Business Responsibility & Sustainability Report

Sirca Paints India Limited ('Sirca') is one of the leading brands for wood coating products in India, with over two decades of experience in the industry. The Company is engaged in the manufacturing and sales of wood coatings and other decorative paints, under its owned or exclusively licensed brands such as Sirca, Unico, Oikos and Durante Vivan, and is also geared to begin exporting its products in some of the South Asian countries shortly. Sirca is significantly expanding its domestic footprint by setting up additional manufacturing facilities & infrastructure to strengthen its position in the East, West and South Indian markets.

Section A: General Disclosure

I. Details of the listed entity

| 1. | Corporate Identity Number (CIN) | L24219DL2006PLC145092 |
|-----|--|---|
| 2. | Name of the Listed Entity | Sirca Paints India Limited |
| 3. | Year of incorporation | 2006 |
| 4. | Registered Office Address | G-82 Kirti Nagar West Delhi 110015 |
| 5. | Corporate address | Same as mentioned above |
| 6. | E-mail | cs@sircapaints.com |
| 7. | Telephone | 011-42083083 |
| 8. | Website | https://www.sircapaints.com/ |
| 9. | Financial year for which reporting is being done | April 01, 2022 to March 31, 2023 |
| 10. | Name of the Stock Exchange(s) where shares are listed | BSE Limited (BSE), National Stock Exchange of India Limited (NSE) |
| 11. | Paid-up capital** | ₹ 27,40,44,000/- divided into 2,74,04,400 shares Equity Shares of ₹ 10 each |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | Name: Suraj Singh Designation: Company Secretary & Compliance Officer Tel.no: 011-42083083 Email: cs@sircapaints.com |
| 13. | Reporting boundary | This report is based on standalone basis |
| | | |

Note**: The Board of Directors, at its meeting held on March 29, 2023, approved the Bonus issue of shares and accordingly the Board of Directors, at it's meeting held on May 12, 2023 approved the allotment of equity bonus shares of 2,74,04,400 (Two Crore Seventy Four Lakhs Four Thousand Four Hundred) Equity Shares of ₹ 10/- each which resulted in to increase in paid-up, issued and subscribed equity shares capital of the Company from 2,74,04,400 equity shares to 5,48,08,800 equity shares face value of ₹ 10/- per share.

II. Products/Services

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

| S.No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|-------|-------------------------------------|-------------------------------------|-----------------------------|
| 1. | Import & Trading of Paints products | Import & Trading of Paints products | 71.82% |
| 2. | Manufacturing of Paints | Manufacturing of Paints | 28.18% |

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

| SI.No. | Products/Services | NIC Code | % of Turnover of the entity |
|--------|-------------------------------------|----------|-----------------------------|
| 1. | Import & Trading of Paints products | 46634 | 71.82% |
| 2. | Manufacturing of Paints | 20221 | 28.18% |

III. Operations

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

| Location | Number of Plants | Number of Offices | Total | |
|---------------|------------------|-------------------|-------|--|
| National | 2 | 12 | 14 | |
| International | 0 | 1 | 1 | |

17. Market served by the entity:

a. Number of locations:

| Locations | Number | | |
|----------------------------------|--------|--|--|
| National (No. of States) | 12 | | |
| International (No. of Countries) | 1 | | |

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

The percentage of total turnover of the Company for contribution of exports is 0.32%.

c. A brief on type of customers.

The Company primarily caters to two customer segments:

Retail

The Company caters to retail customers through its strong & growing distribution network of more than 1,823 dealers, further supported by a branch & depot network of 12 across its key markets. The retail customer segment contributes to nearly 70% of the revenue stream.

OEMs

Since the Company's beginning, Sirca has collaborated with furniture and fixture manufacturers. Sirca's products are a result of several collaborations and thorough understanding of OEM needs. OEMs have also been early adopters of premium wood coating solutions in India. Sirca is the primary and, in many cases, the only choice for furniture manufacturers when it comes to wood coatings. The Company has ensured utmost satisfaction and strong customer relationships by providing strong technical and after-sales support to OEMs. The OEM segment, where the Company works with a well-diversified clientele of around 673 clients, accounts for nearly 30% of the total revenue.

