

Business Responsibility & Sustainability Report FY 2023-24

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity : L18209TG1985PLC005581
2. Name of the Listed Entity : Sanghi Industries Limited
3. Year of incorporation : 1985
4. Registered office address : Sanghinagar P.O. Hayatnagar Mandal, R R District, Telangana – 501 511.
5. Corporate address : Adani Corporate House, Shantigram, S. G. Highway, Khodiyar, Ahmedabad – 382421
6. E-mail : companysecretary.sil@adani.com
7. Telephone : 079-2656 5555
8. Website : www.sanghicement.com
9. Financial year for which reporting is being done : April 2023 to March 2024
10. Name of the Stock Exchange(s) where shares are listed : National Stock Exchange of India Limited and BSE Limited
11. Paid-up Capital : ₹ 258.33 crore
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report : Name: Neeru Bansal
Address: Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S.G. Highway, Ahmedabad – 382421
Contact: +91 9825386934
Email ID: neeru.bansal@adani.com
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together). : Yes, the disclosures under this report is made on standalone basis as the Company is not having any subsidiary company as on end of the FY 2023-24.
14. Name of assurance provider : Intertek India Private Limited
15. Type of assurance obtained : Limited Assurance

II. Products/services

16. 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	Cement, Clinker	100%

17. 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.	Cement & Cement products	23941	100

III. Operations

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

Location	Number of plants	Number of offices	Total
National	1	1	2
International	0	0	0

19. Markets served by the entity:

a) Number of locations

Locations	Number
National (No. of States)	Five (Gujarat, Maharashtra, Rajasthan, MP, Kerala)
International (No. of Countries)	Nil

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

c) A brief on types of customers

Dealers, Builders, Institution, Govt. contractors, RMC/Precast manufacturers.

IV. Employees

20. Details as at the end of Financial Year:

a) Employees and workers (including differently abled):

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Employees						
1.	Permanent (D)	326	321	98.47%	5	1.53%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	326	321	98.47%	5	1.53%
Workers						
4.	Permanent (F)	360	360	100.00%	0	0.00%
5.	Other than Permanent (G)	587	442	75.30%	145	24.70%
6.	Total workers (F + G)	947	802	84.68%	145	15.32%

b) Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
Differently Abled Employees						
1.	Permanent (D)	2	2	100%	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D + E)	2	2	100%	0	0
Differently Abled Workers						
4.	Permanent (F)	0	0	0	0	0
5.	Other than permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F + G)	0	0	0	0	0

21. Participation/ Inclusion/ Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	6	1	16.67
Key Management Personnel	2	0	0

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

	FY2023-24 (Turnover Rate)			FY2022-23 (Turnover rate)			FY2021-22 (Turnover rate)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	54.73	94.79	55.56	53.2	1.07	54.27	45.00	1.70	46.70
Permanent Workers	30.88	100	31.81	24.6	1.20	25.80	25.90	0.00	25.90

V. Holding, Subsidiary and Associate Companies (including joint ventures)**23. (a) Names of holding / subsidiary / associate companies / joint ventures**

Sr. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Ambuja Cements Limited	Holding Company	60.44	No

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

No. (As there was loss during FY 2022-23, the Company is not required to spend under CSR during FY 2023-24)

(ii) Turnover (in ₹) : ₹ 820,17,00,000

(iii) Net worth (in ₹) : ₹ 1110,79,49,201

VII. Transparency and Disclosures Compliances**25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct**

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY2023-24 Current reporting period			FY2022-23 Previous reported Year		
		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	-	0	0	-	0	0	-
Investors (other than shareholders)	*Yes	0	0	-	0	0	-
Shareholders	Yes (Ref. Note 1)	19	1	-	9	3	-

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY2023-24 Current reporting period			FY2022-23 Previous reported Year		
		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
Employees and workers	Yes (Ref. Note 2)	0	0	0	0	0	-
Customers	Yes (Ref. Note 3)	0	0	0	0	0	-
Value Chain Partners	-	0	0	-	0	0	-
Other (any stakeholder)	-	0	0	-	0	0	-

*The Whistle Blower policy of the Company also includes all the stakeholders of the Company and accordingly the grievance of all the stakeholders are covered under the said policy. The Whistle Blower policy is available on the website of the Company at <https://www.sanghicement.com/policies/>

Notes:

- Shareholders Complaints are dealt by the Secretarial Department of the Company and its reporting on quarterly basis are done with Stock Exchanges where the shares of the Company are listed
- Employees of the Company may report their grievances / complaints to their respective Head of Departments / immediate superior which is escalated to the HR department of the Company in case of non-satisfactory resolution
- Customers Complaints are dealt with by a separate team and are resolved within the committee time.

