

# 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	▶	2024-25
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   (+912632) 230000   bn_mohanan@atul.co.in
13.	Reporting boundary	▶	The disclosures under this report are made on standalone basis for Atul Ltd (the Company).
14.	Name of assurance provider	▶	Deutsch Quality Systems (India) Private Limited
15.	Type of assurance obtained	▶	Reasonable assurance is obtained for the indicators covered under BRSR core.

## II. PRODUCTS | SERVICES

### 16. Business activities

No.	Main activity	Business activities	% turnover
1.	Life Science Chemicals	R&D, technology, procurement, manufacturing, sales and marketing	30%
2.	Performance and Other Chemicals	R&D, technology, procurement, manufacturing, sales and marketing	69%
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	36%
2.	Epoxy resins and hardeners	202	34%
3.	Herbicides	202	17%
4.	Textile dyestuffs	202	13%

\*National Informatics Center

## III. OPERATIONS

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

			
Location	Plants	Offices	Total
India	4	8	12

### 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

44%

#### 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

No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
a) Employees						
Managers						
1.	Permanent managers (A)	1,882	1,712	91%	170	9%
2.	Other than permanent managers (B)	23	21	91%	2	9%
3.	Total managers (A+B)	1,905	1,733	91%	172	9%
Workers						
4.	Permanent workers (C)	1,477	1,477	100%	-	NA
5.	Other than permanent workers (D)	2,988	2,826	95%	162	5%
6.	Total workers (C+D)	4,465	4,303	96%	162	4%
b) Differently abled employees						
Managers						
1.	Permanent managers (E)	5	5	100%	-	NA
2.	Other than permanent managers (F)	-	-	NA	-	NA
3.	Total differently abled managers (E+F)	5	5	100%	-	NA
Workers						
4.	Permanent workers (G)	1	1	100%	-	NA
5.	Other than permanent workers (H)	-	-	NA	-	NA
6.	Total differently abled workers (G+H)	1	1	100%	-	NA

NA: not applicable

## 21. Representation of women

	Total (A)	No. and % of females	
		No. (B)	% (B/A)
 Board of Directors	14	2	14%
 Key Managerial Personnel (KMP)	6	0	0%

## 22. Turnover rate for permanent employees

Category	2024-25			2023-24			2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Managers	14%	17%	15%	18%	10%	18%	19%	14%	19%
Workers	6%	0%	6%	8%	0%	8%	10%	0%	10%

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

### 23. Subsidiary, joint venture and associate entities

This information is given on page numbers 56 and 57 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

Applicability of CSR as per Section 135 of the Companies Act, 2013	►	Yes
Turnover	►	₹ 5,075 cr
Net worth	►	₹ 5,538 cr

## VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

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

Stakeholder group from whom complaint is received	Grievance redressal mechanism and its URL	2024-25			2023-24		
		Complaints received	Complaints pending resolution	Remarks	Complaints received	Complaints pending resolution	Remarks
 Community	A mechanism is in place to interact with various stakeholders to understand and address their concerns, if any.	Nil	Nil	-	05	Nil	-
 Shareholders		36	Nil	-	26	Nil	-
 Investors (other than shareholders)		Nil	Nil	-	Nil	Nil	-
 Employees		Nil	Nil	-	Nil	Nil	-
 Customers		Nil	Nil	-	Nil	Nil	-
 Value chain partners		Nil	Nil	-	Nil	Nil	-

## 26. Overview of material responsible business conduct areas











Risk



Opportunity

Material area identified	Indicate whether risk or opportunity	Rationale for identifying risks   opportunities	Mitigating actions	Financial implications of the risk or opportunity
Climate change		<p>Climate change represents a principal risk to the Company. Our operations rely heavily on coal which may have direct effect on greenhouse gas emissions and climate change.</p> <p>Adopting responsible business practices is essential for creating long-term value. As the world transitions to a low-carbon economy, key regulatory and market transition risks that may come to the fore include rising product costs and future government policies and regulations.</p>	<p>The Company is committed to taking collective and constructive action to address climate change and reduce carbon footprint. Following actions are being taken:</p> <ul style="list-style-type: none"> <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>	Negative
Water management	 	<p>Our manufacturing operations require significant water. Hence, the Company may experience direct or indirect impacts on its business operations due to water scarcity.</p> <p>Prudent water management improves the availability of water and may help in sustainable water balance.</p>	<p>The Company has undertaken the following measures for water management:</p> <ul style="list-style-type: none"> <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 and steam condensate recovery system</li> <li>• Recycle water</li> </ul>	Positive

Material area identified	Indicate whether risk or opportunity	Rationale for identifying risks   opportunities	Mitigating actions	Financial implications of the risk or opportunity
<b>Pollutants and waste management</b>	 	<p>The chemical manufacturing process typically generates significant quantities of waste and solvents.</p> <p>Effective waste management ensures regulatory compliance, reduces health and safety risks, promotes resource efficiency through recovery and reuse, lowers environmental impacts and supports the commitment of the Company to sustainability and long-term value creation.</p>	<p>The Company has made waste management an integral part of its manufacturing process. Following actions have been taken:</p> <ul style="list-style-type: none"> <li>• Include green chemistry principles 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>	Negative   Positive
<b>Customer relations</b>		<p>The Company serves around 4,000 customers belonging to 30 diverse industries.</p> <p>Healthy customer relations enable the Company to build trust, understand customer expectations and promote ethical and sustainable practices. It also enhances brand reputation and supports long-term business resilience.</p>	<p>The Company continues to prioritise strong customer relationships as it:</p> <ul style="list-style-type: none"> <li>• Engages with customers through multiple channels</li> <li>• Integrates customer needs into internal processes</li> <li>• Improves customer satisfaction index</li> </ul>	Positive
<b>Occupational health and safety</b>		<p>Our manufacturing operations involve employees interacting with machinery and material handling equipment, posing inherent risks of injury and potential exposure to hazardous materials and pollutants.</p>	<p>The Company has identified occupational health and safety (OHS) as a critical priority and is committed to mitigating OHS risks. The following initiatives are being pursued:</p> <ul style="list-style-type: none"> <li>• Implement ISO 45001:2018 (Occupational Health and Safety Management Systems)</li> <li>• Initiate actions towards zero harm</li> <li>• Conduct regular risk assessments, audits and ensure timely closure of resulting action plans</li> </ul>	Negative

