# Business Responsibility and Sustainability Report

## **SECTION A: GENERAL DISCLOSURES**

## I. BASIC DETAILS

01.	Corporate identity number	L99999GJ1975PLC002859
02.	Name	Atul Ltd
03.	Year of incorporation	1975
04.	Registered office address	Atul House, G I Patel Marg, Ahmedabad 380 014, Gujarat, India
05.	Corporate office address	Atul 396 020, Gujarat, India
06.	E-mail address	sec@atul.co.in
07.	Telephone	(+91 2632) 230000
08.	Website	www.atul.co.in
09.	Financial year	2023-24
10.	Stock exchanges	BSE Ltd and National Stock Exchange of India Ltd
11.	Paid-up capital	₹29,44,17,550
12.	Contact person	Mr Bharathy Mohanan (+91 2632) 230000 bn_mohanan@atul.co.in
13.	Reporting boundary	Standalone
14.	Name of assurance provider	Not applicable
15.	Type of assurance obtained	Not applicable

## II. PRODUCTS | SERVICES

## 16. Business activities

No.	Main activity	Business activities	% turnover
1.	Life Science Chemicals	R&D, technology, procurement, manufacturing, sales and marketing	29%
2.	Performance and Other Chemicals	R&D, technology, procurement, manufacturing, sales and marketing	70%
3.	Others	R&D, technology, procurement, manufacturing, sales and marketing	1%

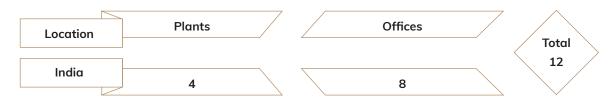
## 17. Products | services sold

No.	Products   Services	NIC* code	% of total turnover
1.	Intermediates	201	38%
2.	Epoxy resins and hardeners	202	33%
3.	Herbicides	202	16%
4.	Textile dyestuffs	202	13%

\*National Informatics Center

## **III. OPERATIONS**

## 18. Number of locations where plants and offices are situated



#### 19. Markets served

## a) Number of locations

Locations	Numbers
National (states)	29
International (countries)	88

## b) Contribution of exports as a percentage of total turnover

43%

## c) Types of customers

The Company serves ~ 4,000 customers belonging to ~ 30 diverse industries.



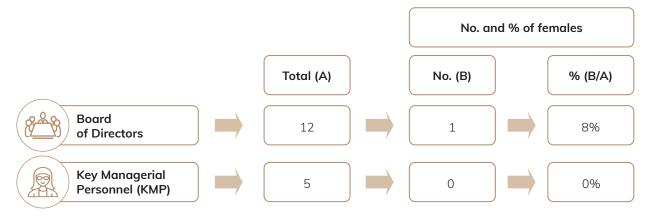
## **IV. EMPLOYEES**

## 20.

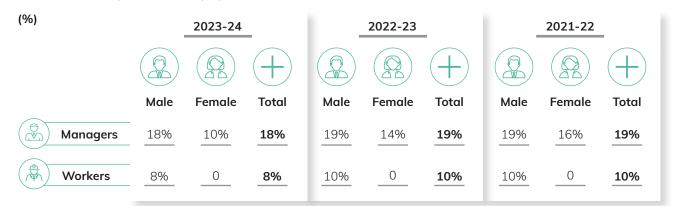
As at the end of the financial year					anagers	Workers	
No.	Particulars	Total (A)	M	ale	Female		
			No. (B)	% (B/A)	No. (C)	% (C/A)	
a)	Employees						
		B					
1.	Permanent managers (A)	1,783	1,620	91%	163	9%	
2.	Other than permanent managers (B)	31	27	87%	4	13%	
3.	Total managers (A+B)	1,814	1,647	91%	167	9%	
4.	Permanent workers (C)	1,472	1,472	100%	_	NA	
5.	Other than permanent workers (D)	2,575	2,540	99%	35	1%	
6.	Total workers (C+D)	4,047	4,012	99%	35	1%	
b)	Differently abled employees						
		B					
1.	Permanent managers (E)	9	9	100%	-	NA	
2.	Other than permanent managers (F)	-	-	NA	_	NA	
3.	Total differently abled managers (E+F)	9	9	100%	-	NA	
4.	Permanent workers (G)	-	-	NA	_	NA	
5.	Other than permanent workers (H)	-	-	NA	-	NA	
6.	Total differently abled workers (G+H)	-	-	NA	-	NA	

NA: not applicable

## 21. Representation of women



### 22. Turnover rate for permanent employees



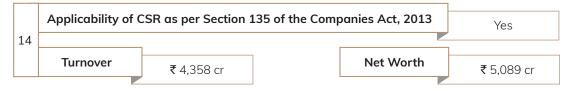
## V. HOLDING, SUBSIDIARY AND ASSOCIATE ENTITIES (INCLUDING JOINT VENTURES)

## 23. Subsidiary, joint venture and associate entities

This information is given on page numbers 40 and 41 in the annexure to the Directors' Report. Business responsibility initiatives of the Company are applicable to the subsidiary, joint venture and associate entities to the extent that they are material in relation to their business activities.

## VI. CORPORATE SOCIAL RESPONSIBILITY

#### 24. Applicability of CSR as per Section 135 of the Companies Act, 2013



## VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

25. Complaints or grievances on any of the nine principles under National Guidelines on Responsible Business Conduct (NGRBC)

Stakeholder			2023-24		2022-23			
group from whom complaint is received	Grievance redressal mechanism and its URL	Complaints received	Complaints pending resolution	Remarks	Complaints received	Complaints pending resolution	Remarks	
Communities		05	Nil	-	Nil	Nil	-	
Shareholders		26	Nil	-	22	Nil	-	
Investors (other than shareholders)	A mechanism is in place to interact with various stakeholders to understand and address their	Nil	Nil	-	Nil	Nil	-	
Employees		Nil	Nil	-	Nil	Nil	-	
Customers	concerns, if any.	Nil	Nil	-	Nil	Nil	-	
Value chain partners		Nil	Nil	-	Nil	Nil	-	