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

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

Sr. 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.	Corporate governance	R		Policy revision/ up gradation / Board review	Negative
2.	Business Ethics	R		Whistle blower policy and its deployment. The Company has a whistle blower policy for its employees, vendors and channel partners	Negative
3.	Customer Experience & Satisfaction	O			Positive
4.	GHG Emissions and Climate Change	O			Positive
5.	Circular economy	O			Positive

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Energy Management Cost of installation/ replacement.	O			Positive / Negative (Cost of installation/ replacement)
7.	Use of Alternative fuels	O			Positive / Negative (Cost of installation/ replacement)
8.	Water Management	O/R	Water is the most crucial resource for maintaining our manufacturing activities. We have a relentless focus on reducing usage and improving conservation to promote water stewardship across our operations	(a) Maintain Zero Liquid Discharge (ZLD) (b) Water used in the plant for industrial cooling is recycled through cooling towers to ensure effective reuse (c) 500 KLD Sewage Treatment Plant (STP) to treat the sewage from the colony. This STP is built on the innovative "Root Zone Treatment technology", which cleans discharged water and makes it safe to use once more for dust control and greenbelt development.	Positive / Negative
9.	Availability of fuels for power generation & process heating	R	Increase in the prices and shortage of availability of the Coal in the Market	Finding of alternative which can be used and figure out other avenues for purchase of coal	Negative
10.	Social engagement & impact	O			Positive / Negative Cost of implementing CSR projects
11.	Human rights and labour conditions	R		The Company ensures that every individual in the Company acts in accordance with applicable laws and supports the protection of human rights, abolition of child labour, avoidance of forced labour and any form of slavery. This is embedded in its various corporate policies like Environment, Health & Safety (EHS) Policy, Whistle-Blower policy, Protection of Women's Rights at Workplace Policy and the Code of Conduct. Training on various issues related to human rights are covered under new employee induction, EHS training, POSH, code of conduct etc.	Negative
12.	Occupational health & safety	R		Training/ awareness/technological upgradation/ review at senior level and Board committee. SIL is committed to its Zero Harm to life.	Negative
13.	Diversity and Inclusion	O			Positive
14.	Sustainable supply chain	O/R		Supplier / vendor Code of Conduct (COC) covers EHS and Human Rights parameters to be adhered and supply chain partners must sign the COC as a part of the contract documents.	Positive / Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC (National Guidelines on Responsible Business Conduct) Principles and Core Elements.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes									
1. a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
b) Has the policy been approved by the Board? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
c) Web Link of the Policies, if available	https://www.sanghiment.com/policies/								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	The Company is duly certified as per ISO 9001, ISO 14001 & ISO 45001 standards. The Portland Pozzolana Cement (PPC) conforms to the IS 1489 (Part 1): 1991 Portland Pozzolana Cement Standard and Portland Slag Cement (PSC) conforms to IS 455: Portland Slag Cement Standards.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<ol style="list-style-type: none"> 1. Reduction in Energy consumption intensity 2. Reduction in GHG emissions 3. Increase the capacity of Waste recovery system (WHRS) 4. Increase the utilisation of AFR 5. Increase the number of beneficiaries 6. Zero harm vision to life. 								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Ongoing Activity								
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements	<p>The Business responsibility and Sustainability Report is one of the many steps we are taking for creating a greener future for our Company and the larger ecosystem. Our sustainability efforts go beyond using nature's resources efficiently and staying compliant. It is our mission to create shared value by empowering our employees and communities to improve their lives, enabling our value chain partners to prosper as we expand our footprint and, above all, delivering quality products to our customers.</p> <p>It is our goal to pave circular driven paths to produce cement with zero waste as much as feasible, reducing our carbon footprint and Green House Gas (GHG) emissions. Using recyclable industrials, reducing the use of coal and PET coke, modifying our product mix to include greener blended cement, and deploying waste heat recovery systems to reuse hot waste gas are just some of the measures we are taking to reduce our carbon footprint. In line with our efforts to decrease the production of waste and increase the adoption of alternative fuels and raw materials, we are in the process of commissioning solar and wind energy assets at our locations.</p>								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	We thank our stakeholders for their continued belief in the Company as we surge ahead with our mission of transforming lives, protecting our planet and delivering sustained values.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name: Mr. Sukuru Ramarao (DIN: 08846591) Designation: CEO & Whole Time Director Contact Details: +91 79 - 2656 5555 E mail ID: companysecretary.sil@adani.com								
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 CEO & Whole Time Director of the Company referred at Point No. 8 is responsible for the decision making on the sustainability related issues of the Company.								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	The Board through its CEO & Whole Time Director Mr. Sukuru Ramarao or the Internal Committees assess the performances of the referred policies									Quarter and Annually.								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The CEO & Whole Time Director / Concerned Head of Departments confirms the compliances with the statutory requirements of relevant principles and rectification of any non-compliances, if any, which in turn is placed before the internal committee of the Board									Annual and / or on regular basis from time to time.								

