HEIDELBERGCEMENT

HeidelbergCement India Limited CIN: L26942HR1958FLC042301

Civ: 126942Hk1958FtC042301 Registered Office 2nd Floor, Plot No. 68, Sector-44, Gurugram, Haryana 122002, India Phone +91-124-4503700 Fax +91-124-4147698 Website: www.mycemco.com

05 September 2023

HCIL:SECTL:SE:2023-24

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

II. Products/services

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

| S. No Description of main activity | | Description of business activity | % of turnover |
|------------------------------------|---------------|-------------------------------------|---------------|
| 1 | Manufacturing | Manufacturing and Selling of Cement | 100 |
| | | | |

15. Products / services sold by the entity (accounting for 90% of the entity's turnover)

| S. No | o. Product / Service | NIC Code | % of total turnover contributed |
|-------|-----------------------------------|----------|---------------------------------|
| 1 | Manufacture of Clinker and Cement | 23941 | 100 |

III. Operations

16. Number of locations where plants and/or operations / offices of the entity are situated

| Location | Number of plants | Number of offices | Total |
|--------------|-----------------------------------------------|--------------------------------------------------|-------|
| National | 2 Integrated Cement Units | 1 Registered Office | 8 |
| | 1 Grinding Unit | 4 Regional Marketing Offices | |
| Internationa | al Nil | Nil | - |

12, 9, 0, 0, 0, 0,

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) |
| | | | EMPLOYEES | | | |
| 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 |
| | | | WORKERS | | | |
| 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) | Ма | ale | Fer | nale |
|-------|-----------------------------------------|-----------|----------------|----------|---------|---------|
| | _ | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| | | DIFFERE | ENTLY ABLED EM | IPLOYEES | | |
| 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 |
| | | DIFFER | ENTLY ABLED W | ORKERS | | |
| 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 | Cementrum I B.V. (Holding Company of HCIL) | Holding | 69.39 | No |

12141

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

| | | | FY 2022-23 | | | FY 2021-22 | |
|---------------------------------------------------------------|------------------------------------------------------------|---|-----------------------------------------------------------------------|---------|-----------------------------------------------------|--------------------------------------------------------------------------|---------|
| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes / No) | 0 | 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 | Yes* | - | - | | - | - | |
| Investors (other than shareholders) | Yes* | - | - | | - | - | |
| Shareholders | Yes* | 5 | 0 | | 2 | 0 | |
| Employees and workers ¹ | 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 | approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| 1. | Emissions managemen | nt 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 ₂ 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 ₂ emission per tonne of cement produced by the Compa | 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 | implications of the risk or opportunity (Indicate positive or negative implications) Positive Positive Negative |
| 3 | Occupation health & | al | | | |
| | 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. | 5 |
| 4 | Community developmer | Opportunity nt | 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. | Not applicable | Positive |
| | | | 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. | | |

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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:

- P1 Businesses should conduct and govern themselves with integrity in a manner that is ethical, transparent and accountable
- P2 Businesses should provide goods and services in a manner that is sustainable and safe
- P3 Businesses should respect and promote the well-being of all employees, including those in their value chains
- P4 Businesses should respect the interests of and be responsive towards all its stakeholders
- P5 Businesses should respect and promote human rights
- P6 Businesses should respect, protect and make efforts to restore the environment
- **P7** Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent
- P8 Businesses should promote inclusive growth and equitable development
- P9 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 | | | | |
|-----------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------|-----------------------|------------------------|----------------------|----------------------|----------|--|--|--|--|
| | PC | | ND MANA | GEMEN | T PROCE | ESSES | | | | | | | | |
| 1. | a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | | | |
| | b. Has the policy been approved by the Board? (Yes / No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | | | |
| | c. Web link of the policies, if available | https://w The CSF https://w The othe | he Code of Conduct (P1) is available at ttps://www.mycemco.com/sites/default/files/PDF/Policies/Code_of_Conduct.pdf he CSR Policy (P7) is available at ttps://www.mycemco.com/sites/default/files/PDF/Policies/CSR_Policy.pdf he other Policies are available on internal portal, which can be easily accessed by mployees of the Company. | | | | | | | | | | | |
| 2. | | | | | | | | | Yes | Yes | | | | |
| 3. | Do the enlisted policies extend to your value chain partners? (Yes / No) | sustaina dealers, | able prac | ctices th and oth | es the roughou er associ | t value o | chain, w | hich incl | udes su | ppliers, | | | | |
| 4. | Name the national and international codes / certifications / labels / standards | internation ISO 140 | onal stan 00; OHSA | dards lai S 18000; | | by the o 00; ISO 5 | rganisatio 0000; SA | ons such 26000; L | as - IS0 JNGC Gui | O 9000; | | | | |
| 5. | Specific commitments, goals and targets set by the entity with defined timelines, if any | also est sustaina been ali ratified i states. 1 | SO 14000; OHSAS 18000; ISO 45000; ISO 50000; SA 26000; UNGC Guidelines; GRI Standards; BIS Standards; ILO Principles; GCCA; IGBC GreenPro. 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) atified 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. | | | | | | | | | | | |



