

## Annexure-D

# Business Responsibility & Sustainability Report

At Deepak Nitrite Limited ('DNL'), sustainability remains at the heart of our business operations, strategic planning, and decision-making processes. Our unwavering commitment to responsible business practices drives us to achieve our Environmental, Social, and Governance ('ESG') objectives. We are dedicated to conducting our business in a manner that safeguards the environment, contributes positively to society, and generates long-term value for all stakeholders.

We continually refine our ESG strategies and collaborate with stakeholders to achieve our shared ESG goals. Our environmental initiatives focus on minimizing our ecological footprint through strategic measures such as increasing the proportion of renewable energy in our total energy mix and reducing carbon emissions. We embarked our renewable energy journey and has signed long-term PPAs with Fourth Partner Energy to source Hybrid renewable energy – Wind and Solar at our Nandesari and Dahej sites, and a separate 3 MW agreement for operations in Roha. These renewable energy initiatives underscore our commitment to building a low-carbon future, aligning with circular economy principles and responsible resource management. By integrating wind and solar power into our operations, we are taking tangible steps towards a cleaner, more resilient energy ecosystem.

In line with this vision, we have successfully installed Scalban technology at the cooling tower, allowing R.O. reject water to be sent to the cooling tower instead of the Multiple Effect Evaporator (MEE). This innovation has significantly reduced the consumption of natural resources and operational expenditure, reflecting our commitment to efficient resource management.

Efficiently utilizing the 4R Concept—Reduce, Reuse, Recycle, and Recover—we are transforming waste into valuable products, creating both environmental and economic benefits. Our advanced pollution control technologies enable us to recycle around 35% of the water generated from wastewater, demonstrating responsible water stewardship.

Furthermore, our commitment extends beyond the factory floor into ecological restoration. We have restored 20.23 hectares of degraded coastal land through mangrove plantation, cultivating and transplanting over 1.07 Lakh native mangrove saplings. This initiative supports biodiversity conservation, carbon sequestration, and coastal protection.

We are committed to cultivating a safe, inclusive, and supportive work environment that empowers both our employees and the communities we serve. We uphold stringent ethical standards and prioritize the development of high-quality products, going beyond mere compliance. Beyond mandatory training, we implement comprehensive human rights education and skill enhancement

programs, recognizing that effective human capital management is crucial to our ongoing success. Our policies focus on enhancing community well-being and ensuring a supportive workplace environment. Our employees, being our most valuable asset, benefit from robust programs covering health, wellness, work-life balance, and rigorous safety measures. Continuous learning and development are central to our HR policies, with a range of training programs designed to enhance technical skills, leadership capabilities, and personal growth.

We are committed to creating an equitable workplace by promoting diversity, inclusion, and equal opportunities, striving to eliminate all forms of discrimination. Our community development efforts aim to generate value by focusing on education, healthcare, and skills development to empower marginalized communities. Our approach involves closely engaging with stakeholders to understand their needs and aspirations and promote resilience among marginalized communities. Through these efforts, we strive to create a lasting positive impact that supports inclusive growth for all members of the society.

DNL's governance framework is grounded in the core principles of integrity, transparency, and accountability. We adhere to the highest standards of corporate governance, ensuring that our operations are conducted ethically and transparently. Our robust code of conduct outlines ethical behavior expectations for all employees, with regular training on ethical practices and mechanisms in place for reporting and addressing any unethical behavior. Transparency is central to our sustainability efforts at DNL. As a practice, we publicly report on our ESG initiatives, including sustainable sourcing. Additionally, we actively collaborate with industry peers, government, and non-governmental organizations. These partnerships drive sustainable solutions, knowledge sharing, and the adoption of best practices, amplifying our impact and advancing global sustainability goals. By working together strategically, we aim to create lasting positive change in both environmental stewardship and societal well-being.

DNL is steadfast in its pursuit of sustainability excellence through a comprehensive and forward-looking approach. By seamlessly embedding ESG principles into our environmental, social, and governance strategies, we not only catalyse economic growth but also deliver enduring, positive impacts on society and the environment continually setting new benchmarks for responsible and sustainable business practices.

**For Deepak Nitrite Limited**

Date: May 28, 2025  
Place: Vadodara

**Maulik Mehta**  
Executive Director & CEO

## SECTION A: GENERAL DISCLOSURES

### I. Details of the Listed Entity

1	Corporate Identity Number (CIN) of the Listed Entity	L24110GJ1970PLC001735
2	Name of the Listed Entity	Deepak Nitrite Limited
3	Year of incorporation	1970
4	Registered Office address	2 <sup>nd</sup> floor, Fermenter House, Alembic City, Alembic Avenue Road, Vadodara - 390003
5	Corporate Office address	2 <sup>nd</sup> floor, Fermenter House, Alembic City, Alembic Avenue Road, Vadodara - 390003
6	E-mail	<a href="mailto:investor@godeepak.com">investor@godeepak.com</a>
7	Telephone	+91 0265-2765200
8	Website	<a href="http://www.godeepak.com">www.godeepak.com</a>
9	Financial year for which reporting is being done	2024-25
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange of India Limited
11	Paid-up Capital	₹ 27,27,86,082
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Shri Arvind Bajpai, Company Secretary, Email: <a href="mailto:investor@godeepak.com">investor@godeepak.com</a> , Telephone: +91 2652765200
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	This report is made on Standalone basis
14	Name of assessment or assurance provider	Bureau Veritas (India) Private Limited
15	Type of assessment or assurance obtained	Reasonable Assurance for BRSR Core and Limited Assurance for BRSR Report

### II. Products/services

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

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

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Nitro Tolidine	24119	17.04%
2	Sodium Nitrite	24117	17.01%
3	Optical Brightening Agents	24298	9.45%
4	EHN	24119	8.85%
5	TFMAP	24119	7.11%
6	MAHCL	24119	6.02%
7	Para Cumidines	24117	5.03%
8	4Nox	24119	4.37%
9	Sodium Nitrate	24119	4.10%
10	DASDA	24297	3.43%
11	2, 4 Xylidine	24119	3.09%
12	2 MEPPES	24119	2.80%
13	2, 6 Xylidine	24119	1.10%
14	NSA	24119	1.00%

## II. Operations

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

S. No.	Location	Number of plants	Number of offices	Total
1	National	5	3	8
2	International	0	0	0

### 19 Markets served by the entity:

#### a Number of locations

S. No.	Locations	Number
1	National (No. of states)	25
2	International (No. of countries)	50

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

45%

#### c A brief on types of customers

1. Manufacturers of Chemicals
2. Manufacturers of Products where chemicals produced by the Company are used as inputs

## IV. Employees

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

#### a Employees and Workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No.(B)	%(B/A)	No.(C)	%(C/A)
Employees						
1	Permanent (D)	1,545	1,495	96.76	50	3.24
2	Other than Permanent (E)	36	34	94.44	2	5.56
3	<b>Total employees (D + E)</b>	<b>1,581</b>	<b>1,529</b>	<b>96.71</b>	<b>52</b>	<b>3.29</b>
Workers						
4	Permanent (F)	212	212	100.00	0	0.00
5	Other than Permanent (G)	2,679	2,676	99.89	3	0.11
6	<b>Total workers (F + G)</b>	<b>2,891</b>	<b>2,888</b>	<b>99.90</b>	<b>3</b>	<b>0.10</b>

#### b Differently abled Employees and Workers:

S. No.	Particulars	Total (A)	Male		Female	
			No.(B)	%(B/A)	No.(C)	%(C/A)
Differently-abled Employees						
1	Permanent (D)	1	1	100.00	0	0.00
2	Other than Permanent (E)	0	0	0.00	0	0.00
3	<b>Total employees (D + E)</b>	<b>1</b>	<b>1</b>	<b>100.00</b>	<b>0</b>	<b>0.00</b>
Differently-abled Workers						
4	Permanent (F)	1	1	100.00	0	0.00
5	Other than Permanent (G)	7	7	100.00	0	0.00
6	<b>Total workers (F + G)</b>	<b>8</b>	<b>8</b>	<b>100.00</b>	<b>0</b>	<b>0.00</b>

## 21 Participation/Inclusion/Representation of women:

Particulars	Total (A)	No. and percentage of Females	
		No. (B)	%(B/A)
Board of Directors	12	1	8.33
Key Management Personnel	2	0	0.00

## 22 Turnover rate for permanent Employees and Workers:

(Disclose trends for the past 3 years)

Particulars	FY 2024-25 (Turnover rate (%) in current FY)			FY 2023-24 (Turnover rate (%) in previous FY)			FY 2022-23 (Turnover rate (%) in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	13.27	18.75	13.45	13.60	31.11	14.32	14.23	19.05	14.37
Permanent Workers	2.31	0.00	2.31	3.16	0.00	3.16	2.63	0.00	2.63

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

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

S. No.	Name of the holding/ subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Deepak Phenolics Limited	Subsidiary	100	YES
2	Deepak Chem Tech Limited	Subsidiary	100	YES
3	Deepak Nitrite Corporation Inc.	Subsidiary	100	YES
4	Deepak Advanced Materials Limited	Subsidiary	100	YES
5	Deepak PMC Limited	Subsidiary	100	YES
6	Deepak Oman Industries (SFZ) LLC	Subsidiary	51	YES
7	Narmada Thermal Power Private Limited	Step Down Subsidiary	100	YES

## VI. CSR Details

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

Yes

#### ii Turnover

₹ 2,526.47 Crores

#### iii Net worth

₹ 3,126.48 Crores

## VII. Transparency and Disclosures Compliances

### 25 Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	NO	0	0		0	0	
Investors (Other than Shareholders)	NO	0	0		0	0	
Shareholders	YES <a href="https://www.godeepak.com/wp-content/uploads/2025/04/Investors-Grievance-redressal-policy-f.pdf">https://www.godeepak.com/wp-content/uploads/2025/04/Investors-Grievance-redressal-policy-f.pdf</a>	12	0		4	0	
Employees and Workers	YES <a href="https://www.godeepak.com/wp-content/uploads/2024/11/DNL_Whistle-Blower-Policy.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/DNL_Whistle-Blower-Policy.pdf</a>	0	0		0	0	
Customers	YES, Customer Complaints are received by the relevant sales team and thereafter, the same are entered into dedicated software and processed as per the standard operating procedure	73	0	Complaints received were related to delivery, packing, handling etc. All the complaints received during the year have been resolved.	60	0	Complaints received were related to delivery, packing, handling etc. All the complaints received during the year have been resolved.
Value Chain Partners	NO	0	0		0	0	

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

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Water Use & Effluent Management	Opportunity	Access to clean and safe water is a fundamental human right and is aligned with the United Nations' Sustainable Development Goal 6, which aims to be achieved by 2030. As a responsible corporate citizen, we are committed to ensure that our operations do not negatively impact the quality or supply of water resources, thereby protecting the ecosystem and society at multiple levels.	NA	Positive - Effective water use and effluent management can drive significant positive financial outcomes for businesses. By optimizing water usage and managing effluent responsibly, companies can reduce operational costs, enhance resource efficiency and mitigate regulatory risks.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Climate Change & Emissions	Risk	Climate change & Emissions stands as one of the most critical challenges confronting our planet today. Given the energy and water-intensive nature of chemical production, our failure to reduce environmental footprint can have significant repercussions on our standing within the industry and our relationships with customers, investors and society as a whole.	We have embraced environmental consciousness through our commitment to sustainable manufacturing practices. This commitment is evident in our focus on reducing utility consumption, extracting value from waste and adopting clean technologies. We are continuously striving to enhance our energy efficiency. Additionally, we ensure that the effluents, emissions and waste generated at our manufacturing facilities remain within the permissible limits set by the respective Pollution Control Boards.	Negative - Climate change & emissions related issues, if not addressed, would result in negative financial implications in long run. Climate related risks including physical as well as transition risk are directly associated with disruptions to our business operations as well as those of our value chain partners. Financial implications of mitigation efforts are well within our considerations while planning our business strategy.
3	Occupational Health & Safety	Risk	Given the inherent nature of our operations, our employees face a range of operational and safety hazards. It is crucial to address any process safety gaps and prevent Occupational Health and Safety (OHS) incidents that could potentially harm our employees. Neglecting employee well-being and safety not only jeopardises their physical welfare but also poses risks to achieving production targets and can have adverse effects on our assets, environment and overall business reputation.	We prioritise continuous and safeguarding of Occupational Health, Safety and employee wellbeing. Stringent safety measures are implemented at all our sites, including regular safety audits and the provision of appropriate personal protective equipment to our employees. We actively promote safety awareness through campaigns and training initiatives.	Negative - Employee health and safety issues, if not addressed, would result in negative financial implications.
4	Community Involvement	Opportunity	Engaging with the community in its development not only uplifts the community's standard of living but also cultivates future workers and consumers for businesses associated with the end products. This proactive involvement also enhances the Company's reputation by fostering goodwill as a benefactor within the community.	NA	Positive - The benefits to the community provided by CSR activities develop goodwill and boost the Company's brand, which has long-term financial benefits.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Growth & Profitability	Opportunity	The Company's capacity to deliver substantial value to all stakeholders hinges on its robust financial foundation. In light of escalating input and energy costs and enduring volatility in foreign exchange rates, maintaining a secure financial position is imperative. This stability not only fortifies its market position but also strengthens relationships with clients, investors and the broader public.	NA	Positive - A planned and methodical approach to investments and cost management will be determining factor to the success of the Company in the short run as well as in the long run.
6	Corporate Governance	Risk	Amid the dynamic landscape of the chemical industry, which is characterised by escalating macro-economic volatility, robust governance practices play a pivotal role in upholding ethical and transparent business operations. Meeting regulatory compliance requirements and effectively managing risks are paramount in ensuring responsible conduct and long term sustainability.	Our governance practices have been established by our competent and esteemed Board of Directors, comprising members with relevant industry expertise, independent thinking and extensive global exposure. Aided by practice transparency in financial reporting, sustainability efforts and other relevant disclosures and ethical decision making processes, bolstered by effective risk management, serve as the foundation of our governance framework. We have instilled a culture of accountability and integrity across the Company, recognising its vital role in promoting good governance practices. We implement and enforce a robust Code of Conduct and ethical standards to guide the behaviour and actions of employees at all levels. Our Board and management prioritise health, safety and environmental considerations by implementing robust safety protocols, promoting sustainable practices and minimising environmental impact. We have a comprehensive Risk Management framework to identify, assess and mitigate risks associated inter alia with operations, safety, environmental impact and compliance to solidify our governance approach. We ensure strict adherence to all applicable laws, regulations and industry standards to maintain compliance and mitigate legal and reputational risks. We have established Board Committees, such as Audit, Risk Management, Nomination and Remuneration, CSR, Sustainability Committees and more to provide focussed oversight in critical areas. We regularly evaluate our governance practices, identify areas for improvement and implement necessary changes to enhance effectiveness and relevance and build trust with all stakeholders in line with global standards of ESG.	Negative - Corporate Governance is increasingly the parameter for evaluation by external stakeholders and are likely to amplify competitive advantage relating to business sustainability. In case of their failure, it would have severe financial implications.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7	Business Ethics & Compliance	Opportunity	Success in business depends on creating and sustaining a culture of ethics and integrity. It supports daily decision-making by providing employees and partners with a useful reference.	NA	Positive - Prioritizing business ethics and compliance can lead to significant financial benefits for organizations. By adhering to ethical standards and regulatory requirements, companies mitigate legal risks and avoid costly fines and penalties. A strong ethical culture also fosters trust and credibility with stakeholders, enhancing customer loyalty, investor confidence and employee morale.
8	Business Continuity	Opportunity	Risk management and ethics are interconnected. A company faces lower risks to its business when it adheres to ethical standards. Aligning business ethics with risk management is crucial for ensuring continuity and resilience during disruptive incidents.	NA	Positive - Business continuity ensures resilience against disruptions, minimizing revenue loss, operational downtime and reputational damage. This proactive approach helps maintain customer trust, preserves market position and reduces recovery costs, ultimately safeguarding profitability and sustaining long-term financial health.
9	Product Stewardship	Risk and Opportunity	Risk: Reputational damage, negative impact on market share, Opportunity: Reduction in environmental impact and increased stakeholder trust and in revenue	DNL has established a protocol to assess the ESG (Environmental, Social and Governance) impacts of products during their development stages. These impacts are carefully considered in our decision-making processes. We have calculated the carbon footprint for most of our products and planning to conduct Life Cycle Assessments (LCA) for few of our existing products.	Positive - Increased circularity will result in decreased cost of materials, increased productivity and greater profitability. Such operational practices also cater to the customers preferences; aligned to responsibly sourced / manufactured products.
10	Sustainable Supply Chain	Risk	Having a sustainable supply chain is critical for company's operations and business continuity. Considering the size of Company's operations, it can influence the ESG priorities for suppliers. It will have a high impact on stakeholders as well.	We maintain a robust logistics and distribution network using secure transportation with GPS tracking to monitor raw materials and finished goods in real-time. Our organised warehousing ensures prompt customer deliveries. Leveraging our manufacturing expertise, integrated facilities and agile operations, we consistently deliver reliable and steady performance.	Negative - Any disruption in Supply Chain would adversely affect the business continuity and hence would jeopardise sustainability of business.



