

**HeidelbergCement India Limited**

CIN: L26942HR1958FLC042301

Registered Office

2<sup>nd</sup> Floor, Plot No. 68, Sector-44,

Gurugram, Haryana 122002, India

Phone +91-124-4503700

Fax +91-124-4147698

Website: www.mycemco.com

HCIL:SECTL:SE:2023-24

05 September 2023

BSE Ltd.  
Listing Department  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort,  
Mumbai - 400001

National Stock Exchange of India Ltd  
Listing Department,  
Exchange Plaza, C/1, Block G,  
Bandra Kurla Complex, Bandra (E)  
Mumbai - 400 051

Scrip Code:500292

Trading Symbol: Heidelberg

Dear Sir,

**Sub: Submission of Business Responsibility and Sustainability Report for FY23**

In compliance with Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Business Responsibility and Sustainability Report of HeidelbergCement India Limited for FY23.

You are requested to take the same on record.

Thanking you,

Yours faithfully,  
For HeidelbergCement India Ltd.

Rajesh Relan  
Sr. Vice President- Corporate Affairs &  
Company Secretary

Encl.: a.a.



# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)

SEBI vide its circular no. SEBI/HO/CFD/CMD-2/P/CIR/2021/562 has mandated the top 1,000 listed companies (by market capitalisation) to disclose and report the requirements under ESG (Environment, Social and Governance) parameters in the BRSR format from the financial year 2022-2023 by replacing Business Responsibility Report.

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1.	<b>Corporate Identity Number (CIN) of the Company</b>	L26942HR1958FLC042301
2.	<b>Name of the Company</b>	HeidelbergCement India Limited
3.	<b>Year of Incorporation</b>	13 May 1958
4.	<b>Registered office address</b>	2 <sup>nd</sup> Floor, Plot No. 68, Sector-44, Gurugram, Haryana - 122002
5.	<b>Corporate office address</b>	2 <sup>nd</sup> Floor, Plot No. 68, Sector-44, Gurugram, Haryana - 122002
6.	<b>E-mail id</b>	investors.mcl@mycem.in
7.	<b>Telephone</b>	0124-4503700
8.	<b>Website</b>	www.mycemco.com
9.	<b>Financial year for which reporting is being done</b>	01 April 2022 to 31 March 2023
10.	<b>Name of the Stock Exchange(s) where shares are listed</b>	National Stock Exchange (NSE) and BSE Limited (BSE)
11.	<b>Paid-up capital</b>	INR 2,266.2 million
12.	<b>Name and contact details of the person who may be contacted in case of any queries on the BRSR report</b>	Mr. Vimal Kumar Jain, Whole-time Director Email: vimal.jain@heidelbergcement.in DIN: 09561918
13.	<b>Reporting Boundary</b> - 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).	The Disclosures under this report are made on a standalone basis.

### II. Products / services

14.	<b>Details of business activities (accounting for 90% of the turnover)</b>		
<b>S. No</b>	<b>Description of main activity</b>	<b>Description of business activity</b>	<b>% of turnover</b>
1	Manufacturing	Manufacturing and Selling of Cement	100
15.	<b>Products / services sold by the entity (accounting for 90% of the entity's turnover)</b>		
<b>S. No.</b>	<b>Product / Service</b>	<b>NIC Code</b>	<b>% of total turnover contributed</b>
1	Manufacture of Clinker and Cement	23941	100

### III. Operations

16.	<b>Number of locations where plants and/or operations / offices of the entity are situated</b>		
<b>Location</b>	<b>Number of plants</b>	<b>Number of offices</b>	<b>Total</b>
National	<ul style="list-style-type: none"> <li>• 2 Integrated Cement Units</li> <li>• 1 Grinding Unit</li> </ul>	<ul style="list-style-type: none"> <li>• 1 Registered Office</li> <li>• 4 Regional Marketing Offices</li> </ul>	8
International	Nil	Nil	-



## 17. Markets served by the entity -

### a. Number of locations

Locations	Number
National (No. of states)	6
International (No. of countries)	Nil

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

Nil

### c. A brief on types of customers

The company serves a diverse set of customers as mentioned below:

- **Dealers:** The Company appoints dealers in the markets and sells cement through them. Dealers further sell cement to retailers and end consumers. The dealers (wholesalers) sell cement to small retailers who thereafter service the demand of retailer customers. Dealers place orders on the warehouse / plant and supplies are made accordingly. The Company gives discounts / incentives to the dealers both monetary and in kind which are linked to their targets.
- **Retailers:** The Company appoints retailers in the market to whom dealers sell cement. The retailers operate counters (sale outlet) and they service the demand of retail customers in vicinity of their location. Majorly, dealers while placing orders on company specify the Retailer firm to whom the cement is to be delivered (*Ship-to-party*). The Company also offers incentive schemes to retailers to promote its products and create brand pull from customers.
- As part of its institutional sales (non-trade) strategy company directly sells to customers depending on their order, size and location. These customers can be Real Estate developers, Infrastructure companies or government departments who consume cement for civil construction activities. Such orders could either be procured directly by company officials or initiated by commission agents. In either case the billing is done by the company directly to the customers.
- In order to support its sales & marketing activities, the Company deploys a team of sales personnel for generating business from the dealers and direct customers and gather market information. The Company also deploys customer service executives to provide technical guidance to end users. The Company uses various modes of advertising for sales promotion and brand building.

