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Sion (East), Mumbai – 400 022, India
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E- MAIL: thirumalai@thirumalaichemicals.com
Website: www.thirumalaichemicals.com

(AN ISO 9001, 14001, 50001/ HACCP & FSSC 22000 CERTIFIED COMPANY)
CIN: L24100MH1972PLC016149

Date: August 03, 2023

Department of Corporate Services
Bombay Stock Exchange Ltd.
P.J. Towers, 25th Floor,
MUMBAI – 400 001
Fax No: 22723121/2037/3719/2941

National Stock Exchange of India Ltd.
Exchange Plaza, Bandra Kurla Complex
Bandra (East)
MUMBAI – 400 051
Fax No: 26598237/8238

**Reg.: Disclosures under Regulation 34(2)(f) of the Securities and Exchange Board of India
(Listing Obligations & Disclosure Requirements) Regulations 2015**

Dear Sir,

Ref.: Scrip code: 500412 / TIRUMALCHM

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations 2015, we are submitting herewith the Business Responsibility and Sustainability Report ('BRSR') for FY 2022-23 which forms part of the Annual Report FY 2022-23.

Kindly acknowledge.

Thanking you,

Yours faithfully,
For THIRUMALAI CHEMICALS LIMITED

A handwritten signature in blue ink, appearing to read 'T. Rajagopalan', is written over a light blue horizontal line.

T. Rajagopalan.
Company Secretary



Business Responsibility and Sustainability Report

Chairman's message

Over the last four decades, TCL has journeyed consistently towards sustainability in all aspects of its businesses. This was driven initially by circumstances and costs; as we saw the results this became the mantra within the company.

Eventually, in the last 20 years it has become a corepart of our DNA.

Each step and initiative has helped us towards greener manufacturing, a lower impact on our environment and on the communities around us, improved business sustainability and living in harmony with the local communities and stakeholders.

1. A lower Energy footprint, lower Greenhouse gas emissions:

We have been able to reduce our energy consumption in our main plant at Ranipet from the grid and all fuel usage dramatically; today over 93% of all our energy use in the site is from internal process waste heat, recaptured, converted to steam & power to run all operations including manufacturing of Petrochemicals, Food Ingredients and Fine Chemicals, Utilities, administration and all support services within the complex.

These technologies and learnings of energy capture from the process and recycle are now being implemented in our new investment at Dahej in western India and in our Petrochemical & Food Ingredients – Fine Chemicals investment in the US.

We estimate that over 90% of all our energy consumption (heat & power) globally will use only recycled energy including for admin, offices and all support services. Less than 10% will be from bought out energy from the electric grids or fossil fuel usage. Our target is to reduce this further. We have been fortunate that we have significant amount of heat generated from our main processes; we have learnt and implemented how to reduce our manufacturing energy use and how to recover from every energy source however small, within our manufacturing complexes.

2. Consumptions of Raw materials and inputs:

When we started the company in 1976 the yield in our main product (Phthalic Anhydride - PA), " was below benchmark levels. Today, in both our sites producing this product we have been able to improve this by about 20%. This is similarly so in all our other products Maleic Anhydride, Food Ingredients, Fine & Speciality Chemicals where we have managed improvements of 7 – 18% in input efficiencies after all losses. These improvements do not include recoveries from waste described below.

3. Recovery & synthesis of valuable by-products (Food Ingredients from our process effluents):

Our main product in India (PA) produces about 4.5% and more of chemical by-products typically Maleic Anhydride, Benzoic acid, etc. Globally most companies incinerate these and let out CO₂; a minority wash these out from the off gases and bio-treat them, again producing CO₂ and methane emissions. In 1985, when we were building our second train in south India, we decided to recover these and convert them to valuable Fine Chemicals.. The same technology is under implementation at our facility and investment in western India and was also implemented in Malaysia 20 years ago.

4. Reducing Water consumption

In 1976-78 when we started first with the manufacture of one petrochemical (PA), we were consuming about 163 M³/ tonof water. Over the years we have constantly strived and have drastically brought down the water consumption by 95%

5. Reducing waste water and going to Zero Discharge

Having recovered almost all the chemicals to produce Fine Chemicals and having reduced our water consumption by over 95% it was easy for us to aim for Zero Discharge. By 2007, this major initiative, involving complete treatment and recycle of all waters back to the process enabled us to become one of the first Zero Discharge chemical sites in India and globally. This system is also being continuously upgraded with the latest technology available.

6. Safety & Health

All manufacturing plants and petrochemical plants in particular demand a high level of safety and health protection for our staff, our contractors and our many partners. Since 2000, we have steadily improved our safety and health performance, as we learnt from other companies, our global customers and from our consultants. We have reached a good level of safety and health protection both in manufacturing operations, allied functions like R&D and in construction of new plants.

7. Organizational Sustainability

From its early days, TCL was forced to build and train its own technical and commercial workforce. We had built a highly technology intensive, highly automated petrochemical company in the then remote - underdeveloped area lacking technical schools, engineering & technical manpower. Poor living conditions and connectivity made it impossible to attract and train competent staff to operate & manage such complex facilities. By 1980, we developed our own model where we setup a training program.

This program continues and provides us with a young team regenerated regularly and managed & guided by more experienced staff. We are extremely proud of our staff and TCL alumni and they in turn are very proud that they belong to this select group. Many of our middle and senior management have started as trainees.

8. Living in harmony with the community

The above initiatives of a zero wastewater discharge, water use reduction and scrubbing out of all chemicals so that our off gases are completely clean, safe and free of smell has helped us develop a close rapport with the communities around us.

As a part of the core culture of our founders and organizations, in 1983, we initiated, supported & managed in-depth programs in women's empowerment and rural health care projects in and around Ranipet, where we have our main plant. These are operated by a separate trust, The Thirumalai Charity Trust (TCT). Since then TCT has grown in these 4 decades as an independent and large organization which continues its work with rural women, rural health care and education.

In line with the philosophy of our founders, the hospital and school projects serve the rural and the economically challenged communities along with the well-educated and developed communities that have grown here. This guarantees good quality.

All these programs are actively supported by TCL, the other companies in the group and many other donors. We consider these initiatives a key part of our DNA and our management and staff are deeply involved in these; however, they are managed as completely independent entities with their own management and operational teams and goals.

To continue the momentum, TCL will embark on a journey towards sustainability aligning with the national and international goals. TCL will implement processes with continuous improvements across multiple dimensions of the Environment, social and governance frame works. Warmly,

**Warmly,
Mr. R. Parthasarathy
Chairman and Managing Director**



Highlights

Principle 1- Ethics

100% Board of directors and KMPs have undergone awareness program on the 9 NGRBC principles and Sustainability

0 no. of. monetary/ non-monetary fines, penalty and charges

Anti-corruption and anti-bribery policy has been established in the current reporting period

Principle 2- Product Stewardship

EPR –As per extended producers responsibility TCL has registered as the brand owner with Central Pollution Control Board.

Principle 3- Employee Well being

0.0 Lost Time Injury Frequency Rate for employees

100% of Employees provided with health insurance, accidental insurance and paternity benefits.

100% of the plants and offices assessed for Health and safety practices

Principle 4- Stakeholder Engagement

Stakeholder Engagement and Grievance Policy

established during the reporting period to form means and procedures to engage with our stakeholders as well as receive active feedbacks for sustained relationships and value creation.

