Annexure E

Business Responsibility and Sustainability Report

I. Details of the listed entity

1	**Corporate Identity Number (CIN) of the listed entity**	L24100MH1972PLC016149
2	**Name of the listed entity**	THIRUMALAI CHEMICALS LIMITED
3	**Year of incorporation**	27/11/1972
4	**Registered office address**	Thirumalai House, Road No.29, Sion-East, Mumbai – 400022
5	**Corporate address**	Spic House, 5th Floor, 88, Mount Road, Guindy, Chennai – 600032
6	**E-mail**	aditya.s@thirumalaichemicals.com
7	**Telephone**	+91 22 2401 7841 / 53 / 61
8	**Website**	www.thirumalaichemicals.com
9	**Financial year for which reporting is being done**	1st April 2025 to 31st March 2026
10	**Name of the Stock Exchange(s) where shares are listed**	BSE Limited and National Stock Exchange of India Limited
11	**Paid-up Capital**	12,05,52,774
12	**Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report**	Aditya Sharma (Company Secretary & Compliance Officer) Tel: +91 22 2401 7841 / 53 / 61 aditya.s@thirumalaichemicals.com
13	**Reporting boundary**	Standalone
14	**Name of assurance provider**	The report is not assured by an external assurance provider
15	**Type of assurance obtained**	Not applicable

II. Products/services

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

S. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacture of petrochemicals (excluding fertilizers and nitrogen compounds)	Manufacturing, distribution, sales and marketing of petrochemicals except fertilizers and nitrogen compounds	100

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

S. No	Product/Service	NIC Code	% of total Turnover contributed
1	Phthalic Anhydride and Derivatives, Malic Acid, Fumaric Acid	20119	70.52

III. Operations

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

Location	Number of Plants	Number of Offices	Total
National	2	3	5

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	28
International (No. of Countries)	33

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

14.29%

c. A brief on types of customers

Thirumalai Chemicals Limited is a leading manufacturer of Phthalic Anhydride (PA), a versatile white crystalline compound that serves as a key raw material across multiple industrial sectors. The Company's customers primarily operate in industries such as plasticizers, resins, paints and coatings, pigments, dyes, construction materials, marine applications, transportation components, food and beverages, and pharmaceuticals.

In the plasticizer segment, PA is extensively used in the manufacture of phthalate plasticizers that enhance the flexibility and durability of plastics. These plastics are further utilized in applications including wire and cable insulation, hoses, pipes, coated fabrics, roofing membranes, and swimming pool liners.

TCL also caters to manufacturers of unsaturated polyester resins (UPR). When reinforced with glass fibers, UPR is converted into fiberglass-reinforced plastics, which are widely used in the construction, marine, and transportation sectors. Additionally, PA-based alkyd resins produced by TCL's customers are essential in the formulation of paints and lacquers for architectural, machinery, and furniture applications.The pigments and dyes industry in India constitutes another significant customer segment, with PA serving as a critical intermediate in production processes.

Beyond PA, TCL is the only manufacturer of Malic Acid in India, supplying to customers primarily in the food and beverage industry where it is used to provide sourness and flavor enhancement. The Company serves reputed global clients such as Perfetti and Symrise in this segment.

TCL also manufactures Fumaric Acid, which caters to customers in the food and pharmaceutical industries for diverse functional applications. Through its diversified product portfolio, TCL serves a broad base of industrial and consumer-focused customers across domestic and international markets.

IV. Employees

20. Details as at the end of Financial Year

a. Employees and workers (including differently abled):

No	Particulars	Total(A)	Male		Female	
			No(B)	%(B/A)	No(C)	%(C/A)
Employees						
1	Permanent (D)	457	414	90.59%	43	9.41%
2	Other than Permanent (E)	20	18	90.00%	2	10.00%
3	Total employees (D + E)	477	432	90.57%	45	9.43%
Workers						
1	Permanent (F)	21	21	100.00%	0	0.00%
2	Other than Permanent (G)	294	260	88.44%	34	11.56%
3	Total Workers (F + G)	315	281	89.21%	34	10.79%

b. Differently abled Employees and workers:

No	Particulars	Total(A)	Male		Female	
			No(B)	%(B/A)	No(C)	%(C/A)
Differently Abled Employees						
1	Permanent (D)	0	0	0.00%	0	0.00%
2	Other than Permanent (E)	0	0	0.00%	0	0.00%
3	Total differently abled employees (D + E)	0	0	0.00%	0	0.00%
Differently Abled Workers						
1	Permanent (F)	0	0	0.00%	0	0.00%
2	Other than Permanent (G)	0	0	0.00%	0	0.00%
3	Total Workers (F + G)	0	0	0.00%	0	0.00%

21. Participation/Inclusion/Representation of women

	Total(A)	No. and percentage of Females	
		No(B)	%(B/A)
Board of Directors	7	3	42.86%
Key Management Personnel	3	1	33.33%

22. Turnover rate for permanent employees and workers. (Disclose trends for the past 3 years)

	FY 2025-26 (Turnover rate in current FY)			FY 2024-25 (Turnover rate in previous FY)			FY 2023-24 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	20.66%	6.98%	19.44%	15.53%	24.44%	16.32%	14.68%	11.24%	14.37%
Permanent Workers	13.33%	0.00%	13.33%	15.38%	0.00%	15.38%	10.17%	0.00%	10.17%

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

23. (a) Names of holding / subsidiary / associate companies / joint ventures.

S. No	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ subsidiary/ associate/ joint venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	TCL Intermediates Private Limited	Subsidiary of TCL	100 %	Yes
2	Optimistic Organic sdn bhd.	Subsidiary of TCL & Cheminvest	TCL - (15.8 %) & Cheminvest -(84.2 %)	Yes
3	Lapiz Europe	Subsidiary of Cheminvest	100 %	Yes
4	TCL Global BV	Subsidiary of TCL/ Holding of TCL INC.	95.43%	Yes
5	TCL INC.	Subsidiary of TCL Global BV/ Holding entity of TCLS LLC	100 %	Yes
6	TCL Specialities LLC (TCLS LLC)	Sole Member Corporation	100 %	Yes
7	Cheminvest PTE LTD	Subsidiary of TCL	100%	Yes

VI. CSR Details

24. Provide the following CSR details

i) Whether CSR is applicable as per section 135 of Companies Act, 2013 –

Yes, CSR is applicable for Thirumalai Chemicals Limited as per section 135 of Companies Act, 2013

ii) Turnover (in Rs.) – 1,35,973 lakhs

iii) Net worth (in Rs.) – 1,49,780 lakhs

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No) (If Yes, then provide web-link for grievance redress policy	FY 2025-26			FY 2024-25		
		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	-
Investors (other than shareholders)	Yes	0	0		0	0	-
Shareholders	Yes	12	0	All Complaints were duly addressed and closed	6	0	All Complaints were duly addressed and closed
Employees and workers	Yes	0	0	-	0	0	-
Customers	Yes	17	0	All Complaints were duly addressed and closed	20	0	All Complaints were duly addressed and closed
Value Chain partners	Yes	0	0		0	0	-
Other (please specify)	Yes	0	0		0	0	-

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

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Health & Safety	R	As a chemical manufacturer, ensuring safety is non-negotiable. We are committed to creating a safe workplace by maintaining an accident-free environment, aiming for zero safety accidents, injuries, and incidents that could harm our workforce or the environment.	Our safety culture is built on proactive measures such as regular training, near-miss reporting, rigorous audits, and participation across all organizational levels. A strong EHS management system helps in identifying and mitigating risks early.	Negative
2	Business Ethics	R	Ethical conduct forms the cornerstone of our business operations. Our Code of Conduct defines key compliance expectations and offers clear guidance to internal stakeholders to discharge their responsibilities with integrity and accountability	TCL has instituted comprehensive policies to promote and uphold ethical conduct throughout the organization. Our Code of Conduct, along with supporting ethical guidelines, serves as a structured framework that clearly outlines expectations for responsible behaviour, integrity, and accountability among all employees and internal stakeholders. These standards are embedded into our operational culture and reinforced through regular training and awareness programs. Such initiatives are aimed at fostering a deep understanding of ethical obligations and ensuring consistent compliance at all levels of the organization	Negative