## IV. Employees

### 18. Details as on March 31, 2023

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

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1	Permanent (D)	667	652	98	15	2
2	Other than Permanent (E)	6	5	83	1	17
3	Total employees (D+E)	673	657	98	16	2
<b>WORKERS</b>						
1	Permanent (F)	329	328	100	1	0
2	Other than Permanent (G)	0	0	-	0	-
3	Total workers (F+G)	329	328	100	1	0



b. Differently abled employees and workers

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1	Permanent (D)	1	1	100	0	0
2	Other than Permanent (E)	0	0	-	0	-
3	Total differently abled employees (D+E)	1	1	100	0	0
<b>DIFFERENTLY ABLED WORKERS</b>						
1	Permanent (F)	0	0	-	0	-
2	Other than Permanent (G)	0	0	-	0	-
3	Total differently abled workers (F+G)	0	0	-	0	-

19. Participation / inclusion / representation of women

	Total (A)	No. and percentage of Females	
		No.(B)	%(B/A)
Board of Directors	6	2	33.33
Key Management Personnel	4	0	0

20. Turnover rate for permanent employees and workers

	FY23			FY22			FY21		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	17.7	11.76	17.59	11.1	26.3	11.5	5.47	9.52	5.60
Permanent Workers	1.13	0.0	1.13	0.99	0.0	0.99	0.43	0.0	0.43

V. Holding, subsidiary and associate companies (including joint ventures)

21. a. Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of Holding / Subsidiary / Associate Companies / Joint Venture (A)	Indicate whether Holding / Subsidiary / Associate / Joint Venture	% of shares held	Does the entity indicated in column A, participate in the Business Responsibility initiatives of listed entity? (Yes / No)
1	Centrum I B.V. (Holding Company of HCIL)	Holding	69.39	No

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes  
(ii) Turnover (in Rs.): INR 22,381 million  
(iii) Net worth (in Rs.): INR 14,613.9 million



## VII. Transparency and Disclosures Compliances

### 23. Complaints / grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGRBC)

#### 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)	FY 2022-23		Remarks	FY 2021-22		Remarks
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	
Communities	Yes*	-	-		-	-	
Investors (other than shareholders)	Yes*	-	-		-	-	
Shareholders	Yes*	5	0		2	0	
Employees and workers <sup>1</sup>	Yes*	7	0		13	0	
Customers	Yes*	-	-		-	-	
Value Chain Partners	Yes*	-	-		2	0	
Other (please specify)	Yes*	-	-		-	-	

\*The Management has implemented a robust Grievance Redressal Policy, referred to as the Vigil Mechanism / Whistle Blower Policy. This framework includes provisions for addressing various types of grievances. The policy outlines a well-defined process through which complaints can be submitted, following a predetermined methodology to ensure a systematic and fair approach to resolution. The Company has also established Prevention of Sexual Harassment Committee for the purpose of reporting incidents of sexual harassment. Further, Heidelberg Materials group has also established a compliance hotline known as "SpeakUp" which can be used by any employee / vendor of any of the subsidiaries of Heidelberg Materials group to anonymously report compliance incidents. In line with the group policy, HCIL has also extended this facility to its employees / vendors for reporting compliance incidents. The Management encourages employees to give their suggestions for improvement in work culture which fosters harmonious relations.

### 24. 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, 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.	Emissions management	Risk	Emissions management is a material risk for any manufacturing enterprise due to its potential impacts on regulatory compliance, reputation, financial performance, and operational continuity. Inadequate management can lead to regulatory penalties, reputational damage, increased costs, and disruptions, making it a critical concern in an environmentally conscious and regulated landscape. Limestone constitutes a primary raw material in cement production and necessitates fossil fuel for its combustion during the manufacturing process. As a result of this process, CO <sub>2</sub> emissions are generated through both the calcination of limestone and the fuel combustion. Such emissions potentially contribute to global warming, thereby exerting the potential to influence business continuity and even precipitate disruptions.	The Company is meticulously planning and implementing various measures, including transitioning to renewable energy sources, increasing power generation from waste heat recovery generation system and alternative fuels handling & storage facility to increase Thermal Substitution Rate (TSR). The above measures help in reducing CO <sub>2</sub> emission per tonne of cement produced by the Company.	Negative



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	Green Power	Opportunity	The company has recognized opportunities for reduction in carbon footprint and operational costs. Switching over from conventional fossil fuels to green power also helps to comply with Renewable Power Purchase Obligation (RPPO) mandated by the State Governments.	Not applicable	Positive
3	Occupational health & safety	Opportunity	Prioritizing occupational health and safety measures can protect employees, reduce accidents, improve productivity, and enhance the company's reputation as a responsible employer. It also helps in attracting and retaining skilled manpower.	Not applicable	Positive
		Risk	Non-compliance with health and safety regulations can have severe consequences for a company. Furthermore, workplace incidents and illnesses can affect productivity, inflate expenses, and expose the company to legal liabilities. Moreover, such incidents can adversely affect employee morale, impact the company's culture, and make it challenging to retain skilled staff and attract new talent. The Company may also face reputational risk.	The Company is committed to conduct its operations with a "Zero Harm" approach, prioritizing the well-being of all stakeholders and maintaining a safe working environment. This commitment involves stringent safety measures, regular maintenance, and monitoring to ensure safety of workmen. The Company enforces essential "Safety Cardinal Rules," obligating all workers to adhere to safety protocols, including proper use of personal protective equipment and ensuring authorized entry to confined spaces.	Negative
4	Community development	Opportunity	Investing in community development programmes, such as rural infrastructure development, healthcare facilities and educational programs, benefits the local community and also creates a positive impact on the company's brand image.  As a responsible corporate citizen, the Company strives to improve the standard of living of the beneficiaries.  We are committed to support social and economic development of our neighbouring communities.	Not applicable	Positive



## SECTION B: MANAGEMENT AND PROCESS DISCLOSURE

This section demonstrates the structures, policies and processes put in place by the Company towards adopting the NGRBC Principles and their Core Elements.

**The National Guidelines for Responsible Business Conduct (NGRBC) as prescribed by the Ministry of Corporate Affairs advocates nine principles referred as P1-P9 as given below:**

