



Annexure 11 to Directors' Report

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

Section A: GENERAL DISCLOSURES

I. Details of listed entity

1.	Corporate Identity Number (CIN) of the Company	L24100MH1993PLC071376
2.	Name of the Company	SHREE PUSHKAR CHEMICALS & FERTILISERS LIMITED
3.	Year of incorporation	29/03/1993
4.	Registered office address	301/302, 3rd Floor, Atlanta Center, Sonawala Road, Goregaon (East) Mumbai MH 400063 IN
5.	Corporate address	301/302, 3rd Floor, Atlanta Center, Sonawala Road, Goregaon (East) Mumbai MH 400063 IN
6.	E-mail id	cosec@shreepushkar.com
7.	Telephone	022-42702525
8.	Website	www.shreepushkar.com
9.	Financial year reported	2022-2023
10.	Name of the Stock Exchanges where shares are listed	Bombay Stock Exchange and National Stock Exchange
11.	Paid-up Capital	316258800
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Mr. Nitesh Pangle Contact Details: 9773491638 Email Id: cosec@shreepushkar.com
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).	Report is done on Consolidated Basis

II. Products/services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of turnover of the Company
1.	Chemicals	Manufacturing	44.79%
2.	Fertilisers	Manufacturing	55.21%

15. Products/Services sold by the Company (accounting for 90% of the turnover)

Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Chemicals, Dyes and Dyes Intermediates	2022	44.79%
2.	Fertilizer and Allied Products	20122	47.53%
3.	Cattle Feeds	10801	7.68%

III. Operations

16. Number of locations where plants and/or operations/offices of the Company are situated: Location : 1) Ratnagiri, Maharashtra, 2) Hisar- Haryana, 3) Deewanganj - Raisen Madhya Pradesh, 4) Meghnagar Jhabua, Madhya Pradesh

Location	Number of plants	Number of offices	Total
National	8	9	17
International	0	0	0

**17. Markets served by the Company****a. Number of locations**

Locations	Number
National (No. of States)	14
International (No. of Countries)	5

b. What is the contribution of exports as a percentage of the total turnover of the Company? – 11.08%**c. Types of customers:**

The Company is one of the manufacturer of Reactive Dyes, Dye Intermediates like H Acid, Vinyl Sulphone, Sulpho Para Base, K Acid, Gamma Acid, acids like Sulphuric Acid 98%, Sulphuric Acid 70%, Oleum 23%, Oleum 65% and Chloro Sulphonic Acid. Shree Pushkar Chemicals and Fertilisers also manufactures a wide range of Fertilizers and Soil Conditioners, thus catering to the widest range of customers; from the smallest of “Farmers to Multinationals”.

IV. Employees**18. Details as at the end of Financial Year, i.e. March 31, 2023:****a. Employees and workers (including differently abled):**

Sl. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
EMPLOYEES%						
1.	Permanent (D)	334	307	92%	27	8%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D+E)	334	307	0	0	0
WORKERS						
4.	Permanent (F)	219	219	100%	NA	NA
5.	Other than Permanent (G)	47	47	100%	0	0
6.	Total workers (F+G)	266	266	0	0	0

b. Differently abled Employees and workers:

Sl. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total differently abled employees (D+E)	0	0	0	0	0
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total differently abled workers (F+G)	0	0	0	0	0



19. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	6	1	17%
Key Management Personnel	4	0	0

20. Turnover rate for permanent employees and workers (disclose trends for the past 3 years)

	FY 2023			FY2022			FY2021		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	13.5	18	14.8	15.4	12.45	13	10.18	9.65	10.02
Permanent Workers	15.52	0	15	22.14	0	20	20.78	0	19

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

21. Name of holding/subsidiary/associate companies/joint ventures

Sl. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether Holding/Subsidiary/Associate/Joint Venture	% of shares held by the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company (Yes/No)
1.	KISAN PHOSPHATES PRIVATE LIMITED	Wholly Owned Subsidiary	100%	Yes
2.	MADHYA BHARAT PHOSPHATE PRIVATE LIMITED	Wholly Owned Subsidiary	100%	Yes

VI. CSR Details

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

(ii) Turnover (in Rs.) - 424,70,92,000/-

(iii) Net worth (in Rs.) – 372,84,82,000/-

VII. Transparency and Disclosure Compliances

23. Complaints/Grievances on any of the principles (Principle 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism in place (Yes/No) (If yes, then provide weblink for grievance redressal policy)	FY2023			FY2022		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	The Company does not have a structured mechanism to receive and redress grievances of communities						
Investors (other than shareholders)	Not applicable, as we don't have any investors other than the shareholders (e.g., preference shareholders or debenture holders)						
Shareholders	Yes, https://www.shreepushkar.com/investor-service-contact/	NIL	NIL	NIL	NIL	NIL	NIL
Employees and workers	Yes, https://www.shreepushkar.com/wp-content/uploads/2023/07/Grievance-Redressal-Policy-for-Employees.pdf	NIL	NIL	NIL	NIL	NIL	NIL



Customers	https://www.shreepushkar.com/contact-us/ The Company website contains an interface where Customers can send any message and complaints with their name, email and phone number and the authorised person address the message and complaints. Further, email is also mentioned in contact us email.	NIL	NIL	NIL	NIL	NIL	NIL
Value Chain Partners	https://www.shreepushkar.com/contact-us/ The Company website contains an interface where value chain partner can send any message and complaints with their name, email and phone number and the authorised person address the message and complaints. Further, email is also mentioned in contact us email.	NIL	NIL	NIL	NIL	NIL	NIL
Other (please specify)	-	-	-	-	-	-	-

* The leadership team conducts meetings with the customers and other value chain partners periodically.