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Water Stewardship	O	Responsible water management is a key operational priority and an essential element of our environmental stewardship. We recognize the growing significance of water conservation in the chemical manufacturing sector and have committed to minimizing our water footprint through strategic initiatives. Our focus lies in implementing process optimization techniques and adopting advanced technologies that enable reduction in specific water consumption across operations. In addition, we are actively enhancing our rainwater harvesting infrastructure by increasing catchment areas to maximize rainwater capture and reduce dependence on external freshwater sources. These initiatives are aligned with our target of achieving a 10% reduction in total water consumption by 2030, with FY 2022–23 as the baseline year. Through these continuous efforts, we aim to strengthen water resilience while supporting long-term business continuity and environmental responsibility.		Positive

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Employee development	O	we view employee development as a strategic enabler for long-term growth and resilience. By continuously nurturing the skills, capabilities, and potential of our workforce, we build a team that is agile, innovative, and aligned with our organizational objectives. A focus on learning and development empowers employees to embrace new technologies, adopt best practices, and actively contribute to improving operational and sustainability outcomes. Furthermore, a well-trained and engaged workforce fosters a culture of accountability and performance, driving higher retention, increased productivity, and a stronger alignment with the company's mission and values.		Positive
5	Community support	O	Supporting the communities in which operations are based is considered a vital part of the organization's values and long-term commitments. Engaging meaningfully with local communities, NGOs, and government bodies helps in understanding specific local needs and priorities. This, in turn, enables the development of targeted initiatives that deliver shared value—benefitting both the business and the		Positive

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			community. Efforts include running skill development programs for local youth to enhance employability and reduce unemployment, while also contributing to social upliftment. In addition, the organization collaborates with charitable institutions to improve access to affordable healthcare and education. Through consistent outreach, partnerships, and social investment, strong community relationships are nurtured, helping build trust, social equity, and long-term impact.		
6	Zero waste to landfill	O	A proactive and structured approach is being adopted to manage waste sustainably, with a strong focus on reducing waste generation at the source. Process optimization and cleaner production technologies are being implemented to recover, reuse, and convert waste streams—such as gases, liquids, and solids—into high-value saleable products and by-products. These efforts significantly reduce reliance on landfills while improving overall material efficiency. The organization continues to enhance recovery systems, explore new recycling opportunities, and strengthen internal practices such as		Positive

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			waste segregation and tracking. These initiatives, combined with employee awareness and process improvements, support the long-term goal of minimizing waste disposal and aligning with environmental best practices		
7	Carbon footprint	R	Efforts to mitigate climate change are being actively pursued through continuous improvements in energy efficiency and a shift towards cleaner fuel sources. A major step has been the transition from Furnace Oil (FO) to Piped Natural Gas (PNG), which has contributed significantly to lowering direct emissions. Over the years, operational processes have been optimized to reduce specific energy consumption, making the manufacturing systems among the most energy-efficient in the industry. Building on this momentum, plans are also underway to explore and integrate renewable energy solutions in the coming years, further supporting long-term decarbonization goals. These actions reflect a strong commitment to minimizing the carbon footprint and aligning with evolving environmental standards and expectations.	A strategic three-pronged approach has been adopted to reduce energy consumption and associated GHG emissions. First, energy recovery systems are deployed to capture waste heat, improving overall energy utilization. Second, operational processes are continuously optimized for enhanced energy efficiency, ensuring minimal energy wastage. Third, a strong internal culture of innovation is fostered, encouraging employees to develop and implement ideas that lead to further reductions in energy usage.	Negative

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8	Corporate governance	R	The Board of Directors plays a pivotal role in setting the strategic direction and establishing policies that guide the organization's operations. It provides comprehensive oversight and ensures effective supervision of the management team. The Board, along with its committees, conducts regular reviews of policy implementation, monitors adherence to governance principles, and offers necessary support to the executive leadership. Through a strong focus on ethical governance, robust risk management frameworks, and efficient business processes, the organization maintains transparency, accountability, and long-term value creation.	Adhering to evolving social norms and regulatory expectations is not merely a compliance requirement but a core element of our long-term sustainability. These principles are deeply embedded in our organizational culture, and we actively engage with our employees to ensure they understand and operate within this ethical framework. This commitment has helped us build a strong reputation as a responsible employer, reliable business partner, and valued community stakeholder. Both the Board of Directors and the management team remain steadfast in fostering a culture of integrity, accountability, and transparency across all levels of the organization.	Negative
9	Regulatory issues & Compliance	R	The organization's policies and practices are firmly aligned with ethical standards, legal obligations, and sustainability principles. We are committed to maintaining this alignment while continuing to remain competitive in the marketplace. By placing a strong emphasis on regulatory compliance and ethical conduct, we contribute meaningfully to societal and environmental well-being, while also	The company maintains strict adherence to all applicable regulations and compliance requirements, embedding these principles into its organizational culture and daily operations. Comprehensive systems and processes have been put in place to continuously monitor and ensure conformity with relevant laws, standards, and guidelines. This proactive compliance framework enables	Negative

S. No	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			strengthening our long-term business resilience and reputation as a responsible and trustworthy enterprise.	ethical operations, effective risk mitigation, and reinforces our unwavering commitment to operating within the legal and regulatory landscape across all facets of the business.	
10	Product safety & Quality	R	Ensuring product safety and delivering high-quality outputs remain top priorities, with a clear focus on consistently meeting and exceeding customer expectations. Our commitment to maintaining rigorous quality standards is central to fostering customer trust and satisfaction.	We actively engage with customers through regular communication and feedback mechanisms, enabling us to understand their evolving needs and continuously improve our products and services to meet their expectations effectively.	Negative

SECTION B- MANAGEMENT AND PROCESS DISCLOSURES

Policy and management processes

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. c. Web Link of the Policies, if available	https://thirumalaichemicals.com/compliance-policies/								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	SMETA (ethical trade audits), Responsible Care, Company Code of Conduct, Whistleblower Policy	FSSC 22000 (equivalent to GFSI), HACCP, ISO 9001, ISO 9004, Halal & Kosher Certifications, Responsible Care	SMETA (social responsibility), Responsible Care, Internal HR and HSE Policies	SMETA, Stakeholder engagement processes, CSR programs	SMETA, Whistleblower Mechanism, Code of Conduct, Equal Opportunity Policy	ISO 14001 (Environmental Management), ISO 50001 (Energy Management), Responsible Care	Responsible Care, Adherence to national regulatory engagement norms	CSR Policy, Community Development Initiatives, SMETA	FSSC 22000, HACCP, ISO 9001, ISO 9004, Customer Feedback & Grievance Redressal System
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Strengthen transparency in financial and non-financial disclosures with a target of zero regulatory violations and robust compliance monitoring systems.	Continue adherence to global product quality and safety standards such as REACH, FSSC 22000, HACCP, and related certifications, while enhancing responsible sourcing and sustainable manufacturing practices.	Achieve zero workplace accidents and progress toward a 100% digitally enabled workforce by 2030, alongside enhanced employee engagement and capability-building initiatives.	Foster inclusive stakeholder engagement, including customers, employees, and communities, and further strengthen grievance redressal mechanisms.	Maintain zero tolerance for human rights violations across operations and the value chain by embedding due diligence into policies and risk frameworks.	Achieve a 25% reduction in GHG emissions, 10% reduction in water consumption, and 10% reduction in industrial waste generation by 2030 (against defined baselines)	Engage constructively in industry forums such as ICC and Responsible Care platforms to advocate responsible and sustainable business practices.	Invest in community development initiatives focused on natural resource conservation, education, healthcare access, and youth skill development.	Sustain high customer satisfaction levels through strong quality assurance, traceability, compliance, and structured feedback mechanisms.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	The Company maintained full regulatory compliance with no significant violations reported during the year. Ongoing ethics training and structured compliance tracking reinforced governance standards.	All key certifications including FSSC 22000, HACCP, ISO 9001, Kosher, Halal, and REACH compliance were successfully retained, with periodic audits ensuring continued alignment with global benchmarks.	Continued focus on workplace safety resulted in no major incidents during the year. Digital transformation initiatives advanced further toward achieving the 2030 digital workforce goal.	CSR and stakeholder engagement programs were actively implemented, particularly in skill development, healthcare access, and education, strengthening community relationships.	The zero-tolerance approach to human rights was upheld with no reported incidents. Awareness programs and grievance mechanisms remained operational and effective.	Transition from Furnace Oil to Piped Natural Gas (PNG) significantly reduced GHG emissions and particulate matter. Installation of Air-Cooled Condensers lowered water consumption in cooling operations. Approximately 16,839 KL of rainwater was harvested and reused. Reuse of plastic packaging materials supported waste reduction and circularity objectives.	Active participation continued in ICC and Responsible Care forums, contributing to policy discussions on sustainability and safety.	CSR investments supported local employment, infrastructure, education, healthcare, and natural resource conservation initiatives.	Customer satisfaction remained strong, with structured feedback systems in place. No major product quality or safety concerns were reported during the year.