Material area identified	Indicate whether risk or opportunity	Rationale for identifying risks   opportunities	Mitigating actions	Financial implications of the risk or opportunity
Employee development		Employee development helps in enhancing employee competence, skills and knowledge. It also reflects a commitment to fairness, inclusion and long-term value creation, which are key for organisational growth.	<p>The Company views employee development as a continuous process and focuses to:</p> <ul style="list-style-type: none"> <li>• Implement learning and development initiatives for all work levels</li> <li>• Enhance skills through role rotations and role enrichments</li> </ul>	Positive
Innovation and Technology		Innovation and technology drive efficiency, improve product safety and reduce environmental impact. This can help in meeting stakeholder expectations, enhance competitiveness and create long term value.	<p>The Company is currently focusing to:</p> <ul style="list-style-type: none"> <li>• Integrate the principles of green chemistry into manufacturing operations</li> <li>• Implement novel technologies</li> </ul>	Positive
Logistics and sustainable sourcing	 	Logistics and sustainable sourcing impact the environment, cost efficiency and supply chain resilience of the Company. Responsible sourcing ensures ethical practices and sustainable use of resources, while efficient logistics help reduce emissions, effluents and wastes.	<p>The Company places great importance on logistics and sustainable sourcing to achieve its business objectives, reduce environmental impact and make a positive difference to the lives of people. We are taking the following actions:</p> <ul style="list-style-type: none"> <li>• Build ESG capacity within critical suppliers (tier 1, 2)</li> <li>• Develop a supplier assessment framework to assess policy, practices and performance on ESG</li> <li>• Conduct on-site sustainability evaluation audits for critical suppliers</li> <li>• Develop third-party audit of suppliers along with reward and recognition</li> <li>• Explore digital technology for transparency in supply chain</li> <li>• Optimise routes and use fuel-efficient vehicles</li> <li>• Use electric vehicles for warehouse</li> </ul>	Positive

## 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:



### Principle 1

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



### Principle 2

Businesses will provide goods and services in a manner that is sustainable and safe.



### Principle 3

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



### Principle 4

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



### Principle 5

Businesses will respect and promote human rights.



### Principle 6

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



### Principle 7

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



### Principle 8

Businesses will promote inclusive growth and equitable development.



### Principle 9

Businesses will engage with and provide value to their consumers in a responsible manner.



✓ Yes ✗ No

Disclosure questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
01. a) The policy   policies cover each principle and its core elements	✓	✓	✓	✓	✓	✓	✓	✓	✓
b) The policy   policies approved by the Board	✓	✓	✓	✓	✓	✓	✓	✓	✓
c) URL of the policies	The Company is in the process of publishing these policies on its website.								
02. The policies are translated into procedures	✓	✓	✓	✓	✓	✓	✓	✓	✓
03. The enlisted policies extend to the value chain partners	✓	✓	✓	✓	✓	✓	✓	✓	✓
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 operations in conformance with the international standards (such as ISO 9000, ISO 14000, OHSAS 18000   ISO 45000), United Nations Global Compact guidelines and principles of International Labour Organisation. The Company has acquired the sustainable procurement certification (ISO 20400).								
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.								
06. Performance against the specific commitments, goals and targets along with reasons in case the same are not met	Not applicable								
07. Statement by Director responsible for the Business Responsibility Report, highlighting environmental, social and governance (ESG) related challenges, targets and achievements	The Company is committed to integrating ESG principles in its businesses which is central to improving the quality of life of the communities it serves.								
08. Highest authority responsible for implementation and oversight of the business responsibility policy(ies)	Board of Directors								
09. Specific Committee of the Board or a Director responsible for decision	The Company has appointed a Whole-time Director to oversee implementation of the policies.								

## 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

The Company has a functional review mechanism complemented by an independent internal audit process.

## 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

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

Segment	Number of programs	Topics   Principles	% of persons
 Board of Directors	4	<ul style="list-style-type: none"> <li>Code of conduct</li> <li>Prevention of sexual harassment (POSH)</li> <li>Human rights</li> <li>Corporate governance</li> </ul>	100%
 KMP	5	<ul style="list-style-type: none"> <li>Code of conduct</li> <li>POSH</li> <li>Human rights</li> <li>Whistleblower</li> </ul>	100%
 Employees (excluding Executive Directors and KMP)	9	<ul style="list-style-type: none"> <li>Acceptance of gifts and business courtesies</li> <li>Atul Values</li> <li>Equal employment opportunity and anti-discrimination</li> <li>Human rights</li> <li>POSH</li> <li>Whistleblower</li> <li>Code of conduct</li> <li>Office etiquette</li> </ul>	100%

#### 2. 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

Type	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

Type	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.

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

Not applicable

**4. 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](http://www.atul.co.in/investors/policies)

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

Category	2024-25	2023-24
Directors	Nil	Nil
KMP	Nil	Nil
Employees (other than KMP)	Nil	Nil

**6. Complaints with regard to conflict of interest**

	2024-25		2023-24	
	Number	Remarks	Number	Remarks
Conflict of interest of the Directors	Nil	Nil	Nil	Nil
Conflict of interest of KMP	Nil	Nil	Nil	Nil

**7. 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 payable**

	2024-25	2023-24
	Days	Days
Number of days of accounts payable	54	60*

\*figures of previous year are regrouped wherever required.

## 9. Openness of business

		2024-25	2023-24
	Purchases from trading houses as % of total purchases	8%	9%
Concentration of purchases	Number of trading houses where purchases are made from	315	284*
	Purchases from top 10 trading houses as % of total purchases from trading houses	48%	61%*
	Sales to dealers   distributors as % of total sales	26%	27%
Concentration of sales	Number of dealers   distributors to whom sales are made	2,776	2,567
	Sales to top 10 dealers   distributors as % of total sales to dealers   distributors	57%	51%
	Purchases with related parties as % of total purchases	7%	4%*
	Sales to related parties as % of total sales	12%	14%
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	43%	56%

\*figures of previous year are regrouped wherever required.