IV. Employees

18. Details as at the end of Financial Year i.e., March 31, 2023:

a. Employees and workers (including differently abled):

| S.No. | Particulars | Total (A) | M | ale | Female | |
|-------|--------------------------|-----------|---------|---------|---------|---------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| | EMPLOYEES | 486 | 446 | 92% | 40 | 8% |
| 1. | Permanent (D) | 239 | 213 | 89% | 26 | 11% |
| 2. | Other than Permanent (E) | 49 | 45 | 92% | 4 | 8% |
| 3. | Total Employees (D+E) | 288 | 258 | 89% | 30 | 11% |
| | WORKERS | 198 | 188 | 95% | 9 | 5% |
| 4. | Permanent (F) | 157 | 150 | 95% | 7 | 5% |
| 5. | Other than Permanent (G) | 41 | 39 | 95% | 2 | 5% |
| 6. | Total workers (F+G) | 198 | 188 | 95% | 9 | 9% |

b. Differently abled employees and workers:

| S.No. | Particulars | Total (A) | M | Male | | Female | |
|-------|--|-----------|---------|---------|---------|---------|--|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) | |
| | DIFFERENTLY ABLED EMPLOYEES | 0 | 0 | 0 | 0 | 0 | |
| 1. | Permanent (D) | 0 | 0 | 0 | 0 | 0 | |
| 2. | Other than Permanent (E) | 0 | 0 | 0 | 0 | 0 | |
| 3. | Total Differently Abled Employees (D+E) | 0 | 0 | 0 | 0 | 0 | |
| | DIFFERENTLY ABLED WORKERS | 0 | 0 | 0 | 0 | 0 | |
| 4. | Permanent (F) | 0 | 0 | 0 | 0 | 0 | |
| 5. | Other than Permanent (G) | 0 | 0 | 0 | 0 | 0 | |
| 6. | Total Differently Abled workers (F + G) | 0 | 0 | 0 | 0 | 0 | |

19. Participation/Inclusion/Representation of women:

| | Total (A) | No. and percentage of Females | |
|--------------------------|-----------|-------------------------------|---------|
| | | No. (B) | % (B/A) |
| Board of Directors | 8 | 1 | 12.5% |
| Key Managerial Personnel | 4 | 1 | 25% |

20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 year)

| | FY 2022-23 | | FY 2021-22 | | | FY 2020-21 | | | |
|-------------------------|------------|--------|------------|-------|--------|------------|-------|--------|-------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent employees (%) | 92% | 8% | 100% | 92.5% | 7.5% | 100% | 91% | 9% | 100% |
| Permanent workers (%) | 97% | 3% | 100% | 96.0% | 4.0% | 100% | 97.5% | 2.5% | 100% |

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

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

| S. No. | Name of the holding/ subsidiary/associate companies/joint ventures (A) | Indicate whether holding/Subsidiary/ Associate/Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|--|--|--------------------------------------|--|
| 1. | Sirca Industries Limited | Subsidiary | 100% | No |

VI. CSR Details

- 22. (i) Whether CSR is applicable as section 135 of Companies Act, 2013: (Yes)
 - (ii) Turnover (in ₹): 267.75 Crore for the year ended March 31, 2023).
 - (iii) Net Worth (in ₹): 26552.67 Crore for the year ended March 31, 2023).

VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom | Grievance Redressal | FY 2022-23 Current Financial Year | | | FY 2021-22 Previous Financial Year | | |
|-------------------------------------|---|--|---|---------|---|---|---------|
| complaint is received | Mechanism in Place (Yes/ No) (If Yes, then provide web-link for grievance redress policy) | 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 | 0 |
| Investors (other than shareholders) | Yes | 0 | 0 | | 0 | 0 | 0 |
| Shareholders | Yes | 0 | 0 | | 0 | 0 | 0 |
| Employees and workers | Yes | 0 | 0 | | 0 | 0 | 0 |
| Customers | Yes | 0 | 0 | | 0 | 0 | 0 |
| Value Chain Partners | Yes | 0 | 0 | | 0 | 0 | 0 |
| Other (please specify) | Yes | 0 | 0 | | 0 | 0 | 0 |

24. Overview of the entity's material responsible business conduct issues:

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

| SI.No. | Materialissue 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 | Talent Management Acquisition & Retention | Risk | Risk of failure in any of the elements of talent management can impact Sirca Paints ability to grow and provide services to its customers. | At Sirca Paints, we follow industry best human resource practices such as to attract, develop,deploy and retain talent. | Negative |

