# Business Responsibility & Sustainability Report

## SECTION A: GENERAL DISCLOSURES

Ι.	Details of the listed entity	
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1.	, , , , ,	: L26940GJ1936PLC149771
2.		: ACC Limited
3.	Year of incorporation	: 1936
4.	Registered office address	: Adani Corporate House, Shantigram, Near Vaishnodevi Circle, S.G. Highway, Ahmedabad – 382421, Gujarat, India.
5.	Corporate address	: Adani Corporate House, Shantigram, Near Vaishnodevi Circle, S.G. Highway, Ahmedabad – 382421, Gujarat, India.
6.	E-mail	: acc-investorsupport@adani.com
7.	Telephone	: +91 792 555 5555
8.	Website	: www.acclimited.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	: BSE NSE
11.	Paid-up Capital	: ₹187.79 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	<ul> <li>Name : Neeru Bansal</li> <li>Address : Adani Corporate House, Shantigram, Near Vaishno Devi Circle, S.G. Highway, Ahmedabad – 382421, Gujarat, India.</li> <li>Contact : +91 982 538 6934</li> <li>Email ID : neeru.bansal@adani.com</li> </ul>
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	: Disclosures made in this report are on a consolidated basis for all Integrated Units and Grinding units, mines and bulk cement terminals. Details of subsidiary companies and joint ventures are not included here.
14.	Name of assurance provider	Intertek India Pvt. Ltd.
15.	Type of the assurance obtained	Limited Assurance

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Clinker, Cement	100%

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

S. No	Product/Service	NIC Code	% of total Turnover contributed
1.	Cement and Cement Products	23941	100%

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#### 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	17	35	52
International	0	0	0

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

#### a. Number of locations

Locations	Number
National (No. of States)	Presence in 27 states and 570+ districts ( $\sim$ 80%)
International (No. of Countries)	Nil

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

Nil, we are not doing export of our products.

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

ACC Limited is India's foremost manufacturer of cement and ready mixed concrete with a countrywide network of factories and marketing offices. Its customer includes its channel partners (dealers and retailers), individual home builder, contractors, big housing contractors, Infrastructure companies and government department.

#### **IV. Employees**

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

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

S.	Particulars	Total	Male		Female	
No.		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
EM	PLOYEES					
1.	Permanent (D)	2,171	2,036	93.78%	135	6.22%
2.	Other than Permanent (E)	31	27	87.10%	4	12.90%
3.	Total employees (D + E)	2,202	2,063	93.69%	139	6.31%
wo	RKERS					
4.	Permanent (F)	1,681	1,647	97.98%	34	2.02%
5.	Other than Permanent (G)	1	0	0.00%	1	100.00%
6.	Total workers (F + G)	1,682	1,647	97.92%	35	2.08%

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

s.	Particulars	Total	Male		Female			
No		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)		
DIF	DIFFERENTLY ABLED EMPLOYEES							
1.	Permanent (D)	8	8	100.00%	0	0.00%		
2.	Other than Permanent (E)	0	0	0.00%	0	0.00%		
3.	Total differently abled employees (D + E)	8	8	100.00%	0	0.00%		
DIF	FERENTLY ABLED WORKERS							
4.	Permanent (F)	5	5	100.00%	0	0.00%		
5.	Other than permanent (G)	0	0	0.00%	0	0.00%		
6.	Total differently abled workers (F + G)	5	5	100.00%	0	0.00%		

#### 21. Participation/Inclusion/Representation of women

		No. and percentage of Females		
	Total (A)	No. (B)	% (B/A)	
Board of Directors	8	1	12.50%	
Key Management Personnel	3	0	0%	

#### 22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2023-24 (Turnover rate in current FY)		2022-23* (Turnover rate in January 2022 to March 2023)			2021** (Turnover rate in previous Year)			
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	28.75%	33.42%	29.04%	23.53%	29.09%	23.89%	15.90%	20.80%	16.20%
Permanent Workers	20.30%	14.93%	20.20%	7.23%	0.00%	7.10%	12.45%	9.41%	12.40%

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

\*\* Data disclosed is for January 2021 to December 2021.

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

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

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	ACC Minerals Resource Limited	Subsidiary	100%	No
2.	Lucky Minmat Limited	Subsidiary	100%	No
3.	Singhania Minerals Private Limited	Subsidiary	100%	No
4.	ACC Concrete South Limited	Subsidiary	100%	No
5.	ACC Concrete West Limited	Subsidiary	100%	No
6.	Asian Concretes and Cements Private Limited	Subsidiary	100%	No
7.	Asian Fine Cements Private Limited	Subsidiary	100%	No
8.	Bulk Cements Corporation (India) Limited	Subsidiary	94.65%	No
9.	OneIndia BSC Private Limited	Joint Venture	50%	No
10.	MP AMRL (Bicharpur) Coal Company Limited	Joint Venture	49%	No
11.	MP AMRL (Semaria) Coal Company Limited	Joint Venture	49%	No
12.	MP AMRL (Marki Barka) Coal Company Limited	Joint Venture	49%	No
13.	MP AMRL(Morga) Coal Company Limited	Joint Venture	49%	No
14.	Aakaash Manufacturing Company Private Limited	Joint Venture	40%	No
15.	Alcon Cement Company Private Limited	Associate	40%	No

#### Financial Statements

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#### VI. CSR Details

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

Yes

- (ii) Turnover (in ₹) : ₹ 19,952 crore
- (iii) Net worth (in ₹) : ₹ 16,022 crore

#### 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	Grievance Redressal Mechanism in Place		Y 2023-202 nt Financia			2022 to Ma ous Financia	
group from whom complaint is received	(Yes/No) (If Yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year		Number of complaints filed during the year		Remarks
Communities	Yes (https://www. adanifoundation.org/ Contact-Us)	0	0		30	0	
Investors (other than shareholders)	Yes (acc-investorsupport@ adani.com)	0	0		0	0	All complaints were closed
Shareholders	Yes (acc-investorsupport@ adani.com)	44	3		40	0	
Employees and workers	Yes (https://www.acclimited. com/assets/new/pdf/ Whistle%20Blower%20 Policy%20ACC.pdf)	11	5	Practicing Open door policy. Grievance are heard by HR Head and Plant Head and at CMO level	3	0	
Customers	Yes (acchelp@adani.com)	19	8	Trade Violation	1	0	Trade violation
Value Chain Partners	Yes (https://www.acclimited. com/assets/new/pdf/ Supplier%20Code%20 of%20Conduct.pdf)	3	2	Bribery, trade violation, conflict of interest	9	0	Bribery, trade violation, conflict of interest
Other (please specify)	Yes ( <u>https://www.acclimited.</u> <u>com/contact-us</u> )	27	13		27	3	