### Leadership indicators

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

Programs held	Topics   Principles	% of value chain partners
1	<ul style="list-style-type: none"> <li>enhance ESG compliance among Tier III Red Category suppliers</li> <li>promote sustainable practices across operations and the supply chain during ISO 20400 audit</li> </ul>	59%

#### 2. 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](http://www.atul.co.in/investors/policies)

## PRINCIPLE 2



Businesses will provide goods and services in a manner that is sustainable and safe.

### Essential indicators

- Percentages of (i) Research and Development (R&D) spend and (ii) capital expenditure (CapEx) spend on technologies specific to improvement of environment and social impact of products and processes are given below:

R&D		CapEx	
2024-25	2023-24	2024-25	2023-24
30%	18%	37%	19%
<b>Improvements in social and environmental aspects</b>		<b>Improvements in social and environmental aspects</b>	
<ul style="list-style-type: none"> <li>• Increase in yield in four products</li> <li>• Decrease in consumption of raw materials in 13 products</li> <li>• Decrease in consumption of solvents in five products and recovery of three value-added products from waste</li> <li>• Decrease in cycle time of one product</li> </ul>		<ul style="list-style-type: none"> <li>• Installation of additional MEE, scrubbers and effluent treatment plants</li> <li>• Installation of magnetic drives for hydrogenator reactors</li> <li>• Installation of artificial intelligence-based CCTV monitoring system in hazardous areas</li> <li>• Upgradation of transformers, uninterruptible power supply (UPS) systems and leak detectors</li> <li>• Upgradation of alarm sensors and fire alarm system</li> <li>• Other initiatives undertaken for a cleaner and safer environment</li> </ul>	

- 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/](http://www.atul.co.in/economic-sustainability/responsible-procurement/)

**b) Percentage of inputs sourced sustainably:**

93%

- 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.

- 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 the 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

### 1. Life cycle perspective | assessment (LCA) for products

The Company has conducted LCA for four products and product carbon footprint for 12 products across businesses.





### 2. 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.

### 3. 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 10.24% of its waste.

### 4. Products and packaging reclaimed at the end of their life cycles and reused, recycled, and safely disposed (in MT)

		2024-25			2023-24		
		Reused	Recycled	Safely disposed	Reused	Recycled	Safely disposed
	Plastics (including packaging)	70	785	826	Nil	1759	145
	E-waste						
	Hazardous waste	Nil	Nil	Nil	Nil	Nil	Nil
	Other waste						

### 5. 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

Category	% of managers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent managers											
Male	1,712	1,712	100%	1,712	100%	-	NA	1,712	100%	1,712	100.0%
Female	170	170	100%	170	100%	170	100%	-	NA	170	100.0%
Total	1,882	1,882	100%	1,882	100%	170	9.0%	1712	91%	1882	100.0%
Other than permanent managers											
Male	21	-	NA	21	100%	-	NA	-	NA	-	NA
Female	2	-	NA	2	100%	-	NA	-	NA	-	NA
Total	23	-	NA	23	100%	-	NA	-	NA	-	NA

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
Permanent workers											
Male	1,477	1,477	100%	1,477	100%	-	NA	1,477	100%	1,477	100%
Female	0	-	NA	-	NA	-	NA	-	NA	-	NA
Total	1,477	1,477	100%	1,477	100%	-	NA	1,477	100%	1,477	100%
Other than permanent workers											
Male	2,826	2,721	96%	2,826	100%	-	NA	2,826	100%	2,826	100%
Female	162	123	76%	162	100%	162	100%	-	NA	162	100%
Total	2,988	2,844	95%	2,988	100%	162	5%	2,826	95%	2,988	100%

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

	2024-25	2023-24
Cost incurred on well-being measures as a % of total revenue	0.05	0.02

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

No. Benefits	2024-25			2023-24		
	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%	82%	Yes	8%	67%	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

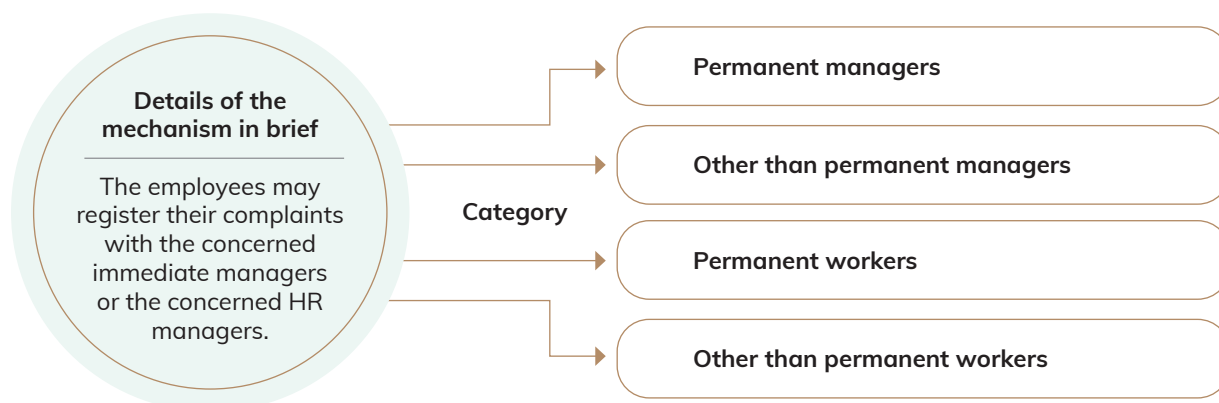
The Company provides equal opportunities to all its employees and to all eligible applicants for employment in the Company.