| SI.No. | Materialissue Identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---|---|---|---|--|
| 2 | Training & Skill Development and Health & Wellness of employees | Opportunity | Employees are our biggest strengths and the ever evolving technology requires employees with right skill sand regular trainings. | At Sirca Paints, we follow industry best human resource practices to develop,deploy talent. The Company arranges several technical and personality development trainings for employees to up skill and make them be ready for any challenge they face. In addition to offer the ambient and safe working condition, the Company conducts various health and safety awareness campaigns and other activities to keep its employees healthy and motivated. | Positive |
| | | Risk | Adverse Health and Wellness condition directly impact son the health and morale of the employees besides productivity impact. | | Negative |
| 3 | Environmental Sustainability | Risk | In view of Global Warming, environmental sustainability has become very crucial for all businesses. | The Company endeavors prevents pollution, reduces waste and minimizes the consumption of resources. We comply with applicable legal requirements which relate to our environmental aspects. We encourage environmental protection among employees and suppliers. | Negative |
| 4 | Governance | Opportunity | Sirca Paints ensures highest level of corporate governance and compliances with the statutory authorities. | - | Positive |

Note: Please also Refer Risk Management Report, which forms Part of the Annual Report.

Section B: Management and Process Disclosures

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

| Disc | losure Questions | P1 | P2 | Р3 | P4 | P5 | Р6 | 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 | No | Yes | Yes |
| 1(b) | Has the policy been approved by the Board? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| 1(c) | Web Link of the Policies, if available | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| 2 | Whether the entity has translated the policy into procedures. (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| 3 | Do the enlisted policies extend to your value chain partners? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| 4 | Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fair trade, Rain forest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| 5 | Specific commitments, goals and targets set by the entity with defined timelines, if any. | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| 6 | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | Yes | Yes | Yes | Yes | Yes | Yes | NA | Yes | Yes |
| | Governance, I | eadersh | ip and o | oversigl | ht | | | | | |
| 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) | Sustainability principles are integrated in the Corporate Policies of the Company are implemented by Management at all levels in day-to-day business operations. As much as we are passionate about severing our clients, we are committed about giving back to the society. | | | | | | | | |
| | | Our Corporate Social Responsibility work has been our way to reach out to communities, understand their needs and be an active corporate citizen. The Company has engaged in activities whereby we contributes to make a positive and distinguishing impact on the environment, customers, employees and other stakeholders. Our collective efforts have directed the improvement on various parameters of the Sustainability development. We strive to take forward our ESG Framework by understanding expectations and ways to incorporate the ESG norms deeper | | | | | s, ng | | | |
| 8 | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies) | | | | | | | | | |
| 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. | | | | | | | | | |

sustainability areas.

10. Details of Review of NGRBCs by the Company:

| Sub | ject for Review | Indicate whether in by Director/Commother Committee | | | Frequen Quarter | cy (Annu ly/Any ot | ally/F her – ¡ | lalf yea please s | rly/ specif | y) |
|---|---|---|---------------------------------------|------------|---|-------------------------|-------------------|----------------------|----------------|------|
| | | P1 P2 P3 P4 | P5 P6 P7 | P8 P9 | P1 P2 | P3 P4 | P5 | P6 I | P7 P | 8 PS |
| Performance against above policies and follow up action | | The policies of the Company are reviewed periodically / on a need basis by department heads/director board committees / board members, wherever Applicable. The frequency of review is annual. The frequency of review is annual. | | | | | | | | |
| of re | npliance with statutory requirements elevance to the principles, and, ification of any non-compliances | The Company com applicable statutor rectifies, non-compreviewed by the Au | y requirements oliance, if any. Tl | and | The freq | uency of | review | / is quar | terly. | |
| | | P1 P2 | P3 P | 4 | P5 P | 6 | P7 | P8 | | P9 |
| 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. | No, The policies an | e reviewed on a | periodic | basis inter | nally. | | | | |
| | If answer to question (1) abov | e is "No" i.e., not all | Principles are c | overed b | y a policy, | reasons | to be s | stated: | | |
| 12 | The entity does not consider the Principles material to its business (Yes/No) | | | Not Ap | plicable | | | | | |
| | The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | | | Not Ap | plicable | | | | | |
| | The entity does not have the financial or/human and technical resources available for the task (Yes/No) | | | Not Ap | plicable | | | | | |
| | It is planned to be done in the next financial year (Yes/No) | | | Not Ap | plicable | | | | | |
| | Any other reason (please specify) | | | Not Ap | plicable | | | | | |
| | | | of the policies | | | | | | | |
| Prin | cipal | | able Policies | | | Link | for p | olicies | | |
| and | ciple 1: Businesses should conduct govern themselves with Ethics, sparency and Accountability | Code of Conduct | | | | /ww.sirca s/#policie | | s.com/ | | |
| goo con | ciple 2: Businesses should provide ds and services that are safe and tribute to sustainability throughout r life cycle | Environment, Heal | th and Safety Po | olicy. | | ww.sirca s/#policie | | s.com/ | | |
| | ciple 3: Businesses should promote well-being of all employees | Code of Conduct & Employees | k Internal HR Po | licies for | | /ww.sirca s/#policie | | s.com/ | | |
| the towa who | ciple 4: Businesses should respect interests of, and be responsive ards all stakeholders, especially those are disadvantaged, vulnerable and ginalized | CSR Policy & Custo | omer Policy. | | | ww.sirca s/#policie | | s.com/ | | |
| | ciple 5: Businesses should respect promote human rights | Code of Conduct. | | | | /ww.sirca s/#policie | | s.com/ | | |
| prot | ciple 6: Businesses should respect, ect, and make efforts to restore the ronment | Environment, Health and Safety Policy. | | | https://www.sircapaints.com/ investors/#policies | | | | | |
| influ | ciple 7: Businesses when engaged in encing public and regulatory policy, ald do so in a responsible manner | NA | | | NA | | | | | |