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

S. No.	Disclosure Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>POLICY AND MANAGEMENT PROCESSES</b>										
1.	<p><b>a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)</b></p> <p><b>b. Has the policy been approved by the Board? (Yes / No)</b></p> <p><b>c. Web link of the policies, if available</b></p>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
		<p>The Code of Conduct (P1) is available at <a href="https://www.mycemco.com/sites/default/files/PDF/Policies/Code_of_Conduct.pdf">https://www.mycemco.com/sites/default/files/PDF/Policies/Code_of_Conduct.pdf</a></p> <p>The CSR Policy (P7) is available at <a href="https://www.mycemco.com/sites/default/files/PDF/Policies/CSR_Policy.pdf">https://www.mycemco.com/sites/default/files/PDF/Policies/CSR_Policy.pdf</a></p> <p>The other Policies are available on internal portal, which can be easily accessed by employees of the Company.</p>								
2.	<b>Whether the entity has translated the policy into procedures. (Yes / No)</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	<b>Do the enlisted policies extend to your value chain partners? (Yes / No)</b>	<p>Yes.</p> <p>The Company recognizes the importance of maintaining ethical and sustainable practices throughout value chain, which includes suppliers, dealers, retailers and other associates involved in supporting the production and sale of its cement.</p>								
4.	<b>Name the national and international codes / certifications / labels / standards</b>	<p>The Company benchmarks its practices and processes against national and international standards laid down by the organisations such as - ISO 9000; ISO 14000; OHSAS 18000; ISO 45000; ISO 50000; SA 26000; UNGC Guidelines; GRI Standards; BIS Standards; ILO Principles; GCCA; IGBC GreenPro.</p>								
5.	<b>Specific commitments, goals and targets set by the entity with defined timelines, if any</b>	<p>In line with the practices of Heidelberg Materials Group, the Company has also established its Sustainability Commitments 2030 as the foundation of its sustainability strategy, initially introduced in 2017. These commitments have been aligned with the United Nations Sustainable Development Goals (SDGs) ratified in 2015 by the UN General Assembly and adopted by all 193 member states. The SDGs aim to eradicate extreme poverty, address inequalities and protect the planet, encompassing 17 goals to be achieved by 2030.</p>								



S. No.	Disclosure Question	P1	P2	P3	P4	P5	P6	P7	P8	P9
		<p>By aligning with the SDGs, HeidelbergCement India recognizes its role in contributing to the country's efforts to address significant social, economic, and environmental challenges. The company's sustainability targets are harmonized with the group-wide strategies and outlined in its Sustainable Development (SD) Plan 2030, which sets the direction for the next decade. Through this plan, the Company aims to integrate sustainability practices and make a positive impact on society and the environment.</p> <p>As a responsible corporate citizen, the Company is committed to fulfil its share of the global responsibility to contain global warming and at the same time continue to reduce the impact on air, land and water. The Company has set a target to achieve 2°C lower Ambient Temperature in all plants compared to the temperature prevailing a kilometre away. Against the target of 2°C reduction, the Company has achieved a target of 1.8°C reduction. The Company also aims to reduce CO<sub>2</sub> to less than 500 kg per tonne of cement.</p> <p>For commitments, goals and targets relating to Environment, Social and Sustainability, please refer to the Sustainability section of the Company's website. The weblink for which is <a href="https://www.mycemco.com/sustainability-development-goals">https://www.mycemco.com/sustainability-development-goals</a> and <a href="https://www.mycemco.com/enviroment">https://www.mycemco.com/enviroment</a></p>								
6.	Performance of the entity against	<p>HCIL has established targets and goals to achieve a more sustainable specific commitments, goals and targets business in line with the Sustainability Commitments 2030. These targets are targets reviewed on a regular basis.</p> <p>Please refer to the Sustainability section of the Company at Company's website. The weblink for which is <a href="https://www.mycemco.com/enviroment">https://www.mycemco.com/enviroment</a></p>								

## 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).

Being a responsible cement manufacturing Company, we at HeidelbergCement India Limited are committed to the BRSR and ESG principles, inclusive growth, UN Sustainable Development Goals and other commitments of the nation. We are committed to continuously strive for improving our ESG performance by not only mitigating social, environmental negative impacts but also by creating positive externalities through our business operations.

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

Name: Mr. Joydeep Mukherjee

Designation: Managing Director

DIN: 06648469

### 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

Name: Mr. Vimal Kumar Jain

Designation: Whole-time Director





10. Details of Review of the National Guidelines on Responsible Business Conduct (NGRBC) by the company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee									Frequency: Annually (A) / Half yearly (H) / Quarterly (Q) / Any other - please specify								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Performance against above policies &amp; follow up action</b>	The Business Responsibility and Sustainability Policies are reviewed periodically on a need basis by the Senior Management of the Company. During the assessment, the efficacy of the policies is reviewed, and necessary changes are implemented wherever necessary.																	
<b>Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances</b>	The Company is compliant with applicable rules and regulations on an on-going basis.																	

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

P1	P2	P3	P4	P5	P6	P7	P8	P9
No. The respective functional heads regularly internally evaluate the functioning of the policies based on the inputs received from concerned stakeholders.								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes / No)						NA			
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes / No)						NA			
The entity does not have the financial or / human and technical resources available for the task (Yes / No)						NA			
It is planned to be done in the next financial year (Yes / No)						NA			
Any other reason (please specify)						NA			

**SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE**

This section demonstrates the Company's performance in integrating the Principles and their Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. The essential indicators as mandated by SEBI have been disclosed in this Report; however since the disclosures in respect of leadership indicators are voluntary, the Company has opted not to deal with the leadership indicators in this maiden report.

**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
<b>Board of Directors</b>	8	Updates on Sustainability aspects and CSR initiatives undertaken	33.3
<b>Key Managerial Personnel (KMP)</b>	12	Updates on Whistle Blower Mechanism and Code of Conduct for Members of Board and Senior Management	100.0
<b>Employees other than BoD and KMPs</b>	24	Compliance Basics, Code of Conduct, Safety, Competencies, Sustainability, Whistle Blower Policy, Prevention of Sexual Harassment at Workplace	74.7
<b>Workers</b>	7	Skill Upgradation, Safety trainings, Emergency, Hazards, Waste Management, First Aid, Core Values and others	67.3



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 Requirements) Regulations, 2015 and as disclosed on the entity’s website):**

NIL

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.**

Not Applicable

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

Heidelberg Materials Group has formulated Anti-Corruption Guidelines and the Company has adopted the same. One of the goals of the Heidelberg Materials Group’s compliance programme is to prevent corrupt behaviour by Group companies and employees. Sections 2.3-2.5 of the Code of Business Conduct (“Anticorruption”, “Gifts, hospitality and benefits”, “Conflicts of interest”) set forth general anticorruption principles. This Guideline is part of the Group compliance programme and gives guidance to employees by providing additional details. The Guidelines apply to all companies of Heidelberg Materials Group. This Guideline not only prohibits corrupt practices punishable under relevant penal laws but also addresses conflict of interest issues and prohibits unethical behaviour, even if such conduct is not a punishable criminal offence. This approach is based on the principle that it is important to avoid even the suggestion that a business or governmental decision might have been influenced by the acceptance or granting of an advantage, be it personal or for any third party.