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
11	Waste Management	Opportunity	The production and use of agrochemicals generate hazardous waste, necessitating a focus on reducing waste generation, as well as recycling and reusing waste wherever possible.	NA	Positive - Implementing effective waste management strategies can lead to substantial financial benefits for businesses. By reducing waste generation, companies can lower disposal costs and improve resource efficiency.
12	Energy Management	Opportunity	Recognizing the importance of energy efficiency in all business activities, we actively monitor our performance using systems installed across multiple locations to track daily energy consumption. Our energy conservation strategy aligns with our commitment in achieving established sustainability goals and targets.	NA	Positive - Effective energy management practices can yield substantial financial benefits for businesses. By optimizing energy use, operational costs associated with utilities, such as electricity and fuel can be reduced.
13	Employee Engagement	Opportunity	Skilled and proficient employees execute their responsibilities with effectiveness and efficiency, contributing to a capable workforce that drives internal growth. This enhances product quality and ultimately, boosts revenue for the Company.	NA	Positive - Efforts in ensuring the skill development of the workforce will lead to a more efficient workforce and improved productivity of the Company.
14	Human Rights	Risk and Opportunity	Human rights significantly influence business operations both internally and externally, spanning from raw material procurement to distribution and disposal. They also play a crucial role in shaping the company's reputation throughout the entire value chain.  Risk: Potential regulatory noncompliance and reputational damage. Opportunity: Upholding employees' and workers' rights through collective action.	We have implemented a robust Human Rights due diligence framework to systematically assess our operations. This includes conducting human rights vulnerability assessments at our operational sites to identify and mitigate risks, as well as monitoring and reporting our performance. We are committed to upholding human rights across all aspects of our business operations. Our commitment to respecting human rights extends to our business partners through alignment with our policies and contractual agreements. In the fiscal year 2024-25, no incidents of human rights violations were reported, demonstrating our dedication to maintaining ethical standards throughout our operations.	Positive - Implications of non-compliance to social adherence norms related to human rights will have reputation impact for any company. The mitigation of such risks requires investment in human rights vulnerability assessment and actions. Proactive and regular compliance by the workforce is imperative to ensure business continuity in the long run.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
15	Customer Relationships	Opportunity	In a rapidly evolving and highly competitive operating environment, the growth of our business is intricately tied to our customer base. Strengthening our relationships with customers is, therefore, a crucial aspect that can profoundly influence our value-creation capabilities.	NA	Positive - A structured and transparent relationship with customers has the potential to expand business in both the short and long run, resulting in a sustainable business model.
16	Diversity, Equity & Inclusion	Opportunity	At DNL, our focus is on creating value through the continuous expansion of our workforce and fostering agility. Our team comprises individuals from diverse educational, cultural and demographic backgrounds. We are committed to upholding principles of inclusion and diversity in our employment practices, ensuring they remain inclusive of all ages and genders.	NA	Positive - Investing in Diversity, Equity and Inclusion (DEI) initiatives can lead to significant financial benefits for organizations. By fostering a diverse workforce that includes individuals from various backgrounds, genders, ages and cultures, companies can enhance innovation and creativity. This diversity of thought often leads to better problem-solving and decision making processes, which can drive operational efficiency and productivity.
17	Product Innovation	Opportunity	As our products are utilized across diverse manufacturing sectors, the demand for advanced compatibility with upgraded technologies is crucial. Emphasizing product innovation through enhanced technologies and processes will position us for a broader market in the future.	NA	Positive - Better products and the introduction of new products into the market will generate more revenue through greater business with existing customers and the addition of new clients.
18	Digitalization, IT Security & Data Privacy	Opportunity	As demonstrated during recent global disruptions, adopting digital modes of operation is crucial. These methods can greatly influence customer relationships, product launches, workforce productivity and operational efficiency.	NA	Positive - The integration of digital technologies within operations has been demonstrated across industries to alleviate operational efficiency and robustness of business output. It also allows the Company to realize strategy automation and business intelligence in the wake of competitive agility.

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

### Policy and Management Processes

#### 1 a Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)

P1	P2	P3	P4	P5	P6	P7	P8	P9
YES	YES	YES	YES	YES	YES	YES	YES	YES

#### b Has the policy been approved by the Board? (Yes/No)

P1	P2	P3	P4	P5	P6	P7	P8	P9
YES	YES	YES	YES	YES	YES	YES	YES	YES

#### c Web Link of the Policies, if available

P1	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P2	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P3	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P4	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P5	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P6	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P7	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P8	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>
P9	<a href="https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf">https://www.godeepak.com/wp-content/uploads/2024/11/Revised-Policy-Manual.pdf</a>

#### 2 Whether the entity has translated the policy into procedures. (Yes / No)

P1	P2	P3	P4	P5	P6	P7	P8	P9
YES	YES	YES	YES	YES	YES	YES	YES	YES

#### 3 Do the enlisted policies extend to your value chain partners? (Yes/No)

P1	P2	P3	P4	P5	P6	P7	P8	P9
NO	NO	NO	NO	NO	NO	NO	NO	NO

#### 4 Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.

P1	-
P2	-
P3	-
P4	-
P5	ISO 45001 Certification
P6	ISO 14001 Responsible Care Logo holder
P7	-
P8	ISO 9001
P9	-

## 5 Specific commitments, goals and targets set by the entity with defined timelines, if any.

P1	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P2	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P3	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P4	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P5	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P6	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P7	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P8	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.
P9	The Company has not set any specific goals with timeline. However, it is endeavor of the Company to ensure implementation of Principles of NGRBC. The Company will carefully assess its strategic positions and develop specific goals targets and commitments with timelines in due course.

## 6 Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.

P1	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P2	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P3	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P4	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P5	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P6	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P7	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P8	The performance against the goals and targets will be assessed in the subsequent Financial Years.
P9	The performance against the goals and targets will be assessed in the subsequent Financial Years.

## Governance, Leadership and Oversight

### 7 Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure).

Please refer to Statement of Shri Maulik Mehta at the beginning of this Report.

### 8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility Policy (ies).

The Sustainability Committee is responsible for implementation and oversight the Business Responsibility Policies.

### 9 Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

Yes. The Company has constituted a Sustainability Committee of Directors for decision making on Sustainability related issues.

**10 Details of Review of NGRBCs by the Company**

	Principles	Performance against above policies and follow up action	Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances
Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	P1	YES	YES
	P2	YES	YES
	P3	YES	YES
	P4	YES	YES
	P5	YES	YES
	P6	YES	YES
	P7	YES	YES
	P8	YES	YES
	P9	YES	YES
Frequency (Annually/ Half yearly/ Quarterly/ Any other please specify)	P1	Half Yearly	Half Yearly
	P2	Half Yearly	Half Yearly
	P3	Half Yearly	Half Yearly
	P4	Half Yearly	Half Yearly
	P5	Half Yearly	Half Yearly
	P6	Half Yearly	Half Yearly
	P7	Half Yearly	Half Yearly
	P8	Half Yearly	Half Yearly
	P9	Half Yearly	Half Yearly

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

<b>P1</b>	No
<b>P2</b>	No
<b>P3</b>	No
<b>P4</b>	No
<b>P5</b>	No
<b>P6</b>	No
<b>P7</b>	No
<b>P8</b>	No
<b>P9</b>	No

**12 If answer to question (1) above is No i.e. not all Principles are covered by a policy, reasons to be stated:**

Not Applicable

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

#### Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	4	Strategy, Risk and Opportunities, Business Sustainability	97.92
Key Managerial Personnel	4	Strategy, Risk and Opportunities, Business Sustainability	100
Employees other than BoD and KMPs	75	Health, Safety and Environment and Sustainability, Code of Conduct and POSH	89
Workers	65	Health, Safety and Environment and Sustainability, Code of Conduct and POSH	78

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

Monetary					
Penalty/Fine	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty	Principle 4	Deputy Collector, Stamp Duty Valuation Department, Section-2, Vadodara.	₹ 50,000	Deficiency in payment of Stamp Duty on Memorandum of Entry executed by the Company on May 27, 2014 for securing the Term Loan/ Working Capital facilities obtained from the Lenders.	Yes
Penalty	Principle 4	Deputy Collector, Stamp Duty Valuation Department, Section-2, Vadodara.	₹ 50,000	Deficiency in payment of Stamp Duty on Memorandum of entries executed by the Company on October 16, 2014 for securing the Term Loan/ Working Capital facilities obtained from the Lenders.	Yes

Monetary					
Penalty/Fine	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty	Principle 4	Office of the Commissioner of Customs, Nahva Sheva -II Centralized Adjudication Cell, Jawaharlal Nehru Custom House, Nhava Sheva-400 707, Dist. Raigad, Maharashtra ('Customs Authorities').	(i) Penalty of ₹ 1,00,00,000/- under Section 114(iii) of the Customs Act. (ii) Penalty of ₹ 1,50,00,000/- under Section 114AA of the Customs Act. (iii) Penalty of ₹ 50,00,000/- under Section 114AB of the Customs Act. (iv) Redemption fine of ₹ 5,00,00,000/- in lieu of confiscation, under Section 125 of the Customs Act.	Recovery of excess benefit claimed under Merchandise Export from India Scheme ('MEIS') on account of Customs Tariff classification. The Company believes the Product classification done by it is appropriate and is followed consistently even before the introduction of MEIS. Further, the same was never challenged by the Customs Authorities before the introduction of the MEIS.	Yes
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Not Applicable					

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

Case Details	Name of regulatory/ enforcement agencies/ judicial institutions
Deficiency in payment of Stamp Duty on Memorandum of entries executed by the Company on May 27, 2014 for securing the Term Loan/ Working Capital facilities obtained from the Lenders. Directed recovery of Stamp Duty of ₹ 86,10,000/-	Chief Controlling Revenue Authority (CCRA), Gandhinagar
Deficiency in payment of Stamp Duty on Memorandum of entries executed by the Company on October 16, 2014 for securing the Term Loan/Working Capital facilities obtained from the Lenders. Directed recovery of Stamp Duty of ₹ 21,00,000/-	Chief Controlling Revenue Authority (CCRA), Gandhinagar
Recovery of excess benefit claimed under Merchandise Export from India Scheme ('MEIS') on account of Customs Tariff classification. The Company believes the Product classification done by it is appropriate and is followed consistently even before the introduction of MEIS. Further, the same was never challenged by the Customs authorities before the introduction of the MEIS.	Custom, Excise & Service Tax Tribunal, Mumbai (CESTAT)

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

Yes. The Code of Conduct of the Company, which is applicable to all the employees, covers the Anti-Corruption and Anti-Bribery Policy of the Company.

The weblink of the same is [https://www.godeepak.com/wp-content/themes/twenty sixteen/companyfiles/corporate\\_governance\\_report/Code%20of%20Conduct\\_Senior%20Management.pdf](https://www.godeepak.com/wp-content/themes/twenty sixteen/companyfiles/corporate_governance_report/Code%20of%20Conduct_Senior%20Management.pdf)

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

Category	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

	FY 2024-25 (Current Financial Year)		FY 2023-24 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Not Applicable	0	Not Applicable
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Not Applicable	0	Not Applicable

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

Since there were no such matters, no corrective actions are required to be taken.

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Number of days of accounts payables	77	61

**9 Open-ness of business**

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

Parameter	Metrics	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	59.45%	50.96%
	b. Number of trading houses where purchases are made from	1,915	1,770
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	53.08%	56.05%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	8.00%	8.00%
	b. Number of dealers / distributors to whom sales are made	66	40
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	88.00%	87.00%
Share of RPTs	a. Purchases (Purchases with related parties / Total Purchases)	9.23%	7.83%
	b. Sales (Sales to related parties / Total Sales)	1.32%	1.13%
	c. Loans and advances (Loans and advances given to related parties / Total loans and advances)	83.77%	99.53%
	d. Investments (Investments in related parties / Total Investments made)	93.33%	90.18%



## Leadership Indicators

### 1 Awareness programmes conducted for value chain partners on any of the principles during the financial year:

S. No.	Total number of awareness programmes held	Topics/ principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	1	Sustainability, Safety Compliance & Emergency Response & Planning.	1%

### 2 Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes. As per the Code of Conduct applicable to the Board of Directors, Directors must avoid any conflicts of interests with the Company. Directors will not enter into, without the prior approval of the disinterested members of the Board, any transaction or relationship with the Company in which they have a financial or personal interest, either directly or indirectly, such as through any relative (as defined under Section 2(77) of the Companies Act, 2013 or any statutory modification or re-enactment thereof), or an organisation with which the Director is affiliated, or any transaction or situation which otherwise involves a conflict of interest. The link to the Code of Conduct for Directors is [https://www.godeepak.com/wp-content/themes/twentyseventeen/companyfiles/corporate\\_governance\\_report/Code\\_of\\_Conduct\\_for\\_Director.pdf](https://www.godeepak.com/wp-content/themes/twentyseventeen/companyfiles/corporate_governance_report/Code_of_Conduct_for_Director.pdf).

## PRINCIPLE 2

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

### Essential Indicator

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

Category	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	0.0%	6%	Efficiency improvement, emission reduction, energy conservation, improved effluent treatment.
Capex	3.94%	5%	Efficiency improvement, emission reduction, energy conservation, improved effluent treatment.

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

Yes.

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

32% of the inputs were sourced sustainably.

### 3 Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for:

#### a Plastics (including packaging)

All plastic waste generated was given to Extended Producer's Responsibility ('EPR') registered plastic waste processor.

#### b E waste

All e-waste generated was given to recycler registered with Pollution Control Board

#### c Hazardous waste

All hazardous waste generated was disposed to PCB-registered, TSDF, CHWIF, Co-processing facility, Pre-processing facility & Recyclers/Actual user facility.

#### d other waste

All other waste generated was disposed to authorised recycling agencies.

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

Yes. The waste collection is in line with the EPR plan submitted to Pollution Control Boards.

### Leadership Indicator

- 1 Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format.**

LCA was not conducted for any products.