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

Return-to-work rate			Retention rate		
Male	→	100%	Male	→	100%
Female	→	100%	Female	→	100%
Total	→	100%	Total	→	100%



## 06. Grievance redressal mechanism for employees



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

Category	2024-25			2023-24		
	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)
Permanent employees						
Male	3,189	244	8%	3,092	294	10%
Female	170	-	0%	163	-	0%
Total	3,359	244	7%	3,255	294	9%

## 08. Training given to employees

Category	2024-25					2023-24				
	Total employees (A)	Skill training imparted (B)	% (B/A)	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	3,189	2,966	93%	2,808	88%	3,092	1,413	46%	2,943	95%
Female	170	170	100%	73	43%	163	146	90%	52	32%
Total	3,359	3,136	93%	2,881	86%	3,255	1,559	48%	2,995	92%

## 09. Performance and career development reviews of employees

Category	2024-25			2023-24		
	Total employees (A)	Employees who had a career review (B)	% (B/A)	Total employees (C)	Employees who had a career review (D)	% (D/C)
Permanent employees						
Male	3,189	3,189	100%	3,092	1,620	52%
Female	170	170	100%	163	163	100%
Total	3,359	3,359	100%	3,255	1,783	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

- environment, health and safety management system audit procedure
- hazard operability and what-if study procedure
- hazard identification and risk assessment procedure
- management of change procedure
- permit to work system
- safety observation audit system
- pre-startup safety review
- environment, health and safety review for greenfield expansion projects
- quantitative risk assessment study
- hazardous area classification study
- dust explosion risk assessment
- electrical safety risk assessment











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, internal | external complaint management and monthly contractor safety meeting.

Access to employees to non-occupational medical and healthcare services

The employees have the requisite access to Atul Foundation Health Center (AFHC) for non-occupational medical and healthcare services. AFHC is staffed with full-time doctors and round-the-clock paramedical staff and is equipped with ICU ambulance.

## 11. Safety-related incidents

Safety incident   number	Category	Managers 	Workers 
		2024-25	2023-24
Lost time injury frequency rate (per one million-person hours worked)		0.00	0.13
		0.09	0.1
Total recordable work-related injuries		2	3
		12	14
Number of fatalities		-	-
		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

Category	2024-25			2023-24		
	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)



**Health and safety practices**  
% covered 100%



**Working conditions**  
% covered 100%

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

- implemented 'closed solid charging' for the identified equipment
- conducted training on process safety testing
- procured advanced fire tender for emergency response
- upgraded the occupational health center
- developed guidelines for scaffolding erection and inspection
- implemented artificial intelligence based safety monitoring system at 11 identified critical workplace areas
- upgraded old electrical motor control center panels as per advanced specifications

- upgraded existing fire alarm system with advanced central addressable fire alarm system
- implemented guidelines on process safety management audit based on OSHA and CFR 1910.119
- developed online 'management of change' system
- implemented periodic electrical safety gap assessment system
- implemented UPS | earthing system audit based on electrical standards

## Leadership indicators

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



**Managers**  
Yes



**Workers**  
Yes

### 2. 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

### 3. 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	Affected managers   workers		Managers   Workers who   whose family members have been rehabilitated	
	2024-25	2023-24	2024-25	2023-24
Managers   Workers	Nil	Nil	Nil	Nil

### 4. 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 provided on a case-to-case basis.

### 5. Assessment of value chain partners



**Health and safety practices**  
93% assessed (by value)



**Working conditions**  
93% assessed (by value)

### 6. 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

#### 1. 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.

#### 2. 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, 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

#### 1. Processes for consultation between stakeholders and the Board on economic, environmental and social topics or if consultation is delegated

Business | Function heads interact with the aforesaid stakeholders and provide key updates to the Board.

#### 2. 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.

#### 3. 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	2024-25			2023-24		
	Total (A)	Covered (B)	% (B/A)	Total (C)	Covered (D)	% (D/C)
Employees						
Permanent	3,359	884	26%	3,255	1,783	55%
Other than permanent	3,011	-	0%	2,607	-	0%
<b>Total employees</b>	<b>6,370</b>	<b>884</b>	<b>14%</b>	<b>5,862</b>	<b>1,783</b>	<b>30%</b>

#### 02. Minimum wages paid to employees

Category	2024-25					2023-24				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent employees										
Male	3,189	-	NA	3,189	100%	3,092	-	NA	3,092	100%
Female	170	-	NA	170	100%	163	-	NA	163	100%
Other than permanent employees										
Male	2,847	0	0%	2,847	100%	2,540	2,540	100%	-	NA
Female	164	0	0%	164	100%	35	35	100%	-	NA

#### 03. Remuneration | Salary | Wages

##### a) Median remuneration | wages

Category	Male		Female	
	Number	Median remuneration   salary   wages (₹)	Number	Median remuneration   salary   wages (₹)
Board of Directors	12	22,72,550	2	12,40,000
KMP (including Executive Directors)	6	2,00,51,693	-	-
Employees other than Board of Directors and KMP	3,183	4,04,958	170	6,98,899

## b) Gross wages

	2024-25	2023-24
Gross wages paid to females as % of total wages	5.68%	4.83%

**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	2024-25			2023-24		
	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**

	2024-25	2023-24
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)

Child labour	
Forced   Involuntary labour	
Sexual harassment	100%
Discrimination at workplace	assessed
Wages	

## 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.

### Leadership indicators

#### 1. Business processes modified | introduced as a result of addressing human rights grievances | complaints

The Company has not received any grievance | complaint regarding human rights.

#### 2. Scope and coverage of human rights due-diligence

The Company has conducted human rights due-diligence through Together-for-Sustainability audit and achieved 96% score.



96% score.

#### 3. Accessibility of premises | offices to differently-abled visitors

Please refer to Q 03. of Principle 3 above

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

Child labour	
Forced   Involuntary labour	
Sexual harassment	93%
Discrimination at workplace	assessed
Wages	(by value)

## 5. 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	2024-25	2023-24
<b>From renewable sources</b>		
Total electricity consumption (A)	1,82,172	1,69,733*
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>1,82,172</b>	<b>1,69,733*</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	2,81,167	2,15,696*
Total fuel consumption (E)	73,45,699	90,95,071*
Energy consumption through other sources (F)	1,480	290*
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>76,28,346</b>	<b>93,11,058*</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>78,10,518</b>	<b>94,80,790*</b>
Energy intensity per rupee of turnover (gigajoules per million rupee)	153.87	217.55*
Energy intensity per turnover adjusted for PPP (gigajoules per million US\$)	7.45	10.53*
Energy intensity per physical output (gigajoules per MT)	14.07	19.78*

\*figures of previous year are regrouped wherever required

Note: IMF purchasing power parity conversion factor considered is 20.66

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

Reasonable assurance carried out by Deutsch Quality Systems (India) Private Limited.