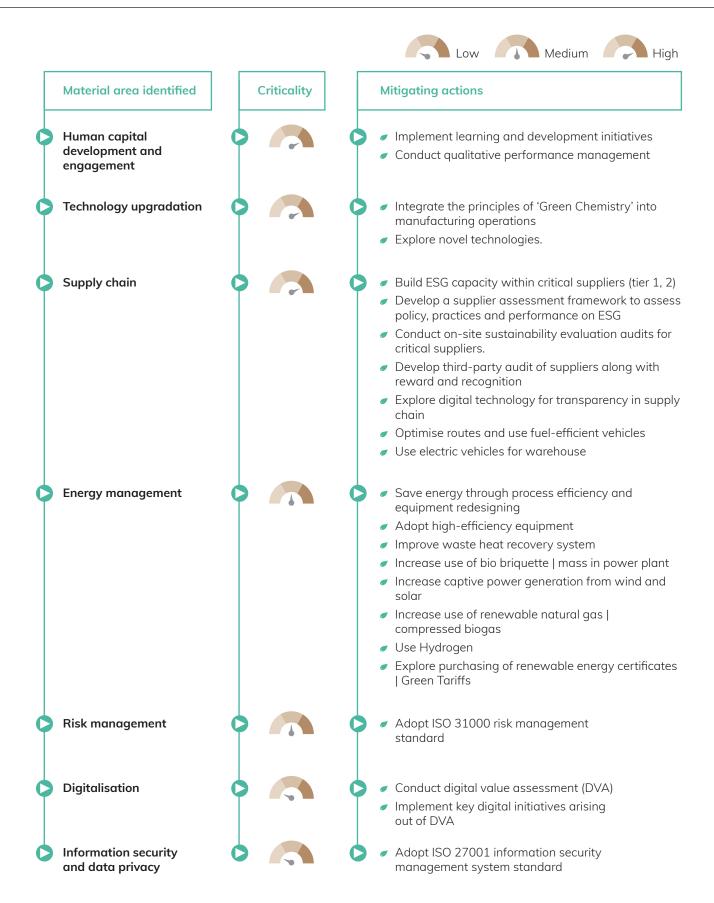


Financial Statements



## 26. Overview of material responsible business conduct areas

		Low Medium High
Material area identified	Criticality	Mitigating actions
Climate change	•	<ul> <li>Validate targets using methods approved by the Science Based Targets initiative (SBTi)</li> <li>Disclose science-based targets</li> <li>Develop a detailed decarbonisation plan</li> <li>Implement energy efficiency measures</li> <li>Switch from fuel to renewable energy</li> <li>Switch from purchased grid electricity to renewable electricity</li> <li>Explore carbon credit or offset mechanisms</li> </ul>
Water management	•	<ul> <li>Conduct internal and external water audits</li> <li>Develop a comprehensive monitoring mechanism</li> <li>Implement rainwater harvesting projects to augment supply at watershed level</li> <li>Explore opportunities to use benign solvents instead of water</li> <li>Switch to waterless technologies for cleaning the vessels</li> <li>Use greywater for toilets</li> <li>Install process &amp; steam condensate recovery system</li> <li>Recycle water</li> </ul>
> Waste management	•	<ul> <li>Include green chemistry principles to reduce hazardous waste</li> <li>Invest in solar dryers to reduce hazardous waste</li> <li>Continue with persistent efforts to extract value-added products from waste stream</li> <li>Convert waste to raw materials</li> <li>Include sustainability parameters throughout the R&amp;D process</li> <li>Decrease emissions, effluent and waste</li> <li>Recycle plastic waste</li> <li>Convert domestic waste to manure</li> </ul>
Customer relations	•	<ul> <li>Increase brand visibility</li> <li>Engage with customers through multiple channels</li> <li>Integrate customer needs into internal processes</li> <li>Improve customer satisfaction index</li> </ul>
Occupational health and safety	•	<ul> <li>Implement ISO 45001:2018 (occupational health and safety management systems)</li> <li>Initiate actions on zero harm</li> <li>Conduct assessments and audits</li> </ul>





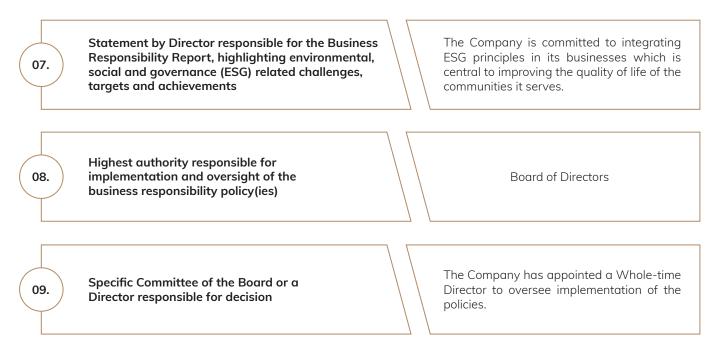
## **SECTION B:** MANAGEMENT AND PROCESS DISCLOSURES

NGRBC principles and core elements

NGRBC released by the Ministry of Corporate Affairs has adopted nine principles related to business responsibility. They are as follows:

P1	Businesses will conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.
P2	Businesses will provide goods and services in a manner that is sustainable and safe.
P3	Businesses will respect and promote the well-being of all employees, including those in their value chains.
P4	Businesses will respect the interests of and be responsive to all their stakeholders.
P5	Businesses will respect and promote human rights.
P6	Businesses will respect and make efforts to protect and restore the environment.
P7	Businesses, when engaging in influencing public and regulatory policy, will do so in a manner that is responsible and transparent.
P8	Businesses will promote inclusive growth and equitable development.
P9	Businesses will engage with and provide value to their consumers in a responsible manner.

								~	Yes	× No
Disclosure questions		P1	P2	P3	P4	P5	<b>P6</b>	P7	<b>P8</b>	<b>P9</b>
Poli	cy and management processes									
01.	a) The policy   policies cover each principle and its core elements	~	~	~	~	~	~	~	~	~
	b) Policy approved by the Board	~	~	~	~	$\checkmark$	~	<ul> <li></li> </ul>	$\checkmark$	~
	c) URL of the policies	The Company is in the process of publishing these points website.					se poli	cies on		
02.	The policies are translated into procedures	~	~	<ul> <li></li> </ul>	~	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	<ul> <li>✓</li> </ul>
03.	The enlisted policies extend to the value chain partners	~	~	$\checkmark$	~	~	$\checkmark$	$\checkmark$	~	~
04.	Name of the national and international codes   certifications   labels   standards adopted and mapped against each principle	The Company has developed policies for its significant								
05.	Specific commitments, goals and targets set with defined timelines, if any	The Company is engaging with subject matter experts and actively pursuing sustainability improvement agenda.						ts and		
06.	Performance against the specific commitments, goals and targets along with reasons in case the same are not met	Not applicable								

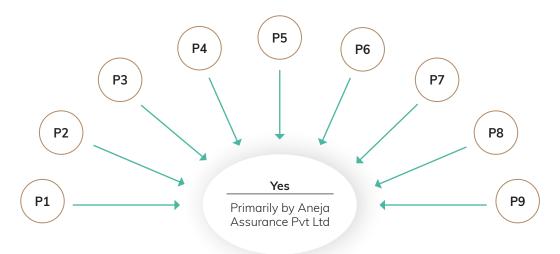


## GOVERNANCE, LEADERSHIP AND OVERSIGHT

10. Details of review of national guidelines for responsible business conduct

Subject for review		Review by Director   a Committee of the Board   any other committee and its frequency								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	
Performance against the above policies and follow-up action	Quarterly									
Compliance with statutory requirements of relevance to the principles and rectification of any non-compliance	Quarterly									

#### 11. Independent assessment | evaluation of the working of its policies by an external agency and name of the agency





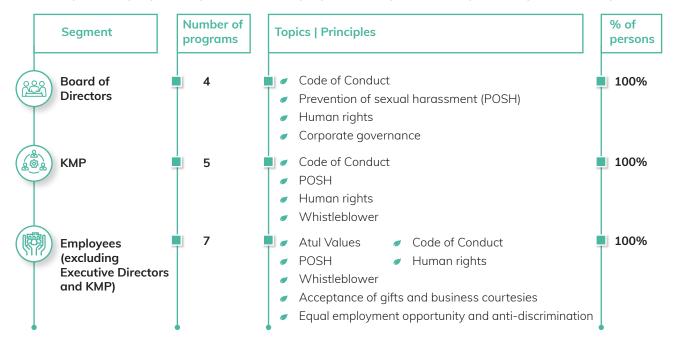
## **SECTION C:** PRINCIPLE-WISE PERFORMANCE DISCLOSURES

## PRINCIPLE 1

Businesses will conduct and govern themselves with integrity and in a manner that is ethical, transparent and accountable.