- 2 If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

There are no significant social or environmental concerns and/or risks arising from production or disposal of products.

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

No recycled materials have been used in the production.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	0	1,235	0	0	1,501	0
E-waste	0	0	0	0	0	0
Hazardous waste	0	0	0	0	0	0
Other waste	0	0	0	0	0	0

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

Not Applicable.

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

### Essential Indicator

- 1 a Details of measures for the well-being of employees:**

		% of employees covered by									
Category	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	%(B/A)	Number (C)	%(C/A)	Number (D)	%(D/A)	Number (E)	%(E/A)	Number (F)	%(F/A)
Permanent Employees											
Male	1,495	1,495	100.00	1,495	100.00	0	0.00	1,495	100.00	0	0.00
Female	50	50	100.00	50	100.00	50	100.00	0	0.00	0	0.00
Total	1,545	1,545	100.00	1,545	100.00	50	100.00	1,495	100.00	0	0.00
Other than Permanent Employees											
Male	34	34	100.00	34	100.00	0	0.00	34	100.00	0	0.00
Female	2	2	100.00	2	100.00	2	100.00	0	0.00	0	0.00
Total	36	36	100.00	36	100.00	2	100.00	34	100.00	0	0.00

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

% of workers covered by											
Category	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	%(B/A)	Number (C)	%(C/A)	Number (D)	%(D/A)	Number (E)	%(E/A)	Number (F)	%(F/A)
Permanent Workers											
Male	212	212	100.00	212	100.00	0	0.00	212	100.00	0	0.00
Female	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	212	212	100.00	212	100.00	0	0.00	212	100.00	0	0.00
Other than Permanent Workers											
Male	2,676	2,676	100.00	2,676	100.00	0	0.00	2,676	100.00	0	0.00
Female	3	3	100.00	3	100.00	3	100.00	0	0.00	0	0.00
Total	2,679	2,679	100.00	2,679	100.00	3	100.00	2,676	100.00	0	0.00

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

Category	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Cost incurred on wellbeing measures as a % of Total Revenue of the Company	0.25%	0.20%

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

S. No.	Benefits	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	100%	Yes	100%	100%	Yes
2	Gratuity	100%	100%	Yes	100%	100%	Yes
3	ESI	100%	100%	Yes	100%	100%	Yes

3 Accessibility of workplaces

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

Yes, our premises have facilities of ramps, lifts, bars and handles, dedicated washrooms for the differently abled employees.

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

Yes. It can be accessed at: <https://www.godeepak.com/wp-content/uploads/2021/05/Diversity-Equal-Opportunity-and-Freedom-of-Association-1-9-2020-.pdf>

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	71	100%	0	0
Female	1	100%	0	0
<b>Total</b>	<b>72</b>	<b>100%</b>	<b>0</b>	<b>0</b>

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

	Yes/No	If Yes, then give details of the mechanism in brief
Permanent Workers	Yes	Each recognised union have their Grievances Committee covering all permanent workers. These committees approach the management for grievances and grievances are resolved judiciously
Other than Permanent Workers	Yes	Periodic Meetings of representatives of Human Resources Department are held with other than permanent Workers to resolve their grievances, if any.
Permanent Employees	Yes	Grievance Committees are in place to redress the grievances.
Other than Permanent Employees	Yes	Periodic Meetings of representatives of Human Resources Department are held with other than permanent employees to resolve their grievances, if any.

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total employees / workers in respective category(A)	No. of employees / workers in respective category, who are part of association(s) or Union(B)	% (B/A)	Total employees / workers in respective category(A)	No. of employees / workers in respective category, who are part of association(s) or Union(B)	% (B/A)
<b>Total Permanent Employees</b>	<b>1,545</b>	<b>0</b>	<b>0.00</b>	<b>1,503</b>	<b>0</b>	<b>0.00</b>
Male	1,495	0	0.00	1,457	0	0.00
Female	50	0	0.00	46	0	0.00
<b>Total Permanent Workers</b>	<b>212</b>	<b>212</b>	<b>100.0</b>	<b>217</b>	<b>217</b>	<b>100.00</b>
Male	212	212	100.0	217	217	100.00
Female	0	0	0.00	0	0	0.00

**8 Details of training given to employees and workers:**

Category	FY 2024-25 (Current Financial Year)					FY 2023-24 (Previous Financial Year)				
	Total (A)	On Health and safety measures (B)		On Skill upgradation (C)		Total (D)	On Health and safety measures (E)		On Skill upgradation (F)	
		No.(B)	% B/A	No.(C)	% C/A		No.(E)	% E/D	No.(F)	% F/D
Employees										
Male	1,495	1,131	75.65	802	53.65	1,457	1,457	100.00	320	21.96
Female	50	16	32.00	27	54.0	46	46	100.00	6	13.04
Total	1,545	1,147	74.24	829	53.66	1,503	1,503	100.00	326	21.69
Workers										
Male	212	108	50.94	94	44.34	217	217	100.00	27	12.44
Female	0	0	0.00	0	0.00	0	0	0.00	0	
Total	212	108	50.94	94	44.34	217	217	100.00	27	12.44

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total (A)	No. (B)	% B/A	Total (C)	No. (D)	% D/C
<b>Employees</b>						
Male	1,495	1,284	85.89	1,457	1,425	97.80
Female	50	39	78.00	46	44	95.65
<b>Total</b>	<b>1,545</b>	<b>1,323</b>	<b>85.63</b>	<b>1,503</b>	<b>1,469</b>	<b>97.74</b>
<b>Workers</b>						
Male	212	0	0.00	217	0	0.00
Female	0	0	0.00	0	0	0.00
<b>Total</b>	<b>212</b>	<b>0</b>	<b>0.00</b>	<b>217</b>	<b>0</b>	<b>0.00</b>

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

Yes.

All locations of DNL has implemented HSE management system in line with ISO 45001 and ISO 14001. Plan-Do-Check-Act cycle is followed for the continual improvement.

**Key features of HSE Management system:**

- 1) OH & S is considered as line-management responsibility.
- 2) Well defined and communicated responsibility, accountability and authority of persons who identify, evaluate or control OSH hazards and risks.
- 3) Promote cooperation and communication among members of the organization, including workers and their representatives, to implement the elements of the organization's OHS management system.
- 4) Well established HSEQ policy and measurable objectives.
- 5) Identification and elimination or control of work-related hazards and risks and promote health at work.
- 6) Health promotion programmes are being organised.
- 7) Periodic review by top leadership on the performance of the OHS management system.
- 8) All sites are audited and performance is evaluated through team of auditors.
- 9) Following seven codes of Responsible Care are in practice:
  - I) Process Safety Code
  - II) Employee Health & Safety
  - III) Pollution prevention
  - IV) Distribution Safety
  - V) Product Stewardship
  - VI) Community awareness & emergency response
  - VII) Security Code
- 10) DNL has received Eco Vadis Bronze Medal in its latest assessment done in year 2024, results published in April 2025.
- 11) DNL has also launched internal Safety Management System named "Parivartan" consisting of seven core elements to enhance safety culture across all sites.

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

Work related hazards are identified through various techniques like Hazard Identification and Risk Assessment ('HIRA') and Hazard and Operability Study ('HAZOP'). Leadership Walk through rounds & Cross site Safety audit also being conducted at regular interval at all sites.

**c Whether you have processes for workers to report the work related hazards and to remove themselves from such risks? (Yes/ No)**

Yes

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

Yes

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

Safety Incident/Number	Category	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million person-hours worked)	Employees	0.29	0.28
	Workers	0	0.26
Total recordable work-related injuries	Employees	2	2
	Workers	9	9
No. of fatalities	Employees	0	0
	Workers	0	0
High-consequence work-related injury or ill health (excluding fatalities)	Employees	0	0
	Workers	0	0

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

DNL is a Responsible Care logo holding Company. Some of the measures for safe working environment is listed below:

- 1) Regular training on EHS related matters are provided to existing employees, workers as well as to new joiners.
- 2) Maintain an organized and orderly facility.
- 3) Communicate hazards to everyone in the facility.
- 4) DCS controlled processes.
- 5) Using engineering controls.
- 6) Treatment of waste in ETP.
- 7) All statutory requirements are complied with.
- 8) We provide PPE for everyone entering our plants.

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	-	0	0	-
Health and Safety	0	0	-	0	0	-

# 14 Assessments for the year:

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

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

We have initiated safety management system to enhance safety culture.

## Leadership Indicators

### 1 Does the entity extend any life insurance or any compensatory package in the event of death of

#### a Employees (Y/N)

Yes

#### b Workers (Y/N)

Yes

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

Standard terms of the Contracts with Value Chain partners contain clauses requiring Value Chain partners to comply with such legal requirements for collection/deduction of statutory dues and depositing the same with appropriate authorities. Further, the payment to such Value Chain partners are released upon verification of such deposition.

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

Category	Total No. of affected employees/ workers		No. of employees/workers rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Employees	0	0	0	0
Workers	0	0	0	0

**4 Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)**

No

**5 Details on assessment of Value Chain partners:**

Category	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100
Working Conditions	100

**6 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of Value Chain partners.**

We have implemented rigorous corrective measures, including enhanced safety training, regular audits and strict compliance checks to address identified risks and improve Health and Safety practices across our Value Chain partners.

**PRINCIPLE 4**

**Businesses should respect the interests of and be responsive to all its stakeholders**

**Essential Indicators**

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

The Company believes that the stakeholders who are affected the most by the business as well as those who affect the Company the most, are key stakeholders for the Company. The key stakeholders are identified as Customers, Investors, Community, Employees and Suppliers.

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

S. No.	Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
1	Customers	No	Email Communication, Face-to face meeting, Phone calls, Virtual meetings, Exhibitions, conferences	Daily	Routine discussion like price variation, timely supply of products etc.
2	Investors	No	Annual General Meeting / analyst meetings/ conferences / Annual Report Quarterly earnings con calls / Media releases Company website / Dedicated investor email address Individual communication channels Through Registrar and Share Transfer Agent (RTA) / Social Media	Quarterly	Financial performance, Operational performance, growth plans, challenges faced by the Company, Material information, Notices of General meeting, Board meetings.

S. No.	Stakeholder Group	Whether identified as Vulnerable and Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
3	Community	Yes	Engaging in regular dialogues with community through meetings, visits and interactions. Executing CSR initiatives to encourage community involvement. Utilising demographic surveys to obtain valuable insights and feedback from the community	Monthly	Community shares their experiences, views and expectations from the Company.
4	Employees	No	Senior leadership communication sessions, Performance review and appraisal meetings. Union meetings for open dialogue and collaboration, Wellness initiatives promoting employee well-being, Employee engagement surveys to gather feedback and insights. Townhall meetings for transparent communication and updates. Sports events to encourage team building and physical well-being	Daily	Feedback on policies, suggestions, queries on HR policies, trainings on sustainability, health and safety, career development.
5	Supplier	No	Advertisement, Email, Face-to-face Meetings, Newspaper, Pamphlets, Phone Calls, SMS, Website, Virtual Meetings	Daily	Quantity and quality of products and services, payment terms, deliverables.

### Leadership Indicators

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

The process for consultation between stakeholders and the Board on economic, environmental and social topics involves both direct and delegated mechanisms. In direct consultation, stakeholders engage with the Management through structured meetings, surveys and public and business forums, where their inputs are systematically recorded and compiled into comprehensive reports. These reports are subsequently presented to the Management during scheduled sessions to inform decision-making. When consultation is delegated, designated representatives such as Committees or managers gather stakeholder's feedback using various methods like meetings and surveys. The collected feedback is synthesized into detailed summary reports, which are communicated to the Management through regular briefings or written submissions. This ensures that the Board is kept informed of stakeholder perspectives and can make decisions based on a broad range of inputs.

#### 2 Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, the stakeholder consultation is used to support the identification and management of environmental and social topics. Input from stakeholders plays a crucial role in shaping policies and activities related to these areas. For instance, in response to community concerns about environmental impacts, formal and informal feedback from stakeholders are instrumental in enhancing the Company's waste management practices, leading to the adoption of a new recycling program. Similarly, stakeholders consultation revealed the need for improved social policies, resulting in the development of a comprehensive community engagement strategy. This strategy included regular meetings and partnerships with local organizations to address social issues more effectively. These consultations ensure that stakeholders perspective are integrated into the Company's policies and activities, fostering sustainable and community-aligned decision-making



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

Based on the stakeholders consultation and baseline surveys, the CSR activities of the Company are inter alia aimed to address the concerns of vulnerable/ marginalized stakeholder groups. Additionally, to better address the needs of marginalized groups such as indigenous communities, the organization conducted focused listening sessions to understand their unique challenges related to social and cultural preservation. This engagement led to the implementation of culturally sensitive environmental management practices and the creation of educational programs aimed at preserving local requirements. Another instance includes partnering with non-profit organizations to provide health support services to underserved populations, thereby addressing their immediate needs and fostering long-term resilience. These actions demonstrate the Company's commitment to actively engaging with and responding to the concerns of vulnerable groups, ensuring that their voices are heard and integrated into the decision-making process.

## PRINCIPLE 5

### Businesses should respect and promote human rights

#### Essential Indicators

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	1,545	31	2.01	1,503	186	12.38
Other than Permanent	36	0	0.00	46	24	52.17
<b>Total</b>	<b>1,581</b>	<b>31</b>	<b>1.96</b>	<b>1,549</b>	<b>210</b>	<b>13.56</b>
<b>Workers</b>						
Permanent	212	0	0.00	217	0	0.00
Other than Permanent	2,676	48	1.79	2,304	0	0.00
<b>Total</b>	<b>2,888</b>	<b>48</b>	<b>1.66</b>	<b>2,521</b>	<b>0</b>	<b>0.00</b>

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

Category	FY 2024-25 (Current Financial Year)					FY 2023-24 (Previous Financial Year)				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	% B/A	No.(C)	% C/A		No.(E)	% E/D	No.(F)	% F/D
Employees										
Permanent	1,545	0	0.00	1,545	100.00	1,503	0	0.00	1,503	100.00
Male	1,495	0	0.00	1,495	100.00	1,457	0	0.00	1,457	100.00
Female	50	0	0.00	50	100.00	46	0	0.00	46	100.00
Other than Permanent	36	0	0.00	36	100.00	46	0	0.00	46	100.00
Male	34	0	0.00	34	100.00	43	0	0.00	43	100.00
Female	2	0	0.00	2	100.00	3	0	0.00	3	100.00
Workers										
Permanent	212	0	0.00	212	100.00	217	0	0.00	217	100.00
Male	212	0	0.00	212	100.00	217	0	0.00	217	100.00
Female	0	0	0.00	0	0.00	0	0		0	
Other than Permanent	2,679	0	0.00	0	100.00	2,304	2,304	100.00	0	0.00
Male	2,676	2,676	100.00	0	0.00	2,253	2,253	100.00	0	0.00
Female	3	3	100.00	0	0.00	51	51	100.00	0	0.00

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

Category	Male		Female	
	Number	Median remuneration/ salary/ wages (₹ in Crores)	Number	Median remuneration/ salary/ wages (₹ in Crores)
Board of Directors (BoD) <sup>1</sup>	7	0.16	1	0.25
Key Managerial Personnel <sup>2</sup>	6	4.22	0	0
Permanent employees other than BoD and KMP	1,489	0.06	50	0.07
Permanent Workers	212	0.07	0	0

#### Notes:

1. Includes only Non-Executive Directors and Independent Directors.
2. Key Managerial Personnel includes Chairman & Managing Director, Whole-time Directors, Chief Financial Officer and Company Secretary.