24. Overview of the Company’s business conduct, pertaining to environment and social matters that present a risk or an opportunity to the business of the Company, rationale for identifying the same, approach to adapt or mitigate the risk along with its financial implications, as per the following format:

Sl. 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.	Human Resource	Risk and Opportunity	Risk: Absence of a comprehensive Human Rights governance structure from the aspects of parameters such as working conditions, child / forced labour, fair remuneration, gender diversity, prevention of sexual harassment, freedom of association, collective bargaining will impact the Company’s performance in social domain from the perspective of employee workforce as well as community. Opportunity: Presence of Human Rights Policy and a strong redressal mechanism outlines the Company’s commitment towards Human Rights protection.	Integrating a strong governance structure for Human Rights from the aspect of Human Rights Policy, grievance redressal mechanism and due diligence across the business operations extending to supply chain partners and vendors.	Positive: Comprehensive alignment of Human Rights principles in accordance with the guiding principles of national and international Human Rights standards amplifies the Company’s performance in social aspect as well as reflect its commitment towards human rights integration within the Company’s business model. Negative: Absence of a Human Rights governance structure could result in employee dissatisfaction, impacting the workforce productivity that could impact the Company’s long-term business growth plan. Lack of a strong redressal mechanism may result in non-compliance issues from relevant regulatory perspective.



2.	Data integrity and security	Risk and Opportunity	<p>Risk: Risk linked to technology directly impact the security and integrity of the system across the business operation. The criticality involved with the technology and cyber security needs to be assessed periodically to prevent breaches of data privacy from the aspects of confidential information of the Company as well as its stakeholders. Opportunity: A strong governance on the data integrity, technology, digitalization and innovation parameters of the Company enables the creation of a secure an impenetrable network</p>	<p>Strengthened perimeter security, IT and monitoring systems, anti-virus and patch management while conducting trainings on cyber security to reduce risks arising from cyber security and data breaches.</p>	<p>Positive: Strong alignment of secure data integrity principles with the help of innovative technology and digitalisation initiatives within the Company's business operations will ensure compliance of data security, privacy and prevent any loss of data. Negative: Lack of a strong data integrity and security mechanism may lead to increase in number of data breaches and loss of valuable data.</p>
3.	Occupational Health and safety	Risk and Opportunity	<p>Risk: Occupational health and safety is critical aspect of the Company's commitment towards workforce welfare which further highlights the performance in terms of provision of safe and secure working environment. Identification of a high number of health and safety incidents reflect the efficiency of the existing EHS management approach. Opportunity: Strong EHS management system integrated with a comprehensive hazard identification, mitigation plans, root cause analysis of the reported incidents and corresponding corrective action plan will highlight the Company's approach and resoluteness towards workforce health and safety.</p>	<p>1. Implementing a robust EHS management system with periodic internal and external audits of the safety practices. 2. Adoption of comprehensive corrective action plans post the identification and assessment of safety incidents to prevent any such future instances.</p>	<p>Positive: Robust Occupational, Health and Safety management approach enables the Company to prevent the occurrence of incidents. Negative: Frequent safety incidents and injuries may adversely impact the Company's performance from the aspect of safety as well as workforce wellbeing.</p>



4	Product responsibility (including quality and safety across lifecycle)	Risk	Risk: Due to high vulnerability of product quality and safety issues addressing risks relevant to product responsibility is critically important. The risk analysis and consecutive mitigation action plans are linked with standards and guidelines of all local and global regulatory agencies, focusing on pharma co vigilance, proprietary, confidentiality and other core governance standards.	<ol style="list-style-type: none"> 1. Employ robust and centralised chemicals co vigilance processes encompassing detailed SOPs that ensure efficient surveillance and reporting of adverse events 2. Make consistent investments in technological interventions, strengthening governance mechanisms, and employee capacity-building in the area of pharma co vigilance management 3. Established global quality standards and procedures throughout the organisation 4. Rolling out periodic training programs for employees on global GMP training 5. Strengthening and harmonising quality related IT applications and systems 6. Undertaking periodic quality review of third-party locations 7. Strengthening quality of manufacturing records, test procedures at lab and continuous uptake of best practices 8. Conducting brand protection activities and strengthen framework for trademark and IP protection activities with the support of a dedicated IP team focusing on patents 	<p>Positive: Compliance of products on the aspects of quality and safety from all relevant regulatory requirements, highlights the Company's commitment as well as integrity towards patient safety.</p> <p>Negative: Identification of major issues from the aspects of product safety and quality may lead to penalties and warnings from relevant regulatory authorities. Further it may have adverse impact on the brand image and value.</p>
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5	Responsible supply chain management	Risk	<p>Risk: Strong dependency on the supply chain for the entire product life cycle poses a requirement of a strong contingency plan to deal with unprecedented situations which may lead to disruption in the supply chain. Further, the Company extends its responsible business principles across the value chain, expecting its suppliers to adhere with the required principles. Non-adherence of the principles from the supplier end may affect the Company's partnership with them, further impacting the business continuity plan.</p>	<ol style="list-style-type: none"> 1. Establish a robust assessment mechanism to assess the implication of unprecedented disruption on the supply chain and develop a comprehensive contingency plan to avoid major impact on the business. 2. Undertake a supplier assessment in alignment with the standard practices and requirements as per the guidance outlined by sector specific responsible supply chain initiatives. 	<p>Positive: Responsible supply chain practices enables the Company to have a strong mechanism to deal with supply chain disruptions due to unprecedented situations, moreover the compliance with the Company's responsible business practices and principles, amplify the Company's social and environment performance across the supply chain.</p> <p>Negative: Non-compliance of the vital requirements from responsible business perspective such as human rights may affect the Company's business partnerships in a long run. Further, it may lead to adverse impact on the brand image from the perspective of association with a non-compliant supplier in the long run.</p>
6	Investments in innovative specialty products and technologies	Opportunity	<p>Opportunity: Investment in innovation and technology facilitates the development of a robust product portfolio in addition to strengthening the product accessibility in line with the Company's vision.</p>		<p>Positive: Investment in innovation and technology will lead to development of stronger product portfolio in addition to fulfillment of patient needs through strengthened product accessibility. Further it will reflect the Company's commitment towards product innovation through its investment in innovation and technology.</p>



SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure Questions		P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes										
1.	a. Whether the Company'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)	The Board of Directors of the Company have approved, from time to time, entity level policies such as Code of Ethics & Conduct, Whistle Blower Policy, Corporate Social Responsibility Policy, etc. in line with the Regulatory requirements. These Policies are signed by respective Officers authorized by the Board. Other policies & procedures are formulated having regard to business needs, controls and compliance with applicable laws & regulations and are approved & signed by the Managing Director.								
	c. Weblink of the policies, if available	https://www.shreepushkar.com/policies-and-code-of-conduct/								
2.	Whether the Company has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to the Company's value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4.	Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by the Company and mapped to each principle.	ISO 9001:2015, ISO 14001:2015, bluesign® SYSTEM PARTNERS, The Global Organic Textile Standard (GOTS), Zero Discharge of Hazardous Chemicals (ZDHC) Certification								
5.	Specific commitments, goals and targets set by the Company with defined timelines, if any.	The Company is engaging with subject matter experts and actively pursuing sustainability improvement agenda.								
6.	Performance of the Company against the specific commitments, goals and targets along with reasons, in case the same are not met.	NA								
Governance, leadership and oversight										
7.	Statement by Director, responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (<i>listed entity has flexibility regarding the placement of this disclosure</i>)	<p>The Company underscores its unwavering dedication to environmental sustainability by proactively addressing issues related to air, land, and water pollution. Additionally, the Company is resolutely committed to upholding the highest standards of corporate governance, a commitment evident in its day-to-day operations. This steadfast dedication is aimed at attaining business excellence while concurrently enriching long-term shareholder value.</p> <p>Through extensive and consistent engagement with stakeholders spanning many years, the Company has been witness to the evolution of its business operations. This evolutionary journey has enabled the Company to strike a delicate equilibrium between its business imperatives and its obligations toward economic, environmental, and social sustainability.</p> <p>By diligently cultivating trust and nurturing collaborative partnerships, the Company wholeheartedly acknowledges the indispensable role played by both internal and external stakeholders within its business framework. With an unswerving commitment, the Company is actively integrating ESG (Environmental, Social, and Governance) principles into its business operations, thereby playing a central role in elevating the quality of life within the communities it serves.</p>								



8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Managing Director is responsible for implementation and oversight of Business Responsibility (BR) performance of your Company.																	
9.	Does the Company have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the business responsibility performance of the Company is assessed on a regular basis by the Senior Leadership Team comprising the Managing Director, Plant Heads, HR Head, Sales and Marketing Head and Procurement Head. Overall performance is assessed at least once a year by the Board.																	
10.	Details of review of NGRBCs by the Company:																		
Subject for review		Indicate whether review provided below taken by Director/Committee of the Board/any other Committee									Frequency (Annually/Half yearly/Quarterly/Any other – please specify)								
		P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action		The policies of the Company are reviewed periodically / on a need basis by department heads / director / board committees / board members, wherever applicable									As required								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances		<p>P1 Under the Vigil Mechanism/ Whistle Blower Policy, there were no complaints received during the FY 2022-23. During the reporting period, no legal actions were pending against the organization for anti-competitive behavior or breaches of anti-trust and monopoly laws.</p> <p>P2 There were no instances raised of non-compliance regarding product and service, health and safety impacts, as well as no instances of non-compliance regarding product and service labelling.</p> <p>P3 There were no complaints relating to child labor, forced labor, involuntary labor, or Sexual Harassment in FY 2022-23.</p> <p>P4 As per the CSR policy, 2% of net profits of the company were spent on Education, Rural Development, Community Development and Health related projects in FY 2022-23.</p> <p>P5 There were no complaints relating to child labor, forced labor, involuntary labor, or Sexual Harassment in FY 2022-23.</p> <p>P6 SPCFL is compliant with the applicable environmental laws, regulations and guidelines in India.</p> <p>P7 The company received no notices for anti-competitive, antitrust, conflict of interest, or monopolistic practices in FY 2022-23.</p> <p>P8 About 52% of materials were sourced from suppliers within a 300km radius in FY 2022-23.</p> <p>P9 There were no data breaches in the system in FY 2022-23.</p>																	
11.	Has the entity carried out independent assessment / evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9	No, The implementation of the Company's Code of Conduct and other policies are reviewed through internal audit/control function. The Quality, Safety & Health and Environmental policies are subject to internal reviews for continuous assessment. The adherence of the policy is also ensured by the various department heads / director /board committees / board members, wherever applicable.								



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 Principle 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)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

Section C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	4	During the year, the Board of Directors and KMPs have participated in various awareness and Familiarisation programmes carried out by way of presentations on and matters relating to the regulations, economy and environmental, social and governance parameters, business news covering the industry in which the Company operates, about the Company & its competitors, financial barometers etc	100 %
Key Managerial Personnel			100 %
Employees other than Board of Directors and KMPs	3	1. Anti Bribery & Anti Corruption Policy 2. Prevention of Sexual Harrashment (POSH) 3. Code of Conduct 4. Whistle blower	95%
Workers	2	1. Anti Bribery & Anti Corruption Policy 2. Prevention of Sexual Harrashment (POSH) 3. Safety Awareness	90%

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:

(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)

Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (In INR) Brief of the Case Has an appeal	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	0	NA	0	0	No
Settlement	0	NA	0	0	No
Compounding fee	0	NA	0	0	No
Non-Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the Case		Has an appeal been preferred? (Yes/No)
Imprisonment	0	NA	0		No
Punishment	0	NA	0		No



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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
	NIL

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

Yes, the Company has an Anti-Bribery policy. The Company has also adopted a Vigil Mechanism Policy to provide a formal mechanism to the Directors, employees and other external stakeholders to report their concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct. The Company's Code of Conduct covers aspects relating to anti-corruption or anti-bribery. In terms of the said Code, the Company believes in conducting its business in a transparent manner and does not indulge in bribery or corruption. The Policy provides for adequate safeguards against victimisation of employees who avail of the mechanism. The policies can be accessed at <https://www.shreepushkar.com/policies-and-code-of-conduct/>

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

	FY 2022-23	FY 2021-22
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

6. Details of complaints with regard to conflict of interest

	FY 2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL	NIL	NIL	NIL
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	NIL	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 conflict of interest.

Leadership Indicators

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

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
NIL	NIL	NIL

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

Yes, every Director of the Company discloses his/her concern or interest in the Company or companies or bodies corporate or firms or other association of individuals and any change therein, annually or upon any change, which also includes the shareholding. Further, a declaration is also taken annually from the Directors under the Code of Conduct confirming that they will always act in the interest of the Company and ensure that any other business or personal association which they may have, does not involve any conflict of interest with the operations of the Company and their role therein. The Senior Management also affirms annually that they have not entered into any material, financial and commercial transactions, which may have a potential conflict with the interest of the Company at large.