#### 02. Sites | Facilities identified as designated consumers under the Perform, Achieve and Trade scheme of Government of India

The power plant and Caustic-chlorine plant have been identified as designated consumers (DC) under the Perform, Achieve and Trade (PAT) scheme. The Company began disclosing its PAT targets in 2020. During the 2019-2022 PAT cycle, the Company achieved an energy consumption rate of 0.81 MT of oil equivalent per MT of production, surpassing the target of 0.874.

The Bureau of Energy Efficiency launched the Carbon Credit Trading Scheme (CCTS) in 2023 to further strengthen the carbon market of India, following the successful completion of the PAT scheme. The Company has completed its baseline assessment for CCTS; however, specific targets for participation in the scheme will be disclosed once finalised.

### 03. Disclosures related to water

Parameter	2024-25	2023-24
<b>Water withdrawal by source (in kL)</b>		
a) Surface water	36,77,881	40,18,716*
b) Groundwater	617	1,962*
c) Third-party water	1,61,917	36,196*
d) Seawater   desalinated water	–	–
e) Others (rainwater storage)	7,30,454	3,26,235
<b>Total volume of water withdrawal (in kL) (a+b+c+d+e)</b>	<b>45,70,869</b>	<b>43,83,109*</b>
<b>Total volume of water consumption (in kL)</b>	<b>45,70,869</b>	<b>43,83,109*</b>
<b>Water intensity per rupee of turnover (kL per million ₹ of revenue)</b>	100.58	100.58*
<b>Water intensity per turnover adjusted for purchasing power parity (PPP) (kL per million US\$)</b>	4.87	4.87*
<b>Water intensity per physical output (kL per MT of product)</b>	9.15	9.15*

\*figures of previous year are regrouped wherever required

Note: IMF purchasing power parity conversion factor considered is 20.66

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

Reasonable assurance carried out by Deutsch Quality Systems (India) Private Limited.

### 04. Water discharge

Parameter	2024-25	2023-24
<b>Destination and level of treatment (in kL)</b>		
a) To surface water		
No treatment	–	–
With treatment – level of treatment	–	–
b) To groundwater		
No treatment	–	–
With treatment – level of treatment	–	–
c) To seawater	36,90,111	36,63,704
No treatment	–	–
With treatment – level of treatment	36,90,111 advanced treatment	36,63,704 advanced treatment

Parameter	2024-25	2023-24
d) Sent to third-parties		
No treatment	-	-
With treatment – level of treatment	-	-
e) Others		
No treatment	-	-
With treatment – level of treatment	-	-
<b>Total water discharged (in kL)</b>	<b>36,90,111</b>	<b>36,63,704</b>

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

Reasonable assurance carried out by Deutsch Quality Systems (India) Private Limited.

### 05. Coverage and implementation of zero liquid discharge

Zero liquid discharge (ZLD) is fully implemented in the Ankleshwar and Tarapur manufacturing sites and in one area of the Atul site. The project to convert one of the three areas at the Atul site into a ZLD facility is currently in the commissioning phase.

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

Parameter	Unit	2024-25	2023-24
NOx	MT/year	78.96	79.44
SOx	MT/year	58.76	58.62
Particulate matter (PM)	MT/year	12.10	17.11
Persistent organic pollutants (POPs)	MT/year	NA	NA
Volatile organic compounds (VOCs)	MT/year	NA	NA
Hazardous air pollutants (HAPs)	MT/year	10.49	8.19
Others – please specify	MT/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 apart from Gujarat Pollution Control Board (GPCB) and scheduled auditors approved by GPCB.

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

Parameter	Unit	2024-25	2023-24
Total Scope 1 emissions	tCO <sub>2</sub> e	6,56,894	8,29,612*
Total Scope 2 emissions	tCO <sub>2</sub> e	1,44,301	60,050*
Total Scope 1 and Scope 2 emissions	tCO <sub>2</sub> e	8,01,194	8,89,662*
Total Scope 1 and Scope 2 emissions per million ₹ of turnover	tCO <sub>2</sub> e	15.78	20.41*
Total Scope 1 and Scope 2 emission intensity per million US\$ turnover adjusted for purchasing power parity	tCO <sub>2</sub> e/USD	0.76	0.99*
Total Scope 1 and Scope 2 emission intensity per physical output	tCO <sub>2</sub> e/MT	1.44	1.86*

\*figures of previous year are regrouped wherever required

Note:

1. IMF purchasing power parity conversion factor considered is 20.66
2. Source of emission factors for Scope I - Intergovernmental Panel on Climate Change
3. Source of emission factors for Scope II - Central Electricity Authority

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

Reasonable assurance carried out by Deutsch Quality Systems (India) Private Limited.

## 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
- reduce power consumption by replacement of fifth generation cell elements with sixth generation cell elements

## 09. Waste management



## Waste generated (in MT)

	2024-25	2023-24
Plastic waste (A)	1,792.63	2,279.81*
E-waste (B)	1.12	3.20*
Bio-medical waste (C)	0.058	0.37
Construction and demolition waste (D)	-	-
Battery waste (E)	8.39 288 numbers	3.38 171 numbers
Radioactive waste (F)	-	-
Other hazardous waste (G)	94,322.36	95,708.03*
Other non-hazardous waste (H)	1,06,884.39	1,02,337.79*
Total waste generated in MT	2,03,008.95	2,00,332.58*
Waste intensity per rupee turnover (MT per million ₹)	4.00	4.60*
Waste intensity per turnover adjusted for PPP (MT per million US\$)	0.19	0.22*
Waste intensity per physical output (MT per MT)	0.37	0.42*

\* figures of previous year are regrouped wherever required

Note: IMF purchasing power parity conversion factor considered is 20.66



## Waste recovered through recycling, re-using or other recovery operations (in MT)

	2024-25	2023-24
(i) Recycled	1,86,082.93	1,85,062.93*
(ii) Reused	63.63	169.44*
(iii) Other recovery operations	-	-
<b>Total</b>	<b>1,86,146.56</b>	<b>1,85,232.37*</b>

\* figures of previous year are regrouped wherever required



## Waste disposed by nature of disposal method (in MT)

	2024-25	2023-24
(i) Incineration	1,073.02	1,237.16*
(ii) Landfilling	14,542.06	12,751.78*
(iii) Other disposal operations	1,246.85	1,291.37*
<b>Total</b>	<b>16,861.93</b>	<b>15,280.31*</b>

\* figures of previous year are regrouped wherever required

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

Reasonable assurance carried out by Deutsch Quality Systems (India) Private Limited.

