AND PROCESS DISCLOSURES

Policy and management processes

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes								
1.b. Has the policy been approved by the Board? (Yes/No)	Yes								
1.c. Web Link of the Policies, if available	https://www.sncl.com/policies								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes								
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes								
4. Name of the national and international codes / certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	ISO 9001:2015 Quality Management System, ISO 45001:2018 Occupational Health & Safety (OHS) and ISO 14001:2015 Environmental Management System (EMS)								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Our commitments are directly aligned with the Sustainable Development Goals and are listed below: **1. Energy & Emissions Management (SDG 7, 8 & 13):** We are committed to reducing energy inefficiencies in our operations, by conducting periodic energy audits and technological improvements. In the next 12 months, we aim to replace any outdated equipment with energy-efficient ones. Furthermore, we are committed to incorporating cleaner sources of energy in our operations. For the same, we are in the process of setting up solar/ wind energy and Green Hydrogen plant. Via these energy efficiency improvements and clean energy initiatives, we aim to decrease our carbon footprint. We will also be training our employees on energy-saving practices. **2. Water Conservation (SDG 6 & 8):** While we have already implemented initiatives for partly high COD/TDS/alkaline effluents, we are committed to reducing our water footprint further. In the next year, we aim to do this by implementing immediate water-saving measures and processes. In addition, we are also looking at implementing water recycling measures. **3. Responsible Consumption (SDG 8 & 12):** Due to the nature of our business, we generate hazardous waste, however, we are working on developing mechanisms to ensure the waste is utilized for coprocessing and other reclamation processes by other industry partners. In addition, we will be conducting periodic waste audits to see how we can improve our processes.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Performance of each of the principles is reviewed periodically by various Committees led by the Management and Board of Directors. In this year, we have made progress with respect to our commitment towards responsible consumption, specifically with respect to waste. Our hazardous waste is sent to MPCB approved vendors as per the compliances. In addition, for the commitments we have mentioned above, constant monitoring will be done.								
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)	SNCL is committed to integrating environmental, social and governance (ESG) principles of product stewardship by enhancing health, safety and environmental impacts of products and services across their lifecycles. The environmental impacts cover Climate, Resources (Energy & Water), Waste Management and Nature & Biodiversity. The Company is committed to conducting beneficial and fair business practices to the labour, human capital and to the employees. It provides employees and business associates with working conditions that are clean, safe, healthy and fair. It strives to be neighbour of choice in the communities in which it operates and contributes to their equitable and inclusive development. To deliver these commitments, the Company has separate CSR Policy, Business & Human Rights Policy, Equal Opportunity Policy, Whistleblower Policy etc.								

Governance, leadership and oversight

	SNCL is also committed to conducting business in a way that positively benefits the community where it works. In this regard, it has strongly aligned to SDG 1, i.e. No Poverty. It has several charitable institutions that are focusing on initiatives such as women reform, education as well as providing medical access to the low income and underprivileged communities.
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Chairman Mr. Asit Dhankumar Javeri (DIN : 00268114) and Managing Director Mr. Abhishek Asit Javeri (DIN: 00273030) under the guidance of the board of directors and its committee is responsible for implementation and oversight of the business responsibility policies.
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the Managing Director of the company provides valuable direction and guidance to the management to ensure that safety and sustainability implications are duly addressed in all new strategic initiatives, budgets audit actions and improvement plans.

10. Details of Review of NGRBCs by the Company : Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	As a practice, business responsibility, policies of the company are reviewed annually or on a need basis by board including the managing director and the chairman. During this assessment, the efficacy of the policies is reviewed and necessary changes to policies and procedures are implemented.									As a practice, business responsibility, policies of the company are reviewed annually or on a need basis by board including the managing director and the chairman. During this assessment, the efficacy of the policies is reviewed and necessary changes to policies and procedures are implemented.								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The company is in compliance with the existing regulations as applicable and statutory compliance certificate on applicable laws. The same is reviewed on an annual basis.									The company is in compliance with the existing regulations as applicable and statutory compliance certificate on applicable laws. The same is reviewed on an annual basis.								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

Sr.No.	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	No								

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)	NA								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

SECTION C : PRINCIPLE WISE PERFORMANCE DISCLOSURE

PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

EI-1. Percentage covered by training and awareness programmes on any of the Principles during the financial year:

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	Percentage of persons in respective category covered by the awareness programmes
Board of directors	1	During the year, the board of directors of the company (including its committees) has invested time on various updates, compromising matters relating to an array of issues pertaining to the business regulations, economy and environmental, social and governance para metres. SNCL strives to provide the latest updates to the BoD so that it can guide the Core Management in enabling responsible business conduct during its operations and interactions with the stakeholders.	100%
Key Managerial Personnel	2	1. Anti-bribery & Anti-corruption Policy, 2. Prevention of Sexual Harassment. SNCL strives to enable its KMP to be provided with the latest trainings and updates to ensure responsible business conduct during its operations and interactions with the stakeholders.	100%
Employees other than BoD and KMPs	2	1. Anti-bribery & Anti-corruption Policy, 2. Energy & Environment Conservation Training. 3. Employee Engagement in Sustainability. SNCL strives to enable responsible business conduct is followed by employees during its operations and interactions with the stakeholders.	60%
Workers	4	1. Health & Safety training & mock drills, 2. Wastewater Management and Pollution Prevention. 3. Climate Change Mitigation Practices SNCL is In process to conduct several other programme in coming years. SNCL strives to enable workers to have awareness of best safety practices while working in the factory premises.	100%

EI-2. EI-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

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

Non-Monetary

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

EI-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.

S.No.	Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
1	NA	NA

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

Yes, it is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption. We remain bound by the applicable Indian and international laws in respect of our conduct both at home and abroad.