| S. No. | Disclosure Question | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | | |
|-----------|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------|----------------------------------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------------------|---------------------------------------------|--|--|
| | | By aligning with the SDGs, HeidelbergCement India recognizes its role contributing to the country's efforts to address significant social, economic and environmental challenges. The company's sustainability targets a harmonized with the group-wide strategies and outlined in its Sustainab Development (SD) Plan 2030, which sets the direction for the next decad Through this plan, the Company aims to integrate sustainability practices ar make a positive impact on society and the environment. | | | | | | | | | | |
| | | of the g continue target to tempera the Con | lobal res to reduce achieve ture prev npany ha | ponsibilit ce the im 2°C lowe vailing a l | y to cont pact on a r Ambien kilometre ed a targ | tain glob air, land a t Temper away. A get of 1.8 | al warmi and water ature in a gainst the 3°C reduc | ng and a r. The Co all plants e target o ction. The | I to fulfil if at the sar mpany ha compare of 2°C rea e Compa | me time as set a d to the duction, | | |
| | | Sustaina website | ability, pl The we | lease ref | er to the which is | Sustain https:// | ability se www.myo | ection of cemco.cc | ent, Soc the Cor m/sustain t | npany's | | |
| 6. | Performance of the entity against | HCIL has established targets and goals to achieve a more sustainab specific commitments, goals and targets business in line with the Sustainabili Commitments 2030. These targets are targets reviewed on a regular basis. | | | | | | | | | | |
| | | | | the Sust link for wh | - | | | - | y at Con viroment | npany's | | |

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

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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 | | | ector | | nmitte | ee of | s unde the B tee | | | Fre | - | - | erly (| |) / Ha Any o ecify | - | | i) / |
|-----------------------------------------------------------------------------------------------------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|------------------------|-----------|-----------|--------|-----------|-----------|-----------|--------|--------------------------|-----------|-----------|----------------|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies & follow up action | basis | s by t | he S | enior | Mana | igem | ent of | the C | Comp | any. I | Durin | g the | asse | ssme | | e effic | | need of the |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | The | Comp | bany i | s con | nplian | t with | appli | cable | rules | and | regula | ations | on a | n on-(| going | basis | 5. | |

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 | PQ |
|----|----|----|-----|----|----|----|----|----|
| | | 10 | 1 4 | 10 | 10 | | 10 | 10 |

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 |
|-----------------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Board of Directors | 8 | Updates on Sustainability aspects and CSR initiatives undertaken | 33.3 |
| Key Managerial Personnel (KMP) | 12 | Updates on Whistle Blower Mechanism and Code of Conduct for Members of Board and Senior Management | 100.0 |
| Employees other than BoD and KMPs | 24 | Compliance Basics, Code of Conduct, Safety, Competencies, Sustainability, Whistle Blower Policy, Prevention of Sexual Harassment at Workplace | 74.7 |
| Workers | 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 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

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

| | FY23 (Current Financial Year) | FY22 (Previous Financial Year) |
|-----------|----------------------------------|-----------------------------------|
| Directors | Nil | Nil |
| KMPs | Nil | Nil |
| Employees | Nil | Nil |
| Workers | Nil | Nil |

6. Details of complaints about conflict of interest

| | FY23 (Current Financial Year) Number Remarks | FY22 (Previous Financial Year) Number Remarks |
|----------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------|
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | Nil | Nil |
| Number of complaints received in relation to issues of Conflict of interest of KMPs | 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 |
|--------------------|------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| R&D | Nil | Nil | NA |
| Capex ² | 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
 - a. The Company produces cement, which is packed in cement bags. These bags are frequently reused to store other construction material.
 - b. Our manufacturing process does not produce any e-waste, however, the e-waste produced in the office operations is sold to the registered recyclers.
 - c. 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.
 - d. 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.