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	No	No	No	No	No	No	No	No	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)	-	-	-	-	-	-	-	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	-	-	-	-	-	-	-	-	-
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	-	-	-	-	-	-	-	-	-
It is planned to be done in the next financial year (Yes/No)	-	-	-	-	-	-	-	-	-
Any other reason (please specify)									

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/ principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	1	The training and awareness on initiatives taken by the Company in line of Environmental, Social and Governance (ESG) Module.	100
Key Managerial Personnel	1	The training and awareness on initiatives taken by the Company in line of Environmental, Social and Governance (ESG) Module.	100
Employees other than BoD and KMPs and Workers	198	Technical, Health & Safety, Material Handling, Policies.	87

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

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/Fine	0	0	0	0	0
Settlement	0	0	0	0	0
Compounding fee	0	0	0	0	0
Non-monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)	
Imprisonment	0	0	0	0	0
Punishment	0	0	0	0	0

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

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

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

The Company has dedicated anti-corruption or anti – bribery policy which is applicable to all the Directors as well as employees of the organisation.

<https://www.sanghicement.com/wp-content/uploads/Anti-Corruption-and-Anti-Bribery-Policy.pdf>

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

	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY2023-24 (Current Financial Year)		FY2022-23 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

None.

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

	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Number of days of accounts payable	27	146

9. Openness of business

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

Parameter	Metrics	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Concentration of purchases	a) Purchases from trading houses as % of total purchases	Nil	Nil
	b) Number of trading houses where purchases are made	Nil	Nil
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	Nil	Nil
Concentration of Sales	a) Sales to dealers/distributors as % of total sales	27%	25%
	b) Number of dealers/distributors to whom sales are made	27	888
	c) Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	15%	11%
Share of RPTs in	a) Purchases (Purchases with related parties/total purchases)	32%	Nil
	b) Sales (Sales to related parties/ Total Sales)	41%	Nil
	c) Loans & advances (Loans & Advances given to related parties/Total loans & advances)	Nil	Nil
	d) Investments (Investments in related parties/Total Investments made)	Nil	Nil

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

Essential Indicators

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

	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	NIL	₹ 58.67 Lakhs	NA
Capex	NIL	₹ 862.38 Lakhs	NA

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

Yes

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

It is mandatory to furnish the evaluation questionnaire (EHS and sustainability parameters) before onboarding as supply chain partners and it has 100% coverage.

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

The Company does not have any specific product to reclaim at the end of life. However, at the operation sites, there are systems in place to recycle, reuse and dispose in line with regulatory requirement

- Cement is an intermediate product of the construction activity. The PP bags used in packaging are also used for storage of multiple items like sand and gravel. The plastic bags once discarded are also recycled by waste recyclers to create new bags.
- The E-waste produced during the office operations is sold to the registered recyclers.
- The hazardous waste generated in the cement production process, is disposed off in Kiln under as an alternative fuel.

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

Yes,

Extended Producer Responsibility (EPR) is applicable to the Company and registration as Brand owner is in process on EPR portal.

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

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	321	321	100%	321	100%	0	0	0	0		
Female	5	5	100%	5	100%	5	100%	0	0		0
Total	326	326	100%	326	100%	5	100%	0	0		
Other than Permanent employees											
Male	0	0	0	0	0	0	0	0	0		
Female	0	0	0	0	0	0	0	0	0		0
Total	0	0	0	0	0	0	0	0	0		

b) Details of measures for the well-being of workers:

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	360	360	100%	360	100%	0	0	0	0		
Female	0	0	0	0	0	0	0	0	0		0
Total	360	360	100%	360	100%	0	0	0	0		
Other than Permanent workers											
Male	442	442	100%	442	100%	0	0	0	0		
Female	145	145	100%	145	100%	0	0	0	0		0
Total	587	587	100%	587	100%	0	0	0	0		

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

	FY 2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the Company	0.31%	0.23%

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

Benefits	FY2023-24 (Current Financial Year)			FY2022-23 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/ N/ NA)	No. of employees covered as a % of total employees*	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/ N/ NA)
PF	31.59	90.83	Y	26	21	Y
Gratuity	100	100	Y	100	100	Y
ESI	0	0.83	Y	0.14	3	Y
Others – please specify	NA	NA	NA	NA	NA	NA

*In ESI, Employees who are eligible for ESI are covered under this category, however, we didn't have any employee under the category in FY 2023-24.

3. Accessibility of workplaces

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

Yes, the Company has appropriate arrangements for disabled persons to assess its premises/ offices

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

Yes

The Company is not having any specific equal opportunity policy, however the Company strongly believes in the principal of inclusion of all in the Organisation without any discrimination on cast, color, gender etc.