Web Link of the Policy : https://drive.google.com/file/d/1fc6OVgtVLcv56Q-eh-HvBz6cX4u4g7f/view?usp=share_link

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

Category	(Current Financial Year)	(Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

Category	Number (CY)	Remarks (CY)	Number (PY)	Remarks (PY)
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

EI-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

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

Particulars	Current Financial Year	Previous Financial Year
Number of days of accounts payables	94	102

EI-9. Open-ness of business. Provide details of concentration of purchases with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format. Concentration of Purchases -

Parameter	Metrics	FY 2023-2024	FY 2022-2023
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	64%	64%
	b. Number of trading houses where purchases are made from	30	25
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	93%	92%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	53%	58%
	b. Number of dealers / distributors to whom sales are made	14	11
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	97%	99%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.09	0.10
	b. Sales (Sales to related parties / Total Sales)	0.17	0.15
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	0.49	0.30
	d. Investments (Investments in related parties / Total Investments made)	0	0

Leadership Indicators

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

S. No.	Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	0	NA	NA

LI-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.-

Managing conflicts of interest is defined as applying measures that either prevent or mitigate the risks that the conflict of interest creates for the Company and its Stakeholders. When a Director, Officer, Employee, or any other Interested Person is faced with an actual, potential, or perceived conflict of interest, they must promptly inform the Company, to obtain a written decision on how to proceed. The purpose of this declaration is to take an ethical decision by clarifying the situation, thus ensuring the continuity of business in accordance with the Company's interests.

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

Essential Indicators

EI-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.

Category	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	0	0	-
Capex	0	0.15%	Reduction in water pollution and upgradation of the ETP plant.

Remarks: In this year there have not been any CAPEX investments on technologies to improve the environmental and social impacts. However, in the next year we have planned to incorporate Solar, Wind and Green Hydrogen projects. For the same, we are currently in the process of acquiring financing.

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

- Yes

EI-2.b. If yes, what percentage of inputs were sourced sustainably ?

- Yes, 9% of inputs were sourced sustainably.
  The Company plans to assess suppliers for sustainable sourcing.

EI-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) - Damaged material comes to the godown and reused wherever possible and then disposed off through authorised contractors. Plastic bags are re-use 4-5 times for internal packing and storage and then disposed through authorised contractors.

EI-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.

- NA

Leadership Indicators

LI-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 ?

S. No.	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.
1	0	0	0	0	0	0

LI-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.

S. No.	Name of Product / Service	Description of the risk / concern	Action Taken
1	Nitrobenzene	Generation of effluent	SNCL has installed an Effluent Treatment Plant (ETP) and also sends the effluent for treatment to the common ETP as per MPCB norms.
2	Metanilic Acid	Generation of effluent and solid waste	SNCL has installed an Effluent Treatment Plant (ETP) and also sends the effluent for treatment to the common ETP as per MPCB norms. Also, solid waste is sent to authorised cement/fertilizer factories
3	Meta-Aminophenol	Generation of effluent and solid waste	SNCL has installed an Effluent Treatment Plant (ETP) and also sends the effluent for treatment to the common ETP as per MPCB norms. In addition, solid waste is sent to authorised cement/fertilizer factories
4	ODB2 (Colour former)	Generation of effluent	SNCL has installed an Effluent Treatment Plant (ETP) and also sends the effluent for treatment to the common ETP as per MPCB norms.

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-2024	FY 2022-2023
HDPE bags	65% (9.075 MT reused from 13.942 MT)	94.36% (4.75706 MT reused from 5.04097 MT)
Effluent water	65%	21.4%

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

	FY 2023-2024			FY 2022-2023		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	13.13	0	0	4.75	0	0
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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

S. No.	Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
1	Finished Good	Negligible 0.04 %

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

Essential Indicators

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

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent Employees											
Male	197	197	100.00%	197	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	11	11	100.00%	11	100.00%	11	100.00%	0	0.00%	0	0.00%
Total	208	208	100.00%	208	100.00%	11	100.00%	0	0.00%	0	0.00%
Other than permanent Employees											
Male	18	18	0.00%	18	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	18	0.00%	18	100.00%	0	0.00%	0	0.00%	0	0.00%

EI-1.b. Details of measures for the well-being of workers.

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent Workers											
Male	39	39	100.00%	39	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	39	100.00%	39	100.00%	0	0.00%	0	0.00%	0	0.00%
Other than permanent Employees											
Male	14	0	0.0%	14	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	0	0.0%	14	100.00%	0	0.00%	0	0.00%	0	0.00%

EI-1.c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

Particulars	Current Financial Year	Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the company	0.06%	0.05%

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

Benefits	No. of employees covered as a % of total employees. (CY)	No. of workers covered as a % of total workers. (CY)	Deducted and deposited with the authority (Y/N/N.A.). (CY)	No. of employees covered as a % of total employees. (PY)	No. of workers covered as a % of total workers. (PY)	Deducted and deposited with the authority (Y/N/N.A.). (PY)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	0%	0%	NA	0%	0%	NA
Others - please specify	-	-	-	-	-	-

EI-3. Are the premises / offices of the entity accessible to differently-abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

- Yes

EI-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.