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)	I am pleased to present the Business Responsibility and Sustainability Report of Thirumalai Chemicals Limited for the financial year 2025–26. This report reaffirms our continued commitment to responsible business conduct and sustainable value creation for all our stakeholders. At Thirumalai Chemicals Limited, sustainability is an integral part of our corporate strategy and operational framework. We regard Environmental, Social, and Governance principles not merely as compliance requirements, but as foundational drivers that strengthen our resilience, competitiveness, and long-term growth. Our approach is centered on proactively identifying ESG risks and opportunities, embedding responsible practices across the value chain, and fostering a culture of accountability and transparency. During the year, we continued to make measurable progress across key environmental priorities. Our transition from Furnace Oil to Piped Natural Gas (PNG) has contributed to lowering greenhouse gas emissions and improving air quality parameters. We also focused on optimizing process efficiencies to reduce specific water consumption and strengthen overall resource management. In line with our circular economy focus, we enhanced waste minimization practices by promoting reuse, recycling, and value-added recovery of by-products.

	On the social front, we remained steadfast in our commitment to employee well-being, workplace safety, and talent development. We strive to cultivate a safe, inclusive, and future-ready workforce supported by continuous learning and engagement initiatives. Our community development efforts continued to focus on education, healthcare access, natural resource conservation, and skill-building programs, undertaken in collaboration with local stakeholders to ensure meaningful and sustainable impact. Governance continues to be a cornerstone of our operations. Our Board of Directors and leadership team uphold high standards of ethics, transparency, and responsible oversight. Robust internal controls, compliance frameworks, and risk management systems enable us to operate with integrity and accountability. Regular communication and training on our Code of Conduct and associated policies reinforce our commitment to ethical business practices across the organization. Looking ahead, we remain focused on advancing our ESG ambitions, including further reduction of GHG emissions, enhancement of energy efficiency, responsible resource management, and evaluation of renewable energy integration opportunities. We are continuously strengthening our data management and disclosure systems to align with SEBI's evolving BRSR requirements and stakeholder expectations. I extend my sincere appreciation to our employees, customers, shareholders, partners, and communities for their continued trust and support. Together, we will continue to drive responsible growth and create enduring value through sustainable and ethical business practices. Warm regards, **Mrs. Ramya Bharathram** Managing Director & CFO Thirumalai Chemicals Limited
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Name: Mr. Sanjay Sinha Designation: CEO
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.	ESG committee is constituted for handling sustainability related matters and chaired by Mr. Sanjay Sinha. This committee will provide report to the board on these aspects.

10. Details of Review of NGRBCs by the Company: Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Managing Director	Risk Management Committee	Nomination & Remuneration Committee	Corporate Social Responsibility Committee	Nomination & Remuneration Committee	Risk Management Committee	Strategy Review Committee	Corporate Social Responsibility Committee	Business Review Committee
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Audit Committee	Risk Management Committee	Nomination & Remuneration Committee	Corporate Social Responsibility Committee	Nomination & Remuneration Committee	Risk Management Committee	Audit Committee	Corporate Social Responsibility Committee	Business Review Committee

Subject for Review	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Annually	Annually	Annually	Annually	Annually	Quarterly	Annually	Annually	Half Yearly
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Annually	Annually	Annually	Annually	Annually	Quarterly	Annually	Annually	Half Yearly

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

S. no	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	No	Yes	Yes	No	No	Yes	No	No	No

Remarks: Policies are verified and audited by Bureau Veritas as part of external audits for compliance and validation.

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

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

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	Percentage of persons in respective category covered by the awareness programmes
Board of directors	2	Code of Conduct, Corporate Social Responsibility (CSR) Enhanced understanding of ethical business practices and social responsibility initiatives, strengthening governance and accountability at the board level.	70.00%
Key Managerial personnel	2	Risk Management & Regulatory Compliance Improved awareness of enterprise risk management practices and regulatory requirements, supporting effective compliance and operational governance.	100.00%
Employees other than BoD and KMPs	15	Mindfulness Awareness Program Awareness on employee Well-being. The training helped create a healthier, more focused, and productive workplace environment.	67.83%
Workers	5	Mindfulness Awareness Program Awareness on employee Well-being. The training helped create a healthier, more focused, and productive workplace environment.	100.00%

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

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

Non-Monetary

Category	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	-	-	-
Punishment	-	-	-	-

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

S. No.	Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
1	NA	NA

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. Our Company maintains a comprehensive Anti-Bribery and Anti-Corruption Policy that underscores our strong commitment to ethical conduct and integrity across all business activities. The policy establishes clear principles, procedures, and controls aimed at preventing bribery and corrupt practices, while ensuring full compliance with applicable laws and regulatory requirements.Through regular training programs, systematic monitoring mechanisms, and strict enforcement protocols, we promote a culture of transparency, accountability, and fairness. This structured approach strengthens internal governance and reinforces the trust and confidence of our stakeholders.

Remarks: https://thirumalaichemicals.com/wp-content/uploads/2023/05/ANTI-BRIBERY-AND-ANTI-CORRUPTION-POLICY.pdf

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

Category	Current Financial Year	Previous Financial Year
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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

Category	Current Financial Year		Previous Financial Year	
	Number - FY 2025-26	Remarks - FY 2025-26	Number - FY 2024-25	Remarks - FY 2024-25
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	Nil	0	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	Nil	0	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.**

There were no complaints/ cases on corruption and conflict of interest For FY 2025-26 and FY2024-25

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

Particulars	Current Financial Year	Previous Financial Year
Number of days of accounts payables	59.20	85.75

9. Open-ness of business - Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics	FY 2025-26	FY 2024-25
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	2.18%	1.59%
	b. Number of trading houses where purchases are made from	191	8
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	66.33%	100.00%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	16.88%	-
	b. Number of dealers / distributors to whom sales are made	107	-
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	74.58%	-
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.77%	0.17%
	b. Sales (Sales to related parties / Total Sales)	47.19%	14.91%
	c. Loans & advances (to related parties / total loans & advances)	100.00%	100.00%
	d. Investments (in related parties / total investments)	99.98%	99.98%

Leadership Indicators

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

S. No.	Total number of awareness programmes held	Topics / principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	2	Occupational Health & Safety Protocols for contract workers, logistics staff, and site visitors.	97.59%
2	2	Safe Material Handling and Loading Practices for logistics partners.	97.59%

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, we maintain a comprehensive Code of Conduct that forms the cornerstone of ethical and transparent business practices across the organization. The Code clearly outlines the standards of behavior expected from all employees and stakeholders, emphasizing integrity, honesty, fairness, and mutual respect in every interaction. By consistently upholding these principles, we strengthen stakeholder trust, enhance organizational credibility, and reaffirm our commitment to accountability and responsible business conduct.

PRINCIPLE 2 Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

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

Particulars	Current Financial Year	Previous Financial Year	Details of improvements in environmental and social impacts
R&D	0.00%	0.00%	-
Capex	4.99%	9.37%	Key initiatives included wastewater treatment and water recovery enhancement through ETP RO membrane upgrades, DM and RO membrane replacements for improved process performance, installation of a separate cooling tank and filtration system to increase yield and reduce hazardous waste, and steam condensate recovery systems to improve energy and resource efficiency.

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

   Yes, the company has embraced Responsible Care Guidelines and SEDEX Members Ethical Trade Audit (SMETA) Best Practice Guidance to ensure sustainable sourcing. By sourcing raw materials in bulk, the company minimizes road transportation over long distances, effectively reducing its carbon footprint.

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

   Yes. Approximately 88% of raw material, packing material, and process chemical suppliers were identified as having recognized quality, environmental, occupational health & safety, or MSME-related compliance certifications.