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	0	0	0	0
Female	0	0	0	0
Total	0	0	0	0

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes,
Other than Permanent Workers	The grievances of the employees, workers are redressed by a separate Works committee of the Company.
Permanent Employees	
Other than Permanent Employees	The workers of the Company may report their grievances / complaints to their respective Head of Departments / immediate superior which is escalated to the HR department of the Company in case of non-satisfactory resolution.

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

Category	FY2023-24 (Current Financial Year)			FY2022-23 (Previous Financial Year)		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of employees/workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees						
- Male						
- Female						
Total Permanent Workers						
- Male						
- Female						

NA

8. Details of training given to employees and workers:

Category	FY2023-24 (Current Financial Year)					FY2022-23 (Previous Financial Year)				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
No. (B)		% (B / A)	No. (C)	% (C / A)	No. (E)		% (E / D)	No. (F)	% (F / D)	
Employees										
Male	321	321	100%	150	47%	504	226	45	184	37
Female	5	5	100%	1	20%	14	3	22	5	36
Total	326	326	100%	151	46%	518	229	44	189	37
Workers										
Male	360	360	100%	325	90%	164	97	59	114	70
Female	0	0	0%	0	0%	3	3	100	3	100
Total	360	360	100%	325	90%	167	100	60	117	70

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

Category	FY2023-24 (Current Financial Year)			FY2022-23 (Previous Financial Year)		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0
Workers						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0

*No performance appraisals were undertaken as the Company was incurring losses.

10. Health and safety management system:

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

Yes, occupational health and safety management system has been implemented by the entity. It covers the entire operations. The EHS Policy and management systems have been implemented in accordance with the International Standards ISO 45001:2018 (Occupational Health and Safety Management System Standard). EHS Management System defines the mandatory requirements for the systematic management and execution within the organisation. The Company's Integrated EHS Management System is accredited by international certification bodies.

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

The Company has in place systematic risk management process to identify and control all the hazards in the operations. The Company's risk management process is applied through five steps (Identification, Assessment, Mitigation, Monitoring and Reporting) and is the key driver for controlling the risk of EHS in business. All relevant stakeholders and EHS team members are involved in risk assessments and the risk management process. Risk assessments and safe work procedure are developed and approved prior to starting any new activity. All identified risks and risk mitigation plans are documented and communicated to all relevant parties as per ISO system.

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

Yes, the workers of the Company can approach to the works committee or their head of Department to report the work-related hazards through internal communication so that the same can be redressed at the earliest.

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

Yes, all the employees and Workers have access to the first aid kits available at the offices / premises of the Company, also OHC is available along with full time doctors and trained nursing staff in township of the Company for instant and quick relief. In case of any serious medical condition the Company shall arrange for the doctors and hospitalisation in required case.

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

Safety Incident/Number	Category	FY2023-24	FY2022-23
		(Current Financial Year)	(Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.59	0
	Workers	0	0.104
Total recordable work-related injuries	Employees	1	0
	Workers	0	0
No. of fatalities	Employees	1	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

The Company is committed to creating a healthy and safe work environment for all employees, contractors, and people engaged directly or indirectly in operations. To support this further, there is a systematic risk management process in place to identify and control all the hazards within the operation which requires verification of conformity. The EHS management system has various procedures and EHS norms. Hazard identification, Risk Assessment (HIRA) and Job Safety Analysis (JSA) is implemented as per the Standard Operating Procedure. Safety Committees are in place to review the adequacy of resources for safety and to provide support for safety management system. Deployment of safe and healthy system of work is assured through periodic safety audits and area inspections across all sections.

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

	FY2023-24			FY2022-23		
	(Current Financial Year)			(Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

14. Assessments for the year:

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

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

The Company's EHS department and safety committee undertake a review of all safety related incidents. The incidents are being investigated and corrective and preventive actions are being implemented to stop recurrence of such incidents. The effectiveness of corrective actions deployment being checked during safety Audits. Also learning from investigation reports are shared across organisation. Significant risks/concerns arising from assessment of health and safety practices are addressed through elimination of manual job, safety capability building, monitoring and supervision, etc.

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

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

The Company has identified its stakeholders which are largely bifurcated as employees, communities, shareholders / investors, Government authorities and Regulatory Bodies, Suppliers & contractors, customers & community at large.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (E-mail, 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
Employees	No	Company's policy, emails and internal meetings and interactions	Regular/ Ongoing	Training requirements, Working environment, safety Compliance, Efficiency of operations, employee well being
Shareholders and Investors	No	Disclosures on the website of the Company and to the Stock Exchanges/ Newspaper Advertisements etc which are available in public at large	Annual, half year, quarterly and need base	Business Updates, Financial & non financial (ESG) performance, Opportunities for growing the portfolio
Government authorities and Regulatory Bodies	No	Regulatory filings, Facility inspections	As per applicable rules/regulations	Audit and inspections requirements, Policy requirements
Suppliers and contractors	No	Meetings, Visits, Supplier/ contractor audits, Facility visits, emails and interactions	Regular/ Ongoing	Business updates & requirements, Payment timelines, Capacity building on SG aspects, Grievance mechanism platform
Customers	No	Advertisement, Digital and social media connect, Website, Phone calls, e-mails and meetings	Ongoing/ Need base	Product details, Product pricing, Product feedback, New product development, Better service
Community	No	CSR projects	Regular/ Ongoing	Healthcare, Education, Mutual rewarding relationship with the Industry/ Company, Optimal utilisation of resources sourced locally