In the Meetings of the Board, the Directors abstain from participating in the items in which they are concerned or interested.



For identifying and tracking conflict of interests involving the Directors / KMPs of the Company, the Corporate Secretarial team maintains a database of the Directors and the entities in which they are interested. This list is shared with the Finance department which flags off the parties in their system for monitoring and tracking transaction(s) entered by the Company with such parties.

The Company has in place a 'Policy on Related Party Transactions' which deals with conflict of interest and are applicable to board members of the Company. Transactions with the board members or any entity in which such board members are concerned or interested are required to be approved by the Audit Committee and the Board of Directors. In such cases, the interested directors abstain themselves from the discussions at the meeting.

Principle 2: Business 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 products and processes to total R&D and capex investments made by the entity, respectively.**

Segment	FY2023	FY2022	Details of improvements in environmental and social impacts
R&D	NIL	NIL	NIL
Capex	0.26	50.16	The Company invested in a solar plant, which has effectively decarbonised the electrical units' requirements. Approximately 65-70% of the plant's electrical energy demand is met through solar power obtained through open access, thereby reducing reliance on conventional sources and contributing to a greener energy mix.

2. **a. Does the entity have procedures in place for sustainable sourcing? (Yes/No) – No**
b. If yes, what percentage of inputs were sourced sustainably?
3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**

(a) Plastics (including packaging)	The Company has engaged an agency tasked with the collection of plastic packaging from Company products on an area-by-area basis, ensuring their return to the Company. Through this initiative, the Company takes proactive steps to mitigate environmental harm by facilitating the recycling of plastic packaging. Additionally, the Company meticulously adheres to the relevant processes mandated by regulatory authorities, underscoring its commitment to responsible environmental practices.
(b) E-waste	The Company follows the applicable processes laid down by the regulatory authorities.
(c) Hazardous waste and	The Company follows the applicable processes laid down by the regulatory authorities.
(d) other waste.	The Company follows the applicable processes laid down by the regulatory authorities.

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, EPR is applicable to the activities of the Company and in respect to the same the Company has applied for EPR-Plastic. Further, the Company has obtained the approval from CPCB, and awaiting the final certificate from CPCB. In this connection, the Company will be submitting mandatory annual return to the concerned Department before the last date.

Leadership Indicators -

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

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link
-	-	-	-	-	-



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

Name of Product / Service	Description of the risk / concern	Action Taken
-	-	-
-	-	-
-	-	-

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

Indicate input material	Recycled or re-used input material to total material	
	FY2023	FY2022
-	-	-

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

	FY2023			FY2022		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
0	-

Principle 3: Business should respect and promote the wellbeing of all employees, including those in their value chains

Essential indicators:

1. a. **Details of measures for the wellbeing of employees:**

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	307	0	0	307	100	0	0	0	0	0	0
Female	27	0	0	27	100	0	0	0	0	0	0
Total	334	0	0	334	100	0	0	0	0	0	0
Other than Permanent employees											
Male	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0



b. Details of measures for the wellbeing of workers:

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Workers											
Male	266	0	0	266	100	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	266	0	0	266	100	0	0	0	0	0	0
Other than Permanent Workers											
Male	301	0	0	301	100	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	301	0	0	301	100	0	0	0	0	0	0

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

Benefits	FY2023			FY2022		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	82%	95%	Y	80%	88%	Y
Gratuity	85%	90%	Y	78%	85%	Y
ESI	10%	80%	Y	8%	72%	Y
Others- please specify	NA					

3. Accessibility of workplaces

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

As per the requirements of the Rights of Persons with Disabilities, the Company manufacturing premises and offices have ramps, elevators and infrastructure for differently abled individuals.

4. Does the Company 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, the Company's Code of Conduct outlines its commitment to non-discrimination, by providing equal opportunity without any discrimination to all its employees irrespective of race, color, religion, sex, national origin, ancestry, age, marital status, sexual orientation or disability.

The Company is in the process of formulating a documented policy on Equal Employment Opportunity in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016, read with the Rights of Persons with Disabilities Rules, 2017.

The policy can be assessed at following link <https://www.shreepushkar.com/policies-and-code-of-conduct/>



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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention Rate	Return to work rate	Retention Rate
Male	100	84%	NA	NA
Female	100	58%	NA	NA
Total	100	85%	NA	NA

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent workers	As part of the Whistleblower Policy, the Company provides a grievance redressal mechanism and encourages its employees and workers to bring to attention any instances of unethical behavior, incidents, frauds or violation. Further, the Company has 'Ask HR' platform for its permanent employees to address any grievances and queries.
Other than permanent workers	Yes, the non-permanent employees and workers communicate their grievances through their respective supervisors. The grievances are further communicated to the Company for necessary action and resolution of the grievances. Additionally, they can also report on any instances of unethical behavior, incident or violations through the Company's Whistleblower mechanism.

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

Category	FY2023			FY2022		
	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	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0
Total Permanent Workers	0	0	0	0	0	0
- Male	0	0	0	0	0	0
- Female	0	0	0	0	0	0



8. Details of training given to employees and workers:

Category	FY2023					FY2022				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	307	42	13.68	2	0.65	257	26	10.12	0	0
Female	27	0	0	0	0	22	0	0	0	0
Total	334	42	13.68	2	0.65	279	26	10.12	0	0
Workers										
Male	219	178	81.28	0	0	174	120	68.97	0	0
Female	47	0	0	0	0	6	0	0	0	0
Total	266	178	81.28	0	0	180	120	68.97	0	0

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

Category	FY2023			FY2022		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0
Workers						
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Total	0	0	0	0	0	0