Principle 5- Human Rights

0 Child labour, Forced/involuntary labour, Sexual harassment, Discrimination at workplace and wages issue

Principle 6- Environment

803179 Giga Joules of energy utilised in FY23

528746 Kilo litres of water consumed in FY23

54854 Metric tonnes of CO2 equivalent of green house gas emitted in FY23

Principle 7- Public Policy Advocacy

0 case filed regarding unfair trade practices and anti-competitive behaviour

5 associations in which TCL actively participates and engages responsibly for policy advocacies, welfare and development of chemical sector as whole

Principle 8- CSR

74% Directly sourced from MSMEs/ small producers

14% Sourced directly from within the district and neighboring districts of TCL's operations

Principle 9- Customer relations

0 Forced Recall of product

100% Products carry information about safe and responsible usage





BRSR OVERVIEW:

SECTION A – General disclosures

SECTION B – Management and process disclosures

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 |
| Principle 2 | Businesses should provide goods and services in a manner that is sustainable and safe |
| Principle 3 | Businesses should respect and promote the well-being of all employees, including those in their value chains |
| Principle 4 | Businesses should respect the interests of and be responsive to all its stakeholders |
| Principle 5 | Businesses should respect and promote human rights |
| Principle 6 | Businesses should respect and make efforts to protect and restore the environment |
| Principle 7 | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |
| Principle 8 | Businesses should promote inclusive growth and equitable development |
| Principle 9 | Businesses should engage with and provide value to their consumers in a responsible manner |



SECTION A – GENERAL DISCLOSURES

Details

| | | |
|----|--|---|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | L24100MH1972PLC016149 |
| 2 | Name of the company | THIRUMALAI CHEMICALS LIMITED |
| 3 | Year of incorporation | 1972 |
| 4 | Registered office address | "Thirumalai House, Road No.29, Sion-East, Mumbai-400 022" |
| 5 | Corporate address | "Spic House, 5th Floor, 88, Mount Road, Guindy, Chennai - 600032" |
| 6 | E-mail | rajagopalan.t@thirumalaichemicals.com |
| 7 | Telephone | Tel: +91 22 2401 7841 / 53 / 61 |
| 8 | Website | www.thirumalaichemicals.com |
| 9 | Financial year for which reporting is being done | 2022-23 |
| 10 | Name of the Stock Exchange(s) where shares are listed | BSE Limited and National Stock Exchange of India Limited |
| 11 | Paid-up Capital | 10,24,10,620 INR |
| 12 | Name of contact details of the person who may be contacted in case of any queries on the BRSR Report | "Rajagopalan T (Company Secretary & Compliance office) Tel: +91 22 2401 7841 / 53 / 61 rajagopalan.t@thirumalaichemicals.com" |
| 13 | Reporting boundary | Standalone |

Products and Services

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

| S. No. | Description of Main Activity | Description of Business Activity | % Of Turnover of the entity |
|--------|--|----------------------------------|-----------------------------|
| 1 | Manufacture of basic chemicals except fertilizers and nitrogen compounds | 2411 | 100% |

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

| S. No. | Product/Service | NIC Code | % Of total Turnover contributed |
|--------|--|----------|---------------------------------|
| 1 | Phthalic Anhydride and Derivatives, Malic Acid, Fumaric Acid | 2411 | 100% |

Operations

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

TCL has its:

- i. Registered office in Mumbai
- ii. Factories at Ranipet, Ranipet District, Tamil Nādu and Dahej, Gujarat
- iii. Tank Farms at Walaja, Ranipet District, and Royapuram, Chennai, Tamil Nadu.
- iv. Marketing offices at Chennai & Delhi

TCL has overseas subsidiaries in Malaysia, Singapore, the USA, the Netherlands & the UK.

| Location | Number of Manufacturing Units | Number of offices | Total |
|----------|-------------------------------|-------------------|-------|
| National | 4 | 3 | 7 |

17. Markets served by the entity:

The company operates in the following markets mentioned below:

a. Number of locations

| Locations | Number |
|----------------------------------|--|
| National (No. of States) | The Company sells its products in all the 28 states and 8 Union territories in the country |
| International (No. of Countries) | The Company sells its products in 4 continents (US, Europe, Asia, Middle East, Africa) |

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

12%

c. A brief on types of customers

Phthalic anhydride (PA) is a white crystalline compound used to manufacture plasticizers, pigments, dyes and resins. One major consumer of PA is the phthalate plasticiser industry, the products of which are used to produce flexible plastic products such as wire & cable applications, hoses, pipes, coated fabrics, roofing membranes and swimming pool liners.

PA is used in the manufacture of unsaturated polyester resins (UPR) that are usually blended with glass fibres to produce fiberglass-reinforced plastics. Principal consumer markets are the construction, marine, and transportation sectors. PA-based alkyd resins are used in paints and lacquers that go in to architectural, machinery, furniture, and fixture applications.

Malic Acid is used majorly for food and beverage application. Customers include global one's like Perfetti, Symrize, etc Fumaric acid is used for feed/ resin/ food application.

Employees

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

| S. No. | Particulars | Total (A) | Male | | Female | |
|------------------|--------------------------|-----------|---------|-----------|---------|-----------|
| | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| EMPLOYEES | | | | | | |
| 1. | Permanent (D) | 488 | 447 | 92% | 41 | 8% |
| 2. | Other than Permanent (E) | 24 | 21 | 88% | 3 | 13% |
| 3. | Total employees (D + E) | 512 | 468 | 91% | 44 | 9% |
| WORKERS | | | | | | |
| 4. | Permanent (F) | 31 | 31 | 100% | 0 | 0% |
| 5. | Other than Permanent (G) | 495 | 446 | 90% | 49 | 10% |
| 6. | Total workers (F + G) | 526 | 477 | 91% | 49 | 9% |

b. Differently abled Employees and workers:

| Differently abled employees | | | | | | |
|-----------------------------|---|-----------|---------|-----------|---------|-----------|
| S. No | Particulars | Total (A) | Male | | Female | |
| | | | No. (B) | % (B / A) | No. (C) | % (C / A) |
| 1. | Permanent (D) | 1 | 1 | 100 | 0 | 0 |
| 2. | Other than Permanent (E) | - | - | - | - | - |
| 3. | Total differently abled employees (D + E) | 1 | 1 | 100 | 0 | 0 |
| Differently abled workers | | | | | | |
| 4. | Permanent (F) | -0- | | | | |
| 5. | Other than permanent (G) | | | | | |
| 6. | Total differently abled workers (F + G) | | | | | |

19. Participation/Inclusion/Representation of women

| | Total (A) | No. and percentage of Females | |
|--------------------------|-----------|-------------------------------|-----------|
| | | No. (B) | % (B / A) |
| Board of Directors | 10 | 2 | 20% |
| Key Management Personnel | 3 | 1 | 33% |

20. Turnover rate for permanent employees and workers

| | FY 2022-23 | | | FY 2021-22 | | | FY 2020-21 | | |
|---------------------|------------|--------|-------|------------|--------|-------|------------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 26% | 13% | 39% | 19% | 15% | 34% | 9% | 27% | 36% |
| Permanent Workers | 3% | 0% | 3% | 18% | 0% | 18% | 5% | 0% | 5% |

Holding, subsidiary and associate companies (including joint ventures)
21. (a) Names of holding / subsidiary / associate companies / joint ventures

| S. No. | Name of the holding / subsidiary / associate companies / joint ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % Of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|---|--|-----------------------------------|--|
| 1 | Thirumalai Chemicals Limited | Holding | 100% | Yes. |
| 2 | TCL Intermediates Private Limited | Subsidiary of TCL | 100% | |
| 3 | Cheminvest Pte Ltd | Subsidiary of TCL | 100% | |
| 4 | Optimistic Organic sdn bhd. | Subsidiary of TCL & Cheminvest | TCL (14%) Cheminvest (86%) | |

| | | | | |
|---|---------------------------------|---|------|---|
| 5 | Lapiz Europe | Subsidiary of Cheminvest | 100% | The Company's Code of Conduct provides guidelines to the company along with all its subsidiaries for conducting business in an ethical, responsible, and accountable manner. The Company encourages its subsidiaries to carry out Business Responsibility Initiatives to the extent that they are material in relation to the subsidiaries' business activities and operating region. |
| 6 | TCL Global BV | Subsidiary of TCL/ Holding of TCL INC. | 100% | |
| 7 | TCL INC. | Subsidiary of TCL Global BV/ Holding entity of TCLS LLC | 100% | |
| 8 | TCL Specialities LLC (TCLS LLC) | Sole Member Corporation | 100% | |

CSR

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

(ii) Turnover (in ₹) - ₹ 1847 Crs

(iii) Net worth (in ₹) - ₹ 962 Crs

Transparency and Disclosure Compliances

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

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy) * | FY 23 Current Financial Year | | | FY 22 Previous Financial Year | | |
|---|---|--|--|---|--|--|---|
| | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | Yes | 0 | 0 | - | 0 | 0 | - |
| Shareholders and Investors | Yes | 0 | 0 | - | 0 | 0 | - |
| Employees and workers | Yes | 0 | 0 | - | 0 | 0 | - |
| Customers | Yes | 19 | 0 | All complaints were duly addressed and closed | 8 | 0 | All complaints were duly addressed and closed |
| Value Chain Partners | Yes | - | - | - | - | - | - |
| Other (please specify) | - | - | - | - | - | - | - |
| Web link | http://www.thirumalaichemicals.com/pdf/STAKEHOLDER%20GRIEVANCE%20REDRESSAL%20POLICY.pdf#toolbar=0 | | | | | | |