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Gross wages paid to Permanent female employees as % of total wages	2.98	3.21

### 4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Ethics, Human Rights & Labour Policy has been adopted by the Company and the Sustainability Committee has been constituted to review all Sustainability related matters of the Company including human rights.

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

The Company has a policy in place for Ethics, Human Rights & Labour Policy. It is committed to maintaining safe and harmonious business environment and workplace for all individuals.

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights related issues	0	0	NA	0	0	NA

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

Category	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees/workers	0	0
Complaints on POSH upheld	0	0

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

The Company has a Policy on Ethics, Human Rights and Labour, which provides anonymity to the complainant and also prevents victimisation of the complainant.

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

Yes

**10 Assessments for the year**

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Sexual Harassment	100%
Discrimination at Workplace	100%
Wages	100%

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

There were no risks/concerns arising from the assessment. However, regular training and awareness sessions are being conducted.

**Leadership Indicators****1 Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.**

Specific clause added in all third-party agreements to avert risk of Human Rights Violation.

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

While the Company is engaging new vendor or contractor it ensures that those parties are aware about human rights protection and written confirmation post due-diligence audit are taken.

**3 Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**

Yes

**4 Details on assessment of Value Chain partners:**

	% of Value Chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	100%
Discrimination at Workplace	100%
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Wages	100%

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

There were no significant risks / concerns arising from the assessment.

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

### Essential Indicators

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

Parameter	FY 2024-25 (Current Financial Year)		FY 2023-24 (Previous Financial Year)	
	Value	Unit	Value	Unit
<b>From renewable sources</b>				
Total electricity consumption (A)	1,530.76	GJ	23.74	GJ
Total fuel consumption (B)	0	GJ	0	GJ
Energy consumption through other sources (C)	0	GJ	0	GJ
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>1,530.76</b>	<b>GJ</b>	<b>23.74</b>	<b>GJ</b>
<b>From non-renewable sources</b>				
Total electricity consumption (D)	3,83,808.64	GJ	3,52,823.79	GJ
Total fuel consumption (E)	14,53,800.75	GJ	17,54,346.79	GJ
Energy consumption through other sources (F)	3,12,297.54	GJ	0	GJ
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>21,49,906.93</b>	<b>GJ</b>	<b>21,07,170.58</b>	<b>GJ</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>21,51,437.69</b>	<b>GJ</b>	<b>21,07,194.32</b>	<b>GJ</b>
<b>Energy intensity per rupee of turnover per rupee of turnover (Total energy consumed / Revenue from operations)</b>	0.000085156	GJ/₹	0.00007735	GJ/₹
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)</b>	0.001759319	GJ/₹	0.0015802	GJ/₹
<b>Energy intensity in terms of physical output -</b>	8.1173	GJ/MT of production	8.8035	GJ/MT of production
Energy intensity (optional) -	0	-	0	-

Source of PPP conversion rates taken from the International Monetary Fund (IMF) published document for FY 2023-24 and FY 2024-25.

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited

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

No

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

Parameter	FY 2024-25 (Current Financial Year)		FY 2023-24 (Previous Financial Year)	
	Value	Unit	Value	Unit
<b>Water withdrawal by source (in kilolitres)</b>				
(i) Surface water	0	Kilolitres	0	Kilolitres
(ii) Groundwater	0	Kilolitres	0	Kilolitres
(iii) Third party water	11,67,269	Kilolitres	13,51,968	Kilolitres
(iv) Seawater / desalinated water	0	Kilolitres	0	Kilolitres
Others	0	Kilolitres	0	Kilolitres
<b>Total volume of water withdrawal (i + ii + iii + iv + v)</b>	<b>11,67,269</b>	<b>Kilolitres</b>	<b>13,51,968</b>	<b>Kilolitres</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>6,70,029</b>	<b>Kilolitres</b>	<b>7,54,745</b>	<b>Kilolitres</b>
<b>Water intensity per rupee of turnover</b>	0.00002652	Kilolitres/₹	0.00002770	Kilolitres/₹
<b>Water intensity per rupee of turnover adjusted for PPP</b>	0.00054791	Kilolitres/₹	0.00056599	Kilolitres/₹
<b>Water intensity in terms of physical output</b>	2.5280	Kilolitres/MT of production	5.6483	Kilolitres/MT of production
<b>Water intensity (optional)</b>	-	-	-	-

Source of PPP conversion rates taken from the International Monetary Fund (IMF) published document for FY 2023-24 and FY 2024-25.

Note: The Company has started monitoring of water consumption from this year as per BRSR guidelines and previous year water consumption figure corrected accordingly

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited

**4 Provide the following details related to water discharged:**

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
	Value	Value
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To surface water	0	0
- No treatment	0	0
- With treatment	0	0
(ii) To Groundwater	0	0
- No treatment	0	0
- With treatment	0	0
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment	0	0
(iv) Sent to third-parties	5,02,284	5,97,223
- No treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment	0	0
<b>Total water discharged (in kilolitres)</b>	<b>5,02,284</b>	<b>5,97,223</b>

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited

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

Yes, the Company has implemented Zero Liquid Discharge system (ZLD) at its Hyderabad Unit-II. Details of ZLD as follows;

1. Effluents with high TDS are first given primary treatment and then processed through a multi-effect evaporator system, from which the concentrate effluent is sent to a fluidized bed recovery system to recover sodium sulfate salt and treated water is being reused in the process.
2. Sewage treated in Sewage Treatment Plant followed by RO plant. RO permeate for reuse & RO reject for evaporation.

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

Parameter	FY 2024-25 (Current Financial Year)		FY 2023-24 (Previous Financial Year)	
	Value	Unit	Value	Unit
NOx	630	TPA	581	TPA
SOx	136	TPA	140	TPA
Particulate matter (PM)	64	TPA	63	TPA
Persistent organic pollutants (POP)	0	NA	0	NA
Volatile organic compounds (VOC)	0	NA	0	NA
Hazardous air pollutants (HAP)	0	NA	0	NA

Note: Air pollutant data previously reported in ppm and mg/Nm<sup>3</sup> is now presented in TPA for consistency with emission reporting standards.

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited

**Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, assumptions and/or calculation tools used.**

The agency approved by National Accreditation Board for testing and Calibration Laboratories (NABL)/ Ministry of Environment and Forests (MoEF) carried out monitoring of each source of air emission and those results are reproduced.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Scope 1 Emissions	Metric tonnes of CO <sub>2</sub> equivalent	1,21,129.44 *	1,17,226.38
Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available			
CO <sub>2</sub>	Metric tonnes of CO <sub>2</sub> equivalent	1,21,055.84	1,17,221.94
CH <sub>4</sub>	Metric tonnes of CO <sub>2</sub> equivalent	1.49	2.69
N <sub>2</sub> O	Metric tonnes of CO <sub>2</sub> equivalent	1.67	1.76
HFCs	Metric tonnes of CO <sub>2</sub> equivalent	0	0
PFCs	Metric tonnes of CO <sub>2</sub> equivalent	0	0
SF <sub>6</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0	0
NF <sub>3</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0	0
Total Scope 2 Emissions	Metric tonnes of CO <sub>2</sub> equivalent	1,01,908.03	93,029.37
Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available			
CO <sub>2</sub>	Metric tonnes of CO <sub>2</sub> equivalent	1,01,908.03	93,028.89
CH <sub>4</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0.45	0.43
N <sub>2</sub> O	Metric tonnes of CO <sub>2</sub> equivalent	0.05	0.04
HFCs	Metric tonnes of CO <sub>2</sub> equivalent	0	0
PFCs	Metric tonnes of CO <sub>2</sub> equivalent	0	0
SF <sub>6</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0	0
NF <sub>3</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0	0
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO <sub>2</sub> equivalent	0.000008828	0.00000772
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)*	Metric tonnes of CO <sub>2</sub> equivalent	0.00018239	0.00015767
Total Scope 1 and Scope 2 emission intensity in terms of physical output-	Metric tonnes of CO <sub>2</sub> equivalent	0.8415	0.8784
Total Scope 1 and Scope 2 emission intensity (optional)-the relevant metric may be selected by the entity	Metric tonnes of CO <sub>2</sub> equivalent	0	0

Source of PPP conversion rates taken from the International Monetary Fund (IMF) published document for FY 2023-24 and FY 2024-25.

\* Note: 70.44 tCO<sub>2</sub>e is included in Scope 1 for Refrigerants.

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited.

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

The Company is making various efforts towards reduction of Green House Gases (GHG) by investing in newer technologies and equipment, which help improving efficiency and thus reducing input at the same time lower energy consumption. In addition, the Company is also making efforts in increasing use of renewable energy by installation of rooftop solar power plants. The recycling of waste water and waste generated is also aimed at reducing GHG emissions.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
		Value	Value
Total Waste generated (in metric tonnes)			
Plastic waste (A)	MT	1,347.04	1,536.82
E-waste (B)	MT	8.52	4.19
Bio-medical Waste (C)	MT	0.02	0.02
Construction and demolition waste (D)	MT	90.47	472.40
Battery Waste (E)	MT	6.82	1.17
Radioactive Waste (F)	MT	0	0
Other Hazardous waste generated (G). Please specify, if any.	MT	73,049.74	1,07,856.24
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	MT	9,116.47	13,226.30
Total (A + B + C + D + E + F + G + H)	MT	83,619.08	1,23,097.15
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	MT/₹	0.00000331	0.00000452
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)*	MT/₹	0.00006838	0.00009231
Waste intensity in terms of physical output	MT/MT	0.3155	0.5142
Waste intensity (optional) - the relevant metric may be selected by the entity	0	0	0
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations			
Category of waste			
(i) Recycled	MT	69,159.70	1,07,473.32
(ii) Re-Used	MT	0	0
(iii) Other recovery operations	MT	1,452.85	2,014.61
Total	MT	70,612.55	1,09,487.93
For each category of waste generated, total waste disposed by nature of disposal method (In MT)			
(i) Incineration	MT	0.02	4.42
(ii) Landfilling	MT	13,006.51	13,604.82
(iii) Other disposal operations	MT	0	0
Total	MT	13,006.53	13,609.24

Source of PPP conversion rates taken from the International Monetary Fund (IMF) published document for FY 2023-24 and FY 2024-25.

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited.

**Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, assumptions and/or calculation tools used.**

The data on waste generation and disposal is recorded and monitored through the SAP, which enables real-time tracking of waste generation, handling, and disposal activities. At the site level, solid and hazardous waste quantities are tracked using logbooks and system-generated disposal manifests. The data is compiled based on actual measurements and operational records, in accordance with the guidelines prescribed under the Environment (Protection) Act, 1986, and the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016

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

The Company ensures responsible waste management practices whereby waste is being segregated, stored, labelled, transported, and sold to recyclers/co-processing to cement industries/disposed to third party treatment facility in line with legal compliance under

Hazardous and Other Waste (Management and Transboundary Movement) Rules, 2016. Moreover, 85% of the total waste generated in FY 2024-25 has been sent for reuse/recycle/pre-processing/co-processing purpose i.e., 71,023.44 MT of waste sent to recycler for producing the value-added product out of waste and co-processing waste sent to third party Cement plant as alternative fuel resources material. Collective efforts to reduce hazardous waste disposal have resulted in an approximate 32% decrease in overall waste disposal.

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

The Company does not have any operations or offices in or around ecologically sensitive areas.

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

The Company was not required to carry out any environmental impact assessments during the year.

**13 Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non compliances, in the following format:**

Yes. The entity is fully compliant with applicable environmental laws and regulations, including the Water (Prevention and Control of Pollution) Act, 1974; the Air (Prevention and Control of Pollution) Act, 1981; the Environment (Protection) Act, 1986; and associated rules made there under. All required consents and authorizations from the State Pollution Control Board (SPCB) are valid and up to date, and periodic returns and reports are submitted as per regulatory timelines

## Leadership Indicators

**1 Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):**

For facilities / plants located in areas of water stress, provide the following information

**For each facility / plant located in areas of water stress, provide the following information:**

- Name of the area**  
Nandeari and Dahej in Gujarat and jeedimetla in Telangana.
- Nature of operations**  
Manufacturing of Basic Intermediate, and Fine & Speciality Chemicals.
- Water withdrawal, consumption and discharge in the following format:**

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	9,86,428.00	11,54,756.00
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres)</b>	9,86,428.00	11,54,756.00
<b>Total volume of water consumption (in kilolitres)</b>	5,44,797.00	6,16,943.00
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>	0.00002156	0.00002265
<b>Water intensity(optional) - the relevant metric may be selected by the entity</b>	0	0
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water	0	0
- No treatment	0	0
- With treatment (specify level)	0	0
(ii) Into Ground water	0	0
- No treatment	0	0
- With treatment (specify level)	0	0
(iii) Into Sea Water	0	0
- No treatment	0	0



Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
- With treatment (specify level)	0	0
(iv) Sent to third-parties	4,41,631.00	5,37,813.00
- No treatment	0	0
- With treatment (specify level)	4,41,631.00	5,37,813.00
(v) Others	0	0
- No treatment	0	0
- With treatment (specify level)	0	0
<b>Total water discharged (in kilolitres)</b>	<b>4,41,631.00</b>	<b>5,37,813.00</b>

Note: From this year, water withdrawal, consumption and discharge for water stress areas have been calculated based on Water Atlas data, with previous year data incorporated for comparison.

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited

**2 Please provide details of total Scope 3 emissions and its intensity, in the following format:**

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total Scope 3 Emissions	Metric tonnes of CO <sub>2</sub> equivalent	2,46,570.12	329,554.92
Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available			
CO <sub>2</sub>	Metric tonnes of CO <sub>2</sub> equivalent	2,46,051.75	327832.77
CH <sub>4</sub>	Metric tonnes of CO <sub>2</sub> equivalent	18.92	24.74
N <sub>2</sub> O	Metric tonnes of CO <sub>2</sub> equivalent	499.45	1697.40
HFCs	Metric tonnes of CO <sub>2</sub> equivalent	0	0
PFCs	Metric tonnes of CO <sub>2</sub> equivalent	0	0
SF <sub>6</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0	0
NF <sub>3</sub>	Metric tonnes of CO <sub>2</sub> equivalent	0	0
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO <sub>2</sub> equivalent/ rupee	0.0000097595	0.00001210
Total Scope 3 emission intensity (optional) the relevant metric may be selected by the entity		0	0

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

Yes, assessment has been carried out by Bureau Veritas (India) Private Limited

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

Not Applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along with summary)	Outcome of the initiative
1	Water Recovery from Specific Effluent Stream	Established low temperature evaporation technology based on mechanical vapour compression system. Around 95% high quality condensed water is recovered from the generated effluent without use of heat generation and rejection units, with lower water recovery cost. Further, recovered water has been reused in operations for washing purpose.	Conservation of natural resources
2	Alteration of neutralizing media leads to a reduction in sludge volume	By treatability study of various coagulants at Research and Development Center, which direct to reduction of 85% in primary sludge from primary treatment	Reduced landfill disposal
3	Water recovery by installing advance technology.	By installing advanced technology, we have successfully reused reverse osmosis (R.O.) reject water in our cooling towers, thereby reducing our dependency on fresh water.	Conservation of natural resources and reduced water discharge

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

Yes. The Company has a comprehensive On-Site and Off-Site Emergency Action Plan. On-Site Emergency Action Plan is designed to ensure the resilience of our operations and the safety of our employees, customers and stakeholders in the event of disruptions. Emergency preparedness plan focusses on Risk Assessment and Impact Analysis and Crisis Management. The roles and responsibilities are clearly defined. These plans are reviewed on half yearly basis to ensure emergency preparedness

- 6 Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**

No significant adverse impact.