- Sadhana Nitro Chem Limited (also referred to as "SNCL" or "the Company") recognizes the value of a diverse workforce and are committed to providing equal opportunities in employment thereby creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.
- The Company is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people with disabilities and transgender persons.
- At SNCL, we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people with disabilities and transgender persons.
- The Company encourages differently abled candidates and transgender persons to apply for any job opportunity arising within the organization.
- Through this policy the Company shall proactively work towards equal opportunity in all aspects of employment of Persons with Disabilities and Transgender Persons including the hiring / selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits.
- To avoid unlawful discrimination by adhering to the Equality Act 2010 which protects characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.
- This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working and selection for employment, promotion, training or other developmental opportunities.
- There are Some relevant terms of the Rights of Persons with Disabilities Act, 2016 and The Transgender Persons (Protection of Rights) Act, 2019 are Discrimination, Person with benchmark disability, Person with disability, Reasonable accommodation, Special Employment Exchange, Specified Disability and Transgender Person.
- Rights and Entitlements in Equal Opportunity Policy of the Company aims at ensuring that none of the employees with a disability is discriminated against on the grounds of their disability unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.
- The Company shall not discriminate with respect to any aspect of the employment relationship including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits, termination or retirement policies, and disciplinary practices.
- Further, with regard to Transgender persons, the Company shall maintain the confidentiality of the gender identity of the employees except where the Company or its representatives is required to disclose such information to government officials or in order to cater to or provide support to such Employees.
- The Company shall, as far as possible, endeavour to provide such facilities and amenities to Persons with Disabilities and Transgender Persons to enable them to effectively discharge their duties in the Company. The Company shall consider the specific and special needs of Person with Disabilities and Transgender Persons employed by it and ensure that its facilities (including physical/digital infrastructure, information and communication technology, safety, and security and transportation system, if any, provided by the Company) are easily accessible.
- The Company will endeavour to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. shall be placed at least one week prior to the scheduled date of commencement of induction/training.

Web Link to the policy: https://drive.google.com/file/d/1hAWGFaohPbs-twSme 6FjX UUK Vo5U Wm6 E/ view?usp=share_link

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

	Permanent employees		Permanent workers	
Gender	**Return to work rate**	**Retention rate**	**Return to work rate**	**Retention rate**
Male	NA	NA	NA	NA
Female	NA	NA	NA	NA
Total	NA	NA	NA	NA

Remarks: None of the female employees took maternity leave in the last two years. We do not have female workers.

EI-6. EI-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.

Category	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, through Personnel & Administration (P&A) department and Union, the permanent workers can submit their grievances to the labour union, detailing the issue and any supporting evidence. The union negotiates with the employer to resolve the grievance, and if necessary, may engage in mediation with a neutral third party.
Other than Permanent Workers	NO
Permanent Employees	Yes, through HR and Admin department, who assess the problem, investigate if necessary, and work towards finding a resolution
Other than Permanent Employees	NO

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

Category	FY 2023-2024			FY 2022-2023		
	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	208	0	0.00%	175	0	0.00%
- Male	197	0	0.00%	162	0	0.00%
- Female	11	0	0.00%	13	0	0.00%
Total Permanent Workers	39	37	94.87%	39	39	100.00%
- Male	39	37	94.87%	39	39	100%
- Female	0	0	0	0	0	0.0%

EI-8. Details of training given to employees and workers:

Category	FY 2023-2024					FY 2022-2023				
	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	215	60	27.91%	60	27.91%	170	53	31.18%	40	23.53%
Female	11	10	90.91%	10	90.91%	13	13	100.00%	8	61.54%
Total	226	70	30.97%	70	30.97%	183	66	36.07%	48	26.23%
Workers										
Male	53	37	69.81%	37	69.81%	39	39	100.00%	39	100.00%
Female	0	0	0.0%	0	0.0%	0	0	0.0%	0	0.0%
Total	53	37	69.81%	37	69.81%	39	39	100.00%	39	100.00%

EI-9. Details of performance and career development reviews of employees and workers

Category	FY 2023-2024			FY 2022-2023		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	215	55	25.58%	170	53	31.18%
Female	11	10	90.91%	13	13	100.00%
Total	226	65	28.76%	183	66	36.07%
Workers						
Male	53	37	69.81%	39	39	100.00%
Female	0	0	0.0%	0	0	0.0%
Total	53	37	69.81%	39	39	100.00%

EI-10.a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

- The safety and health management system covers activities across all manufacturing locations, offices, research, laboratories and supply chain partners and ensuring the protection of environment and health and safety of its employees, contractors, visitors and relevant stakeholders.

EI-10. b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

- For all activities including routine or non-routine (permit / project activities) hazards are identified by a trained cross-functional team and risk assessment and management is done through Hazard Identification and Risk Assessment (HIRA)/ Job Safety Analysis (JSA)/ Standard Operating Procedure (SOP) which is referred before starting any activity. The Company has procedures for process safety and functional safety including Layers of Protection Analysis (LOPA) and Safety Integrity Level (SIL). Identified hazards and associated risks are addressed through operational control procedures using hierarchy of control approach. Techniques like Process Hazard Analysis on a day-to-day basis unsafe conditions and hazards are also identified by employees and reported. It is also extended to contractors working on sites to ensure their concerns are captured. Storing and handling of toxic chemicals like ammonia, benzene, flammable materials like fuel, etc. are identified as the major process hazards at the site for which the Company has carried out Quantitative Risk Assessment; HAZOP study and engineering review by external / internal experts as appropriate.

EI-10. c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)

- Yes, we encourage our workers to report near miss incidents and have an escalation matrix in place. All sites have specific procedures for reporting of work-related hazards, injuries, unsafe conditions and unsafe acts.

EI-10.d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

- Yes, all employees are covered under the health insurance scheme.

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

Safety Incident / Number	Category	FY 2023-2024	FY 2022-2023
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	5.52	5.84
Total recordable work-related injuries	Employees	0	0
	Workers	2	2
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

Remarks: This year, we have managed to consolidate the data on the health and safety related incidents for both years, and are thus restating last year's information.

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

- Sadhana Nitro Chem Ltd., ensures a safe and healthy workplace through robust safety protocols, regular training, risk assessments, well-maintained infrastructure, health initiatives, incident reporting and investigation, and regulatory compliance. We prioritize employee well-being and maintain a culture of safety throughout the organization.

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

	FY 2023-2024			FY 2022-2023		
	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	-	0	0	-
Health & Safety	0	0	-	0	0	-

EI-14. Assessments for the year:

Category	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	0

EI-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.