The Company has also implemented a Code of Conduct that requires the employees to act with high standards of personal and professional ethics, integrity and ensure strict compliance with the applicable laws. You can refer to the Code of Conduct - [https://www.mycemco.com/sites/default/files/PDF/Policies/Code\\_of\\_Conduct.pdf](https://www.mycemco.com/sites/default/files/PDF/Policies/Code_of_Conduct.pdf)

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

	<b>FY23 (Current Financial Year)</b>	<b>FY22 (Previous Financial Year)</b>
<b>Directors</b>	Nil	Nil
<b>KMPs</b>	Nil	Nil
<b>Employees</b>	Nil	Nil
<b>Workers</b>	Nil	Nil

6. **Details of complaints about conflict of interest**

	<b>FY23 (Current Financial Year)</b>		<b>FY22 (Previous Financial Year)</b>	
	<b>Number</b>	<b>Remarks</b>	<b>Number</b>	<b>Remarks</b>
<b>Number of complaints received in relation to issues of Conflict of Interest of the Directors</b>	Nil		Nil	
<b>Number of complaints received in relation to issues of Conflict of interest of KMPs</b>	Nil		Nil	

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

Not Applicable



## PRINCIPLE 2 - BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

### Essential Indicators

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

	FY 2022-23	FY 2021-22	Details of improvements in environmental and social impact
<b>R&amp;D</b>	Nil	Nil	NA
<b>Capex<sup>2</sup></b>	25.7%	26.9%	The Company has made capex investments in Alternate Fuels Project at Narsingarh clinker plant and in captive solar power project at Patheria mines. The AFR project has increased consumption of alternate fuels in Kilns and solar power has reduced the dependency on grid power.

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

The Company has systems in place for sustainable sourcing of materials and their transportation. Limestone is the primary raw material for manufacturing of cement. The Company uses latest mining techniques to stay cost effective in its operations and avoid wastage. The transportation of limestone from Patheria mines to Narsingarh Clinkerisation plant is done in a sustainable manner via 21 km long Overland Belt Conveyor (OLBC). Despite being capital intensive, OLBC has proven advantage over conventional road transportation when it comes to reducing carbon footprint and at the same time it reduces logistics cost. In order to optimize and thereby conserve Limestone, the Company has been producing blended cement only, i.e. producing more cement from every ton of clinker it produces. Consequently, the life of the mines is also getting extended. With a belief that sustainable transportation is attained through less polluting and fuel-efficient transportation mix, most of the inward transported bulk material are by rail.

The Company has long term agreements with thermal power plants to ensure uninterrupted supply of fly ash. The Company ensures maximum consumption of fly ash including wet fly ash, to the extent possible within the permissible norms laid down by Bureau of Indian Standards.

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

Yes, for all the major purchases such as coal, petcoke, gypsum, fly ash, sweetener, and equipment spares and services, 100% of the inputs are sourced sustainably. The company utilizes the SAP-Ariba platform as the guided buying, sourcing, and contracting tool, enabling stakeholders to conduct their sourcing activities digitally. Additionally, the company has implemented SAP ERP to ensure a robust procure-to-pay process for all purchases.

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

- The Company produces cement, which is packed in cement bags. These bags are frequently reused to store other construction material.
- Our manufacturing process does not produce any e-waste, however, the e-waste produced in the office operations is sold to the registered recyclers.
- The Hazardous waste generated in the cement production process, is sold to the registered recyclers or disposers. The incinerable fractions of the hazardous waste are disposed off within the plant kilns itself as per the permissions from State Pollution Control Board.
- We are utilising hazardous waste as an alternative fuel and waste / by-products of other industries viz., fly ash, slag, pet coke and red mud as raw materials in our cement manufacturing process.

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

Yes. Extended Producer Responsibility (EPR) is applicable to the Company and followed as per the plan submitted to the Pollution Control Board.

Cement bags get recycled during use phase multiple times to store various items. In addition, the company disposes off much higher quantities of plastic wastes (from other industries and municipalities) as compared to the PP bags used by it in cement packaging.

<sup>2</sup>Efforts made towards Technology Absorption: a. Use of alternative fuels by installation of AFR system. b. Adaptation to best practices and processes of Heidelberg Materials Group under WOK/ CIP, thus reaping the benefits of their global expertise.



**PRINCIPLE 3 - BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS**

**Essential Indicators**

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

Category	Total (A)	% Of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>PERMANENT EMPLOYEES</b>											
Male	652	652	100	652	100	NA	-	0	-	0	-
Female	15	15	100	15	100	15	100	NA	-	0	-
Total	667	667	100	667	100	15	100	0	-	0	-
<b>OTHER THAN PERMANENT EMPLOYEES</b>											
Male	NA	NA	-	NA	-	NA	-	NA	-	NA	-
Female	NA	NA	-	NA	-	NA	-	NA	-	NA	-
Total	-	-	-	-	-	-	-	-	-	-	-

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

Category	Total (A)	% Of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		No. (B)	% (B/A)	No. (C)	% (C/A)	No. (D)	% (D/A)	No. (E)	% (E/A)	No. (F)	% (F/A)
<b>PERMANENT WORKERS</b>											
Male	328	328	100	328	100	NA	-	0	-	0	-
Female	1	1	100	1	100	1	100	NA	-	0	-
Total	329	329	100	329	100	1	100	0	-	0	-
<b>OTHER THAN PERMANENT WORKERS</b>											
Male	NA	NA	-	NA	-	NA	-	NA	-	NA	-
Female	NA	NA	-	NA	-	NA	-	NA	-	NA	-
Total	-	-	-	-	-	-	-	-	-	-	-

**2. Details of retirement benefits for the current and previous financial year**

Benefits	FY23			FY22		
	No. of employees covered (as a % of total employee)	No. of workers covered (as a % of total workers)	Deducted & deposited with the authority (Yes / No / NA)	No. of employees covered (as a % of total employees)	No. of workers covered (as a % of total workers)	Deducted and deposited with the authority (Yes / No / NA)
PF	100	100	Yes	100	100	Yes
Gratuity	100	100	Yes	100	100	Yes
ESI	NA	NA	NA	NA	NA	NA

**3 Accessibility of workplaces**

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

Yes.