10. Health and safety management system:

<p>a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?</p>	<p>The Safety & Health Management system covers activities across all manufacturing locations, offices, and ensuring the protection of environment and health & safety of its employees, contractors, visitors. The Company has implemented ISO 45001:2018 management system standard. A safety and health management system is part of the Organization's management system which covers:</p> <ul style="list-style-type: none"> • Health and safety work organization and policy in a company • Planning process for accident and ill health prevention • Line management responsibilities and • Practices, procedures and resources for developing and implementing, reviewing and maintaining the occupational safety and health policy. <p>Also, Occupational Health & safety management system is integrated with ISO 45001:2015</p>
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<p>b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?</p>	<p>The Company has established a robust Risk Management process that plays a vital role in preventing incidents, injuries, occupational diseases, ensuring emergency control and prevention, and safeguarding business continuity. Given the inherent hazards associated with our operations and the use of hazardous chemicals, our sites have implemented a structured Hazard Assessment, Risk Assessment, and Management Process. This process encompasses both qualitative and quantitative approaches, subject to regular review, with mitigation plans formulated for high-risk areas.</p> <p>In addition to risk mitigation, this process also takes into account the delineation of roles and responsibilities, the monitoring of control measures, and the competency training and awareness of individuals involved in these activities. We've diligently provided formal risk assessment training when deemed appropriate, underscoring our commitment to maintaining a proactive approach to risk management.</p>
<p>c. Whether you have processes for workers to report work related hazards and to remove themselves from such risks. (Y/N)</p>	<p>Yes, All sites have specific procedure for reporting of work-related hazard, injuries, unsafe condition and unsafe act. Safety suggestion boxes are kept at convenient location with reporting formats.</p> <p>A single form is developed which includes Near Miss, Safety Suggestion, Unsafe Act & Unsafe Condition and are segregated in above four categories and also rewards for reporting near miss, safety suggestion and at least five unsafe conditions during monthly safety gate meeting.</p>
<p>d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)</p>	<p>Yes, workers are covered under ESI scheme</p>

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

Safety Incident /Number	Category	FY2023	FY2022
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	NIL	NIL
	Workers	NIL	NIL
Total recordable work-related injuries	Employees	NIL	NIL
	Workers	NIL	NIL
No. of fatalities	Employees	NIL	NIL
	Workers	NIL	NIL
High consequence work-related injury or ill-health (excluding fatalities)	Employees	NIL	NIL
	Workers	NIL	NIL

12. **Describe the measures taken by the entity to ensure a safe and healthy workplace.**

The Company embeds the guidelines and principles of ISO 45001:2018, OSHA standards, Factory act and other state level regulatory requirements within its Environment Health and Safety (EHS) management system. The EHS policy advocates the provision of safe working environment to all the employees, contractors, sub-contractors, visitors and the neighbouring communities. The Company undertakes periodic internal and external audits to assess the safety practices and procedures in alignment with the EHS management system and the ISO 45001:2018 guidelines. The Company recognises the critical areas requiring immediate corrective action. The safety incidents and hazards are analysed to determine the root cause, subsequently corrective action plans are laid out to prevent the occurrence of similar incidents in the future. Further, as part of the EHS management system, the Company provides safety trainings through modules and safety drill practices to all its employees and workers. The safety training programs enable the development of strong foundation among the workforce, in terms of their ability to identify, mitigate and prevent risks pertaining to Occupational Health and Safety. The Company endeavors to prevent negative health impact on the employees through various health awareness sessions, provision of medical facilities and medical insurance benefits. Additionally, the Company provides voluntary health promotion services such as lifestyle counselling, stress management sessions, nutritional awareness campaigns among others for inculcating healthy lifestyle practices.

**13. Number of Complaints on the following made by employees and workers:**

	FY2023		Remarks	FY2022		Remarks
	Filed during the year	Pending resolution at the end of the year		Filed during the year	Pending resolution at the end of the year	
Working Conditions	N/A	N/A	N/A	N/A	N/A	N/A
Health & Safety	N/A	N/A	N/A	N/A	N/A	N/A

14. Assessments for the year:

	% of plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100% of the locations are audited internally by the entity. The audits are conducted by internal experts to ensure the compliance of safety regulations and identification of major improvement areas.
Working Conditions	100% (All the sites are assessed on their working conditions by the external and internal audits).

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 & safety practices and working conditions.

There has been no concern or significant risk arising from health & safety practices and working conditions, hence, no corrective action taken.

Leadership Indicators

- Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).** No
- Provide the measures undertaken by the entity to ensure payment of statutory dues by the value chain partners.**

The Company requires its value chain partners to abide by the principles of the Company's Supplier Code of Conduct and implement responsible business conduct principles in its operating practices. The Company has in place adequate measures to ensure that statutory dues have been deducted and deposited by the value chain partners through audits, maintaining of Legal registers, periodic audits through agencies.

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

	Total No. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY2023	FY2022	FY2023	FY2022
Employees	NIL	NIL	NIL	NIL
Workers	NIL	NIL	NIL	NIL

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

The Company periodically provides skill-upgradation training programs to all its employees during their employment. The training programs cater to the specific requirements of the cadre and relevant function areas which further enable the employees to pursue employment post retirement or termination, based on the acquired skillset.



5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed	As per the Company's Code of Conduct, the value chain partners are expected to adhere to the principles of Health and safety practices, working conditions as per extant regulations. However, no independent assessment is carried out.
Health and safety practices	100%	
Working Conditions	100%	

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners. -- NA

Principle 4: Business should respect the interests of and be responsive to all its stakeholders

1. Describe the processes for identifying key stakeholder groups of the Company.

SPCFL values and recognizes the role and contribution made by any individual, group or institution that constitute its value chain as a stakeholder. Contribution made by each of them is assessed to identify the key stakeholders. The Company has identified its internal and external group of stakeholders and below listed stakeholder groups have an immediate impact on the operations and working of the Company. This includes Employees, Shareholders, Customers, Communities, Suppliers, Partners and Vendors.