**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

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

Not applicable

**2. Scope 3 emissions and their intensity**

The Company has not carried out Scope 3 - emissions calculation.

**3. 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.



#### 4. 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	Planted 1,25,019 trees in a mega plantation drive, Sanjeevani Planted 82,200 mangroves in 41 hectares of marshy land	Sequestration of carbon
Elimination of volatile organic compounds and toxic chemical exposure	Equipped reactors with vents   stacks to vapour recovery systems   scrubbers	Reduction in process stack emissions
Enhancement of the capacity of common effluent treatment plant (CETP)	Refurbished and upgraded treatment technology to improve efficiency at CETP	Improvement in efficiency and 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 the 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
Elimination of sewage treatment load on CETP	Installed new 100 kLD sewage treatment plant	Reduction in effluent load at CETP
Development of containment facility for effluent transfer line	Set up above ground effluent network with secondary containment at west site	Elimination of risk of loss of containment for effluent transfer line

#### 5. 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.

#### 6. 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.

#### 7. Percentage of value chain partners (by value) that were assessed for environmental impact



## PRINCIPLE 7



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

### Essential indicators

- 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

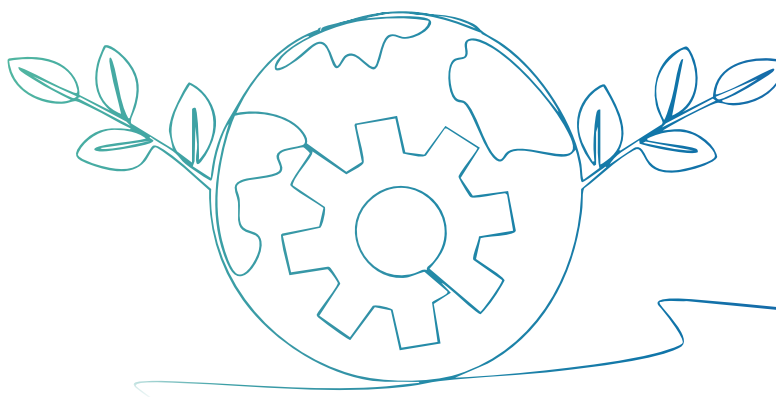
- Corrective action taken or underway on any issue related to anti-competitive conduct, based on adverse orders from regulatory authorities**

Not applicable

### Leadership indicators

- Advocacy of public policy positions**

Not applicable





## PRINCIPLE 8



Businesses will promote inclusive growth and equitable development.

### Essential indicators

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

Not applicable

**2. Projects for which ongoing rehabilitation and resettlement is being undertaken**

Not applicable

**3. 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.

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

Parameter	2024-25	2023-24
Directly sourced from micro, small and medium enterprises   small producers	17%	20%*
Directly from within India	81%	81%*

\*figures of previous year are regrouped wherever required.

**5. Job creation in smaller towns – wages paid to persons employed as a % of total wages**

Location	2024-25	2023-24
Rural	75.76	77.45*
Semi-urban	9.29	8.82*
Urban	3.22	3.25*
Metropolitan	11.73	10.48*

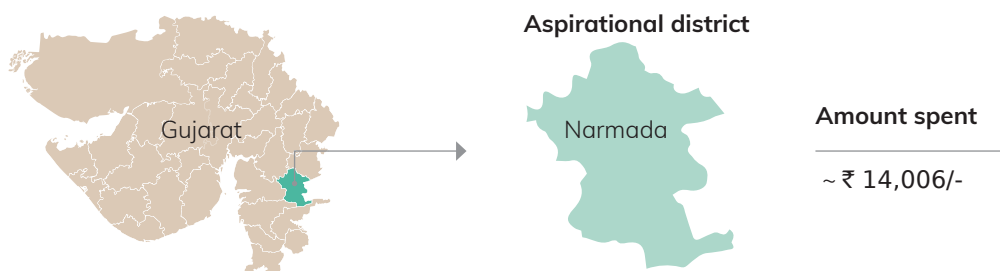
\*figures of previous year are regrouped wherever required.

### Leadership indicators

**1. Actions taken to mitigate any negative social impacts identified in the SIAs (Q 01. of essential indicators above)**

Not applicable

**2. CSR projects undertaken in designated aspirational districts as identified by the government bodies**



### 3. Preferential procurement policy to give preference to purchase from suppliers comprising vulnerable | marginalised groups

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](http://www.atul.co.in/economic-sustainability/responsible-procurement)

#### Vulnerable | marginalised groups from where the Company procures

MSMEs and women-owned enterprises

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

17% of overall spend

### 4. Benefits derived and shared from the intellectual properties owned or acquired based on traditional knowledge

Not applicable

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

Not applicable

### 6. Beneficiaries of CSR projects

No. CSR projects	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalised groups
<b>Education</b>		
01. Improvement of teaching methodology for primary school children – Atul Adhyapika	19,503 students	100%
02. Support to colleges in Valsad district	8,200 students	80%
03. Provision of education kits to children	5,993 students	100%
04. Promotion of science through mobile science lab	3,029 students	100%
05. Promotion of learning and life skills among children	2,034 students	100%
06. Enhancement of educational practices in Kalyani Shala	1,745 students	100%
07. Support to small education initiatives	731 teachers   students	100%
08. Support to education institutions in tribal area	414 students	100%
09. Support to tribal children in Atul Vidyamandir	357 students	100%
10. Provision of scholarships to needy and meritorious students	79 students	100%
11. Contribution to publish books on Indian culture   ecology   philosophy	4 books	-
<b>Empowerment</b>		
12. Facilitation of government schemes to villagers - Adhikaar project	28,308 individuals	100%
13. Support to Industrial Training Institutes	5,892 students	100%
14. Empowerment of women through 221 self-help groups	2,498 women	100%
15. Empowerment of women   youth through various vocational training courses	1,188 students	100%
16. Provision of skill training to youth as apprentices	145 students	100%
17. Creation of livelihood opportunities for tribal families by providing cows	100 individuals	100%
18. Development of micro-entrepreneurs to provide sustainable livelihood	70 entrepreneurs	100%