- All incidents are investigated by a special team to determine root cause analysis and corrective/preventive actions are identified. The incident is further discussed and reviewed in the safety committee meeting. The Company also shares best practices across sites for prevention of injuries / incidents and ensures safety improvements as well as takes several steps to prevent accidents at workplace such as:
  - Implementation of control measures to reduce the risk of workplace accidents
  - Periodically review the Policies and Procedures
  - Performing regular inspections
  - Implementation of consequence management system
  - Hold regular trainings
  - Job roles and responsibilities including those on Safety are documented for all employees
  - Providing suitable PPEs
  - Behavioural-based safety observation round.
  - Asset Management

Leadership Indicators

LI-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).

- Yes, SNCL extends a life insurance or any compensatory package in the event of death.

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

- SNCL monitors remittance of statutory dues by the value chain partners as part of processing their bills on a regular basis.

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

	Total no. of af fected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-2024	FY 2022-2023	FY 2023-2024	FY 2022-2023
Employees	0	0	0	0
Workers	0	0	0	0

LI-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)

- Subject to requirements, SNCL provides opportunities for engagement on specific projects/assignments across the organisation.

LI-5. Details on assessment of value chain partners:

Category	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	0%
Working Conditions	0%

Remarks: Presently we don't have such practices of conducting assessments of value chain partners.

LI-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.

- Presently we don't have such practice.

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

Essential Indicators

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

- Internal and External groups of Stakeholders have been identified. Presently, the given stakeholders' group have the immediate impact on the operations and working of the Company. This includes Employees, Shareholders, Customers, Communities, Suppliers, Creditors, Competitors, Media and Government Agencies.

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

S. No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
1	Shareholders	No	Annual General Meeting, Stock Exchange Intimations, Annual Report, Email, Company Website's	Ongoing	Share Price appreciation, Dividends, Profitability and Financial Stability, growth prospects
2	Employees	No	communication, town hall briefing, goal setting and performance appraisal meetings/review, email, websites, quarterly publication.	Ongoing	Innovation, Operational ef fciencies, improvement area, Long-term strategy plans, training and awareness, responsible marketing, brand communication, health, safety and engagement initiatives.
3	Customers	No	Website, Distributor/retailer/direct customer/visits, customer plant visit, helpdesk, information on packaging, customer survey	Ongoing	Product quality and availability, responsiveness to needs, aftersales service, responsible guidelines/manufacturing, life cycle assessment
4	Suppliers	No	Communication and Partnership meets, MOU and framework agreement, Professional Networks, Product workshop/on site presentation, Satisfaction Surveys.	Ongoing	Quality, timely delivery and payments, ESG consideration (sustainability, safety checks, compliances, ethical behaviour), ISO and OHSAS standards, collaboration and digitalisation opportunities
5	Creditors	No	Communication and Partnership meets, Plant Visit, Contract Management, Professional Networks, Satisfaction Surveys.	Ongoing	Meeting Capital Requirements, Repayment Plans, Debt Restructuring, Debt Forgiveness, Collateral and Security, Financial Projections and Reporting, Legal Considerations.
6	Government	No	Advocacy meetings with local / state / national government and ministries, conferences, membership in local enterprise partnership and industry bodies.	Ongoing	Strong ESG practices (climate change roadmap, frameworks for sustainability and beyond compliance and RC, changes in regulatory frameworks, skill and capacity building, employment, environmental measures), policy advocacy, timely contribution to exchequer/ local infrastructure, proactive engagement.
7	Communities	No	Meets (of community / local authority and town council / committee / location head), community visits and projects, volunteerism	Ongoing	waste management, integrated water management, clean water, climate change impacts, community development, self-sustainability, livelihood support, disaster relief, support of the United Nations Sustainable Developement Goals (UN SDGs) building capacity of future leaders.

Leadership Indicators

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

- The Company management regularly interacts with key stakeholders i.e. investors, customers, suppliers, employees, etc. and has constantly prioritized the engagement with stakeholders as demonstrated by its corporate philosophy in conducting business with morality and responsibility towards society as a good citizen, implementing the code of conduct as a basis of work for all employees, employing the good corporate governance as a principle of management and exercising the sustainable development of SNCL.

LI-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, through materiality study, the Company engages with its stakeholders in terms of identifying and prioritizing the issues pertaining to economic, environmental and social topics. The inputs received from stakeholders on these topics are valuable for shaping policies, strategies, and activities. Here are a few instances of how stakeholder inputs have been incorporated into the policies and activities of entities:
  1. Stakeholder feedback on environmental concerns, such as pollution, resource depletion, or climate change.
  2. Stakeholder input on social issues like labour practices, employee well-being, or supply chain ethics.
  3. Concerns raised by stakeholders regarding human rights violations or labour rights.
  4. Stakeholder feedback on diversity, inclusion, and equality can drive initiatives to promote a diverse and inclusive workforce, equitable hiring practices, or employee training programs. etc.

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

- The Company follows an integrated development approach which specifically targets the disadvantaged, vulnerable and marginalised stakeholders. It has been the Company's constant endeavour to focus on inclusive and collaborative growth. The Company's leadership drives the AA agenda, tools whereby additional efforts are made to recruit, hire and promote qualified women, minorities and individuals with disabilities across the organisation with passion and commitment.

  The Company's integrated development interventions are based on the framework of SDGs (The Sustainable Development Goals) and has the following elements: building economic capital, ensuring environmental integrity, enablers for social, economic and environmental development and building social capital. All social initiatives under these elements are conducted around the Company's areas of operations.

  This approach aims to improve the quality of life, especially in their neighbourhoods. As per the need assessment, the Scheduled Caste (SC) / Scheduled Tribes (ST) community in the Company's neighbourhood regions aspires for better education, health care, agriculture/animal husbandry, better livelihood skills and employment.