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

Category	Description
(a) Plastics (including packaging)	We are strengthening our efforts to monitor and enhance the reuse of packaging materials within our operations. Plastic packaging materials are systematically managed to promote reuse wherever feasible. Any remaining plastic waste is disposed of through authorized pre-processors and recyclers in full compliance with the Plastic Waste Management Rules and our obligations under the Extended Producer Responsibility (EPR) framework.
(b) E-waste	-
(c) Hazardous waste	Hazardous wastes generated during manufacturing operations are stored, handled, and transported in strict compliance with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Such wastes are disposed of only through authorized Treatment, Storage, and Disposal Facilities (TSDFs). Regular training, internal audits, and robust documentation practices are maintained to ensure regulatory compliance and minimize environmental risks.
(d) Other waste	Our core products—Phthalic Anhydride, Malic Acid, and Fumaric Acid—are chemical intermediates that are fully utilized in downstream manufacturing processes, including plasticizers, resins, pigments, dyes, food additives, and beverages. As these products are consumed as inputs in further production, there is no direct end-of-life product waste generated by the Company for recovery, reuse, or recycling.

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

   Yes, the waste collection and disposal practices undertaken by TCL are aligned with the Extended Producer Responsibility (EPR) plans submitted to the respective State Pollution Control Boards (SPCBs) and the Central Pollution Control Board (CPCB). The Company is duly registered under the EPR framework as a Brand Owner and importer and ensures compliance with all applicable regulatory requirements.

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?**

S. No.	NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
1	20119	Phthalic Anhydride	100%	Cradle to Gate	Yes	No
2	20119	Malic Acid	100%	Cradle to Gate	Yes	No
3	20119	Fumaric Acid	100%	Cradle to Gate	Yes	No
4	20119	Di-ethyl Phthalate	100%	Cradle to Gate	Yes	No

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.**

S. No.	Name of Product / Service	Description of the risk / concern	Action Taken
1	Phthalic Anhydride - Cradle to gate	-	-
2	Malic Acid - Cradle to gate	-	-
3	Fumaric Acid - Cradle to gate	-	-
4	Di-ethyl Phthalate	-	-

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).**

S. No.	Indicate input material	Recycled or re-used input material to total material	
		FY 2025-26	FY 2024-25
1	Plastic packaging	8.72%	4.61%

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

	FY 2025-26			FY 2024-25		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	9554	0	0	6919	0	0
E-waste	0	0	0	0	0	0
Hazardous waste	0	0	0	0	0	0
Other waste	0	0	0	0	0	0

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

S. No.	Indicate product category	Action Taken
1	Packaging Material	8.72% (plastic packaging bags reused; product not reclaimed)

Remarks: Not Applicable, since all our chemicals are used as consumables for the manufacturing of other products. There is no product reclamation at the end of product life.

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

Essential Indicators

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

Category	Total (A)	% of employees covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent Employees											
Male	414	414	100.00%	414	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	43	42	97.67%	42	97.67%	42	97.67%	0	0.00%	0	0.00%
Total	**457**	**456**	**99.78%**	**456**	**99.78%**	**42**	**97.67%**	**0**	**0.00%**	**0**	**0.00%**
Other than permanent Employees											
Male	18	18	100.00%	18	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	2	2	100.00%	2	100.00%	2	100.00%	0	0.00%	0	0.00%
Total	**20**	**20**	**100.00%**	**20**	**100.00%**	**2**	**100.00%**	**0**	**0.00%**	**0**	**0.00%**

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

Category	Total (A)	% of workers covered by									
		Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent Workers											
Male	21	21	100.00%	21	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	**21**	**21**	**100.00%**	**21**	**100.00%**	**0**	**0**	**0**	**0.00%**	**0**	**0.00%**
Other than permanent Employees											
Male	260	260	100.00%	260	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	34	34	100.00%	34	100.00%	34	100.00%	0	0.00%	0	0.00%
Total	**294**	**294**	**100.00%**	**294**	**100.00%**	**34**	**100.00%**	**0**	**0.00%**	**0**	**0.00%**

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

Particulars	Current Financial Year	Previous Financial Year
Cost incurred on wellbeing measures as a % of total revenue of the company	0.72%	0.45%

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

Benefits	No. of employees covered as a % of total employees. (CY)	No. of workers covered as a % of total workers. (CY)	Deducted and deposited with the authority (Y/N/N.A.). (CY)	No. of employees covered as a % of total employees. (PY)	No. of workers covered as a % of total workers. (PY)	Deducted and deposited with the authority (Y/N/N.A.). (PY)
PF	100.00%	100.00%	y	100.00%	100.00%	Y
Gratuity	100.00%	100.00%	y	100.00%	100.00%	Y
ESI	100.00%	100.00%	y	100.00%	100.00%	Y
Others – please specify	0.00%	0.00%	NA	0.00%	0.00%	NA

3. 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.

Some of our premises and offices are currently not fully accessible to differently abled employees and workers. However, the organization remains committed to building an inclusive work environment and is taking steps to enhance accessibility in line with the Rights of Persons with Disabilities Act, 2016.

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.The Company upholds a strong Equal Opportunity Policy that forms the foundation of our organizational values. We are committed to creating a workplace where all individuals are treated with dignity, respect, and fairness — irrespective of their background, identity, or abilities. This policy reflects our dedication to building a diverse and inclusive environment, where every employee has the opportunity to grow and contribute meaningfully. We believe that diversity strengthens our culture, drives innovation, and supports our collective success. Weblink: https://thirumalaichemicals.com/wp-content/uploads/2023/05/EQUAL-EMPLOYMENT-OPPORTUNITY-POLICY.pdf

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	NA	NA	NA	NA
Female	100.00%	100.00%	NA	NA
Total	100.00%	100.00%	NA	NA

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

Category	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes, permanent workers have access to a structured grievance redressal mechanism. Concerns can be raised confidentially through suggestion boxes or directly by contacting the HR department or designated personnel via email or phone.
Other than Permanent Workers	Yes, non-permanent workers are provided access to the same grievance redressal channels. They may submit concerns anonymously through suggestion boxes or directly approach the HR department or designated grievance handlers via email or phone, ensuring equal access and fair treatment.
Permanent Employees	Yes, permanent employees have access to a comprehensive grievance redressal framework. Grievances may be submitted through the Wallet HR Portal and TCL Intranet Portal. Employees may also reach out via email or phone to the HR department or designated officers. A defined escalation matrix is in place, allowing concerns to be elevated from the Human Rights Officer to the Factory Manager, Site Head, and ultimately to the CEO & Managing Director, ensuring transparency and timely resolution.
Other than Permanent Employees	Yes, non-permanent employees can access the same grievance mechanisms. They may utilize the Wallet HR platform, TCL intranet, email, phone, or suggestion boxes for anonymous submissions. All grievances are addressed through the same structured and equitable resolution process, ensuring fairness and transparency across the organization.

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

Category	FY 2025-26			FY 2024-25		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No.of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	457	0	0.00%	509	0	0.00%
Male	414	0	0.00%	466	0	0.00%
Female	43	0	0.00%	43	0	0.00%
Total Permanent Workers	21	0	0.00%	24	0	0.00%
Male	21	0	0.00%	24	0	0.00%
Female	0	0	0.00%	0	0	0.00%

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

Category	FY 2025-26					FY 2024-25				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	432	290	67.13%	370	85.65%	497	328	66.00%	410	82.49%
Female	45	31	68.89%	38	84.44%	45	30	66.67%	38	84.44%
Total	**477**	**321**	**67.30%**	**408**	**85.53%**	**542**	**358**	**66.05%**	**448**	**82.66%**
Workers										
Male	281	15	5.34%	17	6.05%	400	17	4.25%	19	4.75%
Female	34	0	0.00%	0	0.00%	34	0	0.00%	0	0.00%
Total	**315**	**15**	**4.76%**	**17**	**5.40%**	**434**	**17**	**3.92%**	**19**	**4.38%**

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	%(D / C)
Employees						
Male	432	331	76.62%	497	343	69.01%
Female	45	30	66.67%	45	25	55.56%
Total	**477**	**361**	**75.68%**	**542**	**368**	**67.90%**
Workers						
Male	281	21	7.47%	400	24	6.00%
Female	34	0	0.00%	34	0	0.00%
Total	**315**	**21**	**6.67%**	**434**	**24**	5.53%

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

Yes. TCL prioritizes the health, safety, and well-being of all individuals associated with its operations. A comprehensive Occupational Health and Safety (OHS) Management System has been implemented, ensuring full coverage across all facilities. Our safety framework extends to employees, contract workers, and vendors visiting our sites, with well-defined protocols designed to maintain a safe and incident-free working environment.Further reinforcing our commitment to international best practices, four of our sites are certified under ISO 45001, demonstrating adherence to globally recognized occupational health and safety standards.