²Efforts 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:

| | | | | % 0 | f employe | es covere | d by | | | | |
|----------|--------------|---------|------------------|----------|--------------------|-----------|-----------------|---------|----------------|---------------------|---------|
| Category | Total (A) | | Health insurance | | Accident insurance | | ernity efits | | rnity efits | Day care facilities | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| | | | | PEI | RMANENT | EMPLOY | EES | | | | |
| 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 | - |
| | | | (| OTHER TH | IAN PERM | ANENT EI | MPLOYEE | S | | | |
| 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:

| | | | | % | Of workers | s covered | by | | | | |
|----------|--------------|---------|---------------|-----------------|------------|-------------|---------|---------|----------------|-----------------|---------|
| Category | Total (A) | | alth rance | Accio insura | | Mate ben | | | rnity efits | Day o facili | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| | | | | PE | RMANEN | T WORKE | RS | | | | |
| 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 | - |
| | | | | OTHER TI | | | VORKERS | | | | |
| 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

| | | FY23 | | | FY22 | |
|----------|-----------------------------------------------------------|-----------------|------------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------------------|
| Benefits | No. of employees covered (as a % of total employee) | covered (as a % | 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.

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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 E | 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.

$7. \ \ \text{Membership of employees in association} (s) \ or unions \ recognised \ by \ the \ listed \ entity$

| 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 wellness | & safety / measures | On s upgrad | | Total (D) | | a & safety / measures | | skill dation |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. F | % (F/D) |
| | | | | | EMPLOYE | S | | | | |
| 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 |
| | | | | | WORKER | S | | | | |
| 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) |
| | | | EMPLOYE | ES | | |
| Male | 652 | 563 | 86 | 659 | 659 | 100 |
| Female | 15 | 15 | 100 | 16 | 16 | 100 |
| Total | 667 | 578 | 87 | 675 | 675 | 100 |
| | | | WORKER | S | | |
| Male | 328 | 328 | 100 | 379 | 379 | 100 |
| Female | 1 | 1 | 100 | 3 | 3 | 100 |
| Total | 329 | 329 | 100 | 382 | 382 | 100 |
| | | | | | | |

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.

| ··· Dotailo of outory folatou inoraonito | | | |
|------------------------------------------|-----------|------|------|
| Safety Incident / Number | Category | FY23 | FY22 |
| Lost Time Injury Frequency Rate (LTIFR) | Employees | 0 | 0 |
| (per one million-person hours worked) | 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 | Employees | 0 | 0 |
| ill-health (excluding fatalities) | Workers | 0 | 0 |

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11. Details of safety related incidents



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 | | New services and offerings Customer Queries & feedback |
| Suppliers and Contractors | l No | Email, Vendor Interactions, Review Meetings | Periodic | Product and service requirement along with commercial terms and conditions Quality Check 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 | Talent development and Training Employee Engagement & Feedback Performance review Sharing regular updates on Company's operational and financial performance Updates on Occupational Health and Safety |
| Regulatory Authorities / Government Agencies | No | Regulatory filings, Representations and Submissions, websites | Periodic and event-based compliances | Regulatory compliance Environmental initiatives Industry feedback and expectations Good Governance Practice |
| Local Communities | No | Community Meetings, Surveys, Awareness campaigns | Periodic and as when required | Educational Initiatives Vocational Courses Rural Infrastructure development Healthcare Facilities 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 | |
|----------------|--------------|----------------------------------------------|---------|-----------|----------------------------------------------|---------|
| T T | ōtal (A) | No. of employees / workers covered (B) | % (B/A) | Total (C) | No. of employees / workers covered (D) | % (D/C) |
| | | | EMPLOYE | EES | | |
| Total employee | s 667 | 355 | 53 | 675 | 486 | 72 |
| | | | WORKEI | RS | | |
| Total workers | 329 | 178 | 54 | 382 | 143 | 37 |