The facilities and premises, both operational and administrative, have been designed to ensure accessibility for employees and workers with any disability.



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, to the extent possible, the Company strives to provide equal opportunity to persons with disability. However, there is no specific policy in this regard.

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

	Permanent Employees		Permanent Workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-	-	-	-
Female	-	-	-	-
Total	-	-	-	-

Note: None of the employees/workers took parental leave during FY23.

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

a. Permanent Employee b. Other than Permanent Employees c. Permanent Workers b. Other than Permanent Workers

The Company has a whistle-blower policy as well as a compliance hotline accessible through Internet and Phone. In addition, there is a committee entrusted with the task of resolution of POSH complaints.

7. Membership of employees in association(s) or unions recognised by the listed entity

Category	FY23			FY22		
	Total employees/workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	667	0	0	675	0	0
- Female	15	0	0	16	0	0
- Male	652	0	0	659	0	0
Total Permanent Workers	329	329	100	382	382	100
- Female	1	1	100	3	3	100
- Male	328	328	100	379	379	100

8. Details of training given to employees and workers

Category	FY23					FY22				
	Total (A)	On health & safety / wellness measures		On skill upgradation		Total (D)	On health & safety / wellness measures		On skill upgradation	
	No. (B)	% (B/A)	No. (C)	% (C/A)	No. (E)	% (E/D)	No. F	% (F/D)		
<b>EMPLOYEES</b>										
Male	652	337	52	498	76	659	123	19	479	73
Female	15	12	80	6	40	16	6	38	12	75
Total	667	349	52	504	76	675	129	19	491	73
<b>WORKERS</b>										
Male	328	169	52	142	43	379	56	15	188	50
Female	1	0	0	0	0	3	0	0	0	0
Total	329	169	51	142	43	382	56	15	188	49



## 9. Details of performance and career development reviews of employees and workers

Category	F23			FY22		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>EMPLOYEES</b>						
Male	652	563	86	659	659	100
Female	15	15	100	16	16	100
<b>Total</b>	<b>667</b>	<b>578</b>	<b>87</b>	<b>675</b>	<b>675</b>	<b>100</b>
<b>WORKERS</b>						
Male	328	328	100	379	379	100
Female	1	1	100	3	3	100
<b>Total</b>	<b>329</b>	<b>329</b>	<b>100</b>	<b>382</b>	<b>382</b>	<b>100</b>

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

Yes, the Company has implemented an occupational health and safety management system. The system includes safety induction training for new employees, a safety film presentation during induction, height phobia tests for workers required to work at elevated positions, training on behaviour-based safety and specific safety requirements, and regular updates relating to operating procedures. The objectives of these measures is to ensure plant safety, promote a safe working environment, and reduce the risk of accidents and injuries.

Furthermore, all manufacturing plants are certified under ISO 45001:2018 Occupational Health and Safety Management System certified by TUV SUD South Asia Private Limited.

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

For the maintenance of a secure cement plant environment, implementation of a comprehensive safety management system is pivotal. This system encompasses risk evaluation and control protocols for all processing activities, a meticulously structured permit system, the use of secure machinery, well-equipped firefighting systems, the upkeep of a clean workspace, regular safety audits, and a skilled and proficient workforce.

Additionally, the Company categorizes hazards in three forms: low hazard, medium hazard, and major hazard.

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

Yes, the Company has processes in place for workers to report work-related hazards and mitigate such risks. In the event of a major hazard, the Company has a protocol where operations are halted immediately, and corrective actions are taken. The initial response involves isolating the hazard to prevent any individuals from approaching it. The area is cordoned off, and the operational team is promptly notified to assess the situation and implement remedial and preventive measures within the specified timeframe. This ensures the safety of all workers and thereby mitigates the risks associated with work-related hazards.

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

Yes, the plants have medical center, and health services providers for non-occupational needs.

## 11. Details of safety related incidents

Safety Incident / Number	Category	FY23	FY22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0	0.2
Total recordable work-related injuries	Employees	0	0
	Workers	0	1
No. of fatalities	Employees	0	0
	Workers	1	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 workplace

The Company maintains an unwavering commitment to the safety of its workforce, encouraging employees to diligently adhere to health and safety programs and protocols. Each plant is equipped with a designated plant safety officer. While rare, process-related hazards may arise during operational periods, often resulting from inadvertent unsafe actions.

All manufacturing plants hold ISO 45001:2018 Occupational Health and Safety Management System certification, endorsed by TUV SUD South Asia Private Limited. External safety audits, overseen by TUV auditors, are conducted annually, supplemented by semi-annual internal audits. Furthermore, the Head of Safety conducts plant safety inspections across all facilities on quarterly basis.

For any maintenance work, authorized employees are required to obtain a 'Permit to Work'. It's imperative that all equipment guards and protective measures are in place before closing the permit, as overlooking this step could lead to potential hazards.

To maintain the safety momentum and awareness throughout the year, the Company has adopted the following health and safety initiatives:

- A monthly safety gate meeting
- A monthly safety theme and communication
- Once-a-four-month plant safety star award programme
- Strict adherence to safety cardinal rules
- Safety zone system, hazard identification and risk assessment control measures
- Work permits and procedures
- Safety inspections and audits
- Fire prevention and protection
- Accident and near-miss incident reporting
- Investigation to determine the root cause & Implementation of safety measures

If a near miss or other event occurs at any plant, the incident learnings are shared with all plants so that necessary corrective actions can be taken if a similar risky condition exists in any other plant. If any of the plant's safety cardinal rules are violated, a warning letter is given to the responsible engineer/manager to modify their behaviour and prevent the recurrence of such events.

There are "Safety Cardinal Rules" that must be followed by workers and contractors. To ensure the safety of employees, contractors and third parties, it is compulsory to wear the following Personal Protective Equipment (PPE) within the plant premises and comply with the following Cardinal Rules:

- All personal protective equipment (PPE) required for a specific task must be used correctly.
- Before performing any task, all equipment's are separated from intrinsic energy sources and inspected to verify that it cannot start or move.
- Safeguards must be put in place before the equipment is started or resumed.
- Competent people with work permit signed by the responsible superior could enter confined places.
- All workplace issues are reported and examined to determine the root cause and implement corrective actions and lessons learnt.
- All drivers must follow driving norms in strict compliance with local laws and company regulations.