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

### ACC LIMITED

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Water management	Risk and Opportunity	<b>Risk</b> – Water being a shared resource, it is essential for business to use it in a responsible way. These risks comprise conflicts with local communities and stakeholders over water rights and usage, potential water scarcity or quality issues due to over-extraction or pollution, and regulatory constraints on water abstraction permits or discharge standards.	We have been investing in rainwater harvesting initiatives, restoring village ponds, construction of check dams, water conservation at closed mines and groundwater recharge for a long time to mitigate the risk of lack of water. As a result, the company is now water positive.	Negative/Positive
			<b>Opportunity</b> – By demonstrating commitment to conserving water resources, we can build stronger relationships with local communities and government. This will help us in securing and maintaining social license to operate, especially in water-stressed regions. In future, the company may qualify for government incentives aimed at promoting water conservation and sustainability initiatives.		
2.	Air quality	Risk	Exposure to dust, Sox, Nox and other pollutants from cement plants can lead to respiratory issues among employees and nearby communities. This may lead to increased costs associated with healthcare for affected employees, and insurance premiums. The company may also face opposition, protests and even legal restrictions on its operations.	We focus on improving air emissions and the surrounding environment. We monitor the plants' stack emissions through the Continuous Emission Monitoring System. We work on upgradation of electrostatic precipitations and replacement of damaged bags to control dust emissions. We take primary and secondary measures to control NOx emissions.	Negative
3.	Circular Economy	Opportunity	Circular economy offers great opportunity to lower the use of natural resources and fossil fuels in cement production and reduces carbon emissions.	-	Positive

Strategic Review

ESG Overview

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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)
4.	Climate and Energy	Risk and Opportunity	<b>Risk</b> – Climate change poses multiple physical risks like flooding, temperature rise, water stress etc. Emerging and potential regulations may introduce or escalate regulatory risks. These extreme weather events can cause infrastructure damage, may hinder the supply chain network affecting timely delivery of raw materials and finished products. It may also cause power outages and affect the manufacturing processes.	The Company has approximately 90% of products in its portfolio which are blended products with lower carbon footprint. Further, we are investing more and more in renewal energy and green energy from WHRS. In addition, we have set ambitious targets for Thermal Substitution Rates (TSR) by using alternate fuels.	Negative/Positive
			<b>Opportunity</b> – Energy cost is a major cost in cement manufacturing. We continuously strive to reduce our specific thermal energy consumption and specific electrical energy consumption to optimise our energy costs. In addition, it is directly related to carbon emissions and by optimising energy consumption, we can lower our carbon emissions.		
5.	Biodiversity	Risk and Opportunity	<b>Risk</b> – Land disturbance and habitat fragmentation from operational activities can lead to biodiversity degradation. <b>Opportunity</b> – Restored ecosystems	We adhere to Indian national regulations and are a signatory to the India Business and Biodiversity Initiative (IBBI) of the Confederation of Indian	Negative/Positive
			can provide long-term environmental benefits, including enhanced ecosystem services such as water filtration, carbon sequestration, and soil preservation. These benefits not only contribute to global environmental goals but also can have positive economic implications for the company and local communities in the long run.	Industry (CII), and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ). We assess the impacts on biodiversity and ecosystem services through set KPIs. This helps in conservation of ecosystem.	
6.	Sustainable Construction	Opportunity	Intervention of sustainable practices and technologies such as substitute cementitious materials, $CO_2$ capture in the built environment, and efficient concrete use help drive down carbon emissions from cement production and hence help to reduce the carbon footprint.	-	Positive
7.	Human Capital Development	Opportunity	Through continuous learning and development and strengthened employee relations, we can mitigate succession planning risks, address skills gaps and ensure continuity of leadership and expertise. It will also help in being competitive in the marketplace and stay ahead of trends. Human Capital development will also contribute to an overall learning culture in the organisation.	_	Positive

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8.	Diversity and Inclusion	Opportunity	Employee diversity leads to increased creativity and innovation, improved communication and teamwork, and a greater understanding and appreciation of different cultures. Additionally, a diverse workforce can help to attract and retain top talent and can provide a competitive advantage for organisations.	-	Positive
9.	Human Rights	Risk and Opportunity	Risk – Concerns related to child/ forced labour, discrimination or any other human rights-related aspects within the workforce and value chain may lead to statutory violations which may negatively impact the brand image. Opportunity – Alignment with the human rights principles and procedures safeguard the employees and value chain partners and ensure zero incidents of non-compliance with regards to International and	We are committed to respecting and promoting human rights across the value chain by inculcating a human rights policy. The policy is in line with The Universal Declaration of Human Rights, Social Accountability 8000 (SA8000) Standard and International Treaties & Conventions related to Human Rights.	Negative/Positive
10.	Occupational Health and Safety	Risk and Opportunity	National Human Rights Standards and Regulations. <b>Risk</b> – Failure to protect workers from occupational hazards can result in legal action, fines, and compensation claims against the company. These risks can lead to significant financial liabilities and damage the company's reputation. Also, potential employees may hesitate from joining the company, and current employees may leave if they perceive their health and safety are not adequately protected, leading to challenges in attracting and retaining a skilled workforce. <b>Opportunity</b> – By prioritising the well-being of all employees and workers, the company can enhance its employer brand, making it a more	initiatives including competency development, training, audits, inspections, surveys, We Care initiatives, Critical Control Management to prevent unwanted events, and especial cross-functional teams to drive process safety. Also, we	Negative/Positive
11.	Community Relations	Opportunity	attractive place to work. Employees are more likely to join and stay with a company that prioritises their well- being, leading to lower turnover rates and higher employee satisfaction. Uplifting livelihood opportunities improves community relations which is essential for the social license to operate. Also, a healthy community will ensure availability of strong local labour force, if required at any given point of time.	-	Positive

Strategic Review ESG Overview

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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)
12.	Customer Relationship Management	Opportunity	CRM empowers to build a positive customer experience based on relevant, real-time information and customer needs that matters to the business. It would enable data driven decision making, improved customer experience and hence drive growth in business by increasing loyalty and enhancing relations.	_	Positive
13.	Corporate Governance and business ethics	Opportunity	Effective governance mechanism in the organisation gives an opportunity of building greater trust among the stakeholders and creates long-term value for them.	_	Positive
14.	Risk Management	Opportunity	Enhanced Risk awareness and in-place emergency preparedness plans help to better foresee risks that may emerge due to climate change, regulations, and geopolitical developments. This helps to stay one step ahead and ensure business continuity and regulatory resilience.	-	Positive
15.	Sustainable Supply Chain	Risk & Opportunity	<b>Risk</b> – Improper usage of resources, human rights violations, non- compliance with Supplier Code of Conduct, zero adoption of sustainable practices by suppliers can adversely impact the environment, social wellbeing, value chain and brand image. Additionally, it might also lead to cases of regulatory non- compliances and fines.	Supply chain and sourcing process has a direct impact on the environment and communities such as emissions, circular economy, water usage, biodiversity, material usage and human rights. We have taken measures to ensure an optimum supply chain with competent suppliers.	Negative/Positive
			<b>Opportunity</b> – The company can leverage suppliers near operations to reduce costs, for greater control, quicker response and helps in cutting down significant emissions related to transportation.		
16.	Information technology and data privacy	Risk & Opportunity	<b>Risk</b> – Instances of information security breaches could lead to loss of sensitive data of customers including personal information. It could also lead to increased media scrutiny resulting in a loss of stakeholder trust, company reputation and regulatory fines or penalties.	With increased digitisation, and heavy dependence on technology systems, it has become critical for us to ensure implementation of SOPs and policies, conduction periodic internal and external (third-party) audits and tests to check the resilience of the IT infrastructure from hackers,	Positive and Negative
			<b>Opportunity</b> – In the ever-evolving landscape of digitalisation and innovation, monitoring and analysis of data in real time would lead to quicker identification and resolution of issues. As a result, this will ensure management of systems and processes more effectively.	cyber-attacks, malware etc.	