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

Nil

- 8 How many Green Credits have been generated or procured:**

- a By the listed entity**

No Green Credits have been generated or procured.

- b By the top ten (in terms of value of purchases and sales, respectively) value chain partners.**

Information not available.

**PRINCIPLE 7**

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

**Essential Indicators**

- 1 a** Number of affiliations with trade and industry chambers/ associations:

5

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

S. No	Name of the trade and industry chambers associations	Reach of trade and industry chambers/ associations (State/National)
1	The Federation of Indian Chambers of Commerce and Industry	National
2	Indian Chemical Council	National
3	Confederation of Indian Industry	National
4	Federation of Gujarat Industries	State
5	Gujarat Employees Organisation	State

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

There were no issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities, hence no corrective actions were required.

**Leadership Indicators**

- 1** Details of public policy positions advocated by the entity

Not Applicable

**PRINCIPLE 8**

**Businesses should promote inclusive growth and equitable development**

**Essential Indicators**

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

There was no requirement for Social Impact Assessment (SIA) during FY 2024-25.

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

There are no projects underway for which Rehabilitation and Resettlement (R & R) are required.

- 3** Describe the mechanisms to receive and redress grievances of the community:

The Company's Environmental, Health and Safety Department as well as Corporate Affairs function remain in constant touch with the community and other associated organisation. The Company has been working for the betterment of community since over 43 years with Deepak Foundation, which was set up in 1982 by late Shri C. K. Mehta, Founder of the Company. Deepak Foundation is in constant touch with the community in and around the surrounding area of the Company's operations to address issues, if any relating to social development.

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Current Financial Year)
Directly sourced from MSMEs/ small producers	19.45%	18.45%
Directly from within India	76.13%	76.84%

Note: The percentage calculations were based on the quantity of input materials sourced.

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

Location	FY 2024-25 (Current Financial Year)	FY 2023-24 (Current Financial Year)
Rural	0.74	0.18
Semi Urban	5.29	2.32
Urban	0.00	0.00
Metropolitan	3.59	3.97

#### Leadership Indicators

##### 1 Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Not applicable because no requirement for Social Impact Assessment during FY 2024-25.

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

S. No.	State	Aspirational District	Amount spent (In ₹)
1	Gujarat	Kanwat	6.83 Lakhs
2	Gujarat	Naswadi	40.58 Lakhs

##### 3 a Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups?

Yes, our Sustainable Procurement Policy outlined the scope to procure from marginalized /vulnerable groups.

##### b From which marginalized /vulnerable groups do you procure?

Not Applicable, Currently, we are not procuring from any marginalized /vulnerable groups.

##### c What percentage of total procurement (by value) does it constitute?

Not Applicable

##### 4 Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge

Not Applicable

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

Not Applicable

## 6 Details of beneficiaries of CSR Projects:

S. No	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Help Desk Project	35,275	100
2	Mobile Health Unit - Dahej	17,427	74
3	Mobile Health Unit- Roha	24,422	70
4	Mobile Health Unit- Talaja	17,995	51
5	Mobile Health Unit- Kawant	23,420	100
6	Setting up Palliative Care Facilities	454	100
7	Medical Buggy	2,04,553	100
8	Mobile Library Roha	1,993	100
9	ICDS Program- Nandesari	2,085	100
10	Remedial Education in English & Math at Nandesari School	510	100
11	Mobile Library- Nandesari	2,289	100
12	Mobile Library- Hyderabad	2,200	100
13	Mobile Library- Savli	2,000	100
14	STEM learning opportunity to Government primary school children- Nandesari & Roha	1,696	100
15	Home Health Aide Course- Vadodara	177	80
16	Home Health Aide Course- Hyderabad	325	100
17	Entrepreneurial Activities SHG- Nandesari	2,413	100
18	Vocational Training- Vadodara	79	100
19	Surabhi- Nandesari	1,741	100
20	Surbhi- Roha	1,354	70
21	Gram Jal Sanchay	287	100
22	Demographic Surveillance Study (DSS)- Vadodara	54,319	35
23	Demographic Surveillance Study (DSS)- Roha	20,789	35
24	Sangaath (Help Desk)- Nandesari	11,550	100

### PRINCIPLE 9

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

#### Essential Indicators

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

Customer complaints are received by the appropriate sales team and then communicated, entered into a dedicated web-based system for Consumer Complaint Management. These complaints are registered, investigated and communicated as per Standard Operating Procedure (SOP), Site specific SOP are in place with outlining detailed workflow and resolution processes. This process is rigorously followed across the Company for customer satisfaction.

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

As a percentage to total turnover	
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	100%

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

Category	FY 2024-25 (Current Financial Year)		Remarks	FY 2023-24 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	0	0	0	0	0	
Advertising	0	0	0	0	0	
Cyber-security	0	0	0	0	0	
Delivery of essential services	0	0	0	0	0	
Restrictive Trade Practices	0	0	0	0	0	
Unfair Trade Practices	0	0	0	0	0	
Other	73	0	Complaints received were related to delivery, packing, handling etc. All the complaints received during the year have been resolved.	60	0	Complaints received were related to delivery, packing, handling etc. All the complaints received during the year have been resolved.

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

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

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

Yes. The Company has a robust framework & policy for cyber security and for protection of Data. The IT infrastructure of the Company is secured with robust firewall systems, intrusion detection and prevention systems and access controls. The systems of the Company are protected with strong authentication mechanisms and encryption technologies to safeguard sensitive information and minimise the risk of data breaches.

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

Not Applicable since no such issues.

#### 7 Provide the following information relating to data breaches:

##### a Number of instances of data breaches

0

##### b Percentage of data breaches involving personally identifiable information of customers

0%

##### c Impact, if any, of the data breaches

Not applicable since no data breaches.

### Leadership Indicators

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

Yes, Information relating to all products of the Company are available on the following platforms:

1. Website : <https://www.godeepak.com/catalog/>

2. Brochure: <https://www.godeepak.com/wp-content/uploads/2024/05/DNL-Brochure-New.pdf>

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

As an intermediate chemicals manufacturing Company, our products are developed in accordance with customer-specific requirements, and our customers are well-informed about their safe usage. Nevertheless, we proactively and regularly engage with both customers and supply chain partners to promote the safe and responsible use of our products through various communication channels.

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

Although the Company does not provide essential services, it maintains effective communication with its customers and ensures they are promptly informed about any planned plant shutdowns that could impact product supply. In addition, the Company keeps all stakeholders regularly updated about any operational disruptions, regardless of the cause, through established communication channels.

#### 4 Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole?

We periodically conduct customers satisfaction surveys for both our domestic and overseas customers to review and enhance our custome services and products. Additionally, we provide product information on our labels that goes beyond local legal requirements. In addition to mandatory labeling, the Company includes detailed information such as the product name, contents, hazard symbols, and the manufacturing location address for each product. This additional information is intended to promote transparency and support informed decision-making, thereby improving customer satisfaction with our services.



# Independent Assurance Statement

To  
**The Board of Directors of Deepak Nitrite Limited**

## INTRODUCTION AND OBJECTIVES OF WORK

The Board of Directors of **Deepak Nitrite Limited** ('the Company') have engaged us to undertake an Independent Assurance of the Company's Sustainability / Non-Financial Performance disclosures in its Business Responsibility & Sustainability Report ('BRSR') for the financial year ended **March 31, 2025** and provide Reasonable Assurance engagement for BRSR ('Core') parameters and Limited Assurance for non-core parameters on the aforesaid Report.

Our scope of work consists of Reasonable Assurance on BRSR Core indicators in the BRSR Report, as described in the Securities and Exchange Board of India's (SEBI) circular no. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023 & SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated December 20, 2024 and clarifications thereto, read with applicable SEBI Regulations and prescribed format, as amended.

## SCOPE OF WORK

The assurance process was conducted in line with the requirements of Bureau Veritas' standard procedures and guidelines for external Assurance of Sustainability Reports, based on current best practice in independent assurance.

The reporting boundaries considered for this reporting period are as follows:

Deepak Nitrite Limited – Registered & Corporate Office, 05 Manufacturing Plants (Nandesari, Dahej, Roha, Taloja and Hyderabad)

Entire organization of **Deepak Nitrite Limited** on Standalone basis for the reporting period from **April 1, 2024 to March 31, 2025**.

As a part of independent Reasonable Assurance, we assessed the appropriateness and robustness of underlying reporting systems and processes, used to collect, analyse and review the information reported. In this process, we undertook the following activities:

Assessment was conducted by means of physical site visits at **Nandesari & Dahej** and virtual site audits at **Roha, Taloja & Hyderabad Manufacturing Sites**. Bureau Veritas interviewed personnel of the Company including CSR, L&D, EHS, Administration, Opex, SCM, Stores, Sustainability and other relevant departments and review of the Company's data & information systems for collection, aggregation, analysis and review.

Data on various BRSR topics was assessed for the locations that were visited. Later, it was confirmed that the same assessed data

went into preparation of the final data within the BRSR for the financial year ended March 31, 2025.

## MANAGEMENT RESPONSIBILITY

The selection of reporting criteria, reporting period, reporting boundary, monitoring and measurement of data, preparation, and presentation of information in the BRSR are the sole responsibility of the Company and its management. We are not involved in drafting or preparation of BRSR. Our sole responsibility is to provide independent Reasonable Assurance engagement for BRSR (Core) parameters and Limited Assurance for non-core parameters on the BRSR for the financial year ended March 31, 2025.

## OUR FINDINGS

On the basis of our methodology and the activities described above,

- Nothing has come to our attention to indicate that the BRSR disclosures are inaccurate or that the information included therein is not fairly stated.
- It is our opinion that Company has established appropriate systems for the collection, aggregation, and analysis of data on Sustainability / Non-Financial performance disclosures in the BRSR.
- The BRSR provides a fair representation of the Company's activities as included therein.
- The information is presented in a clear, understandable, and accessible manner, and allows readers to form a balanced opinion over the Company and status during the reporting period.

## LIMITATIONS AND EXCLUSIONS

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

- Activities outside the defined assurance period.
- Positional statements (expressions of opinion, belief, aim or future intention by the Company and statements of future commitment.
- Competitive claims in the report claiming, "first company in India", "first time in India", "first of its kind", etc.

Our assurance does not extend to the activities and operations of the Company outside of the scope and geographical boundaries as well as the operations undertaken by any subsidiaries or joint ventures of the Company.

Our assurance on economic and financial performance data or information of the Company is based only on the annual audited statement of accounts of the Company for the financial year ended

**March 31, 2025** and our conclusions rest solely upon that audited report.

This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist within the Report.

### **STATEMENT OF INDEPENDENCE, INTEGRITY, AND COMPETENCE**

Bureau Veritas is an independent professional services company that specializes in quality, environmental, health, safety, and social accountability with over 196 years' history. Its assurance team has extensive experience in conducting assessment over environmental, social, ethical and health and safety information, systems and processes.

Bureau Veritas operates a certified Quality Management System which complies with the requirements of ISO 9001:2015 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### **Dinesh PATEL**

Lead Assuror

Bureau Veritas (India) Private Limited. Vadodara, Gujarat, India.

July 19, 2025

Bureau Veritas has implemented and applies a Code of Ethics, which meets the requirements of the International Federation of Inspections Agencies (IFIA), across the business to ensure that its employees maintain integrity, objectivity, professional competence and due care, confidentiality, professional behaviour, and high ethical standards in their day-to-day business activities.

The assurance team for this work does not have any involvement in any other Bureau Veritas projects with the Company.

### **COMPETENCE**

The assurance team has extensive experience in conducting assurance over environmental, social, ethical, and health & safety information, systems and processes an excellent understanding of Bureau Veritas standard methodology for the Assurance of Sustainability Reports.

### **RESTRICTION ON USE OF OUR REPORT**

Our Reasonable Assurance report has been prepared and addressed to the Board of Directors of the Company at the request of the Company solely to assist the Company in reporting on the Company's Sustainability performance and activities. Accordingly, we accept no liability to anyone, other than the Company.

#### **Munji Rama Mohan RAO**

Technical Reviewer

Bureau Veritas (India) Private Limited. Hyderabad, India.

July 19, 2025



## Annexure-E

### REPORT ON CORPORATE SOCIAL RESPONSIBILITY

#### ANNUAL REPORT ON CSR ACTIVITIES FOR THE FINANCIAL YEAR 2024-25

##### 1. Brief outline on CSR Policy of the Company:

The Company is committed to improving the quality of lives of people in the community it serves through long-term stakeholder value creation. The Company's CSR policy is to remain a responsible corporate entity mindful of its social responsibilities to all stakeholders including consumers, shareholders, employees, local community and society at large.

##### 2. Composition of CSR Committee:

Sr. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1)	Shri Deepak C. Mehta	Chairman – ED	2	2
2)	Shri Sanjay Upadhyay	Member - ED	2	2
3)	Smt. Purvi Sheth	Member – ID	2	2
4)	Shri Punit Lalbhai	Member – ID	2	1

(Abbreviations: ED: Executive Director; ID: Independent Director)

##### 3. Provide web-link of Composition of CSR Committee, CSR Policy of the Company and CSR projects approved by the board and disclosed on the website of the Company.

<https://www.godeepak.com/investorcompliances/>

<https://www.godeepak.com/socialresponsibility-activities/>

##### 4. Provide the executive summary along with web-link(s) of Impact Assessment of CSR Projects carried out in pursuance of Sub-Rule (3) of Rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable.

During FY 2024-25, the Company has undertaken three (3) Impact Assessment studies for the following CSR Projects conducted by Renalysis Consultants Private Limited, an independent external agency:

1. Project Mobile Health Unit
2. Project Vivek Vidya
3. Project Sangaath

The study not only details the impact and the benefits accrued by the community, but also proposes some recommendations. The Impact Assessment Report of the study undertaken voluntarily is uploaded on the website at [godeepak.com/social-responsibility-activities/](https://www.godeepak.com/social-responsibility-activities/)

5. (a) Average net profit of the company as per section 135(5). : ₹ 602.86 Crores  
 (b) Two percent of average net profit of the company as per section 135(5). : ₹ 12.06 Crores  
 (c) Surplus arising out of the CSR Projects or programs or activities of the previous financial years. : Nil  
 (d) Amount required to be set off for the financial year, if any. : ₹ 0.76 Crores  
 (e) Total CSR obligation for the financial year [(b)+(c)-(d)]. : ₹ 11.29 Crores
6. (a) Amount spent on CSR Projects (both ongoing and other than ongoing projects). : ₹ 11.77 Crores  
 (b) Amount spent in Administrative Overheads. : ₹ 0.06 Crores  
 (c) Amount spent on Impact Assessment, if applicable. : ₹ 0.11 Crores  
 (d) Total amount spent for the Financial Year [(a)+(b)+(c)]. : ₹ 11.94 Crores

**(e) CSR amount spent or unspent for the Financial Year:**

₹ in Crores

Total Amount Spent for the Financial Year	Total Amount transferred to Unspent CSR Account as per section 135(6)		Amount Unspent		
			Amount transferred to any fund specified under Schedule VII as per second proviso to sub-section(5) of section 135		
	Amount	Date of transfer	Name of the Fund	Amount	Date of transfer
₹ 11.94	Nil	--	Nil	Nil	Nil

**(f) Excess amount for set off, if any :**

₹ in Crores

Sr. No.	Particular	Amount
(i)	Two percent of average net profit of the Company as per Section 135(5)	₹ 11.29
(ii)	Total amount spent for the Financial Year	₹ 11.94
(iii)	Excess amount spent for the Financial Year [(ii)-(i)]	₹ 0.65
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years, if any	NIL
(v)	Amount available for set off in succeeding Financial Years[(iii)-(iv)]	₹ 0.65

\*Net of excess contribution from previous years set-off in the current financial year.