PRINCIPLE 5: Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 2023-2024			FY 2022-2023		
	Total (A)	No. of employees/workers covered (B)	% (B / A)	Total (C)	No. of employees/workers covered (D)	% (D / C)
Employees						
Permanent	208	208	100.00%	175	162	92.57%
Other than permanent	18	18	100.00%	8	8	100.00%
Total Employees	226	226	100.00%	183	170	92.90%
Workers						
Permanent	39	39	100.00%	39	39	100.00%
Other than permanent	14	0	0.0%	0	0	0.0%
Total Workers	53	39	73.58%	39	39	100.00%

EI-2. Details of minimum wages paid to employees, in the following format:

Category	FY 2023-2024					FY 2022-2023				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent	208	0	0.00%	208	100.00%	175	0	0.00%	175	100.00%
Male	197	0	0.00%	197	100.00%	162	0	0.00%	162	100.00%
Female	11	0	0.00%	11	100.00%	13	0	0.00%	13	100.00%
Other than Permanent	18	0	18	18	100.00%	8	0	0.00%	8	100.00%
Male	18	0	0.00%	18	100.00%	8	0	0.00%	8	100.00%
Female	0	0	0.0%	0	0.0%	0	0	0.0%	0	0.0%
Workers										
Permanent	39	0	0.00%	39	100.00%	39	0	0.00%	39	100.00%
Male	39	0	0.00%	39	100.00%	39	0	0.00%	39	100.00%
Female	0	0	0.0%	0	0.0%	0	0	0.0%	0	0.0%
Other than Permanent	14	14	100.00%	0	0.0%	0	0	0.0%	0	0.0%
Male	14	14	100.00%	0	0.0%	0	0	0.0%	0	0.0%
Female	0	0	0.0%	0	0.0%	0	0	0.0%	0	0.0%

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

	Male		Female	
	Number	Median remuneration/salary wages of respective category	Number	Median remuneration/salary/wages of respective category
Board of Directors (BoD)	2	1,68,00,000	1	1,68,00,000
Key Managerial Personnel	2	1,06,26,939	0	0
Employees other than BoD and KMP	193	3,80,294	11	5,37,218
Workers	39	4,50,843	0	0

EI-3.b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

Particulars	Current Financial Year	Previous Financial Year
Gross wages paid to females as % of total wages	12.72%	12.88%

EI-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.

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

- We resolve the issue by discussing with the concerned employees through Admin/HR department.

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

	FY 2023-2024			FY 2022-2023		
	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	-

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

Particulars	Current Financial Year	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

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

- We have in place the necessary mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases. As part of the Whistleblower Policy and POSH Policy, the identity of the complainant is always protected. All such matters are dealt with strict confidence. Also, as part of its Code of Conduct, the Company does not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action.

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

- Yes

EI-10. Assessments for the year:

Category	% 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	0

Remarks : For the Child Labour, Forced Labour, Sexual Harassment and Discrimination at workplace categories, assessments were done by Third Parties. With respect to Wages, assessment was done by the entity and statutory authority.

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

- There was no corrective action required in the FY 2023-24 in view of the above compliances for which monitoring and assessment will be continued.

Leadership Indicators

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

We have not had any business process that needed to be modified or introduced, as there were no human rights grievances. However, we have a Human Rights Policy and a grievance mechanism in place which will be adhered to should any complaints arise.

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

- We have not conducted any Human rights due-diligence yet.

LI-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

LI-4. Details on assessment of value chain partners:

Category	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	0
Discrimination at workplace	0
Child Labour	0
Forced Labour / Involuntary Labour	0
Wages	0
Others - please specify	0

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

- As there was no audit, there are no non-conformists, hence the question of corrective action taken does not arise.

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

Essential Indicators

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

Parameter	FY 2023-2024	FY 2022-2023
From renewable sources		
Total electricity consumption (A)	0.00	0.00
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total energy consumed from renewable sources (A+B+C)	0.00	0.00
From non-renewable sources		
Total electricity consumption (D)	17960.83	12772.01
Total fuel consumption (E)	87284.78	71529.47
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	105245.61	84301.48
Total energy consumed (A+B+C+D+E+F)	105245.61	84301.48
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	558.95 GJ / Crore	596.36 GJ / Crore
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	12514.34 GJ/$-Crore	13213.40 GJ/$-Crore
Energy intensity in terms of physical output	11.51 GJ / MT of production	30.08 GJ / MT of production

Remarks : There has been a change in the energy consumption value from fuels in FY 2022-23, as there was an error in the diesel quantity that was taken. Thus, we are restating the energy consumption values for FY 2022-23. For PPP adjustment, the conversion factors have been taken from the International Monetary Fund. The link for the same can be found here: https:// www. imf. org / external/ datamapper/ PPPEX@WEO/OEMDCF

EI-1. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- No, we have not done the independent assessment/ evaluation/assurance for CY. We had done it for PY and we do it every 3 years. Energy audit assurance is conducted externally by Urjay Electricals and Bhargavi Energy Consultancy and Services.

EI-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.

- The company is not identified as a designated consumer (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

Parameter	FY 2023-2024	FY 2022-2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii)Groundwater	0	0
(iii)Third party water	115396	97174
(iv)Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	**15396**	**97174**
Total volume of water consumption (in kilolitres)	**40388.60**	**34010.90**
Water intensity per rupee of turnover (Water consumed / turnover)	214.5021 KL/Crore	240.5978 KL/
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	**4802.4495 KL / $-Crore**	Crore **5330.8621 KL / $-**
Water intensity in terms of physical output	**4.4174 KL / MT of production**	**Crore 12.1338 KL / MT**

Remarks: For PPP adjustment, the conversion factors have been taken from the International Monetary Fund. The link for the same can be found here: https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDCF

EI-3. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- No

EI-4. Provide the following details related to water discharged: Water discharge by destination and level of treatment (in kilolitres)

Parameter	FY 2023-2024	FY 2022-2023
ParameterWater discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(iv)Sent to third - parties		
- No treatment	0	0
With treatment - please specify level of treatment	75007.40 Primary, Secondary and tertiary treatments	63163.10 Primary, Secondary and tertiary treatments
(v) Others		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
Total water discharged (in kilolitres)	**75007.4**	**63163.1**

Remarks: SNCL has its own ETP where the Primary, Secondary and Tertiary treatments are done and then the treated water is sent to the CETP of the MIDC.