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

TCL adopts a structured and proactive approach to identifying and assessing work-related hazards across its operations. Hazard Identification and Risk Assessment (HIRA) is systematically carried out at all plants to proactively identify potential workplace hazards and evaluate associated risks. A department-wise HIRA register is maintained, with hazard identification undertaken by workers, supervisors, and engineers. These assessments are reviewed by Section Heads and Department Heads to determine the severity of risks and implement appropriate control measures. In addition, Job Safety Analysis (JSA) is conducted for specific tasks by breaking them down into sequential steps, identifying potential hazards at each stage, and defining preventive measures. Employees are trained on these controls to ensure that safety protocols are effectively integrated into routine activities. A structured Work Permit system is also implemented, particularly for hazardous or non-routine maintenance jobs. This ensures proper authorization, risk evaluation, and coordination between process and maintenance teams before commencement of work. Furthermore, regular internal reviews and third-party safety audits are conducted to evaluate operational risks across routine and non-routine activities. Audit observations are reviewed by management to ensure timely corrective actions and to drive continuous improvement in occupational health and safety performance.

c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)

Yes, a digital Safety Portal is available for all employees to report work-related hazards, including Unsafe Acts and Unsafe Conditions. Each employee is provided with a unique login ID to access the portal. Once reported, the concerns are flagged to the respective Section Heads and Department Heads, who initiate appropriate corrective actions. Closure of actions is also documented within the portal. Additionally, the portal facilitates sharing of safety observations, incident learnings, and case studies, helping build a strong safety culture.

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

Yes, employees and workers are provided access to non-occupational medical and healthcare services. Regular eye screenings and annual health check-ups are organized to monitor general health and lifestyle-related conditions. For other non-occupational ailments, employees are referred to the Thirumalai Mission Hospital, run under the charitable arm of Thirumalai Group. Counselling and follow-ups are also provided as part of the preventive healthcare initiatives.

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

Safety Incident/Number	Category	FY 2025-26	FY 2024-25
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.00	0.00
	Workers	0.00	0.00
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
Number of Permanent Disabilities	Employees	0	0
	Workers	0	0

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

The Company follows an integrated and proactive approach to maintaining a safe and healthy workplace. Regular training programs, toolbox talks, and Environment, Health & Safety (EHS) awareness sessions are conducted to strengthen employee understanding of safe work practices. Practical exposure is supported through interactive learning tools such as the safety park, which enhances on-ground safety awareness. Observances such as Environment Day and Safety Week further reinforce a strong culture of responsibility, while structured reward and recognition initiatives promote consistent adherence to safety standards.

To systematically monitor and mitigate risks, the Company conducts cross-functional and electrical safety audits at defined intervals. Core safety frameworks including Process Safety Management (PSM), Job Safety Analysis (JSA), and Hazard Identification and Risk Assessment (HIRA) are embedded across operations. Hazard and Operability (HAZOP) studies are undertaken wherever applicable to evaluate process-related risks. Employee engagement is also encouraged through sustainability-driven initiatives such as tree plantation programs, fostering a broader sense of environmental stewardship alongside workplace safety.

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

Category	FY 2025-26			FY 2024-25		
	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:

Category	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100.00%
Working Conditions	100.00%

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).

Employees - 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 established safeguards and control mechanisms to verify that value chain partners have duly deducted and deposited statutory dues, wherever applicable.

3. Provide the number of employees or workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in EI-11 above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment.

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025-26	FY 2024-25	FY 2025-26	FY 2024-25
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)

In select cases, TCL extends continued engagement opportunities to retired individuals by offering them roles as consultants, based on organizational requirements. This helps retain valuable experience while supporting a smooth transition post-retirement.

5. **Details on assessment of value chain partners:**

Category	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	91.74%
Working Conditions	89.78%

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

Essential Indicators

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

The entity follows a structured framework to identify and prioritize key stakeholder groups, considering individuals, groups, or institutions that either contribute significantly to the value chain or are impacted by its operations. Thirumalai Chemicals has comprehensively mapped both internal and external stakeholders, including investors, employees, customers, suppliers, regulatory authorities, trade unions, and local communities. Engagement with these stakeholders is carried out through both formal and informal channels, facilitating continuous dialogue, timely feedback, and proactive addressing of concerns to ensure alignment with stakeholder expectations and organizational objectives.

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

S. No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication ((Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement
1	Investors / Shareholders	No	Email Communications, Company Website, Annual General Meetings, Stock Exchange Filings.	Need based	To ensure transparent, timely, and consistent communication on the Company's performance, strategic direction, and governance practices. The engagement aims to provide shareholders with updates on financial results, material developments, risk outlook, and long-term value creation initiatives. It also serves as a platform to understand investor expectations, address queries or grievances, and build trust through disclosures that align with statutory and voluntary reporting frameworks.

S. No.	Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication ((Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement
2	Customer	No	Customer service support, customer satisfaction survey, feedback channels	On a regular basis	To gather insights through customer feedback mechanisms in order to assess satisfaction levels, improve product and service quality, and strengthen long-term relationships. The engagement also focuses on promptly addressing customer queries, concerns, and service-related issues, thereby enhancing the overall customer experience and reinforcing the company's commitment to customer-centricity.
3	Employees	No	Intranet Portal, Functional and cross-functional committees, Leader's talk, Regular Employee Communication Forums	On a regular basis	1) Employee benefits 2) Equal opportunities 3) Recognition 4) Learning and development 5) Safety and well-being 6) Performance review and career development 7) Business update
4	Suppliers and Vendors	No	Supplier and Vendor meets , Face-to-face and electronic correspondence, Supplier Audits	Annually	The engagement focuses on resolving queries, assessing supplier performance through continuous feedback mechanisms.
5	Community	No	Community surveys and consultations, CSR initiatives, Volunteering activities, Community events	Monthly	To support inclusive community development through various outreach and CSR initiatives, and to provide effective channels for addressing community concerns and grievances, ensuring transparent and responsive engagement.
6	Regulatory And government bodies	No	Annual reports, Making representations whenever needed, Formal dialogues.	On a need basis	Engagement with relevant authorities for policy advocacy, including active participation in discussions and consultations on regulatory developments, and providing inputs for formulation or amendment of policies impacting our industry and operations.

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 stakeholder consultation process is guided by our Stakeholder Engagement Policy, which establishes a structured framework for meaningful and responsible engagement. We are committed to maintaining open, transparent, and ongoing communication channels to ensure that stakeholder perspectives are acknowledged and considered in decision-making processes. Key economic, environmental, and social matters emerging from these interactions are systematically identified, assessed, and escalated through appropriate internal governance structures. This approach enables timely feedback, supports collaborative resolution of concerns, and strengthens responsiveness across the organization. Through continuous engagement, we strive to create shared value and advance sustainable outcomes that are aligned with stakeholder expectations and our long-term strategic objectives.

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

Yes Stakeholder consultations play a key role in shaping environmental and social initiatives. Based on feedback from customers, TCL has initiated measures to reuse plastic packaging bags used for packaging of our products. This practice reduces plastic waste generation and promotes circular use of materials. These inputs have been integrated into TCL's operational practices, supporting the company's long-term sustainability goals related to resource efficiency, waste minimization, and responsible packaging.

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

We engage with vulnerable and marginalized stakeholder groups primarily through our Corporate Social Responsibility (CSR) initiatives, ensuring that our outreach efforts are inclusive and community-focused. These engagements encourage open dialogue, ongoing feedback, and active participation from community members. Inputs, suggestions, and concerns received from these groups are duly considered during the planning and execution of CSR programs to ensure that interventions are need-based, relevant, and impactful. This participatory approach enables us to better understand and address specific community requirements, thereby supporting social inclusion and sustainable development. During the reporting period, no specific concerns were formally raised by these stakeholder groups.