PRINCIPLE 5: Businesses should respect and promote human rights

Essential Indicators

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

Category	FY2023-24 (Current Financial Year)			FY2022-23 (Previous Financial Year)		
	No. of employees/ workers		% (B / A)	No. of employees/ workers		% (D / C)
	Total (A)	covered (B)		Total (C)	covered (D)	
Employees						
Permanent	326	120	37%	518	172	33
Other permanent	0	0	0	0	0	0
Total Employees	326	0	0	518	172	33
Workers						
Permanent	360	0	0	167	77	46
Other permanent	587	0	0	0	0	0
Total Workers	947	0	0	167	77	46

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

Category	FY April 2023 - March 2024 (Current Financial Year)					FY April 2022 - March 2023 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Permanent										
Male	321	0	0%	321	100%	504	0	0	504	100%
Female	5	0	0%	5	100%	14	0	0	14	100%
Other than Permanent										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
Workers										
Permanent										
Male	360	1	0%	359	100%	164	4	2	160	98
Female	0	0	0	0	0	3	0	0	3	100
Other than Permanent										
Male	442	442	100%	0	0	630	177	28	453	72%
Female	145	145	100%	0	0	155	155	100	0	0

3. Details of remuneration/ salary/ wages

a) Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (₹ In lakhs)	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)*	4	221	1	263
Key Managerial Personnel	1	35	-	-
Employees other than BoD and KMP	321	0.53/Month	5	0.32/Month
Workers	360	0.25/Month	0	-

Note: The median remuneration of erstwhile Executive Directors is calculated on actual basis i.e. after taking into consideration the Full and Final Payment at the time of their resignation w.e.f. 7th December 2023. Post acquisition of the Company by Ambuja Cements Limited, Adani Group, the whole time director and CEO is not drawing any remuneration from the Company.

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

	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Gross wages paid to females as % of total wages	1.13%	2.56%

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, Head HR / HR department is responsible for addressing human rights issues, if any.

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

Yes.

Our employees and workers can write or consult their respective departmental heads or they can approach the Human Resource department of the Company.

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

	FY2023-24 (Current Financial Year)			FY2022-23 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	0	0	0	0
Discrimination at workplace	0	0	0	0	0	0
Child Labour	0	0	0	0	0	0
Forced Labour/Involuntary Labour	0	0	0	0	0	0
Wages	0	0	0	0	0	0
Other human rights related issues	0	0	0	0	0	0

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

	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Total complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees/ workers	0	0
Complaints on POSH upheld	0	0

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

The Company does not promote nor it tolerates any discrimination or harassment in the Company and the Company works on the principle of no discrimination or no harassment and has adopted the principle of equality at work place.

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

The Company have included human rights requirements as a part of business agreements / service agreements / Code of conducts and part of policies and procedures. Also to ensure that each employee is aware about the human rights policies, we conduct awareness sessions during the orientation programme of the employees.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	Currently, the assessment has not been conducted. However, we are in the process to establish proper channel of assessment.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

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

Pro-active measures used to be taken as under: -

- Through Induction
- Through training / awareness sessions to the existing employees

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

Essential Indicators

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

Parameter	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	0	0
Total fuel consumption (B)	0	0
Energy consumption through Other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	0	0
From non-renewable sources		
Total electricity consumption (CPP-1 & 2) GJ (D)	546156	671481
Total fuel consumption (CPP-1 & 2) Ton		
Total electricity consumption (DG) GJ (F)	3024	1036
Total fuel consumption (DG) Ltrs		
Total electricity consumption (Grid) GJ (G)	16460	16727
Total fuel consumption (Grid)		
Total electricity consumption (Clinker Unit Emergency DG-1 1500 KVA) GJ (I)	0	0
Total fuel consumption (Clinker Unit Emergency DG-1 1500 KVA) Ltrs		
Total electricity consumption (Clinker Unit Emergency DG-2 1000 KVA) Kwh (J)	0	0
Total fuel consumption (Clinker Unit Emergency DG-2 1000 KVA) Ltrs		
Total energy consumed from non-renewable sources (D+E+F+G+H+I+J+K)	565640	689245
Total energy consumed	565640	689245
Energy intensity per rupee of turnover (GJ/Rs)	0.00007	-
(Total energy consumed / Revenue from operations)		
Energy intensity in terms of physical output (GJ/tonne of cementitious material)	0.29	-
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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