Further Health & Safety requirements are laid down in the Company's Group guidelines and local documents are available at the plant which are reviewed and revised. Non-compliance with these rules is viewed seriously in all plants.

The Company conducts its business in a way that cause no harm to the people with whom they work with, and endeavours to establish a healthy and safe working.

## 13. Number of complaints on working conditions and health and safety made by employees and workers

Category	FY23			FY22		
	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	-	-	-	-	-	-
Health & Safety	-	-	-	-	-	-



#### 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.

The Company is implementing the following health and safety action plan to further enhance plant safety culture and ensure safe working environment -

- Inspection of work platforms, toe guards & handrails to ensure compliance with group safety standards
- Audit of process & mechanical equipment's to ensure their fit & proper working condition.
- Audit of Sub-station & Motor Control Center (MCC) Room is being carried out on safety, fire detection, earthing etc., to ensure the compliance with the electrical standards.
- Safety interlock switches (No Guard No Start) with 30KW and above to prevent machine operation without rotating parts protection guards
- Audit of Chemical Handling Safety which ensures that chemicals are labelled, availability of Material Safety Data Sheet (MSDS), Proper storage & training for authorized chemical handling personnel in the plant.
- To conduct Refresher Safety Leadership training for all frontline Engineers / Managers and Refresher “driving safety training” for all the truck drivers.

### 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's stakeholder engagement process begins with defining objectives and scope and adopting the medium for engagement. This is followed by identifying and prioritising the internal and external stakeholders and conducting interaction with various stakeholders' groups such as Employees, Dealers, Retailers, Customers, Suppliers, contractors, Regulatory Authorities, Shareholders, Investors, Analysts and Local Communities. This involvement helps us in understanding their viewpoint and put forth our perspective. On the basis of outcome of interaction, appropriate actions are taken in the interest of all the stakeholders.

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

Key Stakeholders	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders & Investors	No	Email, Website, Investor Conferences, General Meetings, Stock Exchange, Earnings Calls	Quarterly / Annually and as and when required	Disseminating and sharing of information with shareholders and investors with a view to update and also seek approval of shareholders as may be required from time to time.
Dealers, Retailers & Customers	No	Email, SMS, Advertisements, Social Media, Website, Dealer / Retailer Conferences	Periodic	1. New services and offerings 2. Customer Queries & feedback
Suppliers and Contractors	No	Email, Vendor Interactions, Review Meetings	Periodic	1. Product and service requirement along with commercial terms and conditions 2. Quality Check 3. Performance review of products and services 4. Vendor queries and feedback





Key Stakeholders	Whether identified as Vulnerable & Marginalized Group (Yes / No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Email, WhatsApp, Communication Meeting, Open-house meetings, performance appraisal sessions, training sessions	Periodic	1. Talent development and Training 2. Employee Engagement & Feedback 3. Performance review 4. Sharing regular updates on Company's operational and financial performance 5. Updates on Occupational Health and Safety
Regulatory Authorities / Government Agencies	No	Regulatory filings, Representations and Submissions, websites	Periodic and event-based compliances	1. Regulatory compliance 2. Environmental initiatives 3. Industry feedback and expectations 4. Good Governance Practice
Local Communities	No	Community Meetings, Surveys, Awareness campaigns	Periodic and as when required	1. Educational Initiatives 2. Vocational Courses 3. Rural Infrastructure development 4. Healthcare Facilities 5. Community engagement

## 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	FY23			FY22		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
<b>EMPLOYEES</b>						
Total employees	667	355	53	675	486	72
<b>WORKERS</b>						
Total workers	329	178	54	382	143	37

2. Details of minimum wages paid to employees and workers:

Category	FY23					FY22				
	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)
<b>EMPLOYEES</b>										
Male	652	-	-	652	100	659	-	-	659	100
Female	15	-	-	15	100	16	-	-	16	100
<b>WORKERS</b>										
Male	328	-	-	328	100	379	-	-	379	100
Female	1	-	-	1	100	3	-	-	3	100



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

	Male		Female	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration / salary / wages of respective category
<b>Board of Directors (BoD)*</b>	1	2,37,91,634	-	-
<b>KMP</b>	3**	1,18,95,817	-	-
<b>Employees other than BOD &amp; KMP</b>	652	7,83,188	15	8,48,515
<b>Workers</b>	328	5,48,143	1	5,20,332

\* Except Mr. Sushil Kumar Tiwari (Whole Time Director upto 9th June 2022) and Mr. Vimal Jain (Whole Time Director wef. 10<sup>th</sup> June 2022), none of the other Board members were paid any remuneration or salary during FY23.

\*\* The KMPs reported here comprise Whole-time Director, Chief Financial Officer, and Company Secretary.

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

Yes, the plant head at each plant location has been assigned the responsibility of addressing human rights impacts or issues caused or contributed to by the business.

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

In line with the company's Grievance Redressal Policy, a confidential and anonymous compliance hotline has been implemented for employees as well as suppliers / contractors to report breaches of both social and professional norms. This system operates in tandem with the Vigil Mechanism, designed to ensure appropriate resolution of grievances.

Ensuring an unbiased approach, the Ethics Counsellor and/or the Chairperson of the Audit Committee oversee investigations of Protected Disclosures received under Vigil Mechanism / Whistle Blower Policy. This process underscores the significance of the complainant's rights, confidentiality, cooperation, and timely completion, all while upholding fairness and thwarting any undue interference.

Furthermore, employees have the option to formally register their complaint(s) in writing with POSH committee or directly address their concerns to the chairperson of the committee in respect of sexual harassment incidents.