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

Stakeholder Group	Whether identified as vulnerable & marginalised group (Yes/ No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, Community Meetings, Notice Board, Website, Others)	Frequency of engagement (Annually, Half yearly, quarterly / others- please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	Annual General Meetings, other shareholder meetings, email communications, Stock Exchange (SE) intimations, investor / analysts meet / conference calls, Annual Reports, quarterly results, media releases, Company / SE website	Annual/Event based/Quarterly	Understanding the expectations of the shareholders / investors and seeking their feedback and presenting it to the Company's management and Board. Communicating the business and financial performance and overall strategy of the Company
Employees	No	Employee interaction, goal setting and performance appraisal, E mail communication, Notice board	Regularly and as and when required	Performance and career development reviews, For building a safe, diverse and inclusive working environment, To communicate the performance and strategy of the Company, To seek their feedback on the work culture
Customers	No	Emails, SMS, Pamphlets, Advertisement, Website, Meetings, survey and grievance redressal	Ongoing and as and when required	Understand their need and strive towards satisfying their needs. Obtain feedback to improve the process. Help customers meet their sustainability goals.
Suppliers / Partners	No	Vendors meet, periodic vendor interaction for grievance redressal, regular vendor audit, meeting, email communication.	As and when required	Procurement, improve efficiency through timely supply of quality goods.



Government	No	Annual Quarterly reports, monthly and as when regulatory filing required.	Periodic and as and when required	Good Governance practise, Regulatory compliance, environmental compliances.
Communities	Yes	Community engagement and CSR initiatives	Ongoing, Need basis	Local development and contribute to better livelihoods

Leadership Indicators

<p>1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.</p>	<p>Engaging with stakeholders is an ongoing and dynamic endeavor for the Company. A consistent and interactive dialogue is diligently maintained with a diverse range of stakeholders, including investors, customers, suppliers, and employees. Through this continuous engagement process, the Company actively seeks, acknowledges, and integrates their perspectives, recommendations, and concerns. This approach fosters a spirit of collaboration and responsiveness, underscoring the Company's commitment to stakeholder engagement and satisfaction.</p>
<p>2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.</p>	<p>Yes, through materiality study, the Company engages with its stakeholders in terms of identifying and prioritising the issues pertaining to economic, environmental and social topics. Environmental and social topics are reviewed and shortlisted based on the materiality study and Standard operating procedure are updated/introduced.</p>
<p>3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/marginalized stakeholder groups.</p>	<p>None of the stakeholder group has been identified as vulnerable or marginalised group during the year</p>

Principle 5: Business 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	FY2023			FY2022		
	Total (A)	No. of employees /workers covered (B)	% (B/A)	Total (C)	No. of employees /workers covered (D)	% (D/C)
Employees						
Permanent	334	334	100%	168	168	100%
Other than Permanent	0	0	100%	0	0	0
Total Employees	334	334	100%	168	168	100%
Workers						
Permanent	219	219	100%	106	106	100%
Other than Permanent	47	47	100%	208	208	100%
Total Workers	266	266	100%	314	314	100%



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

Category	FY2023					FY2022				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	334	0	0	334	100	0	0	0	0	0
Male	307	0	0	307	100	0	0	0	0	0
Female	27	0	0	27	100	0	0	0	0	0
Other than Permanent	0	0	0	0	100	0	0	0	0	0
Male	0	0	0	0	100	0	0	0	0	0
Female	0	0	0	0	100	0	0	0	0	0
Workers										
Permanent	219	0	0	219	100	0	0	0	0	0
Male	219	0	0	219	100	0	0	0	0	0
Female	0	0	0	0	100	0	0	0	0	0
Other than Permanent	348	0	0	348	100	0	0	0	0	0
Male	348	0	0	348	100	0	0	0	0	0
Female	0	0	0	0	100	0	0	0	0	0

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
Board of Directors (BoD)	5	240000	1	68000
Key Managerial Personnel (KMP)	2	1405000	0	0
Employees other than BoD and KMP	222	28000	27	24000
Workers	219	17340	-	-

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) - The Company HR looks after all the issue

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

The Company 'Ask HR' platform, email and other informal channels of communication form part of the internal mechanism for grievance redressal of human rights issues. The Company's Human Rights Policy outlines the grievance redressal mechanism through the open channels of communication and the Ombudsman channel as per the Global Whistleblower Policy. The Ombudsman ensures the confidentiality of the complaints and grievances received through Email: hr@shreepushkar.com.



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

	FY2023			FY2022		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	NIL	NIL	NIL	NIL	NIL	NIL
Discrimination at workplace	NIL	NIL	NIL	NIL	NIL	NIL
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL
Forced Labour/Involuntary Labour	NIL	NIL	NIL	NIL	NIL	NIL
Wages	NIL	NIL	NIL	NIL	NIL	NIL
Other Human rights related issues	NIL	NIL	NIL	NIL	NIL	NIL

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

Within the framework of Whistleblower Policy, the Company places paramount importance on safeguarding the well-being of those who raise concerns. Adhering to the highest standards of confidentiality, the Company ensures that complaint investigations remain strictly discreet, offering complainants immunity from any potential retaliation.

The Company extends comprehensive safeguards to all individuals who, in good faith, make Protected Disclosures in alignment with the principles outlined in the Global Code of Conduct. These encompass a wide range of concerns, including the upholding of business integrity, responsible corporate citizenship, the mitigation of unlawful labor practices, scrutiny of trade activities, and adherence to legal statutes.

In cases pertaining to matters of sexual harassment, the Company's policy is meticulously aligned with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act of 2013 and its associated regulations. This policy assures the utmost preservation of confidentiality throughout the investigative proceedings and goes above and beyond to shield the identity of the complainant.

Through the implementation of these robust measures and its unwavering commitment, the Company actively demonstrates its dedication to fostering a safe, ethical, and accountable work environment for all.

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

Indeed, the Company diligently integrates Human Rights considerations as an integral element in its business agreements. This commitment is explicitly articulated within the comprehensive framework of the Global Code of Conduct, underscoring the Company's unwavering dedication to upholding Human Rights principles. This pledge permeates throughout the organization, touching every employee and intricately connecting with business partners along the value chain.

A pivotal manifestation of this commitment is the mandatory endorsement of the Global Code of Conduct by each employee. This not only symbolizes alignment but also reflects a tangible commitment to the principles enshrined within the code. Furthermore, extending this ethos beyond the organization's boundaries, the Company seamlessly incorporates Human Rights requirements into contractual agreements with suppliers and contractors. This operationalizes the Company's principles, ensuring their widespread adoption within the business ecosystem.

In essence, the Company's steadfast incorporation of Human Rights imperatives into its agreements goes beyond mere rhetoric, serving as a tangible testament to its unwavering dedication to responsible and ethical business practices.