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

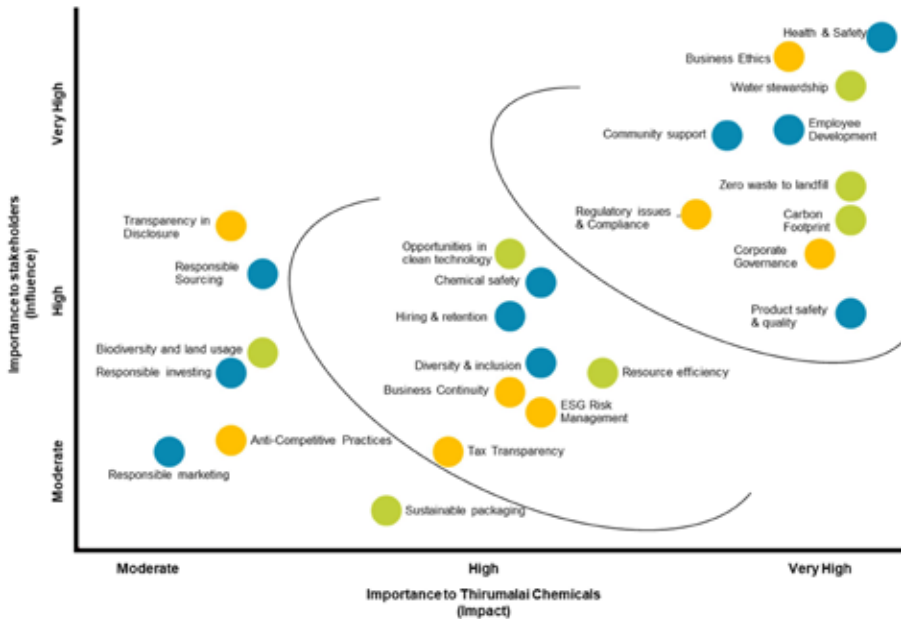
| S. No. | Material identified issue | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|--|---|---|--|
| 1 | Health & Safety | R | As a chemical manufacturing industry, health and safety is very crucial and is an integral part of our organisation to ensure safe workplace. We strive to maintain our working environment as accident-free zone i.e., zero safety accidents, zero injuries and zero incidents that cause harm to the workforce and environment. | TCL has an excellent safety culture and a robust reporting system built on involvement at all levels. We provide periodic safety trainings to promote employee wellbeing and to ensure safety at the workplace. | Negative |
| 2 | Business Ethics | R | Ethical practices are the core principle of our business. The company's code of conduct clearly states the necessary compliance requirements and guidelines for internal stakeholders to perform the duties with highest standard of integrity and accountability. | TCL has stringent policies for ethical practices in place. Our code of conduct and ethics policies provides framework for employees and internal stakeholders and trainings are provided for the same. | Negative |
| 3 | Water Stewardship | O | Energy & water conservation has become deeply embedded in the DNA of the organization. TCL is committed to conduct business in a sustainable and environment friendly manner. | Our company has a strong focus on the reduction of water consumption. Employee engagement at all levels is encouraged and various improvement initiatives are continuously implemented for reduced water usage. | Positive |
| 4 | Employee Development | O | One of the key elements of sustainability is a well-trained and highly motivated workforce. TCL is recognized for the quality of its training & development processes, and for of its people - their motivation, their enthusiasm & eagerness to improve, and perform better. | The upskilling of workforce enables the organisation to create long term value. We encourage our employees to pursue skill development programmes at our company. | Positive |
| 5 | Community Support | O | TCL constantly work towards development of local communities. We provide training programmes to the local youth to improve the employment rate and involved with various charitable organisations for providing affordable healthcare and education. | The training and development programmes of the company for young persons is well received from rural communities and towns. A majority of the employees of the company joined the Company as young trainees. This programme is now being further extended to training local youth to become good craftsmen and technicians in an effort to generate more employment in these communities. | Positive |



| S. No. | Material identified issue | 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) |
|--------|--------------------------------|--|---|--|--|
| 6 | Zero Waste to Landfill | O | TCL implemented various measures for proper handling and disposal of waste. We focus on capturing and synthesizing valuable products from our waste streams, gaseous liquids & solids. Over 85% of solid wastes are recovered as highly pure saleable products & by-products. | Focussed R&D efforts is continuously taken for conversion of wastes to usable and sealable products. | Negative |
| 7 | Carbon Footprint | R | TCL is committed to combat climate change by improving energy efficiency and the use of renewable energy to reduce the carbon footprint. Our manufacturing process is one of the most efficient in the industry. Our Specific Energy (power and heat) consumption in the last three decades has reduced by 78%. | To achieve near zero energy footprint, TCL has a three-pronged energy savings approach. We recover energy from waste heat, we use energy efficiently, and we encourage innovation by employees. | Negative |
| 8 | Corporate Governance | R | The Company's Board of Directors decides the policies and strategy of the Company and has the overall superintendence and control over the management of the Company. The Board and its committees review implementation of these policies, and assists the executive management team as needed. They also ensure that good governance and risk management policies and practices, and efficient business processes are implemented rigorously. | Compliance with progressive social norms and with regulatory requirements is the necessary cost for doing business and essential for our sustainability. These are our values, and we constantly work with our employees so that the individuals and teams in the Company internalize them and work within this framework. This has given us a good reputation as an employer, business partner and a member of the community. The Board of the company and the Management team remain committed to this culture of integrity and transparency in the conduct of our business. | Negative |
| 9 | Regulatory Issues & Compliance | R | The policies and practices of TCL have always been ethical, compliant with laws and regulations and sustainable. We believe that it is possible to follow all those policies and also be competitive. | The company strictly adheres to the regulations and compliance requirements and imbibed them in the organisational culture and practices. There are adequate systems and process in place to monitor and ensure compliance with the applicable laws, rules, regulations and guidelines. | Negative |
| 10 | Product Safety & Quality | R | TCL gives paramount importance to ensure product safety and to deliver quality products for achieving customer delight. | We constantly communicate and receive feedback from the customers and work upon to fulfil their needs and requirements. | Negative |

Thirumalai Chemical's Materiality Matrix

● Social ● Governance ● Environment



ESG Focus Areas for Thirumalai Chemicals

Very High

1. Health & Safety
2. Business Ethics
3. Water Stewardship
4. Employee Development
5. Community Support
6. Zero Waste to Landfill
7. Carbon Footprint
8. Corporate Governance
9. Regulatory Issues & Compliance
10. Product Safety & Quality

High

11. Opportunities in Clean Technology
12. Chemical Safety
13. Hiring & Retention
14. Diversity & Inclusion
15. Business Continuity
16. Resource Efficiency
17. ESG Risk Management
18. Tax Transparency
19. Transparency in Disclosures

Medium

20. Responsible Sourcing
21. Biodiversity & Land usage
22. Responsible Investing
23. Anti-Competitive Practices
24. Sustainable Packaging
25. Responsible Marketing

SECTION B – MANAGEMENT AND PROCESS DISCLOSURES

This section aims to assist businesses in demonstrating the structures, policies and processes in place to adopt the NGRBC Principles and Core Elements. At Thirumalai Chemicals Limited, we have a robust management framework which enables us to align with the NGRBC Principles with respect to structure and policies for delivering our best services in an ethical, and responsible manner. This includes transparent and fair business practices that upholds our accountability and safeguards the needs of all our stakeholders, including customers and employees.

| | |
|-------------|---|
| Principle 1 | Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable |
| Principle 2 | Businesses should provide goods and services in a manner that is sustainable and safe |
| Principle 3 | Businesses should respect and promote the well-being of all employees, including those in their value chains |
| Principle 4 | Businesses should respect the interests of and be responsive to all its stakeholders |
| Principle 5 | Businesses should respect and promote human rights |
| Principle 6 | Businesses should respect and make efforts to protect and restore the environment |
| Principle 7 | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |
| Principle 8 | Businesses should promote inclusive growth and equitable development |
| Principle 9 | Businesses should engage with and provide value to their consumers in a responsible manner |