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

Category	FY23			FY22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
<b>Sexual Harassment</b>	0	-	-	-	-	-
<b>Discrimination at workplace</b>	1	0	Closed	1	0	Closed
<b>Child Labour</b>	0	-	-	-	-	-
<b>Forced or Involuntary Labour</b>	0	-	-	-	-	-
<b>Wages</b>	0	-	-	-	-	-
<b>Other issues</b>	6	0	Closed	12	0	Closed

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

In order to prevent adverse consequences to the complainant in discrimination and harassment cases, the company has established mechanisms aimed at ensuring a fair and unbiased resolution process. One such mechanism is the inclusion of external members in the decision-making committee. These external members bring an objective unbiased perspective and help maintain the integrity of the proceedings.

In cases where the complaint remains unresolved by the internal POSH committee, the option of litigation is available. This serves as an additional safeguard to protect the rights and well-being of the complainant. Litigation provides a formal avenue for seeking legal remedies and addressing any adverse consequences that may have resulted from the discrimination or harassment.



By incorporating external members, the company demonstrates its commitment to address discrimination and harassment cases thoroughly and transparently. These measures are designed to ensure that the complainant is duly supported and protected against victimisation.

To deal with issues other than Sexual Harassment incidents, Heidelberg Materials Group has established a compliance hotline known as “SpeakUp” which can be used by any employee / vendor of any of the subsidiaries of Heidelberg Materials group to anonymously report compliance incidents. In line with the group policy, HCIL has also extended this facility to its employees / vendors for reporting compliance incidents. This platform ensures that all complaints are heard, recorded and registered with the compliance officer for appropriate action and simultaneously ensuring fairness and confidentiality are maintained. It helps in improving confidence of concerned stakeholders in the organisation and also has a deterrent effect.

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

Yes, the Company mandates its suppliers, contractors, and business associates to ensure that they adhere to human rights best practices.

**9. Assessments for the year:**

	<b>% of offices that were assessed (by entity or statutory authorities or third parties)</b>
<b>Child labour</b>	100
<b>Forced / involuntary labour</b>	100
<b>Sexual harassment</b>	100
<b>Discrimination at workplace</b>	100
<b>Wages</b>	100
<b>Others</b>	-

**10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**

Not applicable

**PRINCIPLE 6 - BUSINESS 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:**

<b>Parameter</b>	<b>FY23</b>	<b>FY22</b>
Total electricity consumption (A)	8,65,753.55 GJ	9,91,487.55 GJ
Total fuel consumption (B)	91,93,824.99 GJ	11080582.38 GJ
Energy consumption through other sources (C)	2,58,757.87 GJ	2,66,258.38 GJ
<b>Total energy consumption (A+B+C)</b>	<b>1,03,18,336.41 GJ</b>	<b>1,23,38,328.31 GJ</b>
Energy intensity per rupee of turnover (Total energy consumption / turnover in rupees)	461.03 GJ/INR	537.16 GJ/INR

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

No

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

The PAT scheme promotes using energy credit instruments through tradable excess energy saving certificates (ESCerts). The Narsingarh plant is a Designated Consumer under the PAT scheme of the government since beginning. During PAT cycle-1, i.e., from 2012 to 2015, the plant surpassed the given target of 0.1257 TOE / Ton and achieved 0.1040 TOE / Ton. This resulted in the accumulation of 18,697 ESCerts from the government. The plant also outperformed during PAT cycle-2 (2016 - 2019) and achieved 0.0855 TOE / Ton against the target of 0.0915 TOE / Ton entitling us to receive 14,424 ESCerts. Thereafter, the PAT cycles 3-6 were not applicable to Narsingarh Plant as a Designated Consumer. Currently, the Narsingarh Plant is under PAT Cycle-7 (2022-2025) with a planned target of 0.0825 TOE / Ton.

Further, our grinding units at Jhansi and Imlai have also participated for the first time in PAT Cycle-6 (2020-2023) with planned targets of 0.0089 TOE / Ton and 0.0104 TOE / Ton respectively. The cycle has recently concluded and the process of verification by the designated authority is underway.



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

Parameter	FY23	FY22
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	13,15,213	11,55,655
(ii) Ground Water	1,92,971	2,07,206
(iii) Third Party Water	-	-
(iv) Seawater / Desalinated Water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>15,08,184</b>	<b>13,62,861</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>15,08,184</b>	<b>13,62,861</b>
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>	<b>67.39 ml/INR</b>	<b>59.33 ml/INR</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.**

No

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

Yes.

Cement Manufacturing is a dry process thus there is no direct utilization of water in manufacturing process. Water is only used for industrial cooling purposes. The company is committed to minimise the impact of business operations on natural water resources through the zero-liquid discharge (ZLD) pledge.

The Company has embraced a sustainable approach by incorporating waste materials from other industries, including blast furnace slag and fly ash, as inputs in the cement manufacturing process. This conscious decision plays a vital role in reducing our dependence on naturally sourced resources and fosters material circularity by repurposing and reusing industrial waste effectively.

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

Parameter	Please specify unit	FY23	FY22
NOx	mg/Nm3	618.30	591
Sox	mg/Nm3	22.60	24
Particulate matter (PM)	mg/Nm3	68.652	66.27
Persistent organic pollutants (POP)	mg/Nm3	4	3.7
Volatile organic compounds (VOC)	mg/Nm3	0.001	0.001
Hazardous air pollutants (HAP)	mg/Nm3	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.**

No

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

Parameter	Unit	FY23	Fy22
<b>Total Scope 1 emissions (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)</b>	TCO2e	22,01,410.58	25,60,594.08
<b>Total Scope 2 emissions (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)</b>	TCO2e	1,70,745.84	1,95,543.38
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>	TCO2e / INR	0.000106	0.000120

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

No

<sup>9</sup>Electricity consumption does not include WHR



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

Yes.

Energy management lies at the heart of HCIL's sustainability strategy. The Company strives to reduce its reliance on fossil fuels and transition to renewable energy sources. This Commitment is crucial in minimizing greenhouse gas emissions and promoting environmentally friendly practices. The Company aims to lower air pollutants below average emissions prescribed for the cement industry.

Further, to mitigate climate impact on operations, the Company has implemented a wide range of initiatives and focuses on reduction in emission and adoption of renewable energy. The Company has significantly increased its renewable energy footprint by incorporating solar energy and biomass-based fuels in its operations to mitigate climate impact. Additionally, the plant is equipped with a waste heat recovery system, allowing the company to recover and utilize a significant portion of energy demand. Dedicated plant teams continuously monitor and work to reduce energy consumption and emissions by implementing strategic interventions such as incorporating conveyor belts in the supply chain and retrofitting existing equipment and machinery.