## **Essential indicators**

01. Percentage coverage by training and awareness programs on any of the Principles during the financial year



## 02. Fines | penalties | punishments | awards | compounding fees | settlement amount paid in proceedings (by the Company or by the Directors | KMP) with regulators | law enforcement agencies | judicial institutions, in the financial year

a) Monetary

Туре	NGRBC principle	Name of the regulatory   enforcement agencies   judicial institutions	Amount Brief of the case		Has an appeal been preferred?
Penalty   fine	-	-	Nil		-
Settlement	-	Nil		-	
Compounding fee	_	_		Nil	-

## b) Non-monetary

Туре	NGRBC principle	Name of the regulatory   enforcement agencies   judicial institutions	Brief of the case	Has an appeal been preferred?	
Imprisonment	-	-	-	-	
Punishment	-	-	_	-	

The Company or its Directors | KMPs were not subjected to any fines | penalties | settlements | compounding fees | imprisonments | punishments for the reporting period.

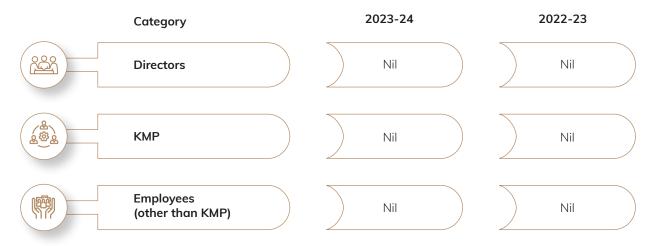
## 03. Appeal | revision preferred in cases where monetary or non-monetary action has been appealed

Not applicable.

#### 04. Anti-corruption or bribery policy and URL of the policy

The Company has a dedicated code of conduct covering anti-corruption and anti-bribery aspects. The Code of Conduct has been published on the Company website: www.atul.co.in/investors/policies

## 05. Directors | KMP | employees (other than KMP) against whom disciplinary action was taken by any law enforcement agency for the charges of bribery | corruption



## 06. Complaints with regard to conflict of interest

	202	3-24	2022-23		
	Number	Remarks	Number	Remarks	
Conflict of interest of the Directors	Nil	Nil	Nil	Nil	
Conflict of interest of KMP	Nil	Nil	Nil	Nil	

07. 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

#### 08. Number of days of accounts payable

	2023-24	2022-23
	Days	Days
Number of days of accounts payable	57	50

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## 09. Openness of business

		2023-24	2022-23
	Purchases from trading houses as % of total purchases	9%	11%
Concentration of purchases	Number of trading houses where purchases are made from	306	289
or purchases	Purchases from top 10 trading houses as % of total purchases from trading houses	5%	7%
	Sales to dealers   distributors as % of total sales	27%	25%
Concentration of sales	Number of dealers   distributors to whom sales are made	2,567	2,434
UI SUICS	Sales to top 10 dealers   distributors as % of total sales to dealers   distributors	51%	54%
	Purchases with related parties as % of total purchases	5%	6%
	Sales to related parties as % of total sales	14%	17%
Share of related party transactions	Loans and advances given to related parties as % of the total loans and advances	100%	100%
	Investments in related parties as % of total investments made	56%	33%

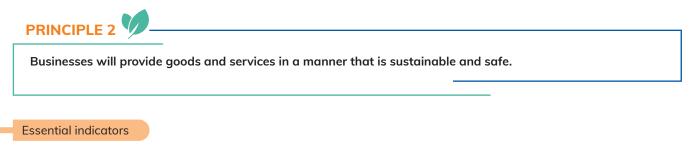
## Leadership indicators

01. Training and awareness programs conducted for value chain partners on any of the Principles during the financial year

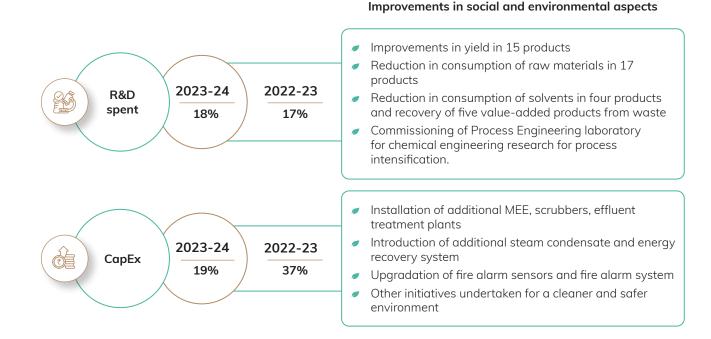
Number of program	Topics   Principles	% of value chain partners
1	<ul> <li>Introduction of capacity building program for Red Category suppliers (TIER III)</li> <li>Adaptation of programs to build awareness regarding sustainable practices</li> <li>Implementation of ESG responsibility in the organisation</li> <li>Implementation and execution of human rights and labour laws</li> <li>Adaptation of Sustainability Development Goals in sustainable practices</li> </ul>	59%

## 02. Processes to avoid | manage conflict of interest involving members of the Board

The Company has a dedicated code of conduct to manage conflicts of interest involving members of the Board. The code of conduct is available on the website of the Company: www.atul.co.in/investors/policies



01. Percentage of research and development (R&D) spent and capital expenditure (CapEx) in specific technologies to improve environmental and social impacts of products and processes to total R&D spent and CapEx, respectively



#### **02.** a) Procedures for sustainable sourcing:

- The Company has procedures in place for sustainable sourcing.
- The URL to its responsible sourcing policy is: www.atul.co.in/economic-sustainability/responsible-procurement/

## b) Percentage of inputs sourced sustainably:

92%

03. Processes to safely reclaim products for reusing, recycling and disposing of at the end of life, for a) plastics (including packaging), b) e-waste, c) hazardous waste and d) other waste

The Company follows the applicable processes laid down by the regulatory authorities.

04. Applicability of extended producer responsibility (EPR) to the activities of the Company and whether the waste collection plan is in line with the EPR plan submitted to pollution control boards

EPR is applicable to the activities of the Company and the waste collection plan is in line with the EPR plan submitted to the Central Pollution Control Board.



Leadership indicators

01. Life cycle perspective | assessment (LCA) for products

The Company has conducted a LCA for four products and product carbon footprint for six products across businesses.

02. Significant social or environmental concerns and | or risks arising from production or disposal of products identified in LCA or through any other means and their mitigation

There were no significant social or environmental concerns and | or risks arising from the production or disposal of products.

03. Recycled or reused input material to total material (by value) used in production (for the manufacturing industry) or providing services (for the service industry)

The Company has in-house facilities to recycle its waste and is continuously striving to maximise it. At present, it is recycling 5.13% of its waste.

04. Products and packaging reclaimed at the end of their life cycles and, reused, recycled, and safely disposed (in metric tonnes)

		2023-24		2022-23			
	Reused	Recycled	Safely disposed	Reused	Recycled	Safely disposed	
Plastics (including packaging)	Nil	1759	145	Nil	Nil	Nil	
E-waste							
Hazardous waste	Nil	Nil	Nil	Nil	Nil	Nil	
Other waste							

**05.** Reclaimed products and their packaging materials (as a percentage of products sold) for each product category Not applicable



## PRINCIPLE 3

Businesses will respect and promote the well-being of all employees, including those in their value chains.