No. CSR projects	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalised groups
<b>Heath</b>		
19. Enhancement of rural health through health camps	26,273 patients	100%
20. Promotion of health and well-being of adolescents and women	9,315 adolescents and women	100%
21. Provision of training for pregnant   lactating mothers and stakeholders through the project titled, 'First 1000 Days'	875 individuals	90%
22. Support to Kasturba Hospital, Valsad	patients of south Gujarat	100%
23. Establishment of Atul Foundation Health Center	patients of 14 villages	-
24. Upgradation of sports infrastructure and equipment	Youth of 10 villages	-
<b>Relief</b>		
25. Improvement in quality of life for migrant workers	~45 students	100%
26. Support to patients in need	33 patients	100%
27. Assistance to people in need	3 individuals	100%
<b>Infrastructure</b>		
28. Renovation of Lalbhai Dalpatbhai Institute of Indology	14,087 individuals	-
29. Renovation of Kalyani Shala and Ulhas cricket ground	18 villages	-
30. Development of community infrastructure in surrounding villages of Atul and Ankleshwar	11 villages	100%
31. Development of community infrastructure in the village - roadside fencing	1 village	-
<b>Conservation</b>		
32. Promotion of nutrition gardens in tribal area	500 individuals	100%
33. Conservation of energy through biogas	500 individuals	100%
34. Establishment of low-cost solid waste management system in villages and colleges	78 villages and 7 colleges	~75%
35. Conservation of water through various interventions	21 villages	100%
36. Conservation of energy through solar energy project	12 villages	100%
37. Initiation of natural resource management project to conserve soil and water	5 villages	~80%
38. Initiation of plastic waste management project   ragpickers livelihood project	4 villages	~50%
39. Operation and maintenance of nature-based wastewater recycling systems	3 villages	80%
40. Provision of drinking water in surrounding villages of Atul	2 villages	100%
41. Establishment of solid waste management system in Atul village - Ujjwal Atul project	1 village	~50%
42. Enhancement of green cover by planting trees - Sanjeevani project	1,25,019 trees	-
43. Nurturing of 6 Miyawaki forests	55,235 trees	-
44. Protection of animals	44 cows	100%

## PRINCIPLE 9



**Businesses will engage with and provide value to their consumers in a responsible manner.**

### Essential indicators

#### 1. 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.

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

Information related to	As a percentage to total turnover
Environment and social parameters	100%
Recycling and   or safe disposal	100%
Safe and responsible usage	100%

#### 3. Consumer complaints

Category	2024-25		2023-24	
	Received	Pending resolution	Received	Pending resolution
Advertising	-	-	-	-
Cyber security	-	-	-	-
Data privacy	-	-	-	-
Delivery of essential services	-	-	-	-
Restrictive trade practices	-	-	-	-
Unfair trade practices	-	-	-	-
Others	215	21	385	64

#### 4. Product recalls on account of safety issues

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

**5. 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.

**6. 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 recurrence 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.

**7. 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****1. Channels, platforms and URL where information on products and services can be accessed**

[www.atul.co.in](http://www.atul.co.in)

**2. 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.

**3. 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.

**4. 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.**

# Independent Assurance Statement

## To the Management and stakeholders of Atul Ltd

DQS India Private Limited (DQS) have been engaged by Atul Ltd (Atul) to provide independent assurance on selected information disclosed under its Business Responsibility and Sustainability Report (BRSR) for the reporting period 2024-25, specifically limited to the **BRSR core indicators**, in accordance with the requirements of the **Securities and Exchange Board of India (SEBI)**. The engagement took place in May and June 2025 and concluded on June 5 - 6, 2025.

## Objectives

The objective of this assurance engagement was to independently assess and express conclusions on underlying reporting processes and validate qualitative and quantitative claims, to limit misstatement and increase the overall credibility of the reported information and data.

## Scope of assurance

The assurance encompassed the information and data related solely to the **BRSR core indicators** as per the SEBI BRSR framework for 2024-25 and focused on the figures, statements and claims related to sustainability during the reporting period April 1, 2024 to March 31, 2025. More specifically, this included:

- information and performance data subject to assurance is limited to the content of the BRSR core parameters only.

## Assurance criteria and level of assurance

This assurance covers the **reasonable level assurance** of BRSR core indicators of Atul.

Assurance activities were provided following the requirements of **ISAE 3000 (Revised)**: international standard on assurance engagements (assurance on non-financial information).

The assurance engagement is not a compliance audit and does not assess or evaluate compliance with applicable laws and regulations.

## Responsibility

The Management of Atul (responsible party) is responsible for the preparation and presentation of the BRSR core indicators for 2024-25. They are responsible for establishing and maintaining the internal controls and processes to ensure the collection, calculation and reporting of accurate and reliable data for this sustainability report.

We, DQS India Private Limited, being the assessor of the report are responsible for expressing a reasonable level assurance conclusion based on the work performed, regarding the accuracy and completeness of the data and information presented as the BRSR core indicators for 2024-25.