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|---|----|----|----|----|----|----|----|----|
| Policy and Management Disclosures | | | | | | | | | |
| 1. a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/ No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| b) Has the policy been approved by the Board? (Yes/ No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| c) Web Link of the Policies, if available | http://www.thirumalaichemicals.com/Policies.html | | | | | | | | |
| 2. Whether the entity has translated the policy into procedures. (Yes / No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | All the policies of the Company are in compliance with national /international standards wherever applicable. TCL is a FSSC 22000 (equivalent to GFSI), HACCP, Halal & Kosher Certified, ISO 9001, ISO 9004, ISO 14001 & ISO 50001 compliant, SMETA and a Responsible Care Company. | | | | | | | | |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any. | The company is in the process of comprehensively evaluating and setting targets/goals across its key ESG focus areas with a definitive timeline. | | | | | | | | |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | Performance against such targets/goals to be assessed post finalisation of targets and timelines determined. | | | | | | | | |
| Governance Leadership and Oversight | | | | | | | | | |
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) Please refer page 2 | | | | | | | | | |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | Name: Mrs. Ramya Bharathram DIN No. 06367352 Designation: Managing Director and CFO e-mail id mail@thirumalaichemicals.com | | | | | | | | |
| 9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details. | Yes, refer point 8 for the details. | | | | | | | | |
| Policy and management processes | | | | | | | | | |



| 10. Details of Review of NGRBCs by the Company: | | | | | | | | | | | | | | | | | | |
|--|--|----|----|----|----|----|----|----|----|--|----|----|----|----|----|----|----|----|
| Subject for Review | Indicate whether review was undertaken 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 | Y | Y | Y | Y | Y | Y | Y | Y | Y | A | A | A | A | A | Q | A | A | H |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | Y | Y | Y | Y | Y | Y | Y | Y | Y | A | A | A | A | A | Q | A | A | H |

| 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 |
|---|----|----|----|----|----|----|----|----|----|
| | N | N | N | N | N | N | N | N | N |

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) | <i>Not Applicable</i> | | | | | | | | |
| 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

The Company acts with integrity in accordance with its core principles of Trust, Value and Service. TCL has adopted a separate Code of Conduct and Ethics which specifically pertains to the Company's Directors and the senior management personnel one level below the Board, including all the functional heads. The Code of Conduct and Ethics is devised to enable the Directors and the senior management personnel to strive to perform their duties with highest standards of integrity, accountability, confidentiality and independence.



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 | 2 | Familiarisation Programs for Directors Awareness program on Sustainability | 100% |
| Key managerial personnel | 2 | ESG Compliance, POSH | 100% |
| Employees other than Body and KMPs | 42 | Awareness on Employee Well-being. Awareness on Human Rights | Employee Well-being- (41-50 years) 41% (31-40 years) - 23% (20-30 years) 15 % Awareness on Human Rights (41-50 years) 39% (31-40 years) - 27% (20-30 years) 21 % |
| 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 |
| Workers | 10 | Awareness on Employee Well-being. Awareness on Human Rights | Employee Well being (41-50 years) 32% (51-55 years) - 26% Employee Well-being (41-50 years) 29% (51-55 years) - 40% |

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

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



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

| Case Details | Name of the regulatory/ enforcement agencies/ judicial institutions |
|--------------|---|
| Nil | Nil |

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

Yes, we have a detailed anti-corruption and anti-bribery policy which highlights our stance on bribery and corruption practices and its consequences in case of non-compliance.

The anti-corruption and anti-bribery policy is available on our website in the following link : <http://www.thirumalaichemicals.com/pdf/ANTI-BRIBERY%20AND%20ANTI-CORRUPTION%20POLICY.pdf#toolbar=0> and serves as a guiding document for our workforce.

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 |

There have been no complaints against our BOD, KMPs, Employees and Workers.

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

| | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| 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 the 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.

TCL endeavours to go beyond the legal compliance requirements and implemented necessary policies and procedures supporting responsible business practices.

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 | % of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|--|---|
| 4 | Safety Protocols | Contract employees, logistics and visiting vendors- 100% |
| | Material Handling & Loading | Logistics-100% |
| | Prevention of Sexual Harassment | Contract employees-30% |
| | Product responsibility | 57% of critical vendors |

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. TCL has a well-defined Conflict of Interest Policy which has clear guidelines provided to deal with conflict of interests .

Principle 2 – Businesses should provide goods and services in a manner that is sustainable and safe.

TCL's commitment to sustainability is reflected through the dedicated R&D team focusing on creating innovative products meeting global standards and are environment friendly. TCL demonstrates business excellence for making our energy footprint near zero by manufacturing in highly efficient manner through energy efficiency measures and waste heat recovery. Moreover, the Company endeavours to embed the principles of sustainability into the various stages of product life cycle, including procurement of raw material / service, manufacturing of product or delivery of service, transportation of raw materials and finished goods, and disposal by consumer.

SDG Linkages-



Essential Indicators

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

| | FY 23 (Current financial year) | FY 22 (Previous financial year) | Details of improvements in environmental and social impacts |
|-------|--|---------------------------------|---|
| R&D | To be updated post the declaration of the Financial Results. | - | - |
| Capex | To be updated post the declaration of the Financial Results. | 18% | Better anaerobic treatment reducing energy and ETP Chemical consumption that reduces hazardous waste to environment |

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

Yes. Responsible Care Guidelines and SEDEX Members Ethical Trade Audit (SMETA) Best Practice Guidance have been adopted by the Company to ensure for sustainable sourcing. Company sources its raw material in bulk, thereby avoiding road transportation over long distances which reduces the carbon footprint.

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

13.43%. (Only Tier 1 vendor were assessed in the current financial year. We expect to increase our coverage in the forthcoming years)

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.

| Waste type | Waste management procedure in place |
|---|---|
| Plastic (including packaging) | All Packaging materials and other plastics are disposed to authorised pre-processors |
| E-waste | All E-Waste are collected and disposed to TNPCB authorised recyclers |
| Hazardous waste | All Hazardous Waste are disposed as per the requirements of Hazardous and other waste management and transboundary rules 2016 |
| Other waste (wastepaper and paper products) | Other wastes are sent to the authorized waste disposal agency. |



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 EPR plan submitted to Pollution Control Boards?

EPR is applicable. TCL has registered as a brand owner with the Central Pollution Control Board.

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 | Results communicated in public domain | If yes, provide the web-link. |
|----------|---------------------------|---------------------------------|--|--|---------------------------------------|---|
| 2411 | Phthalic Anhydride | 100 | Life Cycle perspective is covered under the title "Product Stewardship". The product stewardship summary is provided in the public domain. The summary covers 1. Properties 2. Health & safety information 3. Environmental information, which includes biodegradability, exposure potential during manufacture, handling and Use, and 4. Regulatory Information | The data are obtained from the dossier submitted by the lead registrant representing the Consortium of manufacturers of the product to EU registration Agency (ECHA) as a statutory requirement under the EU law named REACH. TCL is a member of the consortium and owns the right of the data. | Yes | http://www.thirumalaichemicals.com/pdf/Proudct%20Stewardship%20Summary%20-%20PAN.pdf |
| | Malic acid | | | | | |
| | Fumaric acid | | | | | |

Note: The above Life cycle assessment has been conducted from the perspective of REACH (EU) and not a cradle to grave analysis. TCL is in the process of evaluating conducting full scale LCA for its products the coming years.

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 |
|--|-----------------------------------|--------------|
| These parameters have been outlined in Material Safety Data Sheet (SDS) in the products tab in our website. http://www.thirumalaichemicals.com/Products | | |

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

| Indicate input material | Recycled or re-used input material to total material | |
|--|--|------------------------------------|
| | FY 23 (Current financial year) | FY 22 (Previous financial year) |
| Our products are chemicals such phthalic anhydride, malic acid and fumaric acid. While usage of recycle materials could be limited, we are in process of tracking and increasing the reuse of our packaging materials. | | |

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:

| Waste Details | FY 23 (Current financial year) | | | FY 22 (Previous financial year) | | |
|--------------------------------|--------------------------------|-----------|------------------|---------------------------------|----------|-----------------|
| | REUSED | Recycled* | Safely disposed# | REUSED | Recycled | Safely disposed |
| Plastics (including packaging) | NA | NA | | NA | NA | |
| E-waste | NA | NA | 0 | NA | NA | 0 |
| Hazardous waste | NA | NA | 5198.7 | NA | NA | 118.2 |
| Other waste | NA | NA | 51 | NA | NA | |

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 |
|---------------------------|---|
| Packaging material | 7% |

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

TCL gives utmost importance to maintain a positive and healthy workforce as it is the driving force for the success of any organisation. To achieve this, the company has deployed multiple training and engagement programmes towards safe and effective work culture. The company has in place policies and procedures to support diversity, equal opportunity and has zero tolerance for any kind of workplace harassment, bullying, or intimidation, including sexual, physical, verbal, and psychological abuse.