PRINCIPLE 5: Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 2025-26			FY 2024-25		
	Total (A)	No. of employees / workers covered (B)	%(B / A)	Total(C)	No. of employees / workers covered (D)	%(D / C)
Employees						
Permanent	457	425	93.00%	509	480	94.30%
Other than permanent	20	18	90.00%	33	30	90.91%
Total Employees	**477**	**443**	**92.87%**	**542**	**510**	**94.10%**
Workers						
Permanent	21	21	100.00%	24	24	100.00%
Other than permanent	294	294	100.00%	410	410	100.00%
Total Workers	**315**	**315**	**100.00%**	**434**	**434**	100.00%

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

Category	FY 2025-26					FY 2024-25				
	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	457	38	8.32%	419	91.68%	509	45	8.84%	464	91.16%
Male	414	37	8.94%	377	91.06%	466	44	9.44%	422	90.56%
Female	43	1	2.33%	42	97.67%	43	1	2.33%	42	97.67%
Other than Permanent	20	0	0.00%	20	100.00%	33	0	0.00%	33	100.00%
Male	18	0	0.00%	18	100.00%	31	0	0.00%	31	100.00%
Female	2	0	0.00%	2	100.00%	2	0	0.00%	2	100.00%
Workers										
Permanent	21	0	0.00%	21	100.00%	24	0	0.00%	24	100.00%
Male	21	0	0.00%	21	100.00%	24	0	0.00%	24	100.00%
Female	0	0	0.00%	0	0.00%	0	0	0.00%	0	0.00%
Other than Permanent	294	294	100.00%	0	0.00%	410	410	100.00%	0	0.00%
Male	260	260	100.00%	0	0.00%	376	376	100.00%	0	0.00%
Female	34	34	100.00%	0	0.00%	34	34	100.00%	0	0.00%

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	1	36795000	1	25590000
Key Managerial Personnel	3	38792280	1	25590000
Employees other than BoD and KMP	414	47670	43	48825
Workers	21	47682	0	0

Remarks: Mr. Pramod Kumar served as the Company Secretary (KMP) up to 17th August, and Mr. Aditya Sharma was appointed as the Company Secretary (KMP) with effect from 18th August.

b. Provide information on Gross wages paid to females by the entity, in the following format:

Particulars	Current Financial Year	Previous Financial Year
Gross wages paid to females as % of total wages	13.5%	11.5%

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, Responsibility for addressing human rights–related impacts and concerns is assigned to the Head of Human Resources, who acts as the designated focal point for such matters. The Head of HR ensures that company policies, practices, and operations remain aligned with recognized human rights standards and principles. Any grievances or issues raised by employees or other stakeholders are examined and resolved through established redressal mechanisms under HR oversight. This defined governance structure promotes accountability and demonstrates the Company's commitment to upholding and integrating human rights principles across its operations.

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

Employees and workers have access to multiple structured and accessible channels to raise grievances, ensuring timely and effective resolution. They may directly contact the Human Resources department or designated grievance redressal personnel through official email or phone for confidential handling of concerns. In addition, the organization's HRMS portal includes an integrated grievance redressal module that enables employees to submit and track complaints digitally, promoting transparency, proper documentation, and prompt action. Suggestion boxes are placed at appropriate locations within the premises to allow individuals to raise concerns or provide feedback anonymously. A clearly defined escalation mechanism is also in place, whereby grievances can be progressively escalated through the designated Human Rights Officer, Factory Manager, and Site Head, and, where necessary, up to the CEO & Managing Director, depending on the nature and seriousness of the issue.

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

	FY 2025-26			FY 2024-25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	Nil	0	0	Nil
Discrimination at workplace	0	0	Nil	0	0	Nil
Child Labour	0	0	Nil	0	0	Nil
Forced Labour/Involuntary Labour	0	0	Nil	0	0	Nil
Wages	0	0	Nil	0	0	Nil
Other human rights related issues	0	0	Nil	0	0	Nil

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

Particulars	Current Financial Year	Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0.00%	0.00%
Complaints on POSH upheld	0	0

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

TCL is committed to fostering a safe, respectful, and inclusive workplace, free from discrimination, harassment, or any form of inappropriate conduct. To ensure fair and timely resolution of complaints, the Company has constituted a trained Internal Complaints Committee in accordance with applicable regulations. A comprehensive Prevention of Sexual Harassment (POSH) Policy is implemented to effectively prevent, address, and manage concerns related to workplace harassment and discrimination. Additionally, a structured Stakeholder Grievance Redressal Policy is in place to address concerns raised by employees and other stakeholders, reinforcing the Company's commitment to transparency, accountability, and ethical conduct.

Web link: https://thirumalaichemicals.com/wp-content/uploads/2023/05/POSH-POLICY.pdf Weblink:https://thirumalaichemicals.com/wp-content/uploads/2023/05/STAKEHOLDER-GRIEVANCE-REDRESSAL-POLICY.pdf

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

Yes. TCL incorporates human rights considerations through a well-established framework, reflected in its Code of Conduct, Employment and Hiring Policies, and Supplier Code of Conduct. Additionally, the Company has implemented a dedicated Business and Human Rights Policy that outlines the procedures and actions to be taken in response to any human rights violations.

Web link:https://thirumalaichemicals.com/wp-content/uploads/2023/05/BUSINESS-AND-HUMAN-RIGHTS-POLICY.pdf

10. Assessments for the year:

Category	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100.00%
Forced/involuntary labour	100.00%
Sexual harassment	100.00%
Discrimination at workplace	100.00%
Wages	100.00%
Others – please specify	

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

No risk/concern were identified and there is no necessity for corrective action.

Leadership Indicators

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

As there were no human rights-related grievances or complaints reported during the period, no changes to the existing processes were required.

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

No due diligence has 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. The premises are currently not accessible to disabled visitors. However, we are committed to working on improvements to make it accessible in the future.

4. Details on assessment of value chain partners:

Category	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	0.00%
Discrimination at workplace	0.00%
Child labour	0.00%
Forced/involuntary labour	0.00%
Wages	0.00%
Others – please specify	0.00%

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

None.

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

Essential Indicators

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

Parameter	FY 2025-26	FY 2024-25
From renewable sources		
Total electricity consumption (A)	21141.00	16375.03
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	105115.00	166247.00
Total energy consumed from renewable sources (A+B+C)	126259.00	182622.03
From non-renewable sources		
Total electricity consumption (D)	18690	10864
Total fuel consumption (E)	403185	284956.5
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	421875.00	295820.50
Total energy consumed (A+B+C+D+E+F)	548131.00	478442.53
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	40.31 GJ / Million	22.23 GJ / Million

Parameter	FY 2025-26	FY 2024-25
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)	832.04 GJ / Million	508.71 GJ / Million
Energy intensity in terms of physical output	4.71 GJ / MT	2.63 GJ / MT
Energy intensity (optional) – the relevant metric may be selected by the entity	4.71 / MT of Total Production Output	2.63 / MT of Total Production Output

Remarks: Our renewable energy consumption includes power generated from our owned windmill and solar installations. While the windmill generation is not directly consumed onsite, it is supplied to the grid, thereby contributing to a greener grid. Solar energy generated onsite is directly utilized, supporting our renewable energy targets and reducing our overall carbon footprint.

1. Indicate if any independent assessment/evaluation/assurance for energy has been conducted by an external agency. If Yes, provide the name of the 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, as none of the Company's sites or facilities have been classified as Designated Consumers (DCs) under the Government of India's Perform, Achieve and Trade (PAT) Scheme.

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

Parameter	FY 2025-26	FY 2024-25
Water withdrawal by source (in kilolitres)		
(i) Surface water	0.00	0.00
(ii) Groundwater	0.00	0.00
(iii) Third party water	551650.00	781030.00
(iv) Seawater / desalinated water	0.00	0.00
(v) Others	0.00	0.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	551650.00	781030.00
Total volume of water consumption (in kilolitres)	549271.00	772218.00
Water intensity per rupee of turnover (Water consumed / turnover)	40.40 KL / Million	35.88 KL / Million
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	833.77 KL / Million	821.07 KL / Million
Water intensity in terms of physical output	4.72 KL / MT	4.24 KL / MT
Water intensity (optional) – the relevant metric may be selected by the entity. KL / MT of Total Production Output	4.72	4.24

3. 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. Provide the following details related to water discharged

Parameter	FY 2025-26	FY 2024-25
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	-	-
- No treatment	0.00	0.00
With treatment – please specify level of treatment	0.00	0.00
(ii) To Groundwater	-	-
- No treatment	0.00	0.00
With treatment – please specify level of treatment	0.00	0.00
(iii) To Seawater		
- No treatment	0.00	0.00

Parameter	FY 2025-26	FY 2024-25
With treatment – please specify level of treatment	0.00	0.00
(iv) Sent to third-parties	-	-
- No treatment	0.00	0.00
With treatment – please specify level of treatment	2380.00 Primary, secondary and tertiary treatment	8812.00 Primary, secondary and tertiary treatment
(v) Others		
- No treatment	0.00	0.00
With treatment – please specify level of treatment	0.00	0.00
Total water discharged (in kilolitres)	**2380.00**	**8812.00**

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

Yes, Out of the two manufacturing facilities operated by the Company, the Ranipet unit has been a 100% Zero Liquid Discharge (ZLD) facility. The ZLD system ensures that all wastewater is treated, recycled, and reused within the plant, with no liquid effluent discharged externally. The adequacy of the ZLD system at this facility was independently audited and certified by IIT Madras in 2021. This reflects the Company's commitment to responsible water management and environmental sustainability.