**7. Details of Unspent Corporate Social Responsibility amount for the preceding three Financial Year:**

₹ in Crores

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	Preceding Financial Years(s)	Amount transferred to Unspent CSR Account under Section 135(6)	Balance Amount in Unspent CSR Account under Section 135(6)	Amount Spent in the Financial Year	Amount transferred to Fund as specified under Schedule VII as per second proviso to Section 135(5) if any	Amount remaining to be spent in succeeding financial years	Deficiency, if any
					Amount	Date of Transfer	
1.	2023-24	Nil	Nil	Nil	Nil	Nil	Nil
2.	2022-23	0.70	Nil	₹ 70	Nil	Nil	Nil
3.	2021-22	Nil	Nil	Nil	Nil	Nil	Nil
	<b>TOTAL</b>	<b>0.70</b>	<b>Nil</b>	<b>₹ 70</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>

**8. Whether any capital assets have been created or acquired through CSR spent in the Financial Year: Yes**

If yes, enter the number of capital assets created/acquired 

Furnish the details relating to such asset(s) so created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

Sr. No.	Short particulars of the property or asset(s) [including complete address and location of the property]	Pin code of the property or Asset(s)	Date of Creation	Amount of CSR spent (in ₹)	Details of entity/Authority/beneficiary of the registered owner		
					CSR Registration Number, if applicable	Name	Registered address
<b>A</b>	<b>Mobile Health Unit</b> Bungalow No-700, South Side on Dahej Road, Hinglot, Bharuch	392012					
1	Medical Equipment		03-05-2024	7,080/-			
2	Medical Equipment		30-07-2024	29,500/-			
3	Mobile		30-07-2024	12,500/-			
<b>B</b>	<b>Mobile Health Unit</b> Saraswati Bungalow (Tamhankar), Chatrapati Shivaji Nagar, Near Sanjay Gandhi Hospital, Roha	402109					
4	Medical Equipment		30-04-2024	1,416/-			
5	Furniture & Fixtures		30-11-2024	16,000/-			
6	Computer & Printer		13-01-2025	21,000/-			
7	Furniture & Fixtures		26-02-2025	3,500/-			
8	Furniture & Fixtures		28-02-2025	3,100/-			
9	Medical Equipment		28-02-2025	2,478/-			

CSR Registration No: CSR00000353

**Deepak Foundation**
**Address:**

Nijanand Ashram premises, Adjoining L&amp;T Knowledge City, on NH-8, Vadodara – 390019, Gujarat, India

Sr. No.	Short particulars of the property or asset(s) [including complete address and location of the property]	Pin code of the property or Asset(s)	Date of Creation	Amount of CSR spent (in ₹)	Details of entity/Authority/beneficiary of the registered owner		
					CSR Registration Number, if applicable	Name	Registered address
<b>C</b>	<b>Mobile Health Unit</b> Laxmi Public School, Malewadi, Near Anand Nagar Shilotar- Raichur, Sukhapur, Ta- Panvel, Dist. -Raigad	410206					
10	Medical Equipment		31-05-2024	31,270/-			
11	Medical Equipment		15-03-2025	2,478/-			
<b>D</b>	<b>Setting up Palliative Care Facilities</b> Sarakari Andh Sala, Behind Ghelani Petrol Pump, Pensionpura, Nizampura Road, Vadodara	390002					
12	Medical Equipment		31-07-2024	1,003/-			
13	Mixer Grinder		31-07-2024	1,899/-			
14	Medical Equipment		19-11-2024	3,730/-			
15	Medical Equipment		31-01-2025	3,360/-			
<b>E</b>	<b>Medical Buggy</b> Within Nijanand Ashram, Near Laxmi Studio, Adjoining L&T Knowledge City, On NH-8, Ta & Dist. Vadodara	390019					
16	Vehicle		24-02-2025	1,60,000/-			
<b>F</b>	<b>Mobile Library</b> Saraswati Bungalow (Tamhankar), Chatrapati Sivaji Nagar, Near Sanjay Gandhi Hospital, Roha	402109					
17	Computer & Printer		28-03-2025	22,650/-			
<b>G</b>	<b>ICDS Program</b> Deepak Medical Foundation, Near GIDC Office, Nandesari, Vadodara	391340					
18	Tablets		26-06-2024	75,000/-			
19	Interactive Flat Panel 65 inch		28-06-2024	4,13,000/-			
20	Computer/Printer/Scanner		09-10-2024	35,150/-			
21	Furniture & Fixture		09-01-2025	7,080/-			
22	Tablet		28-01-2025	17,800/-			
<b>H</b>	<b>Mobile Library</b> Deepak Medical Foundation, Near GIDC Office, Nandesari, Vadodara	391340					
23	Laptop		11-02-2025	31,900/-			
<b>I</b>	<b>Mobile Library</b> 19-5, Opp Rodamestri Nagar Bus Stop, Gajularamaram Road, Quthbullapur, Jeedimetla, Pin-500055, Hyderabad	500055					
24	Computer/Printer/Scanner		31-12-2024	58,500/-			
25	Projector		31-12-2024	16,500/-			
<b>J</b>	<b>Mobile Library</b> Beside jay Ambe Hostel, Behind Gujarat Homeopathic Medical College, Savli	391770					
26	Tablets		24-06-2024	75,500/-			
27	Dash Camera		12-03-2025	5,133/-			
<b>K</b>	<b>STEM Nandesari</b> Deepak Medical Foundation, Near GIDC Office, Nandesari, Vadodara	391340					
28	Equipment/Computer/Printer		24-10-2024	30,000/-			
<b>L</b>	<b>STEM Roha</b> Saraswati Bungalow (Tamhankar), Chatrapati Sivaji Nagar, Near Sanjay Gandhi Hospital, Roha	402109					
29	Computer/Printer/Scanner		26-12-2024	33,630/-			
30	Tablet		28-02-2025	13,980/-			
31	Furniture & Fixtures		28-02-2025	9,750/-			

CSR Registration No: CSR00000353

**Deepak Foundation****Address:**

Nijanand Ashram premises, Adjoining  
L&T Knowledge City, on NH-8, Vadodara –  
390019, Gujarat, India

Sr. No.	Short particulars of the property or asset(s) [including complete address and location of the property]	Pin code of the property or Asset(s)	Date of Creation	Amount of CSR spent (in ₹)	Details of entity/Authority/beneficiary of the registered owner		
					CSR Registration Number, if applicable	Name	Registered address
<b>M</b>	<b>Home Health Aide Course</b> 19-5, Opp Rodamestri Nagar Bus Stop, Gajularamaram Road, Quthbullapur, Jeedimetla, Pin-500055, Hyderabad	500055					
32	Camera		30-06-2024	5,000/-			
33	Bio Metric Machine		31-07-2024	8,260/-			
34	LED TV		31-12-2024	58,000/-			
35	Furniture & Fixture		28-03-2025	69,000/-			
36	Lab Equipment		28-03-2025	9,625/-			
37	LED TV		28-03-2025	31,900/-			
38	Water Purifier		28-03-2025	8,500/-			
<b>N</b>	<b>Home Health Aide Course</b> Within Nijanand Ashram, Near Laxmi Studio, Adjoining L&T Knowledge City, On NH-8, Ta & Dist. Vadodara	390019					
39	Mobile		30-08-2024	8,499/-			
<b>O</b>	<b>Entrepreneurial Activities through SHG Deepak</b> Medical Foundation, Near GIDC Office, Nandesari, Vadodara	391340					
40	Furniture & Fixture		27-07-2024	14,800/-			
41	Computer/Printer/Scanner		14-10-2024	22,000/-			
42	Furniture & Fixture		28-02-2025	5,175/-			
43	Sewing Machine		26-03-2025	40,400/-			
<b>P</b>	<b>Surabhi</b> Deepak Medical Foundation, Near GIDC Office, Nandesari, Vadodara	391340					
44	Equipment/Assets		18-11-2024	30,000/-			
45	Refrigerator		09-12-2024	12,500/-			
<b>Q</b>	<b>Kamdhenu</b> Saraswati Bunglow (Tamhankar), Chatrapati Sivaji Nagar, Near Sanjay Gandhi Hospital, Roha	402109					
46	Furniture & Fixture		31-12-2024	3,500/-			
47	Tablet		22-07-2024	31,860/-			
<b>R</b>	<b>Sangaath</b> Deepak Medical Foundation, Near GIDC Office, Nandesari, Vadodara	391340					
48	Furniture & Fixtures		30-06-2024	19,352/-			
49	Furniture & Fixtures		02-09-2024	4,000/-			
50	Inverter/Battery		06-09-2024	19,500/-			
51	Speaker with Mic		09-09-2024	6,499/-			
<b>S</b>	<b>Sangaath</b> Saraswati Bungalow (Tamhankar), Chatrapati Sivaji Nagar, Near Sanjay Gandhi Hospital, Roha	402109					
52	Computer/Printer/Scanner		31-07-2024	4,970/-			
53	Furniture & Fixtures		31-08-2024	26,475/-			
54	Computer/Printer/Scanner		25-09-2024	52,950/-			
55	Lamination Machine		25-09-2024	15,450/-			
56	Tablet		25-09-2024	31,860/-			
57	Furniture & Fixtures		26-09-2024	10,900/-			
58	Equipment		07-11-2024	3,540/-			
59	Equipment		24-02-2025	14,000/-			
60	Furniture & Fixtures		24-02-2025	14,050/-			
61	Equipment		28-02-2025	6,200/-			
62	Furniture & Fixtures		24-03-2025	4,500/-			

CSR Registration No: CSR00000353

#### Deepak Foundation

#### Address:

Nijanand Ashram premises, Adjoining L&T Knowledge City, on NH-8, Vadodara – 390019, Gujarat, India

Sr. No.	Short particulars of the property or asset(s) [including complete address and location of the property]	Pin code of the property or Asset(s)	Date of Creation	Amount of CSR spent (in ₹)	Details of entity/Authority/beneficiary of the registered owner		
					CSR Registration Number, if applicable	Name	Registered address
63	Equipment		31-03-2025	4,499/-			
<b>T</b>	<b>Sangaath</b> At Reva Ginning and Pressing Factory, Kawant Boriyad Road, In Front of Hardik Hospital, Naswadi	391150					
64	Biometric Machine		18-09-2024	10,500/-			
65	Furniture & Fixtures		31-12-2024	4700/-			
66	Computer/Printer/Scanner		12-09-2024	17,400/-			
67	Computer/Printer/Scanner		12-03-2025	16500/-			
68	Tablet/Lamination machine		12-03-2025	35000/-			
<b>U</b>	<b>Mobile Health Unit</b> Ramnagar – 1, Nearby keshar hospital, Bodeli Road, Kawant Chhotaudepur	391170					
					CSR Registration No: CSR00000353		
69	Medical Equipment		12-07-2024	29,500/-			
<b>V</b>	<b>Help Desk</b> New Emergency ward, Besides Bhatuji Mandir, SSG Hospital, Vadodara	390001					
					<b>Deepak Foundation</b>		
					<b>Address:</b> Nijanand Ashram premises, Adjoining L&T Knowledge City, on NH-8, Vadodara – 390019, Gujarat, India		
70	CCTV Camera		22-10-2024	32,721/-			
71	FAN		12-03-2025	9116/-			
72	Furniture & Fixture		21-03-2025	11950/-			
73	Furniture & Fixture		25-03-2025	74340/-			
74	Projector		25-03-2025	14,200/-			
<b>W</b>	<b>Vocational Training</b> Samaj Suraksha Sankul, Sarkari Andh Shala, B/h, Ghelani Petrol Pump, Pensionpura, Nizampura road, Vadodara	390002					
75	Computer/Printer/Scanner		31-01-2025	31,900/-			
<b>TOTAL</b>				<b>20,31,478/-</b>			

**9. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5):** Not Applicable

For and on behalf of the Board

**Deepak C. Mehta**

Chairman & Managing Director

Chairman of CSR Committee

(DIN: 00028377)

Date: May 28, 2025

Place: Vadodara

# Annexure-F

## NOMINATION AND REMUNERATION POLICY

*[Adopted by the Board of Directors on 2<sup>nd</sup> May, 2014;*

*Last reviewed and amended by the Board of Directors on 13<sup>th</sup> February, 2025]*

### 1. INTRODUCTION

A transparent, fair and reasonable process for determining the appropriate remuneration at all levels of the Company is required to ensure that shareholders remain informed and confident in the management of the Company. To harmonize the aspirations of human resources consistent with the goals of the Company and in terms of the provisions of the Companies Act, 2013 and the rules made thereunder and the Listing Regulations as amended from time to time, this policy on nomination and remuneration of Directors on the Board of the Company, Key Managerial Personnel and other employees in the Senior Management is formulated in compliance with Section 178 of the Companies Act, 2013 read with the applicable rules thereto and of the Listing Regulations with the Stock Exchanges.

This Policy shall act as a guideline for determining, inter-alia, qualifications, positive attributes and independence of a Director, appointment and removal of the Directors, Key Managerial Personnel and Senior Management employees and matters relating to the remuneration for the Directors, Key Managerial Personnel and other employees.

Pursuant to the requirement of Section 178 of the Companies Act, 2013 and the Listing Regulations with the Stock Exchanges, the Company has a duly constituted Nomination and Remuneration Committee.

### 2. OBJECTIVE OF THE POLICY

2.1. The objective of this Policy is to outline a framework to ensure that the Company's remuneration levels are aligned with best industry practices and are good enough to attract and retain competent Directors on the Board, Key Managerial Personnel and the Senior Management Personnel of the quality required. The key objectives of this Policy include:

- (i) guiding the Board in relation to appointment and removal of Directors, Key Managerial Personnel and Senior Management employees.
- (ii) evaluating the performance of the members of the Board and provide necessary report to the Board for further evaluation of the Board.
- (iii) recommending to the Board the remuneration payable to the Directors and setting forth a policy for determining remuneration payable to Key Managerial Personnel and Senior Management employees.

2.2. While determining the remuneration for the Directors, Key Managerial Personnel and Senior Management employees, regard should be given to prevailing market conditions, business performance and practices in comparable companies, also to financial and commercial health of the Company as well as prevailing laws and government/other guidelines, to ensure that pay structures are appropriately aligned and the levels of remuneration remain appropriate.

2.3. While designing the remuneration package it should be ensured:

- (i) The level and composition of remuneration is reasonable and sufficient to attract, retain and motivate person, to ensure the quality required to run the Company successfully.
- (ii) Remuneration to Directors, Key Managerial Personnel and Senior Management employees involves a balance between fixed and incentive pay reflecting short and long term performance objectives, appropriate to the working of the Company and its goals.

2.4. Some part of the remuneration package may be linked to the achievement of corporate performance targets of the Company and a strong alignment of interest with stakeholders.

2.5. The Committee shall observe the set of principles and objectives as envisaged under the Companies Act, 2013 ("Act") (including Section 178 thereof), rules framed there under and the Listing Regulations including, inter-alia, principles pertaining to determining qualifications, positives attributes, integrity and independence.

2.6. In this context, the following Policy has been formulated by the Nomination and Remuneration Committee and recommended to the Board of Directors for adoption.

### 3. EFFECTIVE DATE

This Policy shall be effective from the date of its adoption by the Board.