## Essential indicators

## **01.** a) Details of measures for the well-being of managers

					% of mar	nagers co	overed by	/				
Category	Total	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities		
	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)	
Permanent managers												
Male	1,620	1,620	100%	1,620	100%	-	NA	125	8%	3	0.2%	
Female	163	163	100%	163	100%	11	7%	_	NA	1	0.6%	
+ Total	1,783	1,783	100%	1,783	100%	11	0.6%	125	0.7%	4	0.2%	
			0	ther thar	n permane	ent manc	igers					
Male	27	-	NA	27	100%	-	NA	_	NA	-	NA	
Female	4	-	NA	4	100%	-	NA	-	NA	-	NA	
(+) Total	31	-	NA	31	100%	-	NA	-	NA	-	NA	

## b) Measures for the the well-being of workers

					% of wo	rkers co	vered by					
Category	Total	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities		
	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)	
Permanent workers												
Male	1,472	1,472	100%	1,472	100%	-	NA	-	NA	-	NA	
Female	-	-	NA	-	NA	-	NA	-	NA	-	NA	
(+) Total	1,472	1,472	100%	1,472	100%	-	NA	-	NA	-	NA	
			0	ther thar	n perman	ent work	ers					
Male	2,540	-	NA	2,540	100%	-	NA	-	NA	-	NA	
Female	35	_	NA	35	100%	-	NA	_	NA	-	NA	
	2,575	-	NA	2,575	100%	-	NA	-	NA	-	NA	



## c) Spending on measures towards the well-being of employees and workers

	2023-24	2022-23
Cost incurred on well-being measures as a % of total revenue	0.02	0.04

## 02. Retirement benefits for current financial year and previous financial year

			2023-2	24	2022-23			
No.	Benefits	Managers	Workers	Deducted and deposited with the authority	Managers	Workers	Deducted and deposited with the authority	
1.	Provident fund	100%	100%	Yes	100%	100%	Yes	
2.	Gratuity	100%	100%	NA	100%	100%	NA	
3.	Employee state insurance	8%	67%	Yes	0.5%	16%	Yes	
4.	Others (please specify)	NA	NA	NA	NA	NA	NA	

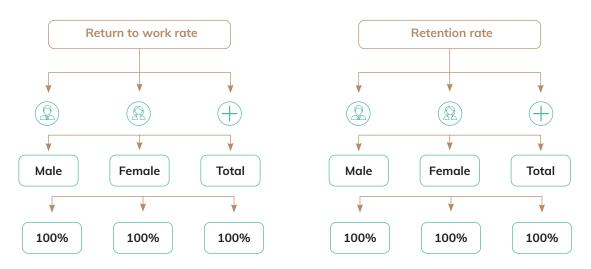
## 03. Accessibility of workplaces

Most of the working locations are accessible to differently-abled persons.

## 04. Equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016

The Company provides equal opportunities to all its employees and to all eligible applicants for employment in the Company.

## 05. Return to work and retention rates of permanent employees who took parental leave in the financial year



## 06. Grievance redressal mechanism for employees



## 07. Membership of employees in recognised association(s) or union(s)

		2023-24		2022-23			
Category	Total employees (A)	Employees who are part of association(s) or unions (B)	% (B/A)	Total employees (C)	Employees who are part of association(s) or unions (D)	% (D/C)	
		Perm	nanent employe	es			
Male	3,092	294	10%	3,049	346	11%	
Female	163	-	0%	139	-	0%	
Total	3,255	294	9%	3,188	346	11%	

## 08. Training given to employees

		2	Ļ	2022-23							
Category	Total employees (A)	Total nployees (A) training % and safe imparted (B/A) training		Health and safety training imparted (C)	% (C/A) Total employees (D)		Skill training imparted (E)	% (E/D)	Health and safety training imparted (F)	% (F/D)	
	Permanent employees										
Male	3,092	1,413	46%	2943	95%	3,049	1,337	44%	409	13%	
Female	163	146	90%	52	32%	139	19	14%	32	23%	
(+) Total	3,255	1,559	48%	2995	92%	3,188	1,356	43%	441	14%	



## 09. Performance and career development reviews of employees

		2023-24		2022-23							
Category	Total employees (A)	nployees had a career		Total employees (C)	Employees who had a career review (D)	% (D/C)					
Permanent employees											
Male	3,092	1,620	52%	3,049	1,620	53%					
Female	163	163	100%	139	139	100%					
(+) Total	3,255	1,783	55%	3,188	1,759	55%					

## 10. Health and safety management system

Implementation of occupational health and safety management systems	The Company has implemented ISO 45001:2018 management system standard
Coverage of such a system	100%
Processes used to identify work-related hazards and assess risks on a routine and non-routine basis	<ul> <li>environment, health and safety management system audit procedure</li> <li>hazard operability and what-if study procedure</li> <li>hazard identification and risk assessment procedure</li> <li>management of change procedure</li> <li>permit to work system</li> <li>safety observation audit system</li> <li>pre-startup safety review</li> <li>environment, health and safety review for greenfield expansion projects</li> <li>quantitative risk assessment study</li> <li>hazardous area classification study</li> </ul>
Processes for workers to report the work-related hazards and to remove themselves from such risks	The Company has requisite processes in place like the joint safety committee, safety observation audit and internal   external complaint management.
Access to employees to non-occupational medical and healthcare services	The employees have the requisite access to Atul Foundation Health Center for the non-occupational medical and health care services. The center is staffed with full-time doctors and round-the-clock paramedical staff and is equipped with ICU ambulance.

#### afat 11.

Safety related incidents		Manage	ers Workers
Safety incident   number	Category	2023-24	2022-23
Lost time injury frequency rate		0.13	-
(per one million-person hours worked)		0.1	0.05
Total recordable work-related injuries		3	10
Total recoludble work-related injuries		14	16
Number of fatalities		-	-
Number of futurities		-	1
High consequence work-related injury or ill-health			-
(excluding fatalities)		-	-

#### 12. Measures taken to ensure a safe and healthy workplace

The Company has environment, health and safety (EHS) policy. To ensure steady improvement in EHS performance, it is adopting voluntary standards such as ISO 45001.

### 13. Complaints made by employees

		2023-24		2022-23			
Category	Filed	Pending resolution	Remarks	Filed	Pending resolution	Remarks	
Working conditions	-	-	Not applicable	-	-	Not applicable	
Health and safety	-	-	Not applicable	-	-	Not applicable	

### 14. Plants and offices assessed (by the Company | statutory authorities | third-parties)



## 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 and safety practices and working conditions

- strengthened 'line breaking work permit' system
- implemented 'closed solid charging' for the identified equipment
- installed fall arrestor system for tanker loading and unloading operations
- implemented breathing air system across the identified plants
- conducted training on process safety testing
- procured 'advanced fire tender' for emergency response
- upgraded occupational health center
- developed guidelines for scaffolding erection and inspection



Leadership indicators

## 01. Extension of life insurance or other compensatory package in the event of death



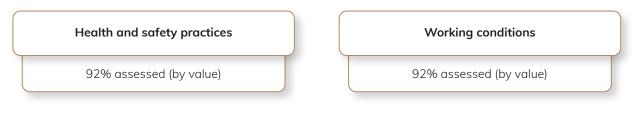
- 02. Measures undertaken to ensure that statutory dues are deducted and deposited by the value chain partners
  - conducted quarterly audits of all statutory records and compliances maintained by the contractors
  - imposed appropriate penalty on the contractor as per the defined standard operating procedure in case of any non-compliance with reference to provident fund remittance, payment of professional tax, employee compensation, etc.
- 03. Number of managers | workers having suffered high consequence work-related injury | ill-health | fatalities (as reported in Q11. of essential indicators, above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment

Category	Affe managers	cted   workers	Managers   Workers who   whose family members have been rehabilitated		
	2023-24	2022-23	2023-24	2022-23	
Managers   Workers	Nil	Nil	Nil	Nil	

04. Transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment

The Company does not have any formal transition assistance program. Support is however provided on a case-to-case basis.