## Assurance quality control and practices

We have followed the international standard on quality control 1 and accordingly have maintained a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the 'DQS India–Conflict of Interest and Code of Ethics Policy', which is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior

BR No. 50257871



## Assurance methodology

The assurance procedures and principles used for this engagement were drawn from the ISAE 3000 standard and methodology developed by DQS, which consists of the following steps:

- Assessing the suitability of the engagement, including the appropriateness of the subject matter and criteria, the competence of the assurance team and the presence of necessary preconditions. The terms of the engagement were agreed upon with the responsible party.
- Developing a comprehensive assurance strategy and plan based on the subject matter, its context and internal controls. This included identifying risks of material misstatement and determining the nature, timing and extent of assurance procedures.
- Evaluating the suitability of the criteria used to measure or evaluate the subject matter, ensuring they were relevant, complete, reliable, neutral and understandable.
- Gathering evidence through detailed procedures including inquiries, inspections, observations, recalculations, analytical reviews and testing of controls and underlying data.

Below is the list of verified BRSR core indicators .

Sr.	Principles and question references	Attributes	Parameters
1	Principle 1, Q8	Customer and supplier engagement	- Average number of accounts payable days
2	Principle 1, Q9	Business openness	- Percentage of purchases and sales with trading houses, dealers, related parties - Loans, advances and investments with related parties
3	Principle 3, Q1(c)	Employee wellbeing and safety	- Spending on wellbeing measures (% of revenue)
4	Principle 3, Q11		- Safety-related incidents (employees and contract workforce)
5	Principle 5, Q3(b)	Gender diversity	- Gross wages to females (% of total wages)
6	Principle 5, Q7		- Number of POSH complaints
7	Principle 6, Q1	Energy footprint	- Total energy consumed - Percentage of energy from renewable sources - Energy intensity
8	Principle 6, Q3	Water footprint	- Total water consumption - Water consumption intensity
9	Principle 6, Q4		- Water discharge by destination and treatment level
10	Principle 6, Q7	Greenhouse gas footprint	- Scope 1 emissions (with GHG breakup: CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> ) - Scope 2 emissions (with CO <sub>2</sub> e breakup) - GHG emission intensity (Scope 1 + 2)

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Sr.	Principles and question references	Attributes	Parameters
11	Principle 6, Q9	Waste and circularity	<ul style="list-style-type: none"> <li>- Category-wise waste generation: plastic (A), e-waste (B), bio-medical (C), construction and demolition waste (D), battery (E), radioactive (F), hazardous (G), other non-hazardous (H)</li> <li>- Total waste generated (A to H)</li> <li>- Waste intensity</li> <li>- Waste recovered (recycled   reused   recovered)</li> <li>- Waste disposed (by method)</li> </ul>
12	Principle 8, Q4	Inclusive development	- Percentage of input materials sourced from MSMEs   local sources
13	Principle 8, Q5		- Wages to employees in smaller towns (% of total wages)
14	Principle 9, Q7	Customer and supplier engagement	- Percentage of customer data breaches to total cybersecurity events

- Conducting materiality and evaluation by applying professional judgement on the evidence obtained to determine whether the subject matter conforms, in all material respects, with the applicable criteria.
- Reporting based on the evidence obtained and its evaluation thereof, which led to preparation of this assurance report and expressing a positive form of conclusion on whether the subject matter is free from material misstatement.
- Performing quality control and documentation based on the quality control system of DQS India throughout the engagement in accordance with the requirements of ISAE 3000 (Revised) and relevant ethical standards. All procedures and findings were documented in a manner sufficient to support our conclusion.

## Observations and findings

In addition to providing reasonable assurance, we noted the following observations during our engagement:

- **Stakeholder inclusivity:**

We found no evidence to suggest that any key stakeholder groups were excluded from the stakeholder engagement processes related to the BRSR core indicators. Atul has demonstrated a proactive and inclusive approach, ensuring that diverse stakeholder perspectives are considered throughout its sustainability-related performance and disclosures.

- **Materiality:**

We are not aware of any significant material sustainability topics related to the BRSR core indicators that have been omitted. Atul has identified and reported on the relevant topics, ensuring alignment with stakeholder expectations and sector-specific material issues, particularly those covered under the BRSR core framework.

- **Responsiveness:**

Atul has established robust processes to effectively respond to stakeholder concerns and manage its material sustainability issues covered under the BRSR core disclosures. While our assurance was limited to the verification of the reported core indicators, we observed that the Company demonstrates adequate responsiveness to relevant stakeholder concerns within this scope.



BR No. 50257871



- **Impact:**

Atul has implemented effective processes to measure, evaluate and manage the environmental and social impacts associated with the BRSR core metrics. These processes are aligned with key performance indicators relevant to the nature of its business and identified material sustainability issues.

- **Reliability:**

Data management processes and internal controls related to the BRSR core indicators are in place and provide a reasonable level of reliability for the reported information. The overall approach supports the accuracy and completeness of core disclosures, particularly at the operational level which are based on site-specific measurement systems.

## Limitations and exclusions

Excluded from the scope of our work is assurance of information relating to:

- Financial disclosures, forward-looking statements of the Company, or other parts of the BRSR beyond the core.

The following limitations must be noted:

- This reasonable assurance engagement relies on a risk-based selected sample of sustainability data and the associated limitations that this entails.
- The reliability of the reported data and information are dependent on the accuracy of metering and other production measurement arrangements employed at site level, which were not addressed as part of this assurance.
- This independent statement should not be relied upon to detect all errors, omissions, or misstatements that may exist.

## Conclusion

Based on the procedures performed and evidence obtained, we conclude that the BRSR core disclosures of Atul for the reporting year 2024-25 **are fairly stated, in all material respects, in accordance with BRSR framework of SEBI and the applicable criteria.**

## Statement of independence, integrity and competence

DQS ensures that appropriately qualified individuals are selected for assurance engagements based on their qualifications, training and experience. The outcomes of all verification and assurance assessments are internally reviewed by Senior Management to ensure that a rigorous and transparent approach is consistently applied. DQS provided assurance services to review the sustainability data and processes of Atul, ensuring alignment with relevant ISO standards and risk management principles. The assurance assessments are the only work undertaken by DQS for Atul, thus safeguarding our independence and impartiality throughout the engagement.

On behalf of the assurance team,

June 16, 2025

Bengaluru, India

**Dr Murugan Kandasamy**

CEO and Managing Director

Deutsch Quality Systems (India) Private Limited

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