### 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.

Dis	sclo	sure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Ро	licy	and management processes									
1.	а.	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.a	cclimite	ed.com/ir	ivestor-r	elations	/corpora	ate-gove	rnance
2.		nether the entity has translated the licy into procedures. (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.		the enlisted policies extend to your lue chain partners? (Yes/No)				are expec ecuting a					icies of
4.		me of the national and international	• ISO 9	9001:20	)15						
		des/certifications /labels/standards g. Forest Stewardship Council,	<ul> <li>ISO 1</li> </ul>	14001:2	015						
		irtrade, Rainforest Alliance, Trustea)	ISO 5	50001:2	2018						
		andards (e.g. SA 8000, OHSAS, ISO,	<ul> <li>ISO 4</li> </ul>	45001:2	018						
		<li>adopted by your entity and mapped each principle.</li>	GCC/	A 2050							
	10	each phhoipie.	<ul> <li>SBTi</li> </ul>								
			• WEF	's 1t.org							
5.		Specific commitments, goals and targets		e comm	itment	s, goals a	nd targe	ts set fo	r 2030		
		t by the entity with defined timelines,	Parame	eter		Target \	rear 203	50			
	11 C	any.	CO <sub>2</sub> emissions		Scope 1: 465 kg/tonne of Cementitious materials (including CPP) Scope 2: 10.4 kg/tonne of Cementitious						
			<u></u>			materials					
			Circular Economy			Consume 30 million tonnes per year of waste derived resources					vaste
				consum	•	5x Wate		-			
				eneficia		3.5 milli					
			Tree pl	antatior	ר	5.93 mil	lion tree	es .			
6.		rformance of the entity against the	Paramo	eter		April 20	23 to M	arch 20	24		
	alo	specific commitments, goals and targets along-with reasons in case the same are not met.		nissions		Scope 1 material Scope 2	s (includ		?)		naterial
				r Econo	my	Consum		million to	onnes of	waste o	derived
			Water	consum	ption	1.0x Wa	ter Posit	ive			
			CSR Be	eneficia	ries	0.3 milli	on				
			Tree pl	antation	า	0.91 Lak	(h				

(	Portfolio Overview	Corporate Overview	Strategic Review	ESG Overview	Statutory Reports	Financial Statements	1
	Pollollo Overview	corporate overview	Strategic Review	ESG OVELVIEW		Finalicial Statements	)

Dis	sclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Go	vernance, leadership and oversight									
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of the disclosure	CEO and Whole Time Director Statement: Progress now implies more than just success; it also entails securing a brighter future. Our Cement Business is committed to sustainabili innovation, and social responsibility. Our resolute mission is to minimise our ecological footprint and make a positive impact on the environment. We are reducing our carbon footprint and fostering a low-carbon future. Beyond environmental care, we invest in commu well-being and social inclusion, empowering them to thrive. Aligned with the Group, we are shaping a better, sustainable tomorrow, integrating social and environmental factors into our operations and decisions. Our blueprint drives efficiency, decarbonisation, and industry redefinition. We are committed to upholding the ESG principles and are pleased with the progress we have achieved towa a sustainable and socially responsible future.						nability, n the ng a mmunity gned is ESG		
<ol> <li>Details of the highest authority</li> <li>CEO and Whole Time Director</li> <li>responsible for implementation and oversight of the Business Responsibility policy (ies).</li> </ol>										
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes/No).	of Inder related	bendent perform	Director	s is resp d issues	oonsible . The co	for over mmittee	rseeing e meets	sustaina every q	•

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

If yes, provide details. the business to improve it.

	Subject for Review		Indicate whether review was ndertaken by Director/Committe the Board/Any other Committe 1 P2 P3 P4 P5 P6 P7 P8		ittee	ee of Guarterly/Any other – nig												
		P1	P2 P3	P4	Р5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	Ρ7	P8	Ρ9
	Performance against above policies and follow up action	Corr		s of th Ipdat				h in t	n in turn Quarterly and then annually at a consolidated level									
	ompliance with statutory equirements of relevance the principles, and, ectification of any on-compliances						е гед	ulato	ory re	equir	emer	it are					lar	
-	Has the entity carried out independent assessment/					P1	P2	P3	Р4	P5	P	6 F	77	P8	Р9			
	evaluation of the working of i agency?(Yes/No). If yes, provi	its po	licies b	y an e	exter	nal			Yes. Internal Controls and Processes are p in place and its assessment and monitoring done by external agency – Grant Thornto								ng is	
I	f answer to question (1) abov	e is "N	lo" i.e. r	not al	l Prir	nciple	es are	e cov	ered	by a	polic	су, геа	esons	to b	e st	ated	:	
	Questions								P1	P2	Р3	P4	P5	P	6 F	P7	P8	Ρ9
	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)				te													
	The entity does not have the resources available for the ta			numa	n ano	d tec	hnica	эl				NOt	Appl	icab	ie			

It is planned to be done in the next financial year (Yes/No)

Any other reason (please specify)

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### 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	8	Capital Market Programme	37.5
		Airport Business	37.5
		ESG Programme	37.5
		ESG Global Trends Programme	37.5
		Awareness about Manufacturing Process, CSR Activities, Cement Business	25
		Capital Profile Programme	12.5
		Green Hydrogen Programme	12.5
		Data Centre Business	12.5
Key Managerial	8	Capital Market Programme	33.33
Personnel		Airport Business	33.33
		ESG Programme	33.33
		ESG Global Trends Programme	33.33
		Awareness about Manufacturing Process, CSR Activities, Cement Business	66.66
		Capital Profile Programme	33.33
		Green Hydrogen Programme	33.33
		Data Centre Business	33.33
Employees other than BoD and KMPs	1,082	571	100
Workers	_	-	_

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 formate (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 e 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				
Punishment	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
Not Applicable	Not Applicable

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.

https://www.acclimited.com/assets/new/pdf/ANTI-CORRUPTION-ANTI-BRIBERY-POLICY.pdf

We strictly adhere to ethical business practices and comply with all applicable laws and regulations related to anti-corruption and anti-bribery. Our Anti-corruption and Antibribery policy govern our employees' behaviour and prohibits any form of bribery, corruption, and unethical practices. We prioritise accountability and transparency in all our operations and take strict action against any non-compliance cases related to corruption, bribery, and anti-competitive behaviour.

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

	FY 2023-24 (Current Financial Year)	FY January 2022-March 2023* (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

## ACC LIMITED

#### Integrated Annual Report 2023-24

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

	FY 2023 (Current Finan		FY January 2022-March 203 (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	

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

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

Not Applicable

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

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Number of days of accounts payable	41	37

#### 9. Open-ness of business

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

Parameter	Me	etrics	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Concentration of purchases	а.	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	а.	Sales to dealers/distributors as % of total sales	81%	83%
b		Number of dealers/distributors to whom sales are made	13,015	12,506
	C.	Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	3%	3%
Share of RPTs in	а.	Purchases (Purchases with related parties/total purchases)	80%	80%
	b.	Sales (Sales to related parties/Total Sales)	13%	5%
	C.	Loans & advances (Loans & Advances given to related parties/Total loans & advances)	21%	10%
	d.	Investments (Investments in related parties/Total Investments made)	43%	90%

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

#### Essential Indicators

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

	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	2.3 crore	1.05 crore	Further Reduction of clinker factor by 1 to 2% in existing products of PPC/ PSC /PCC by optimising product mix
Capex	0.13 crore	Nil	Development of calcined clay limestone based cement with 50% clinker to significantly reduce carbon foot print as compared to Ordinary Portland cement