05. Assessment of value chain partners



## 06. Corrective actions taken or underway to address significant risks | concerns arising from assessments of health and safety practices and working conditions of value chain partners

For contractors working in Atul premises:

Training of all the contractors along with their manpower is being done on a monthly basis. Every month a new topic related to ESG parameters is taken and a quarterly safety refresher course is done.

PRINCIPLE 4

Businesses will respect the interests of and be responsive to all its stakeholders.

## **Essential indicators**

## 01. Processes for identifying key stakeholder groups of the Company

Internal and external groups of stakeholders have been identified - they comprise employees, customers, suppliers, communities and shareholders.

### 02. Key stakeholder groups and the frequency of engagement with vulnerable | marginalised groups

Stakeholder group	Vulnerable   marginalised group	Channels of communication	Frequency of engagement	Purpose and scope of engagement
Employees	No	e-mails, goal setting and performance appraisal review, intranet, talks and letters of Senior Management, websites, etc	ongoing	business information and Company policies, career progression, ement, role rotation, training and development, etc
Customers	No	e-mails, information on packaging, personal meetings, portal, social media, surveys, telephone, website, etc	ongoing	feedback, launches, products and formulations technical service, etc
Suppliers	No	e-mails, information on packaging, personal meetings, portal, surveys, telephone, website, social media, etc	ongoing	feedback, requirement of materials and services, technical service, etc
Government	No	e-mails, letters, representations, personal meetings, etc	ongoing	payment to exchequers, policy advocacy, statutory approvals, etc
Community	No	meetings, visits, projects, etc	ongoing	education, empowerment, health, infrastructure, relief, conservation, etc
Shareholders	No	analyst meet, annual general meeting, annual report, stock exchange intimations, newspapers, website, etc	ongoing	information about business and statutory approvals

## Leadership indicators

01.	Processes for consultation between stakeholders and the Board on economic, environmental and social topics or if consultation is delegated	Business I Function heads interact with the aforesaid stakeholders and provide key updates to the Board.
02.	Details of instances as to how the inputs received from stakeholders on the management of environmental and social topics were incorporated into policies and activities of the Company	Environmental and social topics are reviewed and shortlisted based on the materiality study, and standard operating procedures are updated   introduced.
03.	Details of instances of engagement with and actions taken to address the concerns of vulnerable   marginalised stakeholder groups	The concerns of the vulnerable   marginalised stakeholder groups are mainly addressed by Atul Foundation Trust through six programs, namely, education, empowerment, health, infrastructure, relief and conservation.



## PRINCIPLE 5

Businesses will respect and promote human rights.

## Essential indicators

## 01. Employees who have been trained on human rights issues and policy(ies)

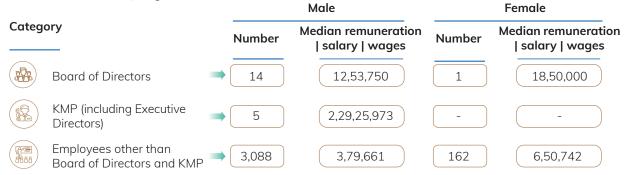
Category	2023-24			2022-23				
	Total (A)	Covered (B)	% (B/A)	Total (C)	Covered (D)	% (D/C)		
Employees								
Permanent	3,255	1,783	55%	3,188	1,537	48%		
Other than permanent	2,607	-	0%	2,601	-	0%		
Total employees	5,862	1,783	30%	5,789	1,537	27%		

## 02. Minimum wages paid to employees

			2023-24	1				2022-23	3	
Category	Equa Total minimun					Total	Equal to minimum wage		More than minimum wage	
	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	(D)	No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent employees										
Male	3,092	-	NA	3,092	100%	3,045	-	NA	3,045	100%
Female	163	-	NA	163	100%	139	-	NA	139	100%
			Other t	han perma	nent emp	loyees				
Male	2,540	2,540	100%	-	NA	2,558	2,558	100%	-	NA
Female	35	35	100%	-	NA	43	43	100%	-	NA

## 03. Remuneration | Salary | Wages

## a) Median remuneration | wages



## b) Gross wages

	2023-24	2022-23
Gross wages paid to females as % of total wages	4.83%	4.13%

## 04. Focal point (individual | committee) responsible for addressing human rights impacts or issues caused or contributed to by the business:

Under progress.

#### 05. Internal mechanisms to redress grievances related to human rights issues

The mechanism to redress grievances under human rights is the same as for other grievances. An independent investigation is carried out by gathering, validating and analysing relevant information. Appropriate action(s) is(are) taken based on the recommendations.

### 06. Complaints made by employees

Category		2023-24		2022-23			
	Filed	Pending resolution	Remarks	Filed	Pending resolution	Remarks	
Child labour	-	-	NA	-	-	NA	
Discrimination at workplace	-	-	NA	-	-	NA	
Forced labour   involuntary labour	-	-	NA	-	-	NA	
Sexual harassment	-	-	NA	-	-	NA	
Wages	-	-	NA	-	-	NA	
Other human rights related issues	_	_	NA	-	-	NA	

## 07. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

	2023-24	2022-23
Total complaints reported under the Act	_	_
Complaints on the Act as a % of female employees	_	_
Complaints upheld	_	_

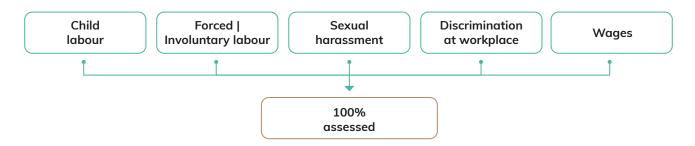
## **08.** Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases Appropriate measures such as confidentiality, protecting the complainant, etc are mentioned in the respective policies.

### 09. Inclusion of human rights in business agreements and contracts

Adherence to human rights form a part of the business agreements and contracts.