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

| Category | | | FY23 | | | | | FY22 | | |
|----------|-----------|------------------------------|---------|---------------------------|---------|-----------|----------------|---------|------------------------|---------|
| | Total (A) | al (A) Equal to minimum wage | | More than minimum wage | | Total (D) | Equa minimu | | More than minimum wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. F | % (F/D) |
| | | | | | EMPLOYE | ES | | | | |
| Male | 652 | - | - | 652 | 100 | 659 | - | - | 659 | 100 |
| Female | 15 | - | - | 15 | 100 | 16 | - | - | 16 | 100 |
| | | | | | WORKER | S | | | | |
| 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 | I | Female |
|--------------------------------|--------|-------------------------------------------------------------------|--------|-------------------------------------------------------------------|
| | Number | Median remuneration / salary / wages of respective category | Number | Median remuneration / salary / wages of respective category |
| Board of Directors (BoD)* | 1 | 2,37,91,634 | - | - |
| КМР | 3** | 1,18,95,817 | - | - |
| Employees other than BOD & KMP | 652 | 7,83,188 | 15 | 8,48,515 |
| Workers | 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. 10th 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 |
| Sexual Harassment | 0 | - | - | - | - | - |
| Discrimination at workplace | 1 | 0 | Closed | 1 | 0 | Closed |
| Child Labour | 0 | - | - | - | - | - |
| Forced or Involuntary Labour | 0 | - | - | - | - | - |
| Wages | 0 | - | - | - | - | - |
| Other issues | 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.

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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:

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

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

Notapplicable

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:

| Parameter | FY23 | FY22 |
|-------------------------------------------------------------------------------------------|-------------------|-------------------|
| 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 |
| Total energy consumption (A+B+C) | 1,03,18,336.41 GJ | 1,23,38,328.31 GJ |
| 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 |
|-------------------------------------------------------------------|--------------|--------------|
| Water withdrawal by source (in kiloli | tres) | |
| (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 | - | - |
| Total volume of water withdrawal (in kilolitres) | 15,08,184 | 13,62,861 |
| Total volume of water consumption (in kilolitres) | 15,08,184 | 13,62,861 |
| Water intensity per rupee of turnover (Water consumed / turnover) | 67.39 ml/INR | 59.33 ml/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

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 |
|--------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------|--------------|
| Total Scope 1 emissions (Break-up of the GHG into CO_2 , CH_4 , N_2O , HFCs, PFCs, SF_6 , NF_3 , if available) | TCO2e | 22,01,410.58 | 25,60,594.08 |
| Total Scope 2 emissions (Break-up of the GHG into CO_2 , CH_4 , N_2O , HFCs, PFCs, SF ₆ , NF ₃ , if available) | TCO2e | 1,70,745.84 | 1,95,543.38 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | 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

³Electricity 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.

| Parameter | FY23 | FY22 | | | | |
|------------------------------------------------------------------|----------|-----------|--|--|--|--|
| Total waste generated (in metric tonnes) | | | | | | |
| 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 | | | | |
| Total (A+B+C+D+E+F+G+H) | 8,581.94 | 10,168.39 | | | | |

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

| Category of waste | | | | | |
|---------------------------------------------------------------------|--------------------------------------|-------|--|--|--|
| (i) Recycled | 0 | 0 | | | |
| (ii) Re-used | 0 | 0 | | | |
| (iii) Other recovery operations (safely disposed) | 6,524 | 6,743 | | | |
| Total | 6,524 | 6,743 | | | |
| For each category of waste generated, total waste disposed by natur | e of disposal method (in metric tonn | es) | | | |

 Category of waste

 (i) Incineration
 0
 0

 (ii) Landfilling
 0
 0

 (iii) Other disposal operations
 2,057.94
 3,425.38

 Total
 2,057.94
 3,425.38

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 | Type of operations | Whether the conditions of environmental approval / |
|---------|--------------|--------------------|-----------------------------------------------------------------|
| | operations / | | clearance are being complied with? (Y/N) |
| | offices | | 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:

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

As a percentage to total turnover

3. Number of consumer complaints:

| I | Received during the year | Pending resolution at end of year | | ed during year | Pending resolution at end of year | Remarks |
|-----------------------------|--------------------------|--------------------------------------|---|-------------------|-----------------------------------|---------|
| Data privacy | 0 | NA | | 0 | NA | |
| Advertising | 0 | NA | | 0 | NA | |
| Cyber-security | 0 | NA | | 0 | NA | |
| Delivery of essential servi | ces NA | NA | Ν | JA | NA | |
| Restrictive Trade Practic | es 0 | NA | | 0 | NA | |
| Unfair Trade Practices | 0 | NA | | 0 | NA | |
| Other | 0 | NA | | 0 | NA | |

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

| | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | Nil | NA |
| Forced recalls | 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.