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

Yes

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

Yes

- The company has a well-defined Supplier Code of Conduct, which helps the Company to integrate ESG parameter in its procurement.
- We have procedures in place for sustainable sourcing in terms of new supplier registration and Group General Terms Conditions is part of all the major procurements.
- As part of sustainable sourcing, more than 99.84% of input material is sourced locally i.e. within India.
- A large quantum of input material is recycled waste material consisting of industrial, municipal and agriculture waste.
- 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.
  - We do not reclaim our products. The Company follows circular economy principles in the manufacturing and end use stage of the product lifecycle.
  - The plastic used for packaging as well as generated otherwise is co-processed in cement kiln. The Company
    is plastic negative.
  - Cement manufacturing process does not produce any E-waste. However, E-waste is produced from office operations. All of e-waste generated is sold to registered recyclers.
  - Major quantity of hazardous waste generated during the process is co-processed in kiln within plant as per the permission from State Pollution Control Board. Remaining hazardous waste is sent to common incinerator authorised by State Pollution Control Board.
- 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 is applicable to the Company and the Company has registered on government EPR portal as Brand Owner. The Company collects the Waste through its waste management arm 'Geoclean' and co-processes it in cement kilns.

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:

					% of en	nployees c	overed by				
Category	, Health insuranc		alth insurance Accident insurance		Maternit	Maternity benefits		y Benefits	Day Care facilities		
j,	Total (A)	Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
					Permane	nt employe	es				
Male	2,036	2,036	100.00%	2,036	100.00%	0	0.00%	2,036	100.00%	Day care faci	
Female	135	135	100.00%	135	100.00%	135	100.00%	0	0.00%	<pre>provided at a sites and offi</pre>	
Total	2,171	2,171	100.00%	2,171	100.00%	135	6.22%	2,036	93.78%	the company	
				Oth	er than Per	manent en	nployees				
Male	27	27	100.00%	27	100.00%	0	0.00%	27	100.00%	Day care faci	lities are
Female	4	4	100.00%	4	100.00%	4	100.00%	0	0.00%	provided at all plant sites and offices of	
Total	31	31	100.00%	31	100.00%	4	12.90%	27	87.10%	the company	

All employees and workers are covered under Health Insurance and Accident Insurance. Maternity and Paternity benefits are extended to all eligible employees and workers. Day care facilities are provided at all plant sites and offices.

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

					% of v	vorkers co	vered by				
Category		Health i	nsurance	Accident	insurance	Maternit	y benefits	Paternity	y Benefits	Day Care fa	cilities
Total (A)		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
					Perman	ent worker	S				
Male	1,647	1,647	100.00%	1,647	100.00%	0	0.00%	1,647	100.00%	Day care faci	lities are
Female	34	34	100.00%	34	100.00%	34	100.00%	0	0.00%	<pre>provided at a sites and offi</pre>	
Total	1,681	1,681	100.00%	1,681	100.00%	34	2.02%	1,647	97.98%	the company	
				Ot	her than Pe	ermanent v	vorkers				
Male	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	Day care faci	lities are
Female	1	1	0.00%	1	0.00%	1	0.00%	0	0.00%	<ul> <li>provided at all plant</li> <li>sites and offices of the company</li> </ul>	
Total	1	1	100.00%	1	100.00%	1	0.00%	0	0.00%		

# 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)	FY 2022-23 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company	36.85 crore (0.20%)	78.73 crore (0.35%)

	(Curr	FY 2023-24 ent Financial N	(ear)	FY January 2022-March 2023* (Previous Financial Year)			
Benefits	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	
PF	100%	100%	Yes	100%	100%	Yes	
Gratuity	100%	100%	NA	100%	100%	NA	
ESI***	0.00%	0.00%	NA	1.93%	0.00%	NA	
Others – please specify	0%	0%	NA	0%	0%	NA	

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

\*\*\* In ESI, only those employees who are eligible under ESI are covered.

\* The Company had changed its financial year end from December to March in FY 23. therefore, the figure for FY 23 is for 15 Months.

#### 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

# 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 believes in equal Opportunity for all. The Company is committed to delivering value through equality and to nurture and promote diversity across its operations. We foster an inclusive work environment that encourages a supportive and professional culture, emphasising trust, empathy, and mutual respect. Our commitment to diversity, equality, and inclusion is reflected in the development of our policies.

Policy on 'Diversity, Equity and Inclusion' available on Company website:

https://www.acclimited.com/assets/new/pdf/Policy%20on%20Diversity%20Equity%20and%20Inclusion.pdf

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

Gender	Permanent e	employees	Permanent workers			
	Return to work rate	Retention rate	Return to work rate	Retention rate		
Male	83.33%	52.38%	0%	0%		
Female	75.00%	22.22%	100%	100%		
Total	82.50%	43.33%	100%	100%		

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	
Other than Permanent Workers	Yes (Practicing Open door policy. Grievance are heard
Permanent Employees	by HR Head and Plant Head and at Chief Manufacturing Officer (CMO) level)
Other than Permanent Employees	

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

	(Cui	FY 2023-24 Trent Financial Year)			uary 2022-March 2023* vious Financial Year)	k
Category	workers in	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/A)	workers in	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	-	-	0%	-	-	0%
– Male	_	_	0%	_	_	0%
– Female	_	_	0%	_	_	0%
Total Permanent Workers	1,681	1,681	100%	2,192	2,192	100%
– Male	1,647	1,647	100%	2,151	2,151	100%
– Female	34	34	100%	41	41	100%

\* The Company had changed its financial year end from December to March in FY 23. therefore, the figure for FY 23 is for 15 Months.

Association/Union are there at worker level and 100% of workers are members of it

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

			′ 2023-24 Financia			F	Y January (Previous			*
Category		On Heal safety m		On S upgrad			On Health and safety measures		On Skill upgradation	
	Total (A)	No. (B)	% (B/A)	No. (C)	% (C/A)	Total (D)	No. (E)	% (E/D)	No. (F)	% (F/D)
				Employ	yees					
Male	2,063	1,339	65%	1,971	96%	3,038	2,105	69%	2,639	87%
Female	139	62	45%	95	68%	221	120	54%	204	92%
Total	2,202	1,401	64%	2,066	94%	3,269	2,225	68%	2,843	87%
				Work	ers					
Male	1,647	67	4%	15	1%	2,162	344	16%	383	18%
Female	35	5	14%	0	0%	41	6	15%	5	12%
Total	1,682	72	4%	15	1%	2,203	350	16%	388	18%

\* The Company had changed its financial year end from December to March in FY 23. therefore, the figure for FY 23 is for 15 Months.

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

Category		Y 2023-24 t Financial Yea	ar)	FY January 2022-March 2023* (Previous Financial Year)								
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)						
Employees												
Male	2,063	2,063	100%	3,048	3,048	100%						
Female	139	139	100%	221	221	100%						
Total	2,202	2,202	100%	3,269	3,269	100%						
		Wor	kers									
Male	1,647	1,647	100%	2,156	2,156	100%						
Female	35	35	100%	41	41	100%						
Total	1,682	1,682	100%	2,197	2,197	100%						

\* The Company had changed its financial year end from December to March in FY 23. therefore, the figure for FY 23 is for 15 Months.