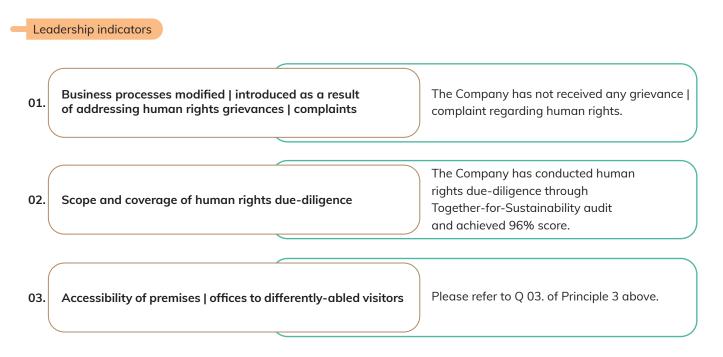


## 10. Plants and offices assessed (by the Company | statutory authorities | third-parties)

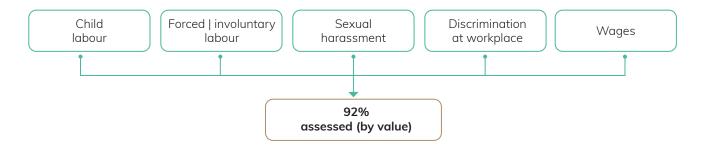


11. Corrective action taken or underway to address significant risks | concerns arising from the assessments mentioned in Q 09. above

There were no significant risks | concerns arising from the human rights assessment.



## 04. Assessment of value chain partners (by value):



05. Corrective action taken or underway to address significant risks | concerns arising from the assessments as mentioned in Q 04. above

There were no significant risks | concerns arising from the assessment of value chain partners.

PRINCIPLE 6

Businesses will respect and make efforts to protect and restore the environment.

## Essential indicators

## 01. Total energy consumption (in gigajoules) and energy intensity

Parameter	2023-24	2022-23
From renewable sources		
Total electricity consumption (A)	1,90,285	90,777
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	1,90,285	90,777
From non-renewable sources		
Total electricity consumption (D)	3,15,711	4,50,450
Total fuel consumption (E)	90,88,318	84,78,228
Energy consumption through other sources (F)	4,33,320	1,95,958
Total energy consumed from non-renewable sources (D+E+F)	98,37,350	91,24,636
Total energy consumed (A+B+C+D+E+F)	1,00,27,635	92,15,413
Energy intensity per rupee of turnover (gigajoules per million rupee)	230.10	184.23
Energy intensity per turnover adjusted for PPP (gigajoules per million USD)	Not applicable	Not applicable
Energy intensity per physical output (gigajoules per tonne)	20.93	20.02

## Independent assessment | evaluation | assurance by an external agency

Escon Tech carried out the evaluation of electricity consumption and Ernst & Young provided the methodology for calculation.

## 02. Sites | Facilities identified as designated consumers (DCs) under the Perform, Achieve and Trade Scheme (PATs) of Government of India

Power plant and caustic | chlorine plant have been identified as DC under the PAT Scheme. The Company has started disclosing PAT targets from 2020. During PAT cycle 2019-2022, it succeeded in achieving an energy consumption rate of 0.81 tonnes of oil equivalent for each tonne of production, surpassing the set target of 0.874.



## 03. Disclosures related to water

Par	ameter	2023-24	2022-23	
Wa	ter withdrawal by source (in kL)			
a)	Surface water	39,82,287	36,24,396	
b)	Groundwater	-	2,27,872	
C)	Third-party water	-	-	
d)	Seawater   desalinated water	-	-	
e)	Others (rainwater storage)	-	-	
Total volume of water withdrawal (in kL) (a+b+c+d+e)		39,82,287	38,52,268	
Tot	al volume of water consumption (in kL)	39,82,287	38,52,268	
Water intensity per rupee of turnover (kL per ₹ cr of revenue)		913.79	770.15	
Water intensity per turnover adjusted for Purchasing Power Parity (PPP) (kL per USD)		Not applicable	Not applicable	
Wa	ter intensity per physical output (kL per tonne of product)	8.31	8.37	

## Independent assessment | evaluation | assurance by an external agency

Independent assessment | evaluation | assurance carried out by Gujarat Pollution Control Board (GPCB), scheduled auditors approved by GPCB and Irrigation Department of Gujarat.

## 04. Water discharge

Parameter		2023-24	2022-23
Desti	nation and level of treatment (in kL)		
a)	To surface water		
	No treatment	_	-
	With treatment – level of treatment	-	-
b)	To groundwater		
	No treatment	_	-
	With treatment – level of treatment	-	-
C)	To seawater	36,63,704	33,25,819
	No treatment	_	-
	With treatment – level of treatment	36,63,704 advanced treatment	33,25,819 advanced treatment

Parameter		2023-24	2022-23
d)	Sent to third-parties		
	No treatment	-	-
	With treatment – level of treatment	-	-
e)	Others		
	No treatment	-	-
	With treatment – level of treatment	-	-
Total	water discharged (in kL)	36,63,704	33,25,819

## Independent assessment | evaluation | assurance by an external agency

Independent assessment | evaluation | assurance carried out by Gujarat Pollution Control Board (GPCB), scheduled auditors approved by GPCB.

## 05. Coverage and implementation of zero liquid discharge (ZLD)

ZLD is fully implemented in the Ankleshwar and Tarapur manufacturing sites and one area in Atul site. Project is under commissioning to make one of the three areas at Atul site ZLD facilities.

#### 06. Air emissions other than greenhouse gas (GHG) emissions

Parameter	Unit	2023-24	2022-23
NOx	tonnes/year	79.44	65.78
SOx	tonnes/year	58.62	62.73
Particulate matter (PM)	tonnes/year	17.11	15.10
Persistent organic pollutants (POPs)	tonnes/year	NA	NA
Volatile organic compounds (VOCs)	tonnes/year	NA	NA
Hazardous air pollutants (HAPs)	tonnes/year	8.19	5.50
Others – please specify	tonnes/year	-	-

### Independent assessment | evaluation | assurance by an external agency

Independent assessment | evaluation | assurance carried out by National Accreditation Board for Testing and Calibration Laboratories and The Ministry of Environment, Forest and Climate Change, Government of India accredited agency.





## 07. GHG emissions (Scope 1 and Scope 2 emissions) and their intensity

Parameter	Unit	2023-24	2022-23
Total Scope 1 emissions	tCO <sub>2</sub> e	8,29,109	7,73,047
Total Scope 2 emissions	tCO <sub>2</sub> e	86,432	1,06,605
Total Scope 1 and Scope 2 emissions	tCO <sub>2</sub> e	9,15,541	8,79,652
Total Scope 1 and Scope 2 emissions per million ₹ of turnover	tCO <sub>2</sub> e	21.01	17.59
Total Scope 1 and Scope 2 emission intensity per turnover adjusted for Purchasing Power Parity (PPP)	tCO <sub>2</sub> e/USD	Not applicable	Not applicable
Total Scope 1 and Scope 2 emission intensity per physical output	tCO <sub>2</sub> e/tonne	1.91	1.91

## Independent assessment | evaluation | assurance by an external agency

Methodology provided by Ernst & Young.