Essential Indicators

1. a. Details of measures for the well-being 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 | 447 | 447 | 100% | 447 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 41 | 41 | 100% | 41 | 100% | 2 | 4.88 | 0 | 0 | 0 | 0 |
| Total | 488 | 488 | 100% | 488 | 100% | 2 | 0.41 | 0 | 0 | 0 | 0 |
| Other than Permanent employees | | | | | | | | | | | |
| Male | 21 | 21 | 100% | 21 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 3 | 3 | 100% | 3 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 24 | 24 | 100% | 24 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |

b. Details of measures for the well-being 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 | 31 | 31 | 100% | 31 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 31 | 31 | 100% | 31 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Other than Permanent workers | | | | | | | | | | | |
| Male | 446 | 446 | 100% | 446 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 49 | 49 | 100% | 49 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 495 | 495 | 100% | 495 | 100% | 0 | 0 | 0 | 0 | 0 | 0 |

2. Details of Retirement Benefits

| Benefits | FY 2022-23 | | | FY 2021-22 | | |
|-------------------------|--|--|--|--|--|--|
| | 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 | 100 | 100% | Y | 100 | 100 | Y |
| Gratuity | 100 | 100% | Y | 100 | 100 | Y |
| ESI | 100 | 100% | Y | 100 | 100 | Y |
| Others – please specify | - | - | - | - | - | - |

3. Accessibility of workplaces

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

Accessibility of workplace is currently not available in some of the locations for differently abled employees and workers. The Company is in the process of assessing the requirements and intends to provide them in future with suitable modifications/ constructions compliant with safety regulations and emergency response.

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. Please find our weblink below:

<http://www.thirumalaichemicals.com/pdf/EQUAL%20EMPLOYMENT%20OPPORTUNITY%20POLICY.pdf#toolbar=0>

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 | NA | NA | NA | NA |
| Female | 100% | 100% | NA | NA |
| Total | 100% | 100% | NA | NA |

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.

| | (If yes, then give details of the mechanism in brief) |
|--------------------------------|---|
| Permanent workers | Grievance Redressal Policy in place. Registration of grievance is through Phone number or e-mail ID available in the company's website. |
| Other than permanent workers | |
| Permanent employees | |
| Other than permanent employees | |

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

| Category | FY 2022-23 | | | FY 2021-22 | | |
|------------------|--|---|---------|---|---|---------|
| | Total employees / workers in respective category (A) | No. of employees/ workers in the respective category, who are part of the association(s) or Union (B) | % (B/A) | Total employees/ workers in the respective category (C) | No. of employees/ workers in the respective category, who are part of the association(s) or Union (D) | % (D/C) |
| Employees | | | | | | |
| Male | 447 | 0 | 0% | 436 | 0 | 0% |
| Female | 41 | 0 | 0% | 33 | 0 | 0% |
| Total | 488 | 0 | 0% | 469 | 0 | 0% |
| Workers | | | | | | |
| Male | 31 | 0 | 0% | 34 | 0 | 0% |
| Female | 0 | 0 | | 0 | 0 | |
| Total | 31 | 0 | 0% | 34 | 0 | 0% |

8. Details of training given to employees and workers:

| Category | FY 2022-23 | | | | | FY 2021-22 | | | | |
|----------------------------|------------|-------------------------------|-----------|----------------------|-----------|------------|-------------------------------|-----------|----------------------|-----------|
| | 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) |
| Permanent Employees | | | | | | | | | | |
| Male | 447 | 233 | 52% | 264 | 57% | 436 | 39 | 9% | 207 | 47% |
| Female | 41 | 18 | 44% | 18 | 44% | 33 | 8 | 23% | 18 | 51% |
| Total | 488 | 251 | 52% | 282 | 58% | 469 | 47 | 10% | 225 | 47% |
| Permanent Workers | | | | | | | | | | |
| Male | 31 | 12 | 39% | 21 | 67% | 34 | 11 | 32% | 18 | 53% |
| Female | 0 | 0 | - | 0 | - | 0 | 0 | - | 0 | - |
| Total | 31 | 12 | 39% | 21 | 67% | 34 | 11 | 32% | 18 | 53% |

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

| Category | FY 2022-23 | | | FY 2021-22 | | |
|----------------------------|------------|---------|-----------|------------|---------|-----------|
| | Total (A) | No. (B) | % (B / A) | Total (C) | No. (D) | % (D / C) |
| Permanent Employees | | | | | | |
| Male | 447 | 275 | 62% | 436 | 250 | 57% |
| Female | 41 | 28 | 68% | 33 | 18 | 47% |
| Total | 488 | 303 | 62% | 469 | 268 | 57% |
| Permanent Workers | | | | | | |
| Male | 31 | 31 | 100% | 34 | 34 | 100% |
| Female | 0 | 0 | - | 0 | 0 | - |
| Total | 31 | 31 | 100% | 34 | 34 | 100% |

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

Yes, TCL places the highest importance on the health, safety, and happiness of its employees. In order to provide a safe and incident-free workplace, we have put into place stringent rules and protocols.

All employees, contract labours, vendors visiting the facility are covered under the Safety systems of the organization. 4 sites are certified under ISO 45001 which specifies requirements for Occupational Health and Safety management systems.

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

- Hazard Identification and Risk Assessment (HIRA)
- Job Safety Analysis
- Workpermit system
- Internal and external audits are carried out to identify work-related hazards and assess risks on a routine and non-routine basis by the entity.

c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks.

Yes, Safety portal is available for reporting any work-related hazards identified by the workers.

d. Do the employees/ workers of the entity have access to non-occupational medical and healthcare services?

Yes, Non occupational medical and Healthcare services is made available to workers and employees

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

| Safety incident/number | Category | FY 2022-23 | FY 2021-22 |
|--|------------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one-million-person hour worked) | Employees* | 0 | 0 |
| | Workers | 0 | 0 |
| Total recordable work-related injuries | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | Workers | 0 | 0 |

Note:

*Employee data includes the FTE including workmen and contract employees.

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

- EHS Awareness to all employees through training.
- Safety toolbox talk
- Safety Park models for training
- Employee's tree plantation programs
- Environment Day celebrations
- Safety week celebrations
- Safe work practices
- Rewards and recognition of best practices
- Cross-functional safety audits
- Yearly third-party safety audit electrical safety audit
- Process Safety Management (PSM) implementation
- Job Safety Analysis (JSA) for all activity
- Hazard Identification and Risk Assessment (HIRA) for all operations
- Hazard and operability study HAZOP all modifications
- Number of complaints on the following made by employees and workers

| | FY 2022-23 | | | FY 2021-22 | | |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working conditions | 0 | 0 | - | 0 | 0 | - |
| Health & safety | 0 | 0 | - | 0 | 0 | - |

14. Assessments for the year

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

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

There are no critical observations generated from Health Safety, working conditions assessments by the entity, authorities or third parties impacting operations.

Leadership Indicators
1. 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).

Employee-Yes

Workers- Yes

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

The Company has safeguards and checks and balances in place to determine if the statutory dues have been deducted and deposited with respect of value chain partners to the extent applicable.

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

| | 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 | |
|-----------|---|------------------------------------|---|------------------------------------|
| | FY 23 (Current financial year) | FY 22 (Previous financial year) | FY 23 (Current f inancial year) | FY 22 (Previous financial year) |
| Employees | 0 | 0 | 0 | 0 |
| Workers | 0 | 0 | 0 | 0 |

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

No.

5. Details on assessment of value chain partner:

| Details on assessment of value chain partners: | % of value chain partners (by value of business done with such partners) that were assessed |
|--|---|
| Health and safety practices | 93%* |
| Working Conditions | 90%* |

*Note: The above assessment has been only extended to our Tier 1 suppliers.

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.

None

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

At TCL, stakeholder participation is a critical component of our business processes. We strive to provide long-term, sustainable value to all of our stakeholders, encompassing our team members, clients, investors, suppliers, and communities. To accomplish this, the Company has mapped its internal and external stakeholders and regularly communicates with the stakeholders in order to understand their expectations and requirements. To generate more employment in the communities we operate in, TCL provides training and development programmes for local youth. Moreover, TCL works alongside with various charitable organizations to fulfil its corporate social responsibility through which we engage in development of marginalised and disadvantaged group of the local communities by providing affordable and quality healthcare and education.

SDG Linkages-

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

Any individual or group of individuals or institutions that adds value to the business chain of the corporation or is materially affected by entity's decision is identified as a core stakeholder. Currently, TCL has mapped its internal and external stakeholders in a structured way and carries out engagements with investors, employees, customers, suppliers, government, regulatory authorities, trade union and local community. The Company follows a system of timely feedback and response through formal and informal channels of communication to ensure that the stakeholder information remains current and updated.