### 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, we have Health and Safety Management standards defined for our processes. The standards are applicable to all our sites

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

We have well defined Hazard identification and risk assessment procedure. All the personnel at sites are trained to assess the risk before start of the activity.

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

Yes

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

Yes

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

Safety Incident/Number	Category	FY 2023-24 (Current Financial Year)	FY January 2022-March 2023* (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR)	Employees	0.38	0.19
(per one million-person hours worked)	Workers	0.62	0.24
Total recordable work-related injuries	Employees	5	5
	Workers	25	30
No. of fatalities	Employees	0	0
	Workers	0	2
High consequence work-related injury	Employees	0	0
or ill-health (excluding fatalities)	Workers	0	0

\* The Company had changed its financial year end from December to March in FY 23. therefore, the figure for FY 23 is for 15 Months.

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

A well defined Health and Safety Management System is designed consisting of planning our strategic action plan for the year, reviewing the standards, procedures, processes etc. The plan is developed at the Corporate level and flows down to the manufacturing units and is tracked month on month basis for its effectiveness. A robust digital platform is established to enhance competency and capability building for both employees and workers. Various campaigns, events and initiatives to build the awareness and culture on ground are held. Other measures include Trainings, monitoring, effective process safety management controls at site, well established vehicle and traffic safety management system which are key pillars for driving our H&S System. With all these in place Senior Leadership engagement and involvement ensures a safe and healthy workplace.

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

	(Cu	FY 2023-24 rrent Financial Year)			uary 2022-March 20 evious Financial Year	
	Filed during Pending resolution the year at the end of year		Remarks	Filed during Pending resolution the year at the end of year Re		Remarks
Working Conditions	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

\* The Company had changed its financial year end from December to March in FY 23. therefore, the figure for FY 23 is for 15 Months.

Statutory Reports

#### 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	67% (Plants are certified for ISO 45001)
Working Conditions	

**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 the actions pertaining to lead and lag indicators are being monitored for all locations. These are presented to Corporate Responsibility Committee, consisting of independent Board members. The meetings are held quarterly. Committee overseas the performance and guides for improvement wherever needed.

#### 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 successful involvement of our stakeholders is essential to the achievement of our strategic goals because it provides us with the opportunity to understand their expectations, respond to their concerns, and assist us in prioritising the areas in which we should be concentrating our efforts. Our mechanism for engaging with stakeholders is governed by our Stakeholder Engagement Policy (<u>https://www.acclimited.com/assets/new/pdf/</u><u>Stakeholder%20Engagement%20policy.pdf</u>), which is further aligned with global best practises.

We identify stakeholders as groups and individuals, who can influence or/are impacted by our operations/activities, change in technology, regulations, market and societal trends either directly or indirectly. Stakeholders comprise of communities, employees, supply chain partners, customers, investors, regulators, industrial organisations etc. Against each group, the potential ways in which stakeholders will be affected as well as the magnitude of both the actual and perceived impacts have been determined. This assists the company in developing a bespoke plan for engaging with stakeholders, which can then be kept up to date as and when is necessary.

Throughout the course of the year, we maintain ongoing dialogue with the many stakeholders by utilising a variety of channels of contact. The insights that we gain from these projects are tremendously helpful, because they allow us to continually enhance both our strategy and our operations. The process of engaging stakeholders also includes regular feedback and grievance redressal methods, both of which are vital components of the process.

Stakeholder Group	•	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	er Ha	requency of ngagement (Annually/ alf yearly/Quarterly/ .hers – please specify)	e to	urpose and scope of ngagement including key opics and concerns raised uring such engagement
Shareholders and Investors	No	<ul> <li>Investor relations arm</li> <li>Annual Report</li> <li>Public disclosures</li> <li>Investor meetings/calls</li> </ul>	•	Quarterly/annually as and when requested One-on-one investor interaction as and when requested	•	To strengthen business conduct and communication Growth and profitability of ESG oriented business
Channel Partners	No	<ul> <li>Channel satisfaction surveys</li> <li>Annual conferences</li> <li>Marketing meetings</li> </ul>	•	Annual/continuous process	•	To enhance transparent communication of products and services
Government & Regulatory Authorities	No	<ul> <li>Annual Report</li> <li>Plant visits</li> <li>Regulatory Compliance reports</li> </ul>	•	Continuous interactions	-	Climate change related rules/regulations Communications on proposed legislations
Customers	Yes	<ul> <li>Customer satisfaction surveys</li> <li>Formal and informal feedback</li> <li>Technical services team camps</li> <li>Products promotion drives</li> <li>Grievances redressal system</li> </ul>		Periodic	-	Customer satisfaction and feedback on services/products Understand grievances Strengthen relationship with customer

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

					`
an	cial	Sta	tem	ents	
011	CIGI	JU	cem	enco	

Stakeholder Group	& Marginalised	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
Employees	No	<ul> <li>Training and seminars</li> <li>Meetings and reviews</li> <li>HR programmes</li> <li>Employee satisfaction surveys</li> <li>Departmental meetings</li> <li>Townhall meetings</li> <li>Internal newsletters and magazines</li> </ul>	<ul> <li>Continuous interactions</li> </ul>	<ul> <li>Work-life balance</li> <li>Transparent appraisal and promotion policy</li> <li>Awareness on internal policies</li> <li>Fair remuneration structure</li> </ul>
Suppliers	Yes	<ul> <li>Supplier meets</li> <li>Periodic assessments and interactions</li> </ul>	<ul> <li>Continuous interactions</li> </ul>	<ul> <li>Adherence to the supplier code of conduct</li> <li>Strengthen business relationships</li> <li>Create awareness for sustainable supply chain</li> </ul>
Community	Yes	<ul> <li>Project-based stakeholder meets</li> <li>CSR arm</li> <li>Community Advisory Pane</li> </ul>	<ul> <li>Continuous interactions</li> </ul>	<ul> <li>Positive engagements for sustainable mining, water conservation, land reclamation, and other initiatives of CSR</li> </ul>
Media	No	<ul> <li>Media briefings</li> <li>Press releases</li> <li>Marketing communication</li> </ul>	<ul> <li>Need based</li> </ul>	<ul> <li>Increase transparency and clarity in shared information</li> </ul>
Construction professionals	No	<ul> <li>Meetings/Conferences</li> </ul>	<ul> <li>Continuous interactions</li> </ul>	<ul> <li>Promote advanced construction techniques, sustainable construction practices, knowledge dissemination on good construction and product quality</li> </ul>
Industry Association	No	<ul> <li>Meetings/Conferences</li> <li>Policy papers</li> </ul>	<ul> <li>Need based</li> </ul>	<ul> <li>Knowledge enhancement for policy interventions and policy advocacy on sustainable development practices in value chain</li> </ul>

### 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:

Cabaaan	(	FY 2023-24 Current Financial Year)		FY J (I	3*	
Category	Total (A)	No. employees workers covered (B)	% (B/A)	Total (C)	No. employees workers covered (D)	% (D/C)
		Employ	ees			
Permanent	2,171	1,907	88%	2,975	1	0%
Other permanent	31	15	48%	294	48	16%
Total Employees	2,202	1,922	87%	3,269	49	1%
		Worke	ers			
Permanent	1,681	0	0%	2,192	0	0%
Other permanent	1	0	0%	11	0	0%
Total Workers	1,682	0	0%	2,203	0	0%