## 08. Projects related to reducing GHG emissions

- reduction of steam consumption by utilising waste heat of distillation for air-preheater
- replacement of compact fluorescent lamps by light emitting diode fittings
- reduction of steam consumption in de-aerator by preheating water through heat recovery from dryer
- replacement of old tray dryer with efficient tray dryer
- reduction of air compressor power consumption by using common compressor for multiple plants

- reduction of PNG consumption by increasing feed concentration
- installation of steam recovery set-up to recover low-pressure steam from distillation column
- replacement of hot water wash with cold water wash in filter press
- use of steam distilled solvent instead of vacuum distilled solvent for batch charging
- reduction of air compressor power consumption by reducing air pressure

## 09. Waste management

Waste generated (in metric tonnes)	2023-24	2022-23
Plastic waste (A)	239.20	510.30
E-waste (B)	2.92	-
Bio-medical waste (C)	0.37	0.60
Construction and demolition waste (D)		-
Battery waste (E)	3.38 171 numbers	4.99 173 numbers
Radioactive waste (F)		
Other hazardous waste (G)	87,237.69	1,22,818.74
Other non-hazardous waste (H)	96,706.23	41,979.41
Total waste generated in tonnes	1,84,189.79	1,65,314.04
Waste intensity per rupee turnover (tonne per rupee cr)	42.26	33.05
Waste intensity per turnover adjusted for PPP (tonne per USD)	Not applicable	Not applicable
Waste intensity per physical output (tonne per tonne)	0.38	0.36

Waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

	2023-24	2022-23
(i) Recycled	83,054.72	1,15,310.67
(ii) Reused	-	-
(iii) Other recovery operations	-	-
Total	83,054.72	1,15,310.67

## Waste disposed by nature of disposal method (in metric tonnes)

	2023-24	2022-23
(i) Incineration	116.22	205.30
(ii) Landfilling	4,066.75	7,813.67
(iii) Other disposal operations	-	-
Total	4,182.97	8,018.97

Independent assessment | evaluation | assurance by an external agency

No assessment | evaluation | assurance has been carried out by an external agency



## 10. Waste management practices and strategies adopted to reduce the usage of hazardous and toxic chemicals in the products and processes and the practices adopted to manage such wastes

The Company has state-of-the-art research and development laboratories which has, amongst others, mandate to decrease | reuse | recycle hazardous and toxic wastes.

Hazardous and toxic wastes management SOP (SOP/INC/11) describes the procedure to collect, store, transport and disposal of hazardous and toxic wastes. Such wastes are dealt with as per the consolidation, consent and authorisation and complying with all requirements of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

11. 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

Not applicable

- 12. Impact assessments of projects undertaken based on applicable laws in the current financial year Nil
- 13. Compliance with the applicable environmental laws | 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

The Company is compliant with the applicable laws | regulations | guidelines.

Leadership indicators

01. Water withdrawal, consumption and discharge in areas of water stress (in kL)

Not applicable

02. Scope 3 emissions and their intensity

The Company has not carried out Scope 3 emissions calculation.

03. With respect to the ecologically sensitive areas reported in Q 11. of essential indicators above, details of significant direct and indirect impact on biodiversity in such areas along with prevention and remediation activities

Not applicable.



## 04. Specific initiatives or innovative technologies or solutions undertaken to improve resource efficiency or reduce impact due to emissions | effluent discharge | waste generation

Initiative undertaken	Details of the initiative	Outcome of the initiative
Development of a green belt around plants and colonies (AS)	Planted 7,67,850 saplings in the last 14 years for the development of a green belt	Sequestration of carbon
Elimination of volatile organic compounds (VOCs) and toxic chemical exposure	Equipped reactors with vents   stacks to vapour recovery systems   scrubbers	Reduction in process stack emissions
Enhancement of the capacity of CETP	Added equipment for better treatment	Ease of operation at CETP
Improvement of the effluent quality	Added equipment for better treatment	Decrease in COD load at ETP
Revamp of effluent collection and transfer from source to ETP	Segregated acidic and basic effluent streams from the source	Decrease in effluent load at CETP
Elimination of high TDS load on effluent treatment plant	Installed separate MEE for the high TDS effluent from identified plant	Decrease in TDS load at ETP
Elimination of contaminated water run-off	Constructed storm water pit with pumping and pH meter facility to transfer to effluent treatment plants	Reduction in chances of contaminated water run-off
Improvement of effluent quality	Developed bio-treatment process	Decrease in phenolics and COD load at ETP

## 05. Business continuity and disaster management plan

The Company has a disaster management plan included in the offsite and onsite emergency plan.

Offsite emergency rehearsals as per the plan are conducted at periodic intervals decided by external authorities at Ankleshwar, Atul and Tarapur sites.

06. Significant adverse impact to the environment, arising from the value chain and their mitigation or adaptation measures

There is no significant adverse impact to the environment arising from the value chain of the Company.

## **07.** Percentage of value chain partners (by value) that were assessed for environmental impact 92%



## PRINCIPLE 7

Businesses, when engaging in influencing public and regulatory policy, will do so in a manner that is responsible and transparent.

Essential indicators

## 01. Affiliations with trade and industry chambers | associations

## Membership of | affiliation to 10 trade and industry chambers | associations

No.	Name	Reach
01.	Alkali Manufacturers Association of India	National
02.	Fragrances and Flavours Association of India	National
03.	Indian Chemical Council	National
04.	Indian Resins Manufacturers Association	National
05.	International Federation of Essential Oils and Aroma Trades	International
06.	The Federation of Indian Chambers of Commerce and Industry	National
07.	The Pesticides Manufacturers and Formulators Association of India	National
08.	Ecological and Toxicological Association of Dyes and Organic Pigment Manufacturers	International
09.	Global Organic Textile Standard	International
10.	The Society of Dyers and Colourists	International

02. Corrective action taken or underway on any issue related to anti-competitive conduct, based on adverse orders from regulatory authorities

Not applicable

Leadership indicators

**01.** Advocacy of public policy positions Not applicable.

PRINCIPLE 8

Businesses will promote inclusive growth and equitable development.

#### Essential indicators

01. Social Impact Assessments (SIAs) of projects undertaken based on applicable laws

Not applicable

#### 02. Projects for which ongoing rehabilitation and resettlement is being undertaken

Not applicable

## 03. Mechanisms to receive and redress grievances of the community

The Company has a process to receive and redress concerns received from the community. A site-level committee consisting of members from various departments is formed, which receives the concerns and works towards its redressal.

#### 04. Input material (inputs to total inputs by value) sourced from local or small scale suppliers

Parameter	2023-24	2022-23
Directly sourced from micro, small and medium enterprises   small producers	19%	23%
Directly from within India	82%	81%

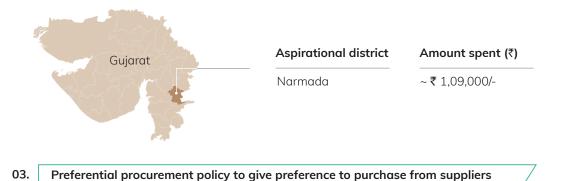
## 05. Job creation in smaller towns - wages paid to persons employed as a % of total wages

Location	2023-24	2022-23
Rural	86.11	86.38
Semi-urban	9.98	10.04
Urban	0.92	0.88
Metropolitan	2.98	2.70



Leadership indicators

- 01. Actions taken to mitigate any negative social impacts identified in the SIAs (Q 01. of essential indicators above) Not applicable
- 02. CSR projects undertaken in designated aspirational districts as identified by the government bodies



Internal guidelines for preferential procurement from marginalised | vulnerable groups are in place. The URL to the policy is: www.atul.co.in/economic-sustainability/responsible-procurement

## Vulnerable | marginalised groups from where the Company procures

MSMEs and women-owned enterprises

comprising vulnerable | marginalised groups

## Percentage of such procurement of the total (by value)

19% of overall spend

- **04.** Benefits derived and shared from the intellectual properties owned or acquired based on traditional knowledge Not applicable
- 05. Corrective actions taken or underway based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved Not applicable