### 4. DEFINITIONS

4.1. In this Policy the following terms shall have the meaning assigned to them:

- (i) **“Act”** means The Companies Act, 2013 and rules made thereunder.
  - (ii) **“Board of Directors”** or **“Board”** means the Board of Directors of the Company.
  - (iii) **“Committee”** means Nomination and Remuneration Committee of Board of Directors of the Company, constituted in accordance with the provisions of Section 178 of the Act and the Listing Regulations.
  - (iv) **“Company”** means “Deepak Nitrite Limited.”
  - (v) **“Director”** shall mean a member of the Board of Directors of the Company appointed from time to time in accordance with the Articles of Association of the Company and provisions of the Act.
  - (vi) **“Employees’ Stock Option”** means the option given to the Directors, other than Independent Directors, officers or employees of a Company or of its holding company or subsidiary company or companies, if any, which gives such directors, officers or employees, the benefit or right to purchase, or to subscribe for, the shares of the company at a future date at a pre-determined price.
  - (vii) **“Executive Director”** shall mean a Director who is in the whole-time employment of the Company other than Managing Director.
  - (viii) **“Financial Year”** shall mean the period ending on the 31<sup>st</sup> day of March every year.
  - (ix) **“Independent Director”** shall mean a Director referred to in Section 149 (6) of the Act read with the Listing Regulations.
  - (x) **“Key Managerial Personnel”** or **“KMP”** shall have the meaning ascribed to it in the Act.
  - (xi) **“Listing Regulations”** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and for the time being in force.
  - (xii) **“Managing Director”** means a Director who, by virtue of the Articles of Association of the Company or an agreement with the Company or a resolution passed in its general meeting, or by its Board of Directors, is entrusted with substantial powers of management of the affairs of the Company and includes a Director occupying the position of Managing Director, by whatever name called.
  - (xiii) **“Policy”** or **“this Policy”** means, “Nomination and Remuneration Policy.”
  - (xiv) **“Remuneration”** means any money or its equivalent given or passed to any person for services rendered by him and includes perquisites as defined under the Income-tax Act, 1961.
  - (xv) **“Senior Management”** means the officers and personnel of the listed entity who are members of its core management team, excluding the Board of Directors, and shall also comprise all the members of the management one level below the Chief Executive Officer or Managing Director or Whole Time Director or Manager (including Chief Executive Officer and Manager, in case they are not part of the Board of Directors) and shall specifically include the functional heads, by whatever name called and the persons identified and designated as key managerial personnel, other than the board of directors, by the listed entity.
- 4.2. Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Companies Act, 2013 and/or Listing Regulations as may be amended from time to time shall have the meaning respectively assigned to them therein.
- ## 5. APPLICABILITY
- This Policy is applicable to:
- (i) Directors (Managing Director, Executive Director, Independent Director and Non-Independent Director)
  - (ii) Key Managerial Personnel
  - (iii) Senior Management employees
  - (iv) Other Employees
- ## 6. NOMINATION AND REMUNERATION COMMITTEE
- ### 6.1. Role of the Committee:
- (a) Identifying persons who are qualified to become Director and who may be appointed in Senior Management cadre in accordance with the criteria laid down, recommend to the Board their appointment and removal and shall carry out evaluation of every Director’s performance.
  - (b) Formulating the criteria for determining qualifications, positive attributes and independence of a Director and recommend to the Board, a policy, relating to the remuneration for the Directors, Key Managerial Personnel and employees.
  - (c) For every appointment of an independent director, the Nomination and Remuneration Committee shall evaluate the balance of skills, knowledge and experience on the Board and on the basis of such evaluation, prepare

a description of the role and capabilities required of an independent director. The person recommended to the Board for appointment as an independent director shall have the capabilities identified in such description. For the purpose of identifying suitable candidates, the Committee may:

- (i) use the services of an external agencies, if required;
- (ii) consider candidates from a wide range of backgrounds, having due regard to diversity; and
- (iii) consider the time commitments of the candidates.
- (d) Formulating the criteria for evaluation of Independent Directors and the Board.
- (d) Devising a policy on Board diversity.
- (e) Ensuring that the Board comprises of a balanced combination of Executive Directors and Non-Executive Directors.
- (f) The Committee shall take into consideration and ensure the compliance of provisions under Schedule V of the Companies Act, 2013 for appointing and fixing remuneration of Managing Directors / Executive Directors.
- (g) While approving the remuneration, the Committee shall take into account financial position of the Company, trend in the industry, qualification, experience and past performance of the appointee.
- (h) Whether to extend or continue the term of appointment of the independent director, on the basis of the report of performance evaluation of independent directors.
- (i) recommend to the Board, all remuneration, in whatever form, payable to Senior Management.
- (j) any other role as may be specified by the Board.

## 6.2. Composition of the Committee

- (a) The Committee shall comprise of at least three (3) Directors, all of whom shall be non-executive Directors and at least two-thirds shall be Independent Directors.
- (b) The Board shall reconstitute the Committee as and when required to comply with the provisions of the Act and/or the Listing Regulations.
- (c) Composition of the Committee shall be disclosed in the Annual Report.
- (d) Term of the Committee shall continue unless terminated by the Board of Directors.

## 6.3. Chairman of the Committee

- (a) Chairman of the Committee shall be an Independent Director.
- (b) Chairman of the Company (whether Executive or non-Executive) may be appointed as a member of the Committee but shall not Chair the Committee.
- (c) In the absence of the Chairman, the members of the Committee present at the meeting shall choose one amongst them to act as Chairman.
- (d) Chairman of the Committee shall be present at the Annual General Meeting or may nominate some other member to answer the shareholders' queries.

## 6.4. Frequency of the Meetings of the Committee

The meeting of the Committee shall be held at such intervals as may be required.

## 6.5. Committee Member's Interest

- (a) A member of the Committee is not entitled to be present when his or her own remuneration is discussed at a meeting or when his or her performance is being evaluated.
- (b) The Committee may invite such executives, as it considers appropriate, to be present at the meetings of the Committee.

## 6.6. Quorum

The quorum necessary for transacting business at a meeting of the Committee shall be two (2) members or one-third of the members of the Committee, whichever is higher, including at least one independent director in attendance.

## 6.7. Voting at the Meeting

- (a) Matters arising for determination at Committee meetings shall be decided by a majority of votes of members present. Any such decision shall for all purposes be deemed a decision of the Committee.
- (b) In the case of equality of votes, the Chairman of the meeting will have a casting vote.

## 7. APPOINTMENT AND REMOVAL OF DIRECTORS, KEY MANAGERIAL PERSONNEL AND SENIOR MANAGEMENT EMPLOYEES

- 7.1. The Committee shall identify and ascertain the integrity, qualification, expertise and experience of the person for appointment as a Director, KMP and Senior Management employee.
- 7.2. A person should possess adequate qualifications, expertise and experience for the position he/ she is considered for



appointment as a Director, Key Managerial Personal or Senior Management employee.

- 7.3. The Company shall not appoint or continue the employment of any person as Managing Director / Executive Director who has attained the age of seventy years. Provided that the term of the person holding this position may be extended beyond the age of seventy years with the approval of shareholders by passing a special resolution based on the explanatory statement annexed to the notice for such motion indicating the justification for such appointment.
- 7.4. The appointment as recommended by the Committee to the Board shall be subject to the approval of the Board.

#### **7.5. Criteria for appointment of Independent Director:**

- 7.5.1. The proposed appointee shall comply with the criteria specified in the relevant provisions of the Act and/or the Listing Regulations. He or she shall not, directly or indirectly, represent the interest of any specific vendor or customer or stakeholder and shall have business reputation and strong ethical standards and possess leadership skills and business experience including board procedures.
- 7.5.2. The Independent Director shall fulfill the qualification and requirements specified under the Act and Listing Regulations.
- 7.5.3. He or she shall also declare his or her independent status prior to appointment to the Board and maintain the same during his or her tenure as an Independent Director. Being a Director of the Company, he or she shall adhere to the Code of Conduct stipulated for the Director.

#### **7.6. Criteria for appointment of Managing Director/ Executive Director:**

- 7.6.1. The Company can have more than one Managing Director or Executive Director.
- 7.6.2. The appointee(s) shall have good educational background, preferably with specialization in the field. He shall have exemplary skills and leadership qualities to lead the Company or as the case may be the function assigned to him.
- 7.6.3. Depending on the role and responsibility, he shall have hands on experience in the relevant field. For example as ED (Operations) is expected to have adequate knowledge and experience about the plant operations and related issues. The suitability of the candidate shall be determined on case-to-case basis by the Committee. Being a Director of the Company, Managing Director / Executive Director shall adhere to the Code of Conduct stipulated for the Director.
- 7.6.4. He or she shall fulfill the conditions as specified under Part I of Schedule V of the Act. However, in case the conditions specified under Part I of Schedule V of the Act is not fulfilled,

such appointments shall be subject to the approval of the Central Government.

#### **7.7. Criteria for appointment of KMPs:**

- 7.7.1. Pursuant to the requirement of Section 203 of the Act, the Company is required to appoint a Managing Director / Manager / Chief Executive Officer and in their absence an Executive Director as Whole Time KMP.
- 7.7.2. The Company may also appoint a Chief Executive Officer (CEO) who may or may not be a Director. The qualification, experience and stature of the CEO could be in line with that of the Executive Director. Where the CEO is designated as KMP, he shall act subject to the superintendence and control of the Board.
- 7.7.3. The Company is also required to appoint a Chief Financial Officer (CFO) as KMP as per the requirement of the Act. The CFO shall preferably be a Chartered Accountant or a Cost & Management Accountant or holds an equivalent qualification and have relevant work experience. He shall be well versed with finance function including but not limited to funding, taxation, forex and other core matters. As required under the Listing Regulations, the appointment of CFO shall be subject to approval of the Audit Committee.
- 7.7.4. As required under the said Section of the Act, a Company Secretary (CS) is also required to be appointed by the Company as a KMP. The CS shall have the prescribed qualification and requisite experience to discharge the duties specified in law and as may be assigned by the Board / Managing Director / Executive Director from time to time.

- 7.7.5. KMPs, other than Managing Director and/or Executive Director shall adhere to the Code of Conduct stipulated for the Senior Management.

#### **7.8. Criteria for appointment of Senior Management employees:**

- 7.8.1. Senior Management employees shall possess the requisite qualifications, expertise and experience depending upon the requirement of the relevant position.
- 7.8.2. The Committee has discretion to decide whether qualification, expertise and experience possessed by a person are sufficient / satisfactory for the concerned position.
- 7.8.3. Senior Management employees shall adhere to the Code of Conduct stipulated for the Senior Management.

#### **7.9. Term / Tenure**

- 7.9.1. Managing Director and Executive Director
- The Company shall appoint or re-appoint any person as its Managing Director / Executive Director for a term not

exceeding five years at a time. No re-appointment shall be made earlier than one year before the expiry of the term.

### 7.9.2. Independent Director

(a) An Independent Director shall hold office for a term up to five consecutive years on the Board of the Company and will be eligible for re appointment on passing of a special resolution by the Company and disclosure of such appointment in the Board's report.

(b) No Independent Director shall hold office for more than two consecutive terms, but such Independent Director shall be eligible for appointment after expiry of three years of ceasing to become an Independent Director.

Provided that an Independent Director shall not, during the said period of three years, be appointed in or be associated with the Company in any other capacity, either directly or indirectly.

(c) The Independent Director shall comply with the requirement of number of directorships he or she can hold as prescribed under the provisions of the Act or the Listing Regulations including any amendment thereto from time to time.

### 7.10. Familiarization Programme for Independent Directors

The Company shall familiarize the Independent Directors with the Company, their roles, rights, responsibilities in the company, nature of the industry in which the company operates, business model of the company, etc., through various programmes.

### 7.11. Evaluation

7.11.1. Subject to Schedule IV of the Companies Act, 2013 and Listing Regulations, the Committee shall carry out the evaluation of Directors periodically.

7.11.2. The performance evaluation of Independent Directors shall be done by the entire Board of Directors, excluding the Director being evaluated.

7.11.3. The Independent Directors at their separate meeting shall review, on yearly basis, the performance of Non-Independent Directors and the Board as a whole.

7.11.4. The Independent Directors at their separate meeting shall also review, on yearly basis, the performance of the Chairperson of the Company, taking into account the views of Executive Directors and Non-Executive Directors.

7.11.5. The entire process of the Performance Evaluation shall be kept in strict confidence and shall not be disclosed to any

person except to those required to perform their duties under the Act.

7.11.6. All the records of Performance Evaluation process and outcome shall be maintained by the Company Secretary of the Company and shall be kept at the Registered Office of the Company. Such records shall be preserved till such time as may be decided by the Board from time to time or as required under the Act.

### 7.12. Removal

Due to reasons for any disqualification mentioned in the Act, rules made thereunder or under any other applicable laws, rules and regulations, the Committee may recommend, to the Board with reasons recorded in writing, removal of a Director, KMP and Senior Management employees subject to the provisions and compliance of the applicable laws, rules and regulations.

### 7.13. Retirement

The Director, KMP and Senior Management employees shall retire as per the applicable provisions of the Act and/or the prevailing policy of the Company. The Board will have the discretion to retain the Director, KMP, Senior Management employees in the same position / remuneration or otherwise even after attaining the retirement age, in the interest and for the benefit of the Company, in accordance with the provisions of the Act and approval of members, wherever required.

## 8. REMUNERATION

### 8.1. Remuneration to Managing Director:

8.1.1. The remuneration comprising of salary, allowance, perquisites and other benefits payable to Managing Director will be determined by the Committee and recommended to the Board for approval.

8.1.2. In addition to the remuneration as stated in 8.1.1. above, Managing Director shall also be paid a Commission, calculated with reference to the Net Profits of the Company in a particular Financial Year, as may be determined by the Board of Directors, subject to the overall ceiling stipulated in Section 197 and other relevant provisions of the Act.

8.1.3. The Managing Director shall be entitled to the following perquisites / allowances:

(i) Housing – Rent free furnished residential accommodation. In case no accommodation is provided by the Company, Managing Director shall be paid house rent allowance as may be decided by the Board of Directors.

(ii) Re-imbursement of gas, electricity, water charges and furnishings.

- (iii) Re-imbursement of medical expenses incurred for self and members of his family, as per rules of the Company.
- (iv) Leave travel concession for self and members of his family, as per rules of the Company.
- (v) Fees of clubs subject to maximum of two clubs.
- (vi) Medical insurance, as per rules of the Company.
- (vii) Personal Accident Insurance, as per rules of the Company.
- (viii) Provision of car and telephone at residence.
- (ix) Company's contribution to provident fund, superannuation fund or annuity fund, gratuity and encashment of leave, as per rules of the Company.
- (x) Retirement and other benefits, as per rules of the Company.

8.1.4. The remuneration and commission to be paid to the Managing Director shall be as per the statutory provisions of the Act and the rules made thereunder for the time being in force and shall be subject to the approval of the shareholders of the Company and Central Government, wherever required.

8.1.5. The remuneration / commission payable to Managing Director shall be reviewed by the Board after close of each Financial Year and based on the Profits made by the Company in that Financial Year, Managing Director shall be paid such enhanced remuneration as the Board may decide subject to the ceiling limits specified in Section 197 and other applicable provisions of the Act read with Schedule V of the Act.

8.1.6. The Managing Director shall not be entitled to sitting fees for attending the meetings of the Board or any Committee thereof.

## 8.2. Remuneration to Executive Director:

### 8.2.1. Fixed Pay

- (a) Executive Director shall be eligible for a monthly remuneration as may be approved by the Board on the recommendation of the Committee in accordance with the provisions of the Act and rules made thereunder for the time being in force.
- (b) The Fixed Pay of Executive Director shall comprise of salary, perquisites, allowances and other benefits. The perquisites, allowances and other benefits to the Executive Director may include the following:
  - (i) Re-imbursement of medical expenses incurred for self and members of his family, as per policy of the Company.