No

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

Yes. And target achieved as per PAT guidelines

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

Parameter	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	629959	671085
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater/desalinated water	2643451	1455628
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	3273410	2126713
Total volume of water consumption (in kilolitres)*	995119	889430
Water intensity per rupee of turnover (Total Water consumed/Revenue (in ₹ crore) from operations) (liters/Rs of turnover)	0.12	-
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/ Revenue from operations adjusted for PPP)	NA	NA
Water intensity in terms of physical output (Total water consumed in KL/t of cementitious material) (liters/tonne of cementitious material)	514	-
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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

4. Provide the following details related to water discharged:

Parameter	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Ground water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Sea water		
- No treatment	0	0
- With treatment – please specify level of treatment	2278291	1237283
- Pre treatment facility comprising Settling cum Dilution chamber and dosing system		
(iv) Sent to Third Parties (Municipal STP)		
- 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)	2278291	1237283

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

No.

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

Yes. The Company has implemented a mechanism of Zero Liquid Discharge. The water used in the plant for industrial cooling is recycled through cooling towers to ensure effective reuse. To ensure effective water usage, SIL erected a 500 KLD Sewage Treatment Plant (STP) to treat the sewage from the colony. This STP is built on the innovative "Root Zone Treatment technology", which cleans discharged water and makes it safe to use once more for dust control and greenbelt development.

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

Parameter	Please specify unit	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
NOx	Tonnes	1481	11766
SOx	Tonnes	514	483
Particulate matter (PM)	Tonnes	193	921
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others – please specify	NA	NA	NA

Note: All our plants meet with the prescribed standards given by respective regulatory body.

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

No

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

Parameter	Unit	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Total Scope 1 emissions	Metric tonnes of CO ₂	1289519	1428572
Total Scope 2 emissions	Metric tonnes of CO ₂	3301	60404
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations(₹ Cr))	(kg CO ₂ /Rs of turnover)	0.16	-
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations adjusted for PPP)		NA	NA
Total Scope 1 and Scope 2 emission intensity in terms of physical output	(kg CO ₂ / tonne of cementitious material)	668	-
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		NA	NA

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

No

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

Yes, Existing WHRS: 15MW, Existing AFR and biomass: 12 TPH

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

Parameter	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	1440	0
E-waste (B)	0	0
Bio-medical waste (C)	0.03	0
Construction and demolition waste (D)	0	0
Battery waste (E)	1.2	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)		
Used Oil	30	22
FO Sludge	0.7	2
Other Non-hazardous waste generated (H). Please specify, if any. (Fly ash & bottom Ash) (Break-up by composition i.e. by materials relevant to the sector)	38136	0
Refractory	699	244
Kiln Process Dust	9746	22324
Steel scrap(Steel Scrap includes castings, waste steel, MS drums, wrapper scrap, iron scrap, grinding balls, HC lining plate, table liner, HC grinding media, etc.)	402	0
Total (A+B + C + D + E + F + G + H)	50456	22591
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations) (kg/Rs of turnover)	0.006	-
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/ Revenue from operations adjusted for PPP)	NA	NA
Waste intensity in terms of physical output) (kg/tonne of cementitious material)	26	-
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled - Sold to authorised recycler	1441	244
(ii) Re-used	38136	9078
(iii) Other recovery operations	0	0
Total	39578	9322
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration - Used in Kiln as an alternative fuel	30	24
(ii) Landfilling	9746	13246
(iii) Other disposal operations (waste co-processed - AF) (000 Tonnes)	1102	0
(iv) Plastic Waste Co-processed)	0	0
Total	10878	13270

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

No. Independent assessment carried out by an external agency

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

Our products do not use any hazardous and toxic chemicals. The Company is certified under ISO 14001:2015 and the scope covers its entire operations of cement manufacturing processes. Under the environmental management system, the Company has guidelines for comprehensive waste management for the identification, segregation, collection, recycling and final disposal. Wherever applicable the Company follows 6R principles of Rethink, Reduce, Reuse, Recycle, Refuse and Repair for waste management. Awareness sessions are undertaken for the employees who have a role and responsibility towards waste management. Performance is monitored and waste data is collected monthly for analysis.