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

| Stakeholder group | Whether identified as vulnerable & marginalised group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community meetings, Notice board, Website), Other | Frequency of engagement (Annually/ half-yearly/ quarterly / others – please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|--------------------------|--|---|--|--|
| Employees | No | <ul style="list-style-type: none"> Intranet Portal Functional and cross-functional committees Leader's talk Regular Employee Communication Forums | On a regular basis | <ul style="list-style-type: none"> Employee benefits Equal opportunities Recognition Learning and development Safety and well-being Performance review and career development Business update |
| Customers | No | <ul style="list-style-type: none"> Customer Service Support Customer Satisfaction Survey | On a regular basis | <ul style="list-style-type: none"> Customer feedback Resolution of their queries |
| Suppliers and Vendors | No | <ul style="list-style-type: none"> Supplier and Vendor meets Face-to-face and electronic correspondence Supplier Audits | Annually | <ul style="list-style-type: none"> Resolving queries Assessing performance Recognition and engagement activities Undertaking discussion on Sustainability Parameters |
| Investors / Shareholders | No | Email, newspaper advertisement, website, Annual General Meetings, disclosures to stock exchanges. | Need based | To update them about important developments in the Company and address their grievances |

| | | | | |
|----------------------------------|-----|---|-----------------|--|
| Community | Yes | <ul style="list-style-type: none"> • Community surveys and consultations • CSR initiatives • Volunteering activities • Community events | Monthly | <ul style="list-style-type: none"> • Community development • Community grievance redressal |
| Regulatory and government bodies | No | <ul style="list-style-type: none"> • Annual reports • Making representations whenever needed • Formal dialogues | On a need basis | <ul style="list-style-type: none"> • Policy Advocacy with concerned authorities • Deliberations and inputs on regulations and policies that have bearing on our operations and businesses • Amendment in existing regulations |

Leadership Indicators

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

Our consultation is driven by our stakeholder engagement policy that has clear guidelines on our approach to stakeholder consultation. Further any critical topics/ issues are communicated

Weblink: <http://www.thirumalaichemicals.com/pdf/STAKEHOLDER%20ENGAGEMENT%20POLICY.pdf#toolbar=0>

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 the policies and activities of the entity.

Yes, stakeholder consultation is used for identification of environmental and social topics. No critical issues concerning environmental, and social topics were raised in the current reporting period.

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

While we engage with vulnerable/ marginalised stakeholder groups regularly through our various initiatives around CSR, we actively seek concerns during the process. No concerns were recorded in the reporting period.

Principle 5: Businesses should respect and promote human rights

TCL is committed to respect and promote human rights of all stakeholders and ensures there is no violation while conducting business. The Company policies support, respect and protect the human rights of its direct as well as indirect Stakeholders. The Company is compliant with national regulations pertaining to human rights covering a host of aspects including non-discrimination, gender equality, freedom of association, collective bargaining, avoidance of child and forced labour among others. TCL has put in place a Code of Conduct which is applicable to all the employees to adhere and uphold the standards contained therein.

SDG Linkages-



Essential Indicators

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

| Category | FY 2022-23 | | | FY 2021-22 | | |
|----------------------|--|--|-----------|------------|--|-----------|
| | Total (A) | No. of employees / workers covered (B) | % (B / A) | Total (C) | No. of employees / workers covered (D) | % (D / C) |
| Employees | | | | | | |
| Permanent | 488 | 290 | 59% | 469 | 299 | 64% |
| Other than permanent | 24 | 18 | 76% | 35 | 25 | 71% |
| Total employees | 512 | 308 | 60% | 504 | 324 | 64% |
| Workers | | | | | | |
| Permanent | 31 | 31 | 100% | 34 | 34 | 100% |
| Other than permanent | Aspects of Human rights forms part of our business contract and all our contract work adhere to firm's policies and guidelines regarding Human rights. | | | | | |
| Total workers | 31 | 31 | 100% | 34 | 34 | 100% |

2. Details of minimum wages paid to employees and workers

| Category | FY 2022-23 | | | | | FY 2021-22 | | | | |
|----------------------|------------|-----------------------|-----------|------------------------|-----------|------------|-----------------------|-----------|------------------------|-----------|
| | 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 | 488 | 68 | 14% | 420 | 86% | 488 | 63 | 13% | 425 | 87% |
| Other than permanent | 24 | 1 | 4.2% | 24 | 100% | 35 | 0 | 0 | 35 | 100% |
| Total employees | 512 | 69 | 13.5% | 444 | 88% | 523 | 63 | 12% | 460 | 88% |
| Workers | | | | | | | | | | |
| Permanent | 31 | 0 | 0 | 31 | 100% | 32 | 0 | 0 | 32 | 100% |
| Other than permanent | 494 | 494 | 100% | 0 | 0 | 410 | 410 | 100% | 0 | 0 |
| Total workers | 525 | 525 | 100% | 31 | 6% | 442 | 410 | 93% | 32 | 7% |

3. Details of remuneration/salary/wage

| | Male | | Female | |
|----------------------------------|--------|---|--------|---|
| | Number | Median remuneration/ salary/ wages of respective category (₹) | Number | Median remuneration/ salary/ wages of respective category (₹) |
| Board of Directors (BoD) | 8 | 2,68,52,500 | 2 | 1,63,25,000 |
| Key managerial personnel | 2 | 2,86,50,000 | 1 | 3,16,00,000 |
| Employees other than BoD and KMP | 430 | 35,000 | 33 | 45,309 |
| Workers | 31 | 36,420 | 0 | 0 |

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 human rights aspects are taken care by the Head HR. Any grievance raised in this regard is addressed by Head HR.

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

There are various channels of communicating grievances including by email or over phone. There are suggestion boxes available which are also meant to air grievances by employees and workers. Further, there is a designated system/process of hierarchy within the Company to communicate grievance right from the designated Human rights officer, factory manager, Site head and CEO & Managing Director.

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

| | FY 2022-23 | | | FY 2021-22 | | |
|-----------------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | 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 | Nil | - | - | Nil | - | - |
| Discrimination at workplace | Nil | - | - | Nil | - | - |
| Child labour | Nil | - | - | Nil | - | - |
| Forced labour/Involuntary labour | Nil | - | - | Nil | - | - |
| Wages | Nil | - | - | Nil | - | - |
| Other human rights-related issues | Nil | - | - | Nil | - | - |

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

TCL is committed to maintaining a safe and productive workplace free from any discrimination or harassment. A trained Internal Complaints Committee has been constituted for timely and impartial resolution of any complaints that may arise in this regard. Also, TCL has a well-defined POSH policy to address discrimination and harassment at workplace. - Weblink: <http://www.thirumalaichemicals.com/pdf/POSH%20POLICY.pdf#toolbar=0>

Further to this, there is also a Stakeholder Grievance Redressal policy for resolution of all grievances raised by the stakeholders,

Weblink: <http://www.thirumalaichemicals.com/pdf/STAKEHOLDER%20GRIEVANCE%20REDRESSAL%20POLICY.pdf#toolbar=0>

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

The Company has a clear mechanism to address human rights requirements which are evidenced by the Company's code of conduct, employment and hiring policies, supplier code of conduct in place. TCL has a Business and Human Rights policy in place to outline the procedures and action that the organization will undertake in case of any human rights violation.

Weblink provided <http://www.thirumalaichemicals.com/pdf/BUSINESS%20AND%20HUMAN%20RIGHTS%20POLICY.pdf#toolbar=0>

9. Assessments of the year

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

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

Nil

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

Nil

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

No due diligence have been conducted

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?

No

4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed | | |
|----------------------------------|---|---|---|
| Sexual Harassment | - | - | - |
| Discrimination at workplace | - | - | - |
| Child Labour | - | - | - |
| Forced Labour/Involuntary Labour | - | - | - |
| Wages | - | - | - |
| Others – please specify | - | - | - |

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

Nil

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

At TCL as per our EQHS Policy, we commit ourselves to operate our Plants and facilities with the utmost care to minimize our impact on the Environment and on the Health and Safety of our employees, the community and our customers. We have committed to combat climate change by improving energy efficiency and use of renewable energy.