The company commissioned a 5.5 Mega Watt (MW) Solar Power Plant situated in its mining area at Damoh, Madhya Pradesh. This development has enabled the mining operations and clinker plant to receive a reliable supply of electricity. With an estimated annual generation of 10 Gigawatt hours, the solar plant serves as a sustainable alternative to the electricity previously procured through short term open access and from the grid. This initiative aligns with the company's commitment to reducing its carbon footprint and promoting the use of renewable energy sources.

Replacement of fossil fuels with alternative fuels (AFs) in clinker production has led to reduction of greenhouse gas emissions leading to significant expansion of renewable energy footprint. In line with these goals, AFs were introduced in Narsingarh Line 3, initially using biomass from nearby areas. The system handles up to 15t/h of AF, including biomass, RDF (Refuse Derived Fuel), and combustible components of Municipal Solid Waste. This initiative underscores the company's commitment to sustainable practices and innovative energy sourcing.

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

Parameter	FY23	FY22
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste (A)	6,524	6,743
E-Waste (B)	3.628	6.85
Bio-Medical Waste (C)	0.1192	0.09572
Construction and demolition waste (D)	0	0
Battery Waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	41.82	51.14
Other Non-hazardous waste generated (H). Please specify, if any.	2,012.37	3,367.30
<b>Total (A+B+C+D+E+F+G+H)</b>	<b>8,581.94</b>	<b>10,168.39</b>

**For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)**

Category of waste	FY23	FY22
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations (safely disposed)	6,524	6,743
<b>Total</b>	<b>6,524</b>	<b>6,743</b>

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

Category of waste	FY23	FY22
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	2,057.94	3,425.38
<b>Total</b>	<b>2,057.94</b>	<b>3,425.38</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.**

No



**9. 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 is aligned with the concept of the circular economy and prioritizes waste management by embedding circularity throughout its production processes, including storage, usage, reuse, recycling, and disposal of waste generated at its facilities.

The Company strives to replace hazardous and toxic chemicals in or products with eco-friendly alternatives. The Company utilizes waste materials from other industries, such as blast furnace slag and fly ash, as input materials for cement manufacturing, effectively reducing the reliance on naturally extracted resources and promoting material circularity.

Various types of hazardous and non-hazardous waste are generated at the company's different plants, including used oil, biomedical waste, E-waste, and battery waste. The company has implemented appropriate infrastructure at each site to safely handle, collect, and store the different types of waste until they are sold to registered Central Pollution Control Board (CPCB) / State Pollution Control Board (SPCB) vendors and recyclers.

At the plant level, waste generated at the site is collected through color-coded collection bins. Instead, the company sells its waste to outsourced vendors responsible for the end-to-end handling of the transported waste.

**10. 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.**

Sr. No.	Location of operations / offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
	Not applicable as there are no operations near above-mentioned zones		

**11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in FY 2022-23**

Name and brief details of project	EIA Notification Number	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web Links
NA					

**12. 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.**

The Company has duly complied with all the applicable environmental laws / regulations / guidelines applicable from time to time such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment Protection Act and the rules made thereunder.

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

**PRINCIPLE 7 - BUSINESS, 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.**

The company is a member of three trade and industry chambers / associations during FY23.

**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	Confederation of Indian Industry (CII)	National
2	Cement Manufacturers' Association (CMA)	National
3	Global Cement and Concrete Association (GCCA), India	National



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

Name of the Authority	Brief of the case	Corrective Action Taken
Nil	Nil	Nil

## PRINCIPLE 8 - BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

### Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA					

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
NA						

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

As a part of the CSR Policy, the HR representative at each plant location meet the representatives of local communities to understand their needs and problems and extend requisite support to the extent possible.

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

	FY23	FY22
Directly sourced from MSMEs / small producers	2.44%	2.56%
Sourced directly from within the district and neighbouring districts	33.66%	39.19%

## 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.

HCIL is a customer centric organisation and has established a highly experienced technical team and a well-defined protocol to efficiently address consumer complaints in a prompt and efficient manner - ranging from the initial receipt of a complaint to its thorough examination, resolution, and subsequent closure.

The Company has a customer service team that provides onsite support and demonstration through a mobile testing van. Additionally, the company has a specialized tool known as 'Dealer Connect', designed to facilitate seamless submission of requests from key dealers. Customers are provided with multiple channels to voice their grievances through mediums such as the official website.

The company's steadfast dedication to ensuring customer satisfaction remains resolute; each complaint is pursued until it attains the pinnacle of customer contentment. This commitment is underscored by the documentation accompanying the resolution of each complaint.

In order to directly engage with customers and gain insights for improvement, the Company has instituted a dedicated Customer Care Centre. This platform enables the Company to address the grievances of customers and provide feedback, thereby ensuring that the complaints are closed to the fullest customer satisfaction leading the Company with an invaluable opportunity to grasp customer sentiment and pinpoint areas requiring attention. This insight subsequently guides the company in devising optimal strategies for assistance and enhancement.



**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
<b>Environmental and social parameters relevant to the product, Safe and responsible usage, Recycling and / or safe disposal</b>	The Company's products adhere to all applicable statutory parameters

**3. Number of consumer complaints:**

	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
<b>Data privacy</b>	0	NA		0	NA	
<b>Advertising</b>	0	NA		0	NA	
<b>Cyber-security</b>	0	NA		0	NA	
<b>Delivery of essential services</b>	NA	NA		NA	NA	
<b>Restrictive Trade Practices</b>	0	NA		0	NA	
<b>Unfair Trade Practices</b>	0	NA		0	NA	
<b>Other</b>	0	NA		0	NA	

**4. Details of instances of product recalls on accounts of safety issues:**

	Number	Reasons for recall
<b>Voluntary recalls</b>	Nil	NA
<b>Forced recalls</b>	Nil	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 data privacy policy is available on the Company's website at <https://www.mycemco.com/data-protection>

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

Since there are no complaints, there was no need for any corrective action. However, we always strive to ensure that the best quality products are delivered to our customers and ensure all feedback from our stakeholders is considered in our business processes.