EI-4. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- Yes, Independent assessment/ evaluation/assurance has been carried out by Equip Chemotech Consultant

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

- Yes, partly high COD/TDS acidic/alkaline effluents are treated separately and evaporated to the extent that only slurry (iron sludge, gypsum and sodium sulphate) remains, whereby there is no liquid discharge. In the next six months, we are also looking at implementing water saving measures, as well as process optimization. We are also looking at implementing water recycling systems.

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

Parameter	Please specify unit	Current Financial Year	Previous Financial Year
Nox	-	-	-
Sox	So_2 - MT	32	35.46
Particulate matter (PM)	TPM - mg/Nm3	52	58
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others - please specify	Acid Mixture - mg/Nm3	-	15

EI-6. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- Yes, assured by Equip Chemotech Consultants.

EI-7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) in MTCO2E & its intensity, in the following format:

Parameter	Unit	FY 2023-2024	FY 2022-2023
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	TCO_2e	6921.87	5672.53
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	TCO_2e	3542.27	2873.7
Total Scope 1 and Scope 2 emission intensity per rupee of turnover	**TCO_2e / rupee of turnover**	**55.5746 TCO_2e/ Crore**	60.4572 TCO_2e /Crore
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	**TCO_2e / rupee of turnover**	**1244.2497 TCO_2e/ $-Crore**	1339.5345 TCO_2e /$-Crore
Total Scope 1 and Scope 2 emission intensity in terms of physical output	**TCO_2e / rupee of turnover**	**1.1445 TCO_2e/ MT of production**	0.9347 TCO_2e / MT of production

Remarks: There has been a change in the Scope 1 emissions value in FY 2022-23, as there was an error in the diesel quantity that was taken. Thus, we are restating the Scope 1 values for FY 2022-23.

For PPP adjustment, the conversion factors have been taken from the International Monetary Fund. The link for the same can be found here: https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDCFE

EI-7. Indicate if any independent assessment/evaluation/ assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- No, any independent assessment/ evaluation/assurance has not been carried out by an external agency.

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

- Sadhana Nitro Chem Ltd. take several steps to reduce greenhouse gas (GHG) emissions along with sulfur dioxide (So2), nitrogen oxides (NOx), and ammonia (NH3) with the following :
  1. Conduct periodic energy audits to determine energy inefficiencies and area of improvement
  2. Decrease in Steam consumption by recycling steam condensate.
  3. Optimisation of steam pressure for ejectors
  4. Utilisation of condensate as pre heating in washing.
  5. Optimisation of hot water washing time of product cake.
  6. Replacement of outdated systems with more energy-efficient alternatives.
  7. Implement emission reduction technology like scrubbers to reduce SOx, and ammonia emissions.

  Sadhana Nitro Chem Ltd. improves energy efficiency by implementing energy management systems, upgrading equipment, and improving process design.

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

Parameter	FY 2023-2024	FY 2022-2023
Total Waste generated (in metric tonnes)		
Plastic waste (A)	13.40	5.17
E-waste(B)	0.00	0.00
Bio-medical waste (C)	0.00	0.00
Construction and demolition waste (D)	15.00	42.00
Battery waste (E)	0.09	0.08
Radioactive waste (F)	0.00	0.00
Other Hazardous waste Please specify, if any. (G)	4453.86	1420.67
Other Non-hazardous waste generated (H). Please specify, if any.(Break-up by composition i.e. by materials relevant to the sector)	0.00	0.00
Total (A + B + C + D + E + F + G + H)	**4482.35**	**1467.92**
Waste intensity per rupee of turnover (Total Waste Generated / Revenue from operations)	**23.8056 MT / Crore**	**10.10.3843 MT / Crore**
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Waste Generated / Revenue from operations adjusted for PPP)	**532.9786 MT / $-Crore**	**230.0815 MT / $-Crore**
Waste intensity in terms of physical output	**0.4902 MT / MT of production**	**0.5237 MT / MT of production**

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste - Plastic		
(i) Recycled	0.00	0.00
(ii) Re-used	13.13	4.75
(iii) Other recovery operations	0.00	0.00
Total	**13.13**	**4.75**
Category of waste - E-Waste		
(i) Recycled	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Bio-medical waste		
(i) Recycled	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Construction and demolition waste		
(i) Recycled	0.00	0.00
(ii) Re-used	15.00	42.00
(iii) Other recovery operations	0.00	0.00
Total	**15.00**	**42.00**
Category of waste - Battery waste		
(i) Recycled	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.09	0.08
Total	**0.09**	**0.08**
Category of waste - Radioactive waste		
(i) Recycled	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Other Hazardous waste		
(i) Recycled	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	4453.86	1420.67
Total	**4453.86**	**1420.67**
Category of waste - Other Non-Hazardous waste		
(i) Recycled	0.00	0.00
(ii) Re-used	0.00	0.00
(iii) Other recovery operations	0.00	0.00
Total	**0.00**	**0.00**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste - Plastic		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.27	0.42
Total	**0.27**	**0.42**

Category of waste - E-Waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Bio-medical Waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Construction and demolition waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Battery		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Radioactive		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Other Hazardous waste. Please specify, if any		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii)Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**
Category of waste - Other Non-hazardous waste generated		
(i)Incineration	0.00	0.00
(ii)Landfilling	0.00	0.00
(iii)Other disposal operations	0.00	0.00
Total	**0.00**	**0.00**

Remarks: Hazardous waste generated by SNCL is given to MPCB authorised Vendors wherein it is used in the Cement industry/fertilizer Industry. CY - Gypsum - 1645.56 + 65.95 MT, Sodium Sulphate - 677.36 MT and Iron Sludge - 2064.99 MT Total hazardous waste generated is 4453.86 MT.