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

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

					FY January 2022-March 2023* (Previous Financial Year)							
	Equal to Minimum Wage		More than Minimum Wage			Equal to Minimum Wage		More than Minimum Wage				
Total (A)	No. (B)	% (B/A)	No. (C)	% (C/A)	Total (D)	No. (E)	% (E/D)	No. (F)	% (F/D)			
Permanent Employees												
2,036	0	0%	2,036	100%	2,791	0	0%	2,791	100%			
135	0	0%	135	100%	184	0	0%	184	100%			
		Other t	han Pern	nanent								
27	0	0%	27	100%	257	0	0%	257	100%			
4	0	0%	4	100%	37	0	0%	37	100%			
		Worke	ers Perma	enent								
1,647	0	0%	1,647	100%	2,151	0	0%	2,151	100%			
34	0	0%	34	100%	41	0	0%	41	100%			
		Other t	han Pern	nanent								
0	0	0%	0	0%	5	0	0%	5	100%			
1	0	0%	1	100%	0	0	0%	0	100%			
	(A) 2,036 135 27 4 1,647 34	(Current Equa Minimur No. (B) 2,036 0 135 0 2,036 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 135 0 0 135 0 0 135 0 0 0 135 0 0 0 0 0 0 0 0 0 0 0 0 0	(Current Financi Equal to Minimum Wage           Total (A)         No. (B)         % (B/A)           2,036         0         %           135         0         0%           135         0         0%           27         0         0%           4         0         0%           1,647         0         0%           34         0         0%           0         0%         0%	Minimum Wage         Minimum           Total         No.         %         No.           No.         %         (B/A)         (C)           Permanent         Emp         (C)         (C)           2,036         0         %         2,036         (C)           135         0         0%         2,036         (C)         (C)           2,036         0         0%         1,35         (C)         (C)         (C)           2,036         0         0%         1,35         (C)         (C)	(Current Financial Year)           Equal to More than Minimum Wage           Minimum Wage         More than Minimum Wage           Total (A)         No.         More than Minimum Wage           2,036         0         %         (C)         (C/A)           2,036         0         0%         2,036         100%           135         0         0%         135         100%           277         0         0%         27         100%           277         0         0%         27         100%           4         0         0%         4         100%           4         0         0%         4         100%           1,647         0         0%         34         100%           34         0         0%         34         100%           34         0         0%         0         0%	(Current Financial Year)           Equal to More than Minimum Wage Minimum Wage           Total (A)         No.         %         No.         %         Total (C)         Total (C/A)         Total (D)           2,036         0         %         2,036         100%         2,791           135         0         0%         135         100%         184           Other than Permanent           27         0         0%         27         100%         257           4         0         0%         4         100%         37           Workers Permanent           1,647         0         0%         34         100%         41           Other than Permanent           0         0%         0%         0%         5	(Current Financial Year)         (Previous More than Minimum Wage           Equal to More than Minimum Wage Minimum Wage         Minimum Wage           Total No.         %         No.         %         Total (D)         Minimum Mage           Total (A)         No.         %         No.         %         More than Minimum Wage         Minimum Mage           Total (A)         No.         %         No.         %         More than Minimum Mage         Minimum Mage           Total (B)         No.         %         No.         %         No.         %         No.         Equal No.         %         %         %         %         %         %         %         %         %         %         %         %         %         %         % <td>(Current Financial Year)(Previous Financial Colspan="4"&gt;(Previous Financial Colspan="4"&gt;(Previous Financial Colspan="4"&gt;(Previous Financial Colspan="4")Equal to More than Minimum WageEqual to Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% % (C)(C/A)Minimum WageTotalNo.%2,0360%2,79100%Other than PermanentUther Workers PermatentOther than Permatent1,64700%3400%Other than PermatentOther than PermatentOther than Permatent00%34100%41000%34100%50Other than Permatent<!--</td--><td>(Current Financial Year)         (Previous Financial Year)           Equal to More than Minimum Wage Minimum Wage         More More Minimum Wage         <th c<="" td=""></th></td></td>	(Current Financial Year)(Previous Financial Colspan="4">(Previous Financial Colspan="4">(Previous Financial Colspan="4">(Previous Financial Colspan="4")Equal to More than Minimum WageEqual to Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% Minimum WageTotalNo.% % (C)(C/A)Minimum WageTotalNo.%2,0360%2,79100%Other than PermanentUther Workers PermatentOther than Permatent1,64700%3400%Other than PermatentOther than PermatentOther than Permatent00%34100%41000%34100%50Other than Permatent </td <td>(Current Financial Year)         (Previous Financial Year)           Equal to More than Minimum Wage Minimum Wage         More More Minimum Wage         <th c<="" td=""></th></td>	(Current Financial Year)         (Previous Financial Year)           Equal to More than Minimum Wage Minimum Wage         More More Minimum Wage         Minimum Wage <th c<="" td=""></th>			

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

#### 3. Details of remuneration/salary/wages, in the following format:

a. Median remuneration/wages:

		Male		Female
	Number	Median remuneration/ salary/wages of respective category	Number	Median remuneration/ salary/wages of respective category
Board of Directors (BoD)	7	33 lac	1	23.25 lac
Key Managerial Personnel	3	6.78 crore	0	NA
Employees other than BoD and KMP	2,063	15.04 lac	139	7.88 lac
Workers	1,647	5.32 lac	35	5.25 lac

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

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Gross wages paid to females as % of total wages	3.59%	4.47%

# 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.

Please refer https://www.acclimited.com/assets/new/pdf/Human%20Rights%20Policy.pdf

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

Please refer https://www.acclimited.com/assets/new/pdf/Human%20Rights%20Policy.pdf

(Practicing Open door policy. Grievance are heard by HR Head and Plant Head and at CMO level)

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

	(Cu	FY 2023-24 Irrent Financial Y	ear)		anuary 2022-March 2023* 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	NA	0	0	NA	
Discrimination at workplace	0	0	NA	0	0	NA	
Child Labour	0	0	NA	0	0	NA	
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA	
Wages	0	0	NA	0	0	NA	
Other human rights related issues	0	0	NA	0	0	NA	

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

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

	FY 2023-24 (Current Financial Year)	FY January 2022-March 2023* (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.

Local plant management have the committee comprising of plant head, HR head and one more person preferably head plant operations. Any complaint regarding discrimination and harassment etc. in specific shall be treated most urgently and will be inquired on priority at the plant level itself.

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

Yes

#### 10. Assessments for the year:

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

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

Proactive measures are taken. At the time of entry of employee or worker, a detailed checklist will be followed to ensure statutory compliance w.r.t. child labour, forced labour and wages without fail. For Sexual harassment, POSH is there in place and for discrimination, local management committee is in place.

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

#### **Essential Indicators**

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

Parameter	FY 2023-24 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
From renewable sources (in Giga Joules)		
Total electricity consumption (A)	352,238	555,120
Total fuel consumption (B)	4,575,702	5,720,000
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	4,927,940	6,275,120
From non-renewable sources (in Giga Joules)		
Total electricity consumption (D)	3,025,541	3,516,840
Total fuel consumption (E)	58,426,300	77,093,000
Energy consumption through other sources (F)	0	0
Total energy consumption (D+E+F)	61,451,841	80,609,840
Total energy consumed (A+B+C+D+E+F)	66,379,781	86,884,960
Energy intensity per rupee of turnover (Total energy consumption/Revenue from operations)	0.000333 GJ/ ₹ of turnover	0.000391 GJ/ ₹ of turnover
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumption/Revenue from operations adjusted for PPP)	hence revenue earn	porting any product, ed is in INR only and is not applicable
Energy intensity in terms of physical output (GJ/tonne of cementitious material)	2.3	2.6
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.