| Principle 8: Businesses should support inclusive growth and equitable development | CSR Policy | https://www.sircapaints.com/ investors/#policies |
|--|-----------------|---|
| Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner | Customer Policy | https://www.sircapaints.com/ investors/#policies |

Section C: Principle Wise Performance Disclosure

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

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 | | FY 2 | 22-23 |
|--------------------------------------|--|--|---|
| | Total number of training & Awareness programmes held | Topic/ Principles covered under the training and its impact | % age of persons in respective category covered by the awareness programmes |
| Board of Directors | 1 session | Training on National Guidelines on Responsible Business Conduct | 100% |
| Key Managerial Personnel | 3 session | Leadership Programs | 60% |
| Employees Other than BoD and KMPs | 10 session | Induction training, Business Ethics, Workplace Conduct, Fraud, Bribery & Corruption, Conflict of Interest, Leadership, POSH, Information and Security Management, Data Privacy | 95% |
| Workers | 7 session | 9 Principles | 90% |

2 Details of fines penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the financial year, in the following format:

| Monetary - FY 22-23 | | | | | | | |
|--|--|---------------|-------------------|---|--|--|--|
| National Guidelines on Responsible Business Conduct (NGRBC) Principle | Name of the Regulatory/ Enforcement agencies/judicial institutions | Amount (in ₹) | Brief of the case | Has an appeal been preferred (Yes/No) | | | |
| Penalty/Fine | NIL | NIL | NIL | NIL | | | |
| Settlement | NIL | NIL | NIL | NIL | | | |
| Compounding Fees NIL | | NIL NIL | | NIL | | | |
| Non-Monetary - FY 22-23 | | | | | | | |
| Imprisonment | NIL | NIL | NIL | NIL | | | |
| Punishment | NIL | NIL | NIL | NIL | | | |

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

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

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, Sirca Paints has an anti-bribery and anti-corruption policy which applies to all the individuals working at all the levels and grades and provides a detailed guidance on the business ethics, values, policies and procedures to prevent corruption and bribery in all the activities and business dealings of Sirca Paints. It sets forth the policy of zero tolerance of bribery applicable to the organization and its subsidiaries. The policy is available on the Company website at https://www.sircapaints.com/investors/#policies.

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

There were no instances of any disciplinary action taken by any law enforcement agency for the charges of bribery/corruption against Directors/KMPs/employees/workers.

6 Details of Complaints with regards to conflicts of interest:

| - | | | | | | |
|---|--------|---------|----------|----------|--|--|
| | FY 2 | 2-23 | FY 21-22 | | | |
| | Number | Remarks | Number | Remarks | | |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | NIL | _ | NIL | <u>-</u> | | |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | NIL | - | NIL | - | | |

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

Not Applicable

LEADERSHIP INDICATORS

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

| FY 22-23 | | | | | | |
|---|--|--|--|--|--|--|
| Total number of awareness programmes held | Topics/principles covered under the training | % age of value chain partners covered (by value of business done with such partners) under the awareness programmes | | | | |
| 4 | 9 Principles | - | | | | |

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, A policy approved by the Board is in place providing the framework for the Company's Corporate Governance philosophy covering Directors, Senior Management and all employees. It addresses conflicts of interest along with related-party transactions; insider trading; compliance with laws, rules & regulations; fair dealing; ethical business practices; and protection and proper use of Company assets.