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:

Sr. No.	Location of operations/ offices	Type of operations	Whether the conditions of environmental approval/ clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1.	Sanghipuram, Gujarat	Captive Jetty	Yes

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
Not applicable as the Company has not conducted any environmental impact assessments (EIA) in year 2023-24					

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:

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

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

Essential Indicators

1.
 - a. Number of affiliations with trade and industry chambers/ associations.
 - 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.	Federation of Indian Mineral Industries	National
2.	Gujarat Chamber of Commerce & Industry (GCCCI)	State
3.	Gujarat Mineral Industry Association (GMIA)	State
4.	CAPEXIL	National

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

Name of authority	Brief of the case	Corrective action taken
	None	

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
Not Applicable as not project undertaken by the entity in the current financial year					

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 ₹)
Not Applicable						

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

The Company has various mechanisms to receive and redress grievance of the community. In plants communities complaints are collected through stakeholder engagement, suggestion box and mail. The communities also follow formal channel and informal channels through CSR teams. The grievance received from community is addressed by the site management involving the industrial and administration department. Any issue which is unresolved or needs management intervention is escalated to the respective director.

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

	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Directly sourced from MSMEs/ small producers	1.86	6.94
Sourced directly from within the district and neighbouring districts	98.14	93.06

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

Location	FY2023-24 (Current Financial Year)	FY2022-23 (Previous Financial Year)
Rural	Nil	Nil
Semi-urban	Nil	Nil
Urban	Nil	Nil
Metropolitan	Nil	Nil

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

*The Company was in the process of being taken over by Ambuja Cements Limited and so there was no hiring of work forces during the period under review)

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

Essential Indicators

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

1. Raised by customer to Company officials like sales officer or Technical services Engineers.
2. Raised by channel partner with whom the customer is dealing.
3. Directly from customer to Company's helpline number given on packaging.
4. Dealer can register through the CRM (Customer Response Management) – portal.
5. By sending an email to customer care services set up at office.

The complaint is gathered from customer in specific format which captures all details of complaint

- Date of receipt, product type, Mfg. Details like week no., Qty supplied, nature of complaint, application area, weather sample collected for external trial or plant trial, MTC to provide.

The Company has set up a proper response mechanism with a team of experienced civil engineers who are attending complaint within stipulated time frame (around 48 hrs) by identifying root cause of the problem, sharing findings with customer, technical guidance of use of product, etc. and thereby, the complaint is brought to a closure.

If issues found at the product level, plant is involved at every step so that similar issues do not occurs in future.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	All necessary information as per regulatory requirements as disclosed on all our products
Safe and responsible usage	Information on cement bags are governed as per BIS.
Recycling and/or safe disposal	Information on cement bags are governed as per BIS.

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

	FY2023-24 (Current Financial Year)			FY2022-23 (Previous Financial Year)		
	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	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair Trade Practices	0	0	NA	0	0	NA
Other	0	0	NA	26	0	NA

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

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

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

Yes <https://www.sanghicement.com/wp-content/uploads/Cyber-security-and-data-privacy-policy.pdf>

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

Since there are no complaints related to above concerns. However, we always strive to ensure the best quality products are delivered to our customers and ensures all feedback from our stakeholder in considered in our business processes.

7. Provide the following information relating to data breaches:

- a) Number of instances of data breaches: NIL
- b) Percentage of data breaches involving personally identifiable information of customers: NIL
- c) Impacts, if any, of the data breaches: NA

Independent Limited Assurance Statement to Sanghi Industries Limited on their Business Responsibility & Sustainability Report (BRSR) FY2023-24

To the Management of Sanghi Industries Ltd., Ahmedabad, India

Introduction

Intertek India Private Limited ("Intertek") was engaged by Sanghi Industries Limited ("SIL") to provide an independent limited assurance on its BRSR (Business Responsibility & Sustainability Report) selected disclosures for FY2023-24 ("the Report"). The scope of the Report comprises the reporting periods of FY2023-24. The Report is prepared by SIL based on SEBI's (Securities and Exchange Board of India) BRSR guidelines. The assurance was performed in accordance with the requirements of International Federation of Accountants (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

Objective

The objectives of this limited assurance exercise were, by review of objective evidence, to confirm whether any evidence existed that the sustainability related disclosures in alignment with BRSR requirements, as declared in the Report, were not accurate, complete, consistent, transparent and free of material error or omission in accordance with the criteria outlined below.

Intended Users

This Assurance Statement is intended to be a part of the Annual Report 2023-24 of Sanghi Industries Limited.

Responsibilities

The management of SIL is solely responsible for the development of the Report and its presentation. Management is also responsible for the design, implementation and maintenance of internal controls relevant to the preparation of the Report so that it is free from material misstatement, whether due to error.

Intertek's responsibility, as agreed with the management of SIL, is to provide assurance and express an opinion on the data and assertions in the Report based on our verification following the assurance scope and criteria given below. Intertek does not accept or assume any responsibility for any other purpose or to any other person or organization. This document represents Intertek's independent and balanced opinion on the content and accuracy of the information and data held within.