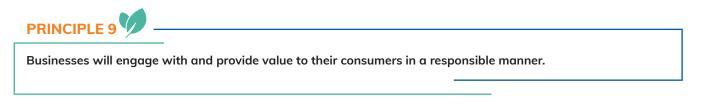
## 06. Beneficiaries of CSR projects

No.	CSR project	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalised groups
Edu	cation	·	·
01.	Provision of sports and music kits to 100 schools	21,896 students	100%
02.	Improvement of teaching methodology for primary school children – Atul Adhyapika	10,224 students	100%
03.	Enhancement of educational practices in the colleges in Valsad district	8,500 students	80%
04.	Provision of education kits to children 4,430 st		100%
05.	. Promotion of science through mobile science lab 3,7		100%
06.	Enhancement of educational practices in Kalyani Shala	1,754 students	100%
07.	Support to Lalbhai Dalpatbhai Institute of Indology 791 studer		-
08.	Support to tribal children in Atul Vidyamandir 358 students		100%
09.	Promotion of learning and life skills among children 356 studen		100%
10.	Support to develop a school in a tribal area	265 students	100%
11.	Provision of culture and arts through Kashmiri folk music 150 people		50%
12.	Support to small education initiatives	80 students	100%
13.	Provision of scholarships to needy and meritorious students	35 students	100%
14.	Contribution to publish books on Indian culture   ecology   philosophy	4 books	-
Emp	oowerment		
15.	Facilitation of government schemes to villagers - Adhikaar project	4,090 people	100%
16.	Empowerment of women through 132 self-help groups	1,521 women	100%
17.	Empowerment of women   youth through various vocational training ogen students		100%
18.	Provision of skill training to youth as apprentices 169 student		100%
19.	Creation of livelihood opportunities for tribal families by providing cows	97 families	100%
20.	Development of micro-entrepreneurs to provide sustainable livelihood	41 entrepreneurs	100%
Hec	ith		
21.	Enhancement of rural health through health camps	24,036 patients	100%
22.	Support to Valsad Raktadaan Kendra	~25,000 patients	50%
23.	Promotion of health and well-being of adolescents and women 5,075 adolescent girls and women		100%
24.	Provision of training for pregnant   lactating mothers and stakeholders through the project titled, First 1000 Days	781 health practitioners	80%

Financial Statements



No.	CSR project	No. of persons benefited from CSR projects					
25.	Support to Kasturba Hospital, Valsad	patients of south Gujarat	100%				
26.	establishment of Atul Foundation Health Center patients of 10 villages		-				
27.	Upgradation of sports infrastructure and equipment	-					
Relief							
28.	Provision of assistance to children with special needs	~100 students	100%				
29.	Support to patients in need	30 patients	100%				
Infrastructure							
30.	Development of community infrastructure in the village – post office and police station	~10 villages	-				
31.	Development of community infrastructure in the village - roadside fencing	1 village	-				
32.	Development of infrastructure in Atul and surrounding villages	Atul and nearby villages	100%				
Conservation							
33.	Conservation of energy through solar energy project	1,431 individuals	100%				
34.	Conservation of water through various interventions	44 farmers	100%				
35.	Establishment of low-cost solid waste management system in villages and colleges	43 villages and 6 colleges 93,066 people	~75%				
36.	Initiation of natural resource management project to conserve soil and water	6 villages	~80%				
37.	Initiation of plastic waste management project   Ragpickers livelihood project	4 villages	~50%				
38.	Establishment of solid waste management system in Atul village- Ujjwal Atul project	1 village	~50%				
39.	Development of nature-based wastewater recycling project	2 villages	80%				
40.	Enhancement of green cover - tree plantation project	34,820 trees and 27,500 trees in 6 Miyawaki forests	-				
41.	Protection of animals	41 animals	100%				



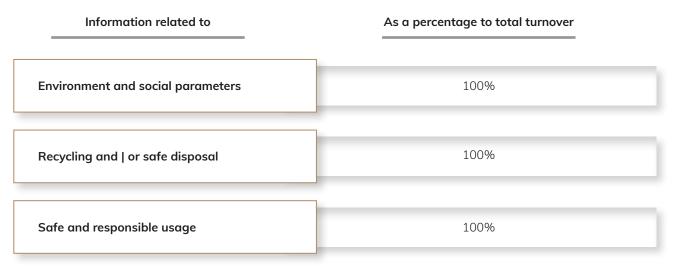
#### **Essential indicators**

### 01. Mechanisms to receive and respond to consumer complaints and feedback

A customer complaint portal is in place. All customer complaints are logged into the 'customer complaint module'. Based on the nature of complaints, auto e-mails are triggered for action. The root cause and corrective and preventive actions are conveyed to customers. The complaint is closed after feedback (by phone | e-mail) from the customer.

Complaints are acknowledged within 48 hours and feedback is provided within seven working days.

#### 02. Turnover of products | services as a percentage of turnover from all products | services that carry information



#### 03. Consumer complaints

Catagoria	2023-24		2022-23	
Category	Received	Pending resolution	Received	Pending resolution
Advertising	-	_	_	-
Cyber security	-	_	_	-
Data privacy	-	-	-	-
Delivery of essential services	-	-	1	-
Restrictive trade practices	-	-	-	-
Unfair trade practices	-	-	-	-
Others	385	64	355	36



## 04. Product recalls on account of safety issues

	Number	Reason
Forced recalls	0	Not applicable
Voluntary recalls	0	Not applicable

## 05. Framework | policy on cyber security and risks related to data privacy

The Company has an Information Security Policy in place to ensure that the data stored in the end-user devices is protected.

# 06. Corrective action 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 the safety of products | services

There were no issues relating to advertising, delivery of essential services, cyber security and data privacy of customers. There was no re-occurrence of product recall. No penalty was levied or action was taken by any regulatory authority on account of any deficiency relating to the safety of products | services in the financial year.

#### 07. Information related to data breaches

- a. Number of instances of data breaches: Nil
- b. Percentage of data breaches involving personally identifiable information of customers: Not applicable
- c. Impact: Not applicable

#### Leadership indicators

#### 01. Channels, platforms and URL where information on products and services can be accessed

www.atul.co.in

### 02. Steps taken to inform and educate consumers about safe and responsible use of products and (or) services

The Company shares material safety data sheets, technical data sheets and product labels on packaging in accordance with globally harmonised system regulations. For liquid chemicals, transport emergency cards are provided to transporters and training is imparted periodically to them and customers on safe handling. Interactions with farmers are arranged through Krishi Vigyan Kendras, farmer field days trainings, etc.

#### 03. Mechanisms to inform consumers of any risk of disruption | discontinuation of essential services

The customers are intimated regarding the scheduled annual maintenance shutdown a few weeks in advance. For key customers, tentative schedules of annual maintenance shutdown are shared at least three months in advance. In case of any unforeseen disruptions in supply, information is conveyed through e-mail and telephone.

#### 04. Display of product information and customer satisfaction survey

The Company provides information related to chemical abstracts service number, European community number, synonyms, hazard statements, precautionary statements, etc over and above what local law mandates.

The Company has a practice to carry out customer satisfaction surveys for major products at regular intervals.

## Note: Serial numbers are in accordance with Annexure-II of notification of SEBI on Business Responsibility and Sustainability Report.