Yes, Intertek India Private Limited

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

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.

- Gagal-1, Gagal-2, Lakheri, Tikaria, Kymore, Chaibasa, Jamul, Bargarh, Wadi, Madhukarai, Chanda, Sindri, Thondebhavi & Kudithini are the Designated Consumer
- All the above designated consumers have achieved their PAT Target except for Chaibasa, Thondebhai & Kudithini
- Chaibasa PAT target was achieved by purchasing EScerts,
- For Thondebhai & Kudithini plant, PAT target will be achieved as per due date FY-2025-26 through purchasing EScerts

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

Parameter	FY 2023-24 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)	
Water withdrawal by source (in kilolitres)			
(i) Surface water	5,201,018	3,417,852	
(ii) Groundwater	1,131,151	807,828#	
(iii) Third party water	78,187	2,439#	
(iv) Seawater/desalinated water	0	0	
(v) Others (Rain Water Harvested)	7,925,778	7,818,146#	
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	14,336,135	12,046,265#	
Total volume of water consumption (in kilolitres)	14,336,135	12,046,265#	
Water intensity per rupee of turnover (Water Consumption in litre/ Revenue in $\vec{*}$ )	0.07	0.05	
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/ Revenue from operations adjusted for PPP)	, , , , , , , , , , , , , , , , , , , ,		
Water intensity in terms of physical output (liters/tonne of cementitious material)	497	364	
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA	

\*\* This include water consumed in township wherever plants have attached townships. It also includes water consumption from harvested water.

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.

Yes, Intertek India Private Limited

- \* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.
- <sup>#</sup> Values of 2022-23 have been updated for Cement Plant, CPP (Captive Power Plant) and Colony. Whereas during previous year reporting withdrawal was considered only for Cement Plant.

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

Parameter	FY 2023-24 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
<ul> <li>No treatment</li> </ul>	0	0
<ul> <li>With treatment – please specify level of treatment</li> </ul>	0	0
(ii) To Groundwater		
– No treatment	0	0
<ul> <li>With treatment – please specify level of treatment</li> </ul>	0	0
(iii) To Seawater		
– No treatment	0	0
<ul> <li>With treatment – please specify level of treatment</li> </ul>	0	0
(iv) Sent to Third Parties (Municipal STP)		
– No treatment	0	0
<ul> <li>With treatment – please specify level of treatment</li> </ul>	0	0
(v) Others		
– No treatment	0	0
<ul> <li>With treatment – please specify level of treatment</li> </ul>	0	0
Total water discharged (in kilolitres)	0	0

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.

Yes, Intertek India Private Limited

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

Zero Liquid Discharge is implemented at all plant locations. No waste water/ treated waste water is discharged outside the plant premises.

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

Parameter	Please specify unit	FY 2023-2024 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
NOx	Tonnes	9,721	18,094.34
SOx	Tonnes	469	1,939.42
Particulate matter (PM)	Tonnes	268	450.7
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.

Yes, Intertek India Private Limited

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

Parameter	Unit	FY 2023-2024 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into $CO_2$ , $CH_4$ , $N_2O$ , HFCs, PFCs, SF6, NF3, if available)	Tonnes of CO <sub>2</sub>	14,800,767	17,467,685
Total Scope 2 emissions (Break-up of the GHG into $CO_2$ , $CH_4$ , $N_2O$ , HFCs, PFCs, SF6, NF3, if available)	Tonnes of $\rm{CO}_2$	601,746	654,793
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	KgCO2/ ₹ of turnover	0.08	0.08
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)		hence revenue	ot exporting any product, earned is in INR only and ment is not applicable
Total Scope 1 and Scope 2 emission intensity in terms of physical output	KgCO2/tonne of cementitious material	534	548
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.

Yes, Intertek India Private Limited

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

The Company is committed to reduce its carbon footprint. It is a signatory to SBTi to be Net Zero by 2050. The 2030 GHG emission reduction targets are validated by SBTi. The Company has taken multiple initiatives to reduce greenhouse gases. These include: 1) Improved technology 2) Energy efficiency 3) Use of renewable energy 4) Use of green energy like WHRS 5) Use of alternate fuels 6) Use of alternate raw materials 7) Reduction in clinker factor and having larger share of green products in its portfolio.

<sup>\*</sup> The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

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

Parameter	FY 2023-24 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	39,206.58	50,766.16
E-waste (B)	45.60	38.70
Bio-medical waste (C)	43.23	0.90
Construction and demolition waste (D)	10,344.31	0
Battery waste (E)	38.00	51.30
Radioactive waste (F)	0.30	0
Other Hazardous waste. Please specify, if any. (G)	77.09	134.2
Other Non-hazardous waste generated (H).Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)"	449,524.84	806,756#
Total (A+B + C + D + E + F + G + H) in metric tonnes	499,279.95	857,748#
Waste intensity per rupee of turnover (Kg/₹ of turnover) (Total waste generated/Revenue from operations)	0.003	0.004
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operations adjusted for PPP)	any product, ł earned is in IN	not exporting nence revenue R only and PPP not applicable
Waste intensity in terms of physical output (kg/tonne of cementitious material)	17	26
Waste intensity (optional) – the relevant metric may be selected by the entity		NA
For each category of waste generated, total waste recovered through recycling operations (in metric tonnes)	g, re-using or oth	ner recovery
Category of waste		te is mainly
(i) Recycled		through
(ii) Re-used	co-processing t and a verv sr	nall quantity
(iii) Other recovery operations	through auth	norised scrap
	dealers. Bio-m	edical waste is

Total

 do-processing by the company and a very small quantity through authorised scrap
 dealers. Bio-medical waste is disposed through incineration of bio-medical waste at
 authorised Common Biomedical Waste Treatment Facilities.
 E-waste and battery waste is recycled through authorised recyclers. Hazardous waste is mainly coprocessed in cement kiln and the quantity which cannot be co-processed is sent to common incinerator.

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) Category of waste

Parameter	FY 2023-24 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
(i) Incineration	Plastic was	
(ii) Landfilling	disposed	-
(iii) Other disposal operations	co-processing b and a very sr	
Total	through auth dealers. Bio-me disposed throug of bio-medic authorised Com Waste Treatm E-waste and ba recycled throu recyclers. Haza mainly coproce kiln and the q cannot be co-pr to common incir no disposal of w	edical waste is gh incineration cal waste at mon Biomedical ent Facilities. attery waste is igh authorised ordous waste is ssed in cement uantity which ocessed is sent nerator. There is

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.

Yes. By Intertek India Pvt. Ltd.

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

# For 2022-23, Flyash data has been updated in Non-Hazardous waste generation which was not considered previous year.

# 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.

Hazardous and non-hazardous Waste generated at all locations is collected and segregated separately as per its characteristics in line with Waste Management Rules for specific wastes. Plastic waste is mainly disposed through co-processing by the Company and a very small quantity through authorised scrap dealers. Bio-medical waste is disposed through incineration of bio-medical waste at authorised Common Biomedical Waste Treatment Facilities. E-waste and battery waste is recycled through authorised recyclers. Hazardous waste is mainly coprocessed in cement kiln and the quantity which cannot be co-processed is sent to common incinerator.