SDG Linkages-


Essential Indicators
1. Details of total energy consumption (in Giga Joules (GJ)) and energy intensity

| Parameter | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Total electricity consumption (A) GJ | 19713 | 15042 |
| Total fuel consumption (B) GJ | 731195 | 442554 |
| Energy consumption through other sources (Renewables) (C) GJ | 53883 | 34181 |
| Total energy consumption (A+B+C) GJ | 804791 | 491777 |
| Energy intensity per rupee of turnover GJ/ Lakhs Rupees (Total energy consumption/ turnover in rupees) | 438.58 | 341.96 |

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 assessment by external agency has been conducted in the current reporting year.

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.

Not applicable.

There are no sites/facilities that have been identified as Designated Consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

| Parameter | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | 0 | 0 |
| (ii) Groundwater | 0 | 0 |
| (iii) Third-party water (municipal water supplies) | 528746 | 522326 |
| (iv) Seawater / desalinated water | 0 | 0 |
| (v) Others | 0 | 0 |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 528746 | 522326 |
| Water intensity per rupee of turnover (water consumed / turnover) KL/ Lakhs INR | 2.9 | 3.6 |

4. Has the entity implemented a mechanism for zero liquid discharge? If yes, provide details of its coverage and implementation.

TCL has been 100% Zero Liquid Discharge since 2001. ZLD was audited and certified by IIT Madras in 2021 for adequacy.

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

| Parameter | Unit | FY 2022-23 | FY 2021-22 |
|-------------------------------------|--------------------------|------------|------------|
| NOx | Microgram/m ³ | 50 | 50 |
| SOx | Microgram/m ³ | 80 | 80 |
| Particulate matter (PM) | Microgram/m ³ | 45 | 45 |
| Persistent organic pollutants (POP) | - | - | - |
| Volatile organic compounds (VOC) | Microgram/m ³ | 12 | 12 |
| Hazardous air pollutants (HAP) | - | - | - |

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) and its intensity:

| Parameter | Unit | FY 2022-23* | FY 2021-22 |
|---|---|-------------|------------|
| 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 | 119683 | 98630 |
| 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 | 4395 | 3250 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | Metric tonnes of CO ₂ equivalent/ Cr. Rupees Turnover of TCL | 68 | 71 |

7. Does the entity have any project related to reducing greenhouse gas emission? If Yes, then provide details.

For FY 23 we have not developed any project to reduce Green House Gases, however we are in plans to increase the usage of renewable energy to reduce our emission intensity.

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

| Parameter | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| Total waste generated (in metric tonnes) | | |
| Plastic waste (A) | 50 | 25.16 |
| E-waste (B) | 0.4 | 0.45 |
| Bio-medical waste (C) | 0 | 0 |
| 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) | 5148 | 118.43 |

| Parameter | FY 2022-23 | FY 2021-22 |
|---|------------|------------|
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) | 51 | 0 |
| Total (A+B + C + D + E + F + G + H) | 5249.4 | 144.04 |
| 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 | N/A | N/A |
| (ii) Re-used | N/A | N/A |
| (iii) Other recovery operations | N/A | N/A |
| Total | N/A | N/A |
| For each category of waste generated, total waste disposed of by nature of disposal method (in metric tonnes) | | |
| Category of waste | | |
| | 0 | 0 |
| (i) Incineration | 2.2 | 11 |
| (ii) Landfilling | 72 | 108 |
| (iii) Other disposal operations | 5174 | 25 |
| Total | 5248.2 | 144 |

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

1. The Unit is ZLD from 2006 onwards. All the waste waters generated in the unit is treated and recycled back into the system.
2. The HW generated in the unit is stored and disposed as per the Hazardous Waste Management, Handling and Transboundary rules 2016.
3. The Scrubber Solution which is a PA Plant effluent is collected and used as a raw material for the manufacture of Fumaric Acid (Wealth from Wastes). The emissions from the Scrubber and Thermic Fluid Heater systems are connected online and monitored on a 24 X 7 basis. These emissions are also monitored by TNPCB and CPCB. E-Waste generated in the unit is disposed to TNPCB authorised E-Waste recyclers on a regular basis.

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:

| Sr. No. | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|--|--------------------------------|--------------------|---|
| No Operations in these areas. All operations in SIPCOT and GIDC complexes earmarked for industry with valid EIA and EC's | | | |

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 |
|---|----------------------|------|---|--|-------------------|
| CTE Application for D2 Expansion Project in Dahej | | | | | |

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 there under (Y/N). If not, provide details of all such non-compliances:

| Sr. 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 |
|-----------------|---|---------------------------------------|---|---------------------------------|
| Fully compliant | | | | |

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:

| | Unit | FY23 | FY22 |
|--|------|--------|--------|
| From renewable sources | | | |
| Total electricity consumption (A) | GJ | 53883 | 34181 |
| Total fuel consumption (B) | GJ | - | - |
| Energy consumption through other sources (C) | GJ | - | - |
| Total energy consumed from renewable sources (A+B+C) | GJ | 53883 | 34181 |
| From non-renewable sources | | | |
| Total electricity consumption (D) | GJ | 19713 | 15042 |
| Total fuel consumption (E) | GJ | 731195 | 442554 |
| Energy consumption through other sources (F) | GJ | - | - |
| Total energy consumed from non-renewable sources (D+E+F) | GJ | 804791 | 491777 |

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 assessment by external agency has been conducted in the current reporting year.

2. Provide the following details related to water discharged:

| | FY23 | FY22 |
|---|------|------|
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) To Surface water | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (ii) To Groundwater | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (iii) To Seawater | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (iv) Sent to third-parties | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (v) Others | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| Total water discharged (in kilolitres) | | |

Zero Liquid discharge has been implemented across site

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 assessment by external agency has been conducted in the current reporting year



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: No plants are in water stressed areas

| | FY23 | FY22 |
|--|------|------|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | | |
| (ii) Groundwater | | |
| (iii) Third party water | | |
| (iv) Seawater / desalinated water | | |
| (v) Others | | |
| Total volume of water withdrawal (in kilolitres) | | |
| Total volume of water consumption (in kilolitres) | | |
| Water intensity per rupee of turnover (Water consumed / turnover) | | |
| Water intensity (optional) – the relevant metric may be selected by the entity | | |
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) Into Surface water | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (ii) Into Groundwater | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (iii) Into Seawater | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (iv) Sent to third-parties | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| (v) Others | | |
| No treatment | | |
| With treatment – please specify level of treatment | | |
| Total water discharged (in kilolitres) | | |

Not applicable

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 assessment by external agency has been conducted in the current reporting year.

4. Please provide details of total Scope 3 emissions & their intensity:

| Parameter | Unit | FY 2022-23 | FY 2021-22 |
|--|---------------------------------|------------|------------|
| Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | | |
| Total Scope 3 emissions per rupee of turnover | tCO2e/INR | | |
| Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity | - | | |

No assessment has been done in the current reporting period. We will be assessing our value chain in the next financial year.

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 assessment by external agency has been conducted in the current reporting year



5. With respect to the ecologically sensitive areas reported at 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.

No ecologically sensitive areas around the unit

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

| S.No | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|------|-------------------------------|---|---------------------------|
| | Zero Liquid Discharge Process | http://www.thirumalaichemicals.com/environment.html | 0.57 Cr. / Year Savings |

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

Emergency Preparedness Plan has the following Scope and readiness

EMERGENCY PREPAREDNESS AND RESPONSE

This procedure covers the identification of potential accident and emergency situations and the response plan for them.

Responsibility: Head – Safety.

Reference: ISO 14001:2015 – Clause 8.2 – Emergency preparedness and response ISO 45001:2018 – Clause 8.2 - Emergency preparedness and response

Identification: The emergency situations are identified based on a detailed analysis of all the activities and products handled in this Organization and their environmental aspects and types of occurrences. The following incidents have been identified as potential emergency situations requiring an action plan

1. Major fire
 2. Release of inflammable liquid
 3. Explosion
 4. Natural Calamities
 5. Structural collapse / Bomb threat
 6. Uncontrolled leakage of hazardous chemicals
 7. Deluge of untreated effluent or of high-pressure steam.
- Hence, each one of them or a combination of them can be an emergency situation.

Applicability

The emergency situations may occur in any one of the following locations:

- ◆ Factory premises at SIPCOT, RANIPET
- ◆ Receiving terminal at Walaja Road Railway Station, Ammoor, and
- ◆ Storage Installation at Royapuram, Chennai, near Chennai Port

An emergency preparedness and contingency plan has been drawn for each of these three locations. These plans include all the actions identified to contain the situation. The Head – Safety in consultation with the Heads of Terminals and Heads of production, prepares the plans, which are checked and approved by the management representative. The action plans are available with Heads of terminals and Head Safety.