For PPP adjustment, the conversion factors have been taken from the International Monetary Fund. The link for the same can be found here: https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDCF

EI-9. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- Yes, assured by Equipment Chemotech Consultancy

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

1. SNCL optimizes the manufacturing processes to reduce the use of hazardous chemicals such as redesigning processes to minimize the use of harmful substances, reducing process waste, and improving process efficiency.

2. SNCL adopts waste minimization practices to reduce the amount of hazardous waste generated by implementing new treatment methods and using alternative disposal methods.

3. SNCL complies with all relevant regulations governing the use and disposal of hazardous substances that includes strict protocols for handling, storage, and disposal of hazardous waste.

4. As authorized by MPCB the Hazardous waste generated by SNCL such as Lime Sludge and Sodium Sulfate is sent to the Cement factory which they use as their raw material.

5. A waste assessment will also be conducted to identify areas of improvement.

EI-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/of fices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with ? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Not applicable, as SNCL Factory comes under the chemical zone declared by MIDC	Not applicable	Not applicable

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

S. 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	NA	NA	NA	NA	NA	NA

EI-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
1	Not applicable, SNCL complies with all MPCB norms.	Not applicable	Not applicable	Not applicable

Leadership Indicators

LI-1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): (i) Name of the area- Not Applicable

LI-1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): (ii) Nature of operations- Not Applicable

LI-1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): Water withdrawal, and consumption in the following format:

Parameter	FY 2023-2024	FY 2022-2023
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	0	0
Total volume of water consumption (in kilolitres)	0	0
Water intensity per rupee of turnover (Water consumed / turnover)	0.0000 KL / Crore	0.0000 KL / Crore
Water intensity (optional) – the relevant metric may be selected by the entity. KL / - of -	-	-
W**ater discharge by destination and level of treatment (in kilolitres)**		
(i) To Surface water		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
With treatment - please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

LI-1. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- Yes, assured by Equipment Chemotech Consultancy

LI-2. Please provide details of total Scope 3 emissions (MTCO2E) & its intensity, in the following format:

Parameter	Unit	FY 2023-2024	FY 2022-2023
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if	-	-	-
available)	- / rupee of turnover	-	-
Total Scope 3 emissions per rupee of turnover Total Scope 3 emission intensity (optional) - the relevant metric may be selected	- / - of -	-	-

LI-2. Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

- Not Applicable at the present as we are not calculating the scope 3 emissions.

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

- Not Applicable, as SNCL Factory comes under the chemical zone declared by MIDC

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Controlled emissions	Installations of Scrubbers for less emissions of NOx and Sox	So2 and SO3 SPM limits are within the norms
2	Effluent discharge	Upgradation of our existing Effluent treatment plant	Acidic/Alkaline effluents are neutralized to clean water and remove any toxic and non-toxic materials or chemicals from it so that that water can be reused or released in the environment which will do less harm to the environment
3	Minimizing waste generation	Reduction at Source/ recycle/ reuse	Reduction in the H.W. Load

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

- Yes, emergency preparedness plan and on-site emergency plan is in place as per ISO 14001:2015 and ISO 45001:2018. The plan outlines strategies and procedures to mitigate the impact of potential disruptions, such as natural disasters, equipment failures, or supply chain interruptions. It includes measures to ensure employee safety, protect critical infrastructure, maintain essential operations, and restore normalcy as swiftly as possible. The plan is regularly reviewed, updated, and tested, ensuring SNCL's ability to respond effectively to unforeseen events and minimize potential disruptions to its operations.

LI-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.

- There is no significant impact to the environment arising from the value chain of the company.

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

- SNCL may look into developing value chain partner assessments in the near future.

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

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

- Three

EI-1.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.

Sr. No	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	Bombay Chamber of Commerce and Industry	State
2	Indian Chemical Council	State
3	Federation of Indian Export Organizations (FIEO)	National

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

Sr. No	Name of authority	Brief of the case	Corrective action taken
1	NA	NA	NA

Remark: There were no issues related to anti-competitive conduct.

Leadership Indicators

LI-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	NA	NA	NA	NA	NA

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

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

S. No.	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
1	NA	NA	NA	NA	NA	NA

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

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

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

- SNCL has a robust mechanism to receive and redress grievances of the community as highlighted below:

1. Grievance Redressal Officer: The Company has Designate a specific employee or a grievance redressal officer who is responsible for handling community grievances. This person has the necessary authority and training to address complaints effectively.
2. Dedicated Email Address or Phone Line: The Company has created an email address or phone line for community members to submit their grievances. This provides a direct and easily accessible channel for communication.
3. Community Liaison: The Company has appointed a community liaison officer who can act as a bridge between the company and the community. This person can attend community events, engage with local leaders, and be available for in-person meetings with community members.

Community Grievance Mechanism Process:

A. Receive & acknowledge: Grievances can be written or verbal and can be expressed in local languages. They can by lodged by email, phone, through our community relations and development staff working locally, and other locally dedicated channels, as well as at corporate level. The grievances can be expressed anonymously, as well as on behalf of another individual. The channel is also open for our local suppliers. Local community grievance mechanisms are regularly communicated to local communities. Each grievance is acknowledged once received, and the complainant is informed of the next steps.

B. Assess & assign: The grievance manager and the respective departments investigate the grievance and respond to the complainant informing them about the proposed resolution. In some cases, more information may be requested from the complainant to ensure a thorough investigation.