Assurance Scope

The assurance has been provided for selected sustainability performance disclosures presented by SIL in its Report. The assurance boundary included data and information for the operations of Sanghipuram, Gujarat and SIL (Corporate Office) in accordance with SEBI's BRSR guidelines. Our scope of assurance included verification of data and information on selected disclosures reported as summarized in the table below:



Section A: General Disclosures

- Total number of permanent employees
- Total number of permanent and other than permanent workers
- Total number of female employees and workers
- Total number of differently abled employees and workers (permanent and other than permanent)
- Turnover rate for permanent employees and permanent workers

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

- Number and percentage of employees covered under health insurance, accident insurance and maternity benefits
- Number and percentage of workers covered under health insurance, accident insurance
- No. of employees covered as a percentage of total employees under the benefits of Provident Funds (PF), Gratuity and Employee State Insurance (ESI)
- No. of workers covered as a percentage of total workers under the benefits of PF, Gratuity and ESI
- Return to work and retention rates of permanent employees and workers that took parental leave
- Safety data (fatalities, loss time injuries and recordable work-related injuries)
- Percentage of plants and offices that were assessed for health and safety practice and working conditions
- Number of complaints made by employees and workers on working conditions and Health and Safety
- Number and Percentage of employees and workers covered under training on health and safety related measures and skill upgradation

Principle 5: Businesses should respect and promote human rights

- Number and percentage of employees and workers covered under training on human rights policy and issues
- Minimum wage paid to employees and workers

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

- Total electricity and fuel consumption by renewable and non-renewable sources
- Energy intensity
- Total water withdrawn and consumption
- Water discharge data by destination and treatment
- Water intensity
- Air emissions (other than Greenhouse Gases)
- Scope 1 and 2 emissions data and emission intensity (scope 1 and 2)
- Hazardous and non-hazardous waste generation, utilization, and disposal data

Assurance Criteria

Intertek conducted the assurance work in accordance with requirements of 'Limited Assurance' procedures as per the following standard:

- International Standard on Assurance Engagements (ISAE) 3000 (revised) for 'Assurance Engagements other than Audits or Reviews of Historical Financial Information'.
- International Standard on Assurance Engagements (ISAE) 3410 for 'Assurance Engagements on Greenhouse Gas Statement

A limited assurance engagement comprises of limited depth of evidence gathering including inquiry and analytical procedures and limited sampling as per professional judgement of assurance provider. A materiality threshold level of 10% was applied. Assessment of compliance and materiality was undertaken against the stated calculation methodology and criteria.

Methodology

Intertek performed assurance work using risk-based approach to obtain the information, explanations and evidence that was considered necessary to provide a limited level of assurance. The assurance was conducted by desk reviews, and stakeholder interviews with regards to the reporting and supporting records for the fiscal year 2024 at SIL's corporate office in Ahmedabad. Our assurance task was planned and carried out during May 2024. The assessment



included the following:

- Review of the Report that was prepared in accordance with the SEBI's BRSR guidelines.
- Review of processes and systems used to gather and consolidate data.
- Examined and reviewed documents, data and other information made available at SIL's operational sites, corporate office and digitally.
- Conducted online interviews with key personnel responsible for data management.
- Assessment of appropriateness of various assumptions, estimations and thresholds used by SIL for data analysis.
- Review of BRSR disclosures on sample basis for the duration from 1st April 2023 to 31st March of 2024 for SIL was carried out remotely.
- Appropriate documentary evidence was obtained to support our conclusions on the information and data reviewed and details would be provided in a separate management report.

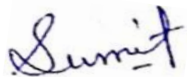
Conclusions

Intertek reviewed selected BRSR disclosures provided by SIL in its Report. Based on the data and information provided by SIL, Intertek concludes with limited assurance that there is no evidence that the sustainability data and information presented in the Report is not materially correct. The report provides a fair representation of BRSR disclosures and is in accordance with the SEBI's BRSR guidelines to the best of our knowledge.

Intertek's Competence and Independence

Intertek is a global provider of assurance services with a presence in more than 100 countries employing approximately 43,500 people. The Intertek assurance team included competent sustainability assurance professionals, who were not involved in the collection and collation of any data except for this assurance opinion. Intertek maintains complete impartiality towards any people interviewed.

For Intertek India Pvt. Ltd.



Sumit Chowdhury, Verifier
Sr. Manager-Sustainability
Intertek Assuris



Elizabeth Mielbrecht, Reviewer
Project Director
Intertek Assuris

23rd May 2024

No member of the verification team (stated above) has a business relationship with Sanghi Industries Ltd. stakeholders beyond that is required of this assignment. No form of bribe has been accepted before, throughout and after performing the verification. The verification team has not been intimidated to agree to do this work, change and/or alter the results of the verification. The verification team has not participated in any form of nepotism, self-dealing and/or tampering. If any concerns or conflicts were identified, appropriate mitigation measures were put in place, documented and presented with the final report. The process followed during the verification is based on the principles of impartiality, evidence, fair presentation and documentation. The documentation received and reviewed supports the conclusion reached and stated in this opinion.