Testing: Periodic emergency preparedness and response drills are conducted without any prior notice by the Head – Safety with permission from Head- Works. The mock drills are conducted for each of the identified emergency situations and observations are recorded. The mock up drills are also conducted as tabletop drills for easy understanding and improvement.

Head- Safety keeps a schedule of the mock up drills for the field as well as for table top.

Review: The emergency preparedness and response plans are reviewed based on the observations recorded by Head – Safety during mock drills and actual emergency situations. Revisions are made if any gaps are identified.

Disaster recovery systems for SAP servers available and regular daily backup are taken.

Web Link: <http://www.thirumalaichemicals.com/pdf/BUSINESS%20CONTINUITY%20POLICY.pdf#toolbar=0>

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?

Not yet assessed

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

Followed as per our checklist

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

TCL is affiliated with several industry and trade associations and actively participate in these forums to enable the sharing of best practises, to represent industry concerns, and to assist in the implementation of measures to promote industry and larger community growth. We pursue our policy advocacy work by collaborating with various trade and industry associations, government bodies, as well as other comparable collective platforms, and we drive efforts to ensure policy advocacy positions support ethical business practices, environmental stewardship, social well-being, and respect for human rights.

SDG Linkages-



Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

TCL is affiliated to 5 trade and industry chambers and associations.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such a 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 | National |
| 2 | Indian Chemical Council | National |
| 3 | Chemical Industries Association | National |
| 4 | Indo American Chamber of Commerce | India, USA |
| 5 | Chemicals & Petrochemicals Manufacturers Association | 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 authority | Brief of the case | Corrective action taken |
|--|-------------------|-------------------------|
| No case was filed by any stakeholder against TCL regarding unfair trade practices, irresponsible advertising and anti-competitive behaviour during the financial year. | | |

Leadership Indicators

1. Details of public policy positions advocated by the entity:

| S. No. | Public policy advocated | Method resorted for such advocacy | Whether information available in the public domain? (Yes/No) | Frequency of review by board (Annually/ half yearly/ quarterly / others – please specify) | Web-link, if available |
|--------|--|--|--|---|------------------------|
| 1 | BIS Standards amendments and quality control Order for Phthalic anhydride (To regulate Carcinogenic Naphthalene based Phthalic anhydride use in India) | Constant interaction with department of Chemicals, GOI and letters from Industry Associations, Research Institutions | Yes | Business Review Committee -Quarterly | - |
| 2. | Administrative participation by company personnel in Chem Skill Development Centre (CSDC)-Established for training Chemical Engineering graduates. | Through Industry associations covering ~300 graduates every year including industrial training. | Yes | No board review | - |

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

TCL is actively engaged in upliftment of the communities and involved in implementing various development programmes for the benefit of marginalised and underprivileged sections. Our CSR policy covers wider areas of principal support like Education, Health, Women Empowerment and Community development services. Our dedicated CSR committee recommends the spending on approved CSR activities and monitors them to achieve impactful result,

SDG Linkages-



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 |
|-----------------------------------|----------------------|----------------------|---|--|-------------------|
| - | - | - | Not Applicable | - | - |

2. Provide information on the 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 ₹) |
|----------------|--|-------|----------|---|--------------------------|---------------------------------------|
| Not Applicable | | | | | | |

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

There is a Manual system in place for community to record grievances at main entrance gate of each of facilities

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

| | FY 2022-23 | FY 2021-22 |
|--|------------|------------|
| Directly sourced from MSMEs/ small producers | 74% | 61% |
| Sourced directly from within the district and neighbouring districts | 14% | 10% |

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 |
|--|-------------------------|
| Not Applicable | |

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

| Sr. No. | State | Aspirational District | Amount spent (In INR) |
|----------------|-------|-----------------------|-----------------------|
| Not Applicable | - | - | - |

(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No) -No,

our selection of suppliers is purely based on their reputation in the Market, recommendation from any of their business associates and our assessment of their technical ability.

(b) From which marginalized /vulnerable groups do you procure? - Not Applicable
(c) What percentage of total procurement (by value) does it constitute? - Not Applicable
4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Intellectual property is 100% owned by TCL and Subsidiaries. This has been developed inhouse.

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 |
|-------------------|-------------------|-------------------------|
| None | - | - |

6. Details of beneficiaries of CSR projects:

| Sr. No. | CSR Project | No. of persons benefitted from CSR Projects | % of beneficiaries from vulnerable and marginalized groups |
|---------|---|---|--|
| 1 | Thirumalai Charity Trust- Early detection, Monitoring and Control of Non- Communicable diseases | 22000 | 90% |
| 2 | Purchase, installation and commissioning of CT scan | 500 | - |
| 3 | Medical oxygen generator installed in two major government hospital | 12000 | - |

| Sr. No. | CSR Project | No. of persons benefitted from CSR Projects | % of beneficiaries from vulnerable and marginalized groups |
|---------|---|--|--|
| 4 | Starting an Educational Institution for Allied Health Sciences | Will be accounted in the next financial year | |
| 5 | Freedom Trust, Chennai (For providing beneficiaries with artificial limbs at HD Kote, Karnataka) | 52 | 100% |
| 6 | Bhuvana Foundation, Chennai (For donation under CSR for its School "Vidya Vanam" at Anaikatty, Coimbatore.) | 112 | 100% |
| 7 | South Central India Network for Development Alternatives (SCINDeA), Vellore (For a Project on RO based Water Purifier with 1 Year Comprehensive AMC Plan for Students of 1 Rural School & Renovation of a Toilet Block in 1 Rural School) | 430 | 100% |
| 8 | CHILD, Chennai (For their "PROJECT SHAKTHI" which is to ensure free access and distribution of sanitary napkins to girls and women who belong to the economically weaker section.) | 30000 | 100% |
| 9 | Sri Sathya Sai Health & Education trust, Chennai (To support them for surgeries of the children with congenital heart disease.) | 3 | - |

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

TCL is a customer centric company and works continuously to ensure customer satisfaction by providing quality products and services. The company gives prime importance to its customer and incorporates the customer feedback in a timely manner to enhance its customer experience and to achieve customer delight.

SDG Linkages-



Essential Indicators

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

Once the complaint is received, it is directed to the respective plant and cause of problems are identified & corrective action is shared with customer

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

| | As a % to total turnover |
|---|--------------------------|
| Environmental and social parameters relevant to the product | 100% |
| Safe and responsible usage | 100% |
| Recycling and/or safe disposal | None |

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

| | FY 2022-23 | | Remarks | FY 2021-22 | | Remarks |
|--------------------------------|-------------------------|-----------------------------------|----------------|--------------------------|-----------------------------------|---------|
| | Receive during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Data privacy | Nil | Nil | - | Nil | Nil | - |
| Advertising | Nil | Nil | - | Nil | Nil | - |
| Cyber-security | Nil | Nil | - | Nil | Nil | - |
| Delivery of essential services | Nil | Nil | - | Nil | Nil | - |
| Restrictive trade practices | Nil | Nil | - | Nil | Nil | - |
| Unfair trade practices | Nil | Nil | - | Nil | Nil | - |
| Other | 19 | 19 | Quality issues | Nil | 8 | 8 |

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

| | Number | Reasons for Recall |
|-------------------|--------|---------------------------------|
| Voluntary Recalls | 1 | Quality Standards were not met. |
| Forced Recalls | 0 | N/A |

5. Does the entity have a framework/policy on cyber security and risks related to data privacy? If available, provide a web link to the policy.

Yes- <http://www.thirumalaichemicals.com/pdf/CYBER%20SECURITY%20POLICY.pdf#toolbar=0>

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 the safety of products/services.

Not applicable

Leadership Indicators

- Channels/platforms where information on products and services of the entity can be accessed.**
TCL's services and information can be accessed through the website www.thirumalaichemicals.com.
- Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.**
The customers are provided the required process and product handling annexures for safe usage.
- Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**
In case of unavailability of products customers are kept duly informed.
- 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) -**
Yes, information such as product Name, Batch No. CAS No., Date of production, Date of Expiry, supplier details, bag net weight & gross weight, labelling instructions, hazard statements, & precautionary statements
- Provide the following information relating to data breaches:**
 - Number of instances of data breaches along-with impact.
TCL reported zero data breaches for FY 22-23
 - Percentage of data breaches involving personally identifiable information of customers.
TCL through its robust IT infrastructure ensures complete record of any data breach incidence. Since there were no data breaches during the reporting period, the question is not applicable for this year's reporting purpose.