The Company has a Code of Conduct for Directors and senior management personnel. All the Directors and senior management personnel have confirmed compliance with the said code. (Weblink-Investors - sirca (sircapaints.com))

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

We have adequate procedures in place for procuring goods and services sustainably by means of our purchase policy that covers numerous aspects of sustainable sourcing such as value for money, price, quality, availability, functionality, environmental, governance and social aspects.

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.

The Company is committed to offer products that meet internationally accepted green product standards. This commitment drives the team of dedicated professionals working at Company's partner's Research & Technology Centre at Italy, where technology and innovation are the corner stones. Research, development and innovation through a structured approach to projects, as well as the constant improvement of process technologies, are essential for growth in new markets, but also for strengthening the Company's core business. This cause positive environmental and social impacts.

The products developed in the last one year are listed below:

- Anti-bacterial Emulsion and Anti-viral Emulsion
- Water based wood coating

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

Yes, The Company maintains a healthy relationship with its service providers, vendors and other suppliers.

The Company has developed supplier intimacy and goodwill which enables the Company to source quality raw materials even when there is scarcity of raw material in Market. We engage with local suppliers for sustainable sourcing. Adequate steps are taken for safety during transportation, which, in turn, help to mitigate the impact on climate.

If yes, what percentage of inputs were sourced sustainably? 2(b)

More than 60% sourcing is done from manufacturers who have a formal sustainability programme.

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

| Reclaimed Products | Reclaimation Process |
|--------------------------------|-------------------------------------|
| Plastics (including packaging) | Sold as Scrap to Local Scrap Dealer |
| E-waste | Sold as Scrap to Local Scrap Dealer |
| Hazardous waste and | Sold as Scrap to Local Scrap Dealer |
| Other waste | Given to Authorized Recycler |

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

Yes, EPR is applicable to the Company. As a responsible manufacturer, the Company has complied with the obligations as stipulated under the Plastic Waste management amended rules 2022 well before March 31, 2023.

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?

The Company is in the process of undertaking Life Cycle Perspective/Assessment (LCA)

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.

The details will be available and disclosed upon completion of Life Cycle Assessments of Key Products.

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

| Indicate Input Material | Recycled or re-used input material to total material | | | | | |
|---------------------------|--|--|--|--|--|--|
| | FY 22-23 FY 21-22 | | | | | |
| TiO2 Dust (in MT) | - | | | | | |
| Reclaimed Solvent (in MT) | NIA | | | | | |
| Powder Fines (in MT) | — NA | | | | | |
| Paint Sludge (in MT) | | | | | | |

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

| | FY 22-23 | | | FY 21-22 | | | |
|--------------------------------------|----------|----------|--------------------|----------|----------|--------------------|--|
| | Re-Used | Recycled | Safely Disposed | Re-Used | Recycled | Safely Disposed | |
| Plastics (including packaging) -MT | NA | NA | NA | NA | NA | NA | |
| E- Waste | NA | NA | NA | NA | NA | NA | |
| Hazardous waste | NA | NA | NA | NA | NA | NA | |
| Other waste, Paint Sludge (in MT) | NA | NA | NA | NA | NA | NA | |

5 Reclaimed products and their packaging materials (as percentage of products sold) for each product category. Our paints products are consumables and hence are non-retrievable at their end-of-life.

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

ESSENTIAL INDICATORS

| | | | | | ESSENI | IAL INDICA | IORS | | | | | |
|------|--|-----|---------|------------|----------|---------------|-----------|------------|---------|------------|---------|------------|
| 1(a) | Details of measures for the well-being of employees: | | | | | | | | | | | |
| | | | | | | FY 22-23 | : | | | | | |
| | % of Employees Covered by | | | | | | | | | | | |
| | Category Total Health Accident Maternity Paternity Day Care (A) Insurance Insurance Benefits Benefits Facilities | | | | | | | | | | | |
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| | Permanent Employees | | | | | | | | | | | |
| | Male | 213 | 135 | 63% | 0 | 0 | 0 | 0 | 74 | 35% | 20 | 9% |
| | Female | 26 | 17 | 65% | 0 | 0 | 6 | 23% | 0 | 0 | 2 | 8% |
| | Total | 239 | 152 | 64% | 0 | 0 | 6 | 3% | 74 | 31% | 22 | 9% |
| | Other than Permanent Employees | | | | | | | | | | | |
| | Male | 45 | 3 | 7% | 0 | 0 | 0 | 0 | 10 | 22% | 7 | 16% |
| | Female | 4 | 1 | 25% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | 49 | 4 | 8% | 0 | 0 | 0 | 0 | 10 | 20% | 7 | 14% |
| 1(