- (ii) Leave travel concession for self and members of his family, as per policy of the Company.
- (iii) Medical and other insurances, as per policy of the Company.
- (iv) Company Car with Driver.
- (v) Company's contribution to provident fund, superannuation fund or annuity fund, gratuity and encashment of leave, as per the policy of the Company.
- (vi) Retirement and other benefits, as per policy of the Company.
- (vii) Hardship Allowance, as may be decided by the Company.

- (c) The break-up of the pay scale and quantum of perquisites including, employer's contribution to P.F. pension scheme, medical expenses etc. shall be decided and approved by the Board on the recommendation of the Committee and approved by the shareholders and Central Government, wherever required.

### 8.2.2. Variable Pay

In addition to the salary, perquisites, allowances and other benefits as mentioned above, Executive Director will also be entitled to a Variable Pay. The amount of Variable pay shall be paid annually after the end of each Financial Year. The amount of Variable Pay shall be paid annually after the end of each Financial Year. The Variable Pay shall be 25% of the fixed pay, subject to terms of appointment of respective Executive Director. This amount of variable pay shall be paid annually after the end of each Financial Year and will be entirely based on the individual's performance and Company's performance and may vary from 0% to 100% of the variable pay as per policy of the Company. Such Variable Pay for a particular Financial Year shall be recommended by the Nomination and Remuneration Committee to the Board of Directors.

### 8.2.3. Loyalty Bonus

In addition to the above, Executive Director shall also be entitled for the Loyalty Bonus as per policy of the Company.

### 8.2.4. Payment of Variable component / Increments

- (a) Payment of Variable component of the remuneration of the Executive Director for a particular Financial Year and increments to the existing remuneration structure of Executive Director shall be recommended by the Chairman & Managing Director of the Company to the Committee based upon the individual performance and also the Company's performance as per policy of the Company.

(b) The Committee shall review the payment of Variable component of the remuneration of the Executive Director for a particular Financial Year and increments to the existing remuneration structure of Executive Director as recommended by the Chairman & Managing Director of the Company and recommend the same to the Board for its approval. Such Variable component and proposed enhanced remuneration as recommended by the Committee to the Board should be within the overall limits of managerial remuneration as prescribed under the Act and rules made thereunder.

(c) The Executive Director shall also be entitled to reimbursement of all legitimate expenses incurred by him while performing his duties and such reimbursement will not form part of his remuneration.

8.2.5. Executive Director shall not be entitled to sitting fees for attending meetings of the Board or any Committee thereof.

### 8.3. Minimum Remuneration

Where, in any financial year, the Company has no profits or its profits are inadequate, the Company shall pay remuneration to its Managing Director(s) and Executive Director(s) in accordance with the provisions of Schedule V of the Act.

### 8.4. Remuneration to Independent Director and Directors other than Managing Director/ Executive Director:

#### 8.4.1. Sitting Fees

The Independent Director / Directors other than Managing Director and Executive Director may receive remuneration by way of fees for attending meetings of Board or Committee thereof.

Provided that the amount of such fees shall not exceed the maximum amount as provided in the Act, per meeting of the Board or Committee or such amount as may be prescribed by the Central Government from time to time.

The Sitting Fee paid to Independent Directors, shall not be less than the Sitting Fees payable to other Directors.

The sitting Fees payable to Independent Director/Directors other than Managing Director and Whole-time Director shall be decided by the Board of Directors from time to time and shall be reviewed every 3 (Three) years.

#### 8.4.2. Commission on the Net Profits

Apart from receiving the Sitting Fees, Independent Director(s) / Non-Independent Director(s) may be paid Commission on the Net Profits of the Company for a particular Financial Year within the monetary limit approved by shareholders, subject to the limit not exceeding 1% of the Net Profits of the Company computed as per the applicable provisions of the

Act. The amount of Commission payable to each Independent Director / Non-Independent Director for a particular Financial Year shall be decided by the Chairman of the Company and shall be approved by the Board.

Independent Director/ Director other than Managing Director and Executive Director shall also be entitled to reimbursement of all legitimate expenses incurred by him for attending the meetings of Board or Committee thereof.

#### 8.4.3. Stock Options

Independent Director shall not be entitled to any stock option of the Company or Subsidiary Companies.

### 8.5. Provisions for excess remuneration

If any Director draws or receives, directly or indirectly by way of remuneration any such sums in excess of the limits prescribed under the Act or without the prior sanction of the Central Government, where required, he / she shall refund such sums to the Company and until such sum is refunded, hold it in trust for the Company. Subject to the approval of Central Government, the Shareholders of the Company may waive recovery of such excess remuneration by passing an Ordinary Resolution.

### 8.6. Remuneration to Key Managerial Personnel and Senior Management employees:

8.6.1. The remuneration to Key Managerial Personnel and Senior Management employees shall comprise of Fixed Pay and Variable Pay and governed by the Company's HR Policy.

8.6.2. Remuneration of a KMP and Senior Management at the time of their appointment will be recommended by the Managing Director / Executive Director to the Committee. The Committee shall review such remuneration and recommend the same to the Board for approval. Any subsequent modification to the remuneration of Key Managerial Personnel shall also be recommended by the Managing Director/Executive Director to the Committee for its review and recommending to the Board for approval.

#### 8.6.3. Fixed Pay

The Fixed Pay of Key Managerial Personnel and Senior Management employees shall comprise of salary, perquisites, allowances and other benefits as per policy of the Company. The break-up of the pay scale and quantum of perquisites including but not limited to employer's contribution to P.F, pension scheme, medical expenses etc. shall be as per Company's HR Policy.

#### 8.6.4. Variable Pay

The remuneration of KMP and Senior Management employees will also comprise performance linked variable pay. The amount of variable pay will be 16% of their fixed pay.

This amount of variable pay shall be paid annually after the end of each Financial Year and will be entirely based on the individual's performance and Company's performance and may vary from 0% to 100% of the variable pay as per policy of the Company. Such Variable Pay for a particular Financial Year shall be recommended by the Nomination and Remuneration Committee to the Board of Directors.

#### 8.6.5. Loyalty Bonus

In addition to the above, KMP and Senior Management employees shall also be entitled to Loyalty Bonus as per policy of the Company.

**8.7.** The remuneration to other employees of the Company shall be governed by the Company's HR Policy.

#### 8.8. Stock Options

8.8.1. With the objective to incentivize and retain key talent within the Group as well as to motivate the Employees to contribute towards growth and profitability, the Board of Directors of the Company, approved 'Deepak Nitrite Limited Employee Stock Option Scheme-2024' ('DNL-ESOP Scheme-2024').

The Shareholders of the Company, vide a Special Resolution passed on 19<sup>th</sup> April, 2024, approved the ESOP Scheme-2024. Further, in terms of requirements of SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021, the Shareholders of Company have also by way of a separate Special Resolution, approved extending the DNL-ESOP Scheme-2024 to the employees of Subsidiary Companies of the Company.

Accordingly, Stock Options of DNL may be offered to Executive Director(s), Key Managerial Personnel and other employees of the Company in terms of the DNL-ESOP Scheme-2024 ('eligible employees').

8.8.2. The Committee, while considering the revision in remuneration of eligible employees for the period(s) subsequent to granting of Stock Options to them, shall consider their total remuneration, which shall also include monetary value of benefit arising from vested Stock Options, in compliance with applicable provisions of law.

#### 8.9 Loans and Advances to Employees

- (a) The Loan, advance and other financial assistance facilities to the employees shall be governed by the DNL HR policy as amended from time to time and shall be considered as a part of 'conditions of service' for employees of the Company.
- (b) Advances to the employees for the purpose of performance of his duties shall be governed by the DNL HR Policy as amended from time to time and shall be considered as a part of 'conditions of service' for employees of the Company.

#### 9. BOARD DIVERSITY

- 9.1. The Board of Directors shall have the optimum combination of Directors from the different areas / fields like operations, projects, production, management, quality assurance, finance, legal, sales and marketing, research and development, Human Resources etc. or as may be considered appropriate.
- 9.2. The Board shall have at least one Director who has accounting or related financial management expertise.

#### 10. DISCLOSURE

This Policy shall be placed on the website of the company and the salient features of the policy along with other details as required under the provisions of law, shall be disclosed in the Board's Report.

#### 11. REVIEW OF THE POLICY

This Policy shall be reviewed by the Committee after every three years.

#### 12. AMENDMENTS TO THE POLICY

The Board of Directors on its own and / or as per the recommendations of the Committee can amend this Policy, as and when deemed fit.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the competent authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

## Annexure-G

### DISCLOSURE UNDER SECTION 197(12) OF THE COMPANIES ACT, 2013:

#### PART (A) – DISCLOSURE AS REQUIRED UNDER RULE 5(1) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014:

- Ratio of remuneration of each Director to the median remuneration of the employees of the Company for the Financial Year ended March 31, 2025 and the percentage increase in remuneration of each Director, Chief Financial Officer, Chief Executive Officer, Company Secretary or Manager in the Financial Year ended March 31, 2025:

Name of the Director/ KMP	% Increase in Remuneration in the F.Y. 2024-25*	Ratio to Median Remuneration
Shri Deepak C. Mehta Chairman & Managing Director	14.21	137.38
Shri Sanjay Upadhyay Director(Finance) & Group CFO	12.01	95.37
Shri Maulik Mehta Executive Director & CEO	16.75	79.07
Shri Girish Satarkar Executive Director	10.45	38.82
Shri Ajay C. Mehta Non-Executive Director	0.00	2.40
Shri Meghav Mehta Non-Executive Director	0.00	2.40
Shri Sanjay Asher Independent Director	(33.33)	3.19
Smt. Purvi Sheth Independent Director	(16.67)	3.99
Shri Dileep Choksi Independent Director	(25.00)	2.40
Shri Punit Lalbhai Independent Director	0.00	2.40
Shri Vipul Shah Independent Director	0.00	2.40
Shri Prakash Samudra <sup>1</sup> Independent Director	(50.00)	2.40
Shri Somsekhar Nanda Chief Financial Officer	14.67	NA
Shri Arvind Bajpai Company Secretary	11.82	NA

\* Excluding sitting fees.

<sup>1</sup>. Shri Prakash Samudra ceased to be Independent Director from close of business hours on April 9, 2025.

**Notes:**

1. In the Financial Year 2024-25, there was an increase of 8.2% in the median remuneration of employees.
2. There were 1,757 permanent employees on the rolls of the Company as on March 31, 2025.
3. Average Percentile increase already made in the salaries of employees other than Managerial Personnel in the last Financial Year was 11.95% and average percentile increase in remuneration of Managerial Personnel was 13.35%.

Shri Deepak C. Mehta, Chairman & Managing Director of the Company is also Chairman & Managing Director of Deepak Phenolics Limited ("DPL") a Wholly Owned Subsidiary of the Company.

As per the term of his appointment, he is entitled to profit related commission from DPL. For the Financial Year 2024-25, the Commission to Shri Deepak C. Mehta is ₹ 18 Crores.

Average increase in remuneration of both, managerial and non-managerial personnel were determined based on the overall performance of the Company.

Key result areas of the managerial personnel are broadly to achieve Company's growth and performance target, achieving the same against various adverse externalities globally, devising sustenance strategy to combat global forces like competition, exchange rate etc, which, in turn, enhance shareholders' value. Remuneration of the managerial personnel is based on the Nomination and Remuneration Policy as recommended by the Nomination & Remuneration Committee and approved by the Board of Directors.

As against above, remuneration for non-managerial personnel is based on an internal evaluation of assigned target area which are broken into subsets of key result areas of the managerial personnel.

4. It is affirmed that the remuneration is as per the Nomination & Remuneration Policy of the Company.

For and on behalf of the Board

Place : Vadodara  
Date : May 28, 2025

**Deepak C. Mehta**  
Chairman & Managing Director  
(DIN: 00028377)



## Annexure-H

### INFORMATION REQUIRED UNDER SECTION 134(3)(M) OF THE COMPANIES ACT, 2013 READ WITH RULE 8(3) OF THE COMPANIES (ACCOUNTS) RULES, 2014 PERTAINING TO CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO

#### (A) Conservation of Energy:

##### (i) Steps taken or impact on conservation of energy:

- At Dahej, power optimised by installing FRP fan blades at cooling towers.
- At NDS, vent steam utilised by generating low pressure steam resulted in less steam consumption from source.
- Power optimisation by process innovation during re crystallisation of Sodium Nitrite.
- Power optimisation in centrifugal pumps by internal coating.
- Introduced system to utilize wet cake instead of Dry powder in OBA resulting in reduction in drying cost.
- Implementation of Smart Power Optimizer: Smart Power Optimization (Smart PO) works on the principle of predictive load curve simulation on electrical circuit using ML/AI algorithm. Successfully commissioned Smart Power Optimiser Panels at Nandesari, Dahej and Roha Plant which has started 9 % of power savings.
- Implementation of Scaleban Technology: Successfully commissioned Scaleban Technology at Roha Plant which has started savings in steam consumption. Scaleban's technology can assist in achieving Zero Liquid Discharge (ZLD) sustainably on a very cost-effective basis without relying on costly conventional technologies.
- Mechanical Vapour Compression (MVR): Successfully commissioned MVR at Nandesari and Roha Plant. MVR technology can assist in achieving Zero Liquid Discharge (ZLD) sustainably on a very cost-effective basis without relying on costly conventional technologies.

##### (ii) Steps taken for utilizing alternate sources of energy:

- Use of PRT (Pressure Reducing Turbine) to generate power in place of PRV (Pressure Reducing Valve).

- Started receipt of power from alternate sources. Successfully initiated drawl of Solar power for its Nandesari Plant to replace 20% of total conventional power. Initiative will be extended to other plants with higher replacement in FY 2025-26.

##### (iii) Spend on energy capex in FY 2024-25:

- Total ₹ 12.18 Crores capex are approved related to energy conservation.

#### (B) Technology Absorption:

##### (i) Efforts made towards Technology Absorption:

- Technology developed for import substituted products.
- In-house development of "platform technology" where similar chemistry can be successfully intensified at world best level.

##### (ii) Benefits derived like product yield improvement, cost reduction, product development or import substitution:

- Innovative processes developed for import substituted products in the in-house Research & Development facility through Process Engineering Research & Innovation (PERI) Lab.
- Continuous chemical processes developed to reduce raw materials consumption norms and by-products formation, also evaluated alternative routes to make cheaper and cleaner technologies.
- Batch Process yield improvement been successfully demonstrated and running commercially for better sustainability in the market and cost reduction to build profit.

##### (iii) Information regarding technology imported, during the last 3 years: Nil

##### (iv) Information regarding in-house technology developed, during the last 3 years: 5 nos & Applied for patent : 3



- (v) Expenditure incurred on Research and Development:

(₹ in Crores)		
Particulars	2024-25	2023-24
a) Capital	0.73	9.13
b) Recurring	21.60	20.33
<b>Total</b>	<b>22.33</b>	<b>29.46</b>
Total R&D expenditure as a percentage to total turnover	0.88%	1.08%

### (C) Foreign Exchange Earnings and Outgo:

The Foreign Exchange earned in terms of actual inflows during the year and the Foreign Exchange outgo during the year in terms of actual outflows.

(₹ in Crores)		
Particulars	2024-25	2023-24
Total Foreign Exchange Earned	1141.32	1277.51
Total Foreign Exchange Outgo	439.27	378.54

For and on behalf of the Board

**Deepak C. Mehta**

Chairman & Managing Director  
(DIN: 00028377)

Place : Vadodara  
Date : May 28, 2025