**9. Assessment for the year:**

	% of the Company's plants and offices that were assessed (by the Company or statutory authorities or third parties)
Child Labour	NIL
Forced Labour/Involuntary Labour	NIL
Sexual Harassment	NIL
Discrimination at workplace	NIL
Wages	NIL
Other- please specify	NIL

Note: The Internal & external Auditors conduct assessments as per the Audit schedule. Assessments are also carried out by respective Government authorities and the Company has not received any non-compliance certification.

10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above. - NA**Leadership Indicators****1. Details of a business process being modified / introduced as a result of addressing human rights grievances/ complaints. -NA****2. Details of the scope and coverage of any Human rights due-diligence conducted.**

The Company in the reporting period did not undertake any Human Rights due diligence. The Company's revised Human Rights Policy expects all the employees and members of the value chain to abide by its principles. As part of the policy statement, the Company outlines that it will undertake human rights due diligence to identify adverse human rights impact of the business on all relevant stakeholders and correspondingly address, prevent and mitigate through corrective actions.

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

Yes, as per the requirements of the Rights of Persons with Disabilities, the Company manufacturing premises and offices have ramps, elevators and infrastructure for differently abled individuals.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed	All the locations under the entity are assessed on the above parameters, complying with the requirements of the Shop Establishments Act for offices and the Factor Inspector audits at plants.
Sexual Harassment	100	
Discrimination at workplace	100	
Child Labour	100	
Forced Labour/Involuntary Labour	100	
Wages	100	
Others – please specify	100	

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



Principle 6: Business should respect and make efforts to protect and restore the environment

Essential Indicators

1. Details of total energy consumption (in Giga joules) and energy intensity, in the following format:

Parameter	FY2023	FY2022
Total electricity consumption (A)	41,359	1,08,729
Total fuel consumption (B)	20,209.92	4,11,549.65
Energy consumption through other sources (C)		
Total energy consumption (A+B+C)	61,568.92	5,20,278.65
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees(In Lakhs))	0.89	8.80
Energy intensity (optional) – the relevant metric may be selected by the Company	NA	NA

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 Company have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any. - No

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

Parameter	FY2023	FY2022
Water withdrawal by source (in kilolitres)		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others	1794.6	7990
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	NA	NA
Total volume of water consumption (in kilolitres)	1794.6	7990
Water intensity per rupee of turnover (Water consumed / turnover(Lakhs))	0.02	0.13
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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 Company implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation. - No

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

Parameter	Unit	FY2023	FY2022
NOx	ug/m3	15.69	15.4
SOx	ug/m3	7.66	8
Particulate matter (PM)	mg/Nm3	57.48	57.02
Persistent organic pollutants (POP)	NA	NA	NA
Volatile organic compounds (VOC)	NA	NA	NA
Hazardous air pollutants (HAP)	NA	NA	NA
Others – please specify	mg/Nm3	15.9	14.5



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 (Scope1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY2023	FY2022
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	Nil	Nil
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	Nil	Nil
Total Scope 1 and Scope 2 emissions per rupee of turnover	Nil	Nil	Nil
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	Nil	Nil	Nil

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

7. Does the Company have any project related to reducing Green House Gas emission? If yes, then provide details.
No

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

Parameter	FY2023	FY2022
Total Waste generated (in metric tonnes)		
Plastic waste (A)	NA	NA
E-waste (B)	NA	NA
Bio-medical waste (C)	NA	NA
Construction and demolition waste (D)	NA	NA
Battery waste (E)	NA	NA
Radioactive waste (F)	NA	NA
Other Hazardous Waste. Please specify, if any. (G)	1	2
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	1.7	4.35
Total (A+B + C + D + E + F + G + H)	2.7	6.35
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	NA	NA
(ii) Re-used	NA	NA
(iii) Other recovery operations	Sent to Mumbai Waste Management-Taloja (CHWTSDF)	Sent to Mumbai Waste Management-Taloja (CHWTSDF)
Total		
For each category of waste generated, total waste disposed of through disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	NO	NO
(ii) Landfilling	1	2
(iii) Other disposal operations	1.7	4.35
Total	2.7	6.35

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 establishment. 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. - No
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 in the following format:

S. 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.
1	NA	NA	NA
2	NA	NA	NA
3	NA	NA	NA
4	NA	NA	NA
5	NA	NA	NA
6	NA	NA	NA
7	NA	NA	NA
8	NA	NA	NA
9	NA	NA	NA

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
1	NA	NA	NA	NA	NA
2	NA	NA	NA	NA	NA
3	NA	NA	NA	NA	NA
4	NA	NA	NA	NA	NA
5	NA	NA	NA	NA	NA
6	NA	NA	NA	NA	NA
7	NA	NA	NA	NA	NA
8	NA	NA	NA	NA	NA
9	NA	NA	NA	NA	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, in the following format:

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
1	NO	NA	NA	NA
2	NO	NA	NA	NA
3	NO	NA	NA	NA
4	NO	NA	NA	NA
5	NO	NA	NA	NA
6	NO	NA	NA	NA
7	NO	NA	NA	NA

Leadership Indicators -

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY2023	FY2022
From renewable sources		
Total electricity consumption (A)	18495.83 Giga Joules	2338.94 Giga Joules
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
Total energy consumed from renewable sources (A+B+C)	18495.83 Giga Joules	2338.94 Giga Joules
From non-renewable sources		
Total electricity consumption (D)	41359 Giga Joules	108729 Giga Joules
Total fuel consumption (E)	20209.92 Giga Joules	411549.65 Giga Joules
Energy consumption through other sources (F)	NA	NA
Total energy consumed from non-renewable sources (D+E+F)	61568.92 Giga Joules	520278.65 Giga Joules

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.



2. Provide the following details related to water discharged:

Parameter	FY2023	FY2022
Water discharge by destination and level of treatment (in kilolitres)		
i) To Surface water	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) To Groundwater	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iii) To Seawater	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties	Sent to CETP	Sent to CETP
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(v) Others	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
Total water discharged (in kilolitres)	NA	NA

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.