C. Investigate & respond: The grievance manager and the respective departments investigate the grievance and respond to the complainant informing them about the proposed resolution. In some cases, more information may be requested from the complainant to ensure a thorough investigation.

D. Close out: After Investigation the remedies may be proposed. If the solution is refused, the complainant can appeal, in which case the grievance will be re-evaluated by alternate investigators. Once the complainant accepts the solution, the grievance is considered resolved.

E. Lessons learned: A key step in the process is regular review and extraction of lessons learned from the grievances received. Grievance trends are regularly discussed with senior management at operated sites. They inform the adaptation of operations to prevent future repetition of the same community concerns, or improvements to the grievance management process itself.

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

Category	Current Financial Year	Previous Financial Year
Directly sourced from MSMEs/ small producers	95%	95%
Sourced directly from within the district and neighbouring districts	95%	95%

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

Location	Current Financial Year	Previous Financial Year
Rural	33%	38.10%
Semi-urban	-	-
Urban	-	-
Metropolitan	67%	61.90%

Leadership Indicators

LI-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):

S.No.	Details of negative social impact identified	Corrective action taken
1	NA	NA

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

S.No.	State	Aspirational District	Amount spent (In INR)
1	NA	NA	0

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

- No, we do not have a preferential procurement policy where we give preference to purchase from suppliers comprising marginalized/vulnerable groups.

LI-3.b. From which marginalized /vulnerable groups do you procure ?

- NA

LI-3.c. What percentage of total procurement (by value) does it constitute ?

- Nil

LI-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
1	NA	NA	NA	NA

LI-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.

S.No.	Name of authority	Brief of the Case	Corrective action taken
1	NA	NA	NA

LI-6. Details of beneficiaries of CSR Projects

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Funding towards the operations of Sheth Hirachand Gumanji Dharamshala. (SDG 1& 3)	Nature of the CSR project is as such that the data cannot be compiled	Nature of the CSR project is as such that the data cannot be compiled
2	Women's Reform Ashram, Mumbai Central (SDG 1&5)	Nature of the CSR project is as such that the data cannot be compiled	100%
3	Student's Hostel, Mumbai Central (SDG 1&4)	Nature of the CSR project is as such that the data cannot be compiled	Nature of the CSR project is as such that the data cannot be compiled

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

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

- Customer Complaints: As soon as the company is in receipt of the Customer Complaint, a report is prepared in the format of (LS/8.2-4) and forwarded the same to Quality Control Dept., Production Dept. and IMS Coordinator.

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

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

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

	FY 2023-2024			FY 2022-2023		
	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	-
Other						

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

Category	Number	Reasons for recall
Voluntary recalls	0	Not Applicable
Forced recalls	0	Not Applicable

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

- Yes, the company recognizes information as a critical business asset. SNCL's ability to operate competitively in global markets and meet all its stakeholders' evolving requirements depending on the ability to ensure that confidentiality, integrity & availability of its information is protected through pertinent security controls and proactive measures. The Information Security Policy (“the Policy”) provides an integrated set of protection measures that must be uniformly applied across SNCL to ensure a secured operating environment for its business operations. Customer Information, organizational information, supporting IT systems, processes and people that are generating, storing and retrieving information are important assets of SNCL. The availability, integrity and confidentiality of information are essential in building and maintaining competitive edge, cash flow, profitability, legal compliance and respected company image.

  The Policy addresses the information security requirements of:

  1. Confidentiality: Protecting sensitive information from disclosure to unauthorised individuals or systems;
  2. Integrity: Safeguarding the accuracy, completeness and timeliness of information;

3. Availability: Ensuring that information and vital services are accessible to authorised users when required.

This policy applies to all employees, contractors, partners, Interns/Trainees working in SNCL. Third party service providers providing services or wherein data is held outside SNCL premises, shall also comply with this policy. The objective of the Policy is to provide SNCL, an approach to managing information risks and directives for the protection of information assets to all units and those contracted to provide services. Information security governance consists of leadership, organisational structures and processes that protect information and mitigation of growing information security threats Critical outcomes of information security governance include:

- Alignment of information security with business strategy to support organisational objectives.
- Management and mitigation of risks and reduction of potential impacts on information resources to an acceptable level.
- Management of performance of information security by measuring, monitoring and reporting information security governance metrics to ensure that organisational objectives are achieved.
- Optimisation of information security investments in support of organisational Objectives.

It is important to consider the organisational necessity and benefits of information security governance. They include increased predictability and the reduction of uncertainty in business operations, a level of assurance that critical decisions are not based on faulty information, enabling efficient and effective risk management, protection from the increasing potential for legal liability, process improvement, reduced losses from security-related events and prevention of catastrophic consequences and improved reputation in the market and among customers.
Web link to the policy : https://drive.google.com/file/d/1hAWGFaohPbs-twSme6 FjXUUKV o5UWm6E/view?usp= share_ link

EI-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.

- There were no corrective actions required to be taken.

EI-7. Provide the following information relating to data breaches

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

b. Percentage of data breaches involving personally identifiable information of customers - Not Applicable

c. Impact, if any, of the data breaches - Nil

Leadership Indicators

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

- The information on products of our Company can be accessed on https://www.sncl.com/

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

- Material Safety Data Sheet (MSDS) for each product is sent with every shipment and to every consumer.

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

- The company informs the consumers through phone calls and emails

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

- The company provides the necessary details required which is mandated as per local laws. Company does not display product information on the product over and above. Yes, the company carry out survey with regard to consumer satisfaction relating to the products and significant locations of operation.

LI-5. Provide the following information relating to data breaches: a. Number of instances of data breaches along-with impact

- Nil

LI-6. Provide the following information relating to data breaches: b. Percentage of data breaches involving personally identifiable information of customers

- Not Applicable