The cement manufacturing process does not generate much hazardous wastes. It mainly consists of waste lubricating oils which are co-processed in cement kilns.

Through the co-processing technology, the Company provides a 'Zero Landfill' solution that doesn't create any additional emission and in addition avoids soil contamination, water and air pollution coming from landfill sites, recovering energy and minerals from the waste materials.

Geoclean helps ACC contribute to safe waste management solutions in industries and municipalities and increase the utilisation of alternative fuels in cement kilns. The Company has been building up stakeholders' awareness on these issues through its advocacy in appropriate forums.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval/clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1.	Kudithini Cement works, Bellary, Karnataka	Cement Grinding	Yes
2.	Sindola Limestone Mines	Mining	Yes
3.	Lakheri Limestone Mines	Mining	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
GAGAL LIMESTONE MINE (M.L. AREA 231.25 Ha) Production Capacity of 4.5 million TPA (Limestone, Shale & Quartzite) with two nos. Crushers, capacity being 1000 TPH & 400 TP	SO. 1533 (E) dated 14 September, 2006 & its amendments	PH completed on 24 August, 2023 for revalidation of EC as per Notification dated 06 April, 2018 of MOEFCC	Yes	Yes	https://hppcb.nic.in/
Revalidation of EC of Lakheri Limestone Mine (ML Area 1516.88 ha) with production capacity of 1.5 MTPA and waste/topsoil 11.25 Lakh CuM per annum (Maximum) with existing Wobbler and screening plant of 400 TPH at villages Gendoli Kala, Gendoli Khurdh, Pholai, Gutha, Mahuwa, Dangaheri, Budel, Kankra, Chamavali, Uttarana, Lkaheri, Sakhoda, Nayagaon & Papadi, Tehsil: Indergarh & Kesoraipatan, District: Bundi, Rajasthan	SO. 1533 (E) dated 14 September, 2006 & its amendments	EC received on 29 December, 2023	Yes	Yes	https://parivesh.nic. in/newupgrade/#/ trackYourProposal
Kannur Limestone block (Auction block) - Maximum production capacity of 12 MTPA Total area 550 ha. located at Village-Ingalgi, Basaveshwaranagara, Halkatta, and Kundanoor, Taluka Chittapur, District Kalaburagi (Karnataka)	•	PH completed on 27 June, 2023	Yes	Yes	https://kspcb. karnataka.gov.in
Proposed Gothra Parasrampura West Block for limestone at Gothra Village, Taluka Navalgarh, District Jhunjunu, Rajasthan	SO. 1533 (E) dated 14 September, 2006 & its amendments	TOR Granted on 29 January, 2024	Yes	Yes	https://parivesh.nic. in/newupgrade/#/ trackYourProposal

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	Co	rrective action taken, if any
1.	Under Section 26 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981	Exceedance of Ambient Air Quality Monitoring results and results of ETP & STP outlets of Cement Plant	Forfeit the Bank Guarantee of ₹ 10 Lakh	1. 2. 3.	plant premises and under shed laying along plant boundary.

# 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: 6
  - b. List the top 10 trade and industry chambers/associations (determined based on the total members of such body) the entity is a member of/affiliated to.

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/ associations (State/National)
1.	Indian Business & Biodiversity Initiative (IBBI)	National
2.	Global Cement Concrete Association (GCCA)	National
3.	Confederation of Indian Industry (CII)	National
4.	National Safety Council (NSC)	National
5.	World Economic Forum (WEF)	International
6.	Science Based Target Initiative	International

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

Name of authority	Brief of the case	Corrective action taken				
None. Company ensures compliance with all anti-trust laws						

All agreements are duly vetted to ensure due compliance with anti-trust laws.

Training modules are circulated to sales/marketing/procurement team from time to time to create awareness on cartelisation/restrictive trade practices

We seek proactive advise/clarifications from external law firms in case of any doubt in any transaction before proceeding ahead with the same

### 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.

Social Impact Assessment is a part of EIA for getting Environment Clearance for projects. All projects listed in Question No 12 of Principle 6 have SIA component in-built as part of the study carried out. In addition, assessing social impacts of the CSR projects is an ongoing process at Adani Foundation, that continues to assess social impacts using platforms such as Social Engagement Scorecard (SES), Community Advisory Panel (CAP) etc. Any social impacts emerging out of these platforms is seriously considered and factored into annual work plan and activities of Adani Foundation.

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. Name of Project for No. 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 ₹)
		NIL		

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

In order to effectively address the grievances of the community, which they may have from time to time, a mechanism is being put in place. A grievance redressal register (GRR) is kept with the CSR in-charge at the site. The community members are encouraged to reach out to the CSR person in-charge via any mechanism including in-person visit to CSR office, phone call or a written letter.

Often times, it so happens that the community representatives register the grievance with the local district administration and the latter then forwards it to the site BU. In such a case, the grievance shall be registered duly in the GRR.

Mechanism to operationalise the system is as follows:

- The person in custody of the grievance register will make an entry as soon as the grievance is received. (Turn Around Time – 2 days)
- 2. The CSR in-charge at site will regularly monitor the register and will lead the efforts to find an amicable resolve to the grievance registered. (Turn Around Time 1 year)
- 3. Any new grievances registered shall be scrutinised and prioritised by the site CSR Head and the important ones (those that may impact the business operations or those matters that are deemed genuinely important by the site CSR Head) shall be promptly brought to the notice of site BU Head. (Turn Around Time – Immediately)
- 4. Once the grievance is addressed adequately, the same shall be marked completed in the GRR.
- 5. A summary report of the grievances received and tackled shall be reported to AF HO on a quarterly basis

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

	FY 2023-24 (Current Financial Year)	FY January 2022- March 2023* (Previous Financial Year)
Directly sourced from MSMEs/ small producers	1.66%	0.33%
Directly from within India	98.97%	99.52%

# 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	(Current	FY 2022-2023 (Previous Financial Year)
Rural	2	231
Semi-urban	0	30
Urban	0	192
Metropolitan	0	119

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

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

#### **Essential Indicators**

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

The Company has provided on its website a dedicated e-mail address wherein the Company receives and responds to consumer complaints and feedbacks. The e-mail address is <u>acchelp@adani.com</u>. In addition, every package has printed customer care details with postal address, toll free phone number and email id.

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	The Company's products confirm to all
Safe and responsible usage	applicable statutory parameters.
Recycling and/or safe disposal	

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

	FY 2023-24 (Current Financial Year)			FY January 2022- March 2023* (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		0	0	
Advertising				0	0	
Cyber-security	0	0		0	0	
Delivery of essential services	0	0		0	0	
Restrictive Trade Practices	24	11	Complaints related to bribery, conflict of interest, asset misappropriation	32	2	Complaints related to bribery, conflict of interest asset misappropriation
Unfair Trade Practices	20	9	Complaints related to Trade Violation	9	1	Complaints related to Trade Violation
Other	16	8		0	0	

\* The Company had changed its financial year end from December to March in FY 23. Therefore, the figure for FY 23 is for 15 months.

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

Yes, https://www.acclimited.com/assets/new/pdf/Cyber%20security%20and%20data%20privacy%20policy.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.

All communications have necessary disclaimer as per Advertising Standard Council of India (ASCI) and Bureau of Indian Standard (BIS) guidelines.

#### 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: Nil
- c. Impacts, if any, of the data breaches : NA