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

Parameter	Please specify unit	FY 2025-26	FY 2024-25
NOx	µg/m3	180	220
SOx	µg/m3	20	20
Particulate matter (PM)	µg/m3	5.4	5.4
Persistent organic pollutants (POP)	NA	0	0
Volatile organic compounds (VOC)	µg/m3	5	5
Hazardous air pollutants (HAP)	NA	0	0
Others – please specify in the remark section	µg/m3	50	50

6. Indicate if any independent assessment/evaluation/assurance for Air emissions has been conducted by an external agency. If Yes, provide the name of the agency:

Yes. TNPCB- Tamil Nadu Pollution Control Board.

Remarks: Yes. Independent assessment of air emissions has been conducted by external agencies as part of regulatory compliance and environmental monitoring. In addition to Online Continuous Emission Monitoring Systems (OCEMS) installed on all stacks, monthly air emission samples are collected and analyzed by third-party agencies. These assessments are carried out by Tamil Nadu Pollution Control Board (TNPCB)–authorized laboratories and MoEF&CC-recognized third-party environmental consultants, ensuring adherence to statutory norms and credible verification of emission levels.

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

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	TCO_2e	74585	98464
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	TCO_2e	3774.4	2160.73
Total Scope 1 and Scope 2 emission intensity per rupee of turnover	TCO_2e / rupee of turnover	5.76 TCO2e / Million	4.68 TCO2e / Million

Parameter	Unit	FY 2025-26	FY 2024-25
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	TCO_2e / rupee of turnover	118.95 TCO2e / Million	106.95 TCO2e / Million
Total Scope 1 and Scope 2 emission intensity in terms of physical output	TCO_2e / rupee of turnover	0.67 TCO2e / MT	0.55 TCO2e / MT
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	TCO_2e / MT of Total Production Output	0.67	0.55

7. Indicate if any independent assessment/evaluation/assurance for GHG Emissions (Scope 1 and 2) has been conducted by an external agency. If Yes, provide the name of the agency: -

No assessment by external agency has been conducted in the current reporting year.

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

Yes, the Company continues to undertake projects aimed at reducing greenhouse gas (GHG) emissions as part of its ongoing sustainability commitment. Building on last year's transition from Furnace Oil (FO) to Piped Natural Gas (PNG) for thermic fluid heaters, the Company has been focusing on optimizing operational efficiencies to maximize emission reduction benefits from this shift. The PNG transition continues to contribute to lower direct (Scope 1) emissions compared to conventional fuels. In addition, the Company is actively evaluating the feasibility of integrating renewable energy solutions and other low-carbon energy alternatives to further reduce its carbon footprint.

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

Parameter	FY 2025-26	FY 2024-25
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0.00	0.00
E-waste(B)	2.65	4.85
Bio-medical waste (C)	0.12	0.10
Construction and demolition waste (D)	0.00	0.00
Battery waste (E)	0.00	0.00
Radioactive waste (F)	0.00	0.00
Other Hazardous waste.Please specify, if any. (G)	4909.27	6258.74
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	102.65	97.80
Total (A + B + C + D + E + F + G + H)	**5014.69**	**6361.49**
Waste intensity per rupee of turnover (Total Waste Generated / Revenue from operations)	**0.368 MT / Million**	**0.295 MT / Million**
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Waste Generated / Revenue from operations adjusted for PPP)	**7.61 MT / Million**	**6.76 MT / Million**
Waste intensity in terms of physical output (Total Waste Generated / Physical Output)	**0.043 MT / MT**	**0.034 MT / MT**
Waste intensity (optional) the relevant metric may be selected by the entity	**0.043 MT / MT of Total Production Output**	**0.034 MT / MT of Total Production Output**
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste - Plastic		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Plastic Waste Recycled, Re-used and other recovery operations	**0.00**	**0.00**
Category of waste - E-Waste		
(i) Recycled	2.65	4.85

Parameter	FY 2025-26	FY 2024-25
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total E-Waste Recycled, Re-used and other recovery operations	**2.65**	**4.85**
Category of waste - Bio-medical waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Bio-medical Waste Recycled, Re-used and other recovery operations	**0.00**	**0.00**
Category of waste - Construction and demolition waste		
(i)Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Construction Waste Recycled, Re-used and other recovery operations	**0.00**	**0.00**
Category of waste - Battery waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Battery Waste Recycled, Re-used and other recovery operations	**0.00**	**0.00**
Category of waste - Radioactive waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Radioactive Waste Recycled, Re-used and other recovery operations	**0.00**	**0.00**
Category of waste - Other Hazardous waste		
(i) Recycled	7.82	8.64
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Other Hazardous Waste Recycled, Re-used and other recovery operations	**7.82**	**8.64**
Category of waste - Other Non-Hazardous waste		
(i) Recycled	0	0
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total Other Non-hazardous Waste Recycled, Re-used and other recovery operations	0.00	0.00
Total	**10.47**	**13.49**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste - Plastic		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
Total Plastic Waste Incineration, Landfilling and other disposal operations	**0.00**	**0.00**
Category of waste - E-Waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
Total E-waste Waste Incineration, Landfilling and other disposal operations	**0.00**	**0.00**

Parameter	FY 2025-26	FY 2024-25
Category of waste - Bio-medical Waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0.12	0.10
Total Bio-medical Waste Incineration, Landfilling and other disposal operations	**0.12**	**0.10**
Category of waste - Construction and demolition waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
Total Construction Waste Incineration, Landfilling and other disposal operations	**0.00**	**0.00**
Category of waste - Battery		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
Total Battery Waste Incineration, Landfilling and Other disposal operations	**0.00**	**0.00**
Category of waste - Radioactive		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
Total Radioactive Waste Incineration, Landfilling and Other disposal operations	**0.00**	**0.00**
Category of waste - Other Hazardous waste. Please specify, if any		
(i) Incineration	0	0
(ii) Landfilling	77.42	23.72
(iii) Other disposal operations	3814.40	5105.40
Total Other Hazardous Waste Incineration, Landfilling and Other disposal operations	**3891.820**	**5129.12**
Category of waste - Other Non-hazardous waste generated		
(i) Incineration	0	0
(ii) Landfilling	33.7300	0
(iii) Other disposal operations	68.9200	97.8000
Total Other Non-hazardous Waste Incineration, Landfilling and Other disposal operations	**102.65**	**97.80**
Total	**3994.59**	**5227.02**

9. Indicate if any independent assessment/evaluation/assurance for Waste has been conducted by an external agency. If Yes, provide the name of the agency:

No assessment by external agency has been conducted in the current reporting year.

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

Thirumalai Chemicals Limited has implemented a comprehensive and responsible waste management framework focused on minimizing environmental impact, enhancing resource efficiency, and ensuring strict regulatory compliance:

1. The Ranipet manufacturing facility has been operating as a Zero Liquid Discharge (ZLD) unit since 2006, with all wastewater treated and fully recycled back into the process, thereby eliminating liquid effluent discharge.

2. Hazardous waste generated from operations is managed in accordance with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, ensuring safe storage, handling, transportation, and disposal through authorized agencies.

3. The scrubber solution generated from the Phthalic Anhydride (PA) plant is effectively reused as a raw material in the production of Fumaric Acid, exemplifying a "Wealth from Waste" approach and promoting circularity within operations.

4. Air emissions from scrubbers and thermic fluid heaters are continuously monitored through Online Continuous Emission Monitoring Systems (OCEMS), which are integrated with the Tamil Nadu Pollution Control Board (TNPCB) and Central Pollution Control Board (CPCB) networks to ensure real-time compliance.

5. E-waste generated at the facility is systematically collected and disposed of through TNPCB-authorized recyclers in accordance with applicable regulations.

TCL continues to evaluate opportunities to further reduce waste generation and enhance recycling or reuse of additional waste streams, aligning with its long-term sustainability and circular economy objectives.