3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

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

- (i) Name of the area
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY2023	FY2022
Water withdrawal by source (in kilolitres)		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	3737	14949
(iv) Seawater / desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres)	NA	NA
Total volume of water consumption (in kilolitres)	3737	14949
Water intensity per rupee of turnover (Water consumed / turnover)	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA



Water discharge by destination and level of treatment (in kilolitres)		
i) Into Surface water	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) Into Groundwater	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iii) Into Seawater	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties	NA	NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(v) Others	From MIDC	From MIDC
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
Total water discharged (in kilolitres)	NA	NA

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. - NA

4. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY2023	FY2022
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	Nil	Nil
Total Scope 3 emissions per rupee of turnover	Nil	Nil	Nil
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	Nil	Nil	Nil

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. - NA

5. With respect to the ecologically sensitive areas reported in Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities. - NA

6. If the entity provided below taken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	ETP Provided	Primary, Secondary & Tertiary treatment provided	Effluent quality improved
2	Scrubber Provided	Stack provided	Emission as per MPCB/CPCB norms
3	Bag Filters Provided	Stack provided	Ambient air quality improved



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

The Company has recently enhanced its on-site emergency plan to ensure a swift and effective response in the event of an emergency.

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

As of now, there is no adverse impact to the environment.

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

Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential indicators

1. a. **Number of affiliations with trade and industry chambers/associations.- FIVE**
- b. **List the top 10 trade and industry chambers/associations (determined based on the total members of such body) the Company 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	Bombay Chamber of Commerce	National
2	Director Geenral of Foreign Trade	National
3	Dyestuffs Manufacturers Association of India	National
4	Chemicals Export Promotion Council (CHEMEXCIL)	National
5	The Fertiliser Association of India (FAI)	National

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

Name of the authority	Brief of the case	Corrective action taken
NA		
The Company has not engaged in any anti competitive conduct		

Leadership Indicators

1. **Details of public policy positions advocated by the Company:**

S. No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/ No)	Frequency of Review by Board (Annually/ Half yearly/Quarterly/Others- please specify)	Web Link, if available
Nil	Nil	Nil	Nil	Nil	Nil
Nil	Nil	Nil	Nil		Nil
Nil	Nil	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 Company, 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
-	-	-	-	-	-
-	-	-	-	-	-

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by the Company, in the following format:

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	Amount paid to PAFs in the FY (In INR)
-	-	-	-	-	-	-

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

The Company has established a robust process dedicated to receiving and effectively addressing concerns and grievances from the community. To ensure a comprehensive approach, a site-level committee is formed, comprising representatives from key departments such as administration, security, CSR, and the SWOT committee. This diverse team is entrusted with the task of receiving both written and verbal concerns, and subsequently, orchestrating their prompt resolution.

The resolution process entails a collaborative field visit or investigation, wherein the committee collectively assesses the situation. This proactive approach ensures that concerns are met with appropriate actions within a reasonable timeframe. Notably, each concern is meticulously documented and monitored until its final closure, demonstrating the Company's commitment to accountability and transparency.

Moreover, the Company goes beyond mere grievance resolution. As part of its community development initiatives, proactive engagement with the community is a cornerstone. Throughout the year, a dynamic calendar of informal and formal sessions is curated, fostering meaningful interactions between the Company and the community. These sessions complement dedicated program-specific meetings, all of which synergistically contribute to effective collaboration.

The engagement strategy is thoughtfully tailored to engage different segments of the community. This includes targeted outreach to youth, women, and community leaders. The involvement of senior leadership further underlines the Company's genuine commitment, as they regularly connect with the community, reinforcing a sense of partnership and mutual understanding.

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

	FY2023	FY2022
Directly sourced from MSMEs/small producers	6.59	7.12
Sourced directly from within the district and neighbouring districts	34.26	34.90

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
-	-
-	-



2. Provide the following information on CSR projects undertaken by the Company in the designated aspirational districts as identified by government bodies:

S. No.	State	Aspirational District	Amount spent (In INR)
Nil	Nil	Nil	Nil

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) - NO
 (b) From which marginalized /vulnerable groups do you procure? – NA
 (c) What percentage of total procurement (by value) does it constitute? – NA
4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
-	-	-	-	-
-	-	-	-	-

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

Name of authority	Brief of the Case	Corrective action taken
-	-	-
-	-	-

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalised groups
1.	Upliftment of handicap, Promoting health care including preventive health care and making available safe drinking water	-	-
2.	Adoption school for promoting Education and distribution of books.	-	-

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.

A well-established system is in place for dealing with consumer feedback. Consumers are provided multiple options to connect with the Company through email, telephone, website, etc.

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	Response
Environmental and social parameters relevant to the product	-	The Company's products confirm 100% to all applicable statutory parameters.
Safe and responsible usage		
Recycling and/or safe disposal		



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

	FY2023		Remarks	FY2022		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	-	-	-	-	-	-
Advertising	-	-	-	-	-	-
Cyber- security	-	-	-	-	-	-
Delivery of essential services	-	-	-	-	-	-
Delivery of essential services						
Restrictive Trade Practices	-	-	-	-	-	-
Unfair Trade Practices	-	-	-	-	-	-
Other (product related)	-	-	-	-	-	-

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

	Number	Reasons for recall
Voluntary recalls	-	-
Forced recalls	-	-

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

The Company has an internally available framework on cyber security.

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.

For FY 2022-23, there were no complaints received for issues pertaining to delivery of essential services, advertising, action taken by regulatory authorities on safety of products.

Leadership Indicators

Channels/platforms where information on products and services of the Company can be accessed (provide web-link, if available).	https://www.shreepushkar.com/
Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.	All businesses of the Company comply with the regulations and relevant disclosures concerning marketing communications, including advertising and promotion. The Company's communications are aimed at enabling consumers to make informed purchase decisions and safety usage.
Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.	The Company do not fall under essential service maintenance
Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/ Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)	The Company displays product information as mandated by Fertiliser (Control) Order, 1985. Material Safety Data Sheet are sent with all sample and products. Consumer satisfaction survey is not conducted.
Provide the following information relating to data breaches:	
a. Number of instances of data breaches, along with impact	NIL
b. Percentage of data breaches involving personally identifiable information of customers	NIL