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

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

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

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

S. No.	Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
1	Not applicable and all manufacturing facilities are located at Industrial estate areas.	-	-	-	-	-

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

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
1	-	-	-	-

Leadership Indicators

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

(i) Name of the area

Not Applicable

(ii) Nature of operations

Not Applicable

1. 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. Please provide details of total Scope 3 emissions (MTCO2E) & its intensity, in the following format:

Parameter	FY 2025-26	FY 2024-25
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	70679.3	69737.4
Total Scope 3 emissions per rupee of turnover	5.20 TCO2e / Million	3.24 TCO2e / Million
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	0.61 TCO2e / MT	0.38 TCO2e / MT

2. 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 independent assessment/ evaluation/assurance has been carried out by an external agency.

3. With respect to the ecologically sensitive areas reported at EI-11 above, provide details of the 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

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	ZLD System for Wastewater Recycling	Zero Liquid Discharge system continues to operate for treating and recycling process effluent.	1,03,049 KL of water recycled during FY2025–26, reducing freshwater withdrawal and enhancing resource efficiency.
2	Plastic Packaging Material Recycling and Reuse	Utilized PP and HDPE product packaging materials efficiently through internal reuse and recycling initiatives to support resource optimization and circularity practices.	372 tons of plastic packaging material were recycled through certified recyclers in FY 2025–26, ensuring circular usage.
3	Rainwater Harvesting and Reuse	Rainwater collected from rooftops catchment areas was stored and reused within the plant for non-potable purposes.	16,839 KL of rainwater harvested and reused in FY2025–26, contributing to water conservation efforts.

5. **Does the entity have a business continuity and disaster management plan? If yes, please give details in 100 words or input web link.**

   Yes, Details: the organization maintains a Business Continuity and Disaster Management Plan to ensure swift response and minimal disruption during emergencies. The plan, led by the Safety Department Head, aligns with ISO 14001:2015 and ISO 45001 Clause 8.2. It covers emergencies like major fires, chemical leaks, structural failures, and natural disasters across all operational locations including the factory at SIPCOT, Ranipet, and terminals in Walaja Road and Royapuram. Emergency scenarios are identified, risk-assessed, and regularly tested through mock drills. Plans are reviewed annually and updated based on drill learnings and actual incident experiences to drive continuous improvement.

   https://thirumalaichemicals.com/wp-content/uploads/2023/05/BUSINESS-CONTINUITY-POLICY.pdf

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

   None.

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

   Environmental parameters are integrated into our vendor and supplier assessment checklists, enabling preliminary evaluation of value chain partners for environmental risks. While these tools are in place, a quantified analysis of partners assessed (by value of business) has not yet been conducted. The organization acknowledges this gap and plans to systematically analyze and report the percentage of value chain partners assessed for environmental impacts in future cycles, as part of its evolving sustainability and supply chain management practices.

8. **How many Green Credits have been generated or procured?**

   a. Generated by the listed entity - 0

   b Procured by the top ten (in terms of value of purchases and sales, respectively) value chain partners - 0

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

Essential Indicators

1. **a. Number of affiliations with trade and industry chambers/ associations - 5**

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National/International)
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.**

S. No.	Name of authority	Brief of the case	Corrective action taken
1	-	-	-

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 public domain? (Yes/No)	Frequency of Review by Board	Web Link, if available
1	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	-
2	Promotion of sustainable chemical manufacturing	Engagement through industry associations such as CII and ICC	No	No board review	-

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

Essential Indicators

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

S. No.	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
1	NA	NA	NA	-	-	-

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

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the Financial Year (In INR)
1	Not Applicable	-	-	-		

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

A manual grievance recording system is available at the main entrance gate of each facility, enabling local community members to submit their concerns directly and accessibly.

4. Input material sourced from suppliers (by value):

Category	Current Financial Year	Previous Financial Year
Directly sourced from MSMEs/ small producers	4.53%	4.78%
Sourced directly from within India	67.55%	95.22%

5. **Job creation in smaller towns- Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) in the following locations, as % of total wage cost. (Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)**

Location	Current Financial Year	Previous Financial Year
Rural	2.67%	2.59%
Semi-Urban	9.36%	8.43%
Urban	43.45%	43.44%
Metropolitan	11.36%	10.37%

Leadership Indicators

1. **If any Social Impact Assessments have been reported in EI-1, please provide details of actions taken to mitigate any negative social impacts identified:**

S. No.	Details of negative social impact identified	Corrective action taken
1	-	-

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

S. No.	State	Aspirational District	Amount spent (In INR)
1	Not applicable	-	0

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

No. The Company's supplier selection process is based on objective criteria such as market reputation, references from existing business associates, and an internal assessment of the supplier's technical capabilities and reliability. While there is no formal preferential procurement policy currently in place for marginalized or vulnerable groups, all suppliers are evaluated fairly and equally based on merit and capability.

b. From which marginalized /vulnerable groups do you procure? - Not applicable

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

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

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

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.**

S. No.	Name of authority	Brief of the Case	Corrective action taken
1	None	-	-

6. **Details of beneficiaries of CSR Projects:**

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	THIRUMALAI CHARITY TRUST (DONATION)	51478	85%
2	Christian Medical College Vellore	960	100%

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

Essential Indicators

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

Upon receiving a customer complaint, it is promptly routed to the relevant plant or department for thorough investigation. A detailed root cause analysis is carried out to determine the underlying issue, followed by implementation of appropriate corrective and preventive actions. After resolution, the Company communicates the findings and actions taken to the customer, ensuring transparency, accountability, and timely closure of the complaint.

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

Category	As a percentage to total turnover
Environmental and social parameters relevant to the product	100.00%
Safe and responsible usage	100.00%
Recycling and/or safe disposal	100.00%

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

	FY 2025-26			FY 2024-25		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	17	0	None	20	0	None

Remarks: Quality issues were addressed and closed.

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

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

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

Yes. Thirumalai Chemicals Limited has implemented a comprehensive Cyber Security Policy aimed at protecting sensitive data, IT systems, and networks from potential cyber threats. The policy outlines clear guidelines and procedures to ensure the confidentiality, integrity, and availability of the Company's information assets. By prioritizing cybersecurity, TCL aims to safeguard its operations and stakeholder interests against data breaches and cyber-attacks, thereby maintaining operational integrity and stakeholder trust.

Remarks: https://thirumalaichemicals.com/wp-content/uploads/2023/05/CYBER-SECURITY-POLICY.pdf

6. **Provide details of any corrective actions taken or underway on issues relating to any of the following: i. Advertising; ii. Delivery of essential services; iii. Cyber security and data privacy of customers; iv. Re-occurrence of instances of product recalls V. penalty / action taken by regulatory authorities on safety of products / services.**

   There have been no reported instances relating to advertising, delivery of essential services, cyber security, or data privacy of customers during the reporting period. As such, no corrective actions were required in these areas. Additionally, there were no occurrences of product recalls or penalties/actions imposed by regulatory authorities concerning the safety of the Company's products or services.

7. **Provide the following information relating to data breaches:**

   a. Number of instances of data breaches - Nil

   b. Percentage of data breaches involving personally identifiable information of customers -

      TCL maintains a robust IT infrastructure that enables accurate tracking and documentation of any potential data breach incidents. No data breaches were reported during the reporting period, reflecting the effectiveness of the Company's cybersecurity measures.

   c. Impact, if any, of the data breaches - None

Leadership Indicators

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

   TCL's services and information can be accessed through the website www.thirumalaichemicals.com

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

   To promote safe and responsible product usage, customers are provided with comprehensive product and process handling annexures. These documents outline detailed guidelines on safe storage, handling procedures, transportation precautions, and appropriate application methods. By sharing this critical information, the Company ensures that customers are well-informed about potential risks and best practices, enabling them to use the products in a manner that upholds safety standards, regulatory compliance, and operational efficiency.

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

   In the event of potential product unavailability or disruption, customers are promptly informed through established communication channels. This ensures transparency and enables them to plan accordingly, minimizing any operational impact on their end.

4. **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. In addition to the information mandated under applicable local regulations, TCL provides expanded product details on its labels. These include the Product Name, Batch Number, CAS Number, Date of Manufacture, Expiry Date, Supplier Information, Net and Gross Weight, specific labeling instructions, as well as relevant Hazard and Precautionary Statements. This enhanced disclosure supports greater transparency, improves traceability, and facilitates safe handling and usage by end users. No, TCL has not conducted any formal customer satisfaction survey during the reporting period related to its major products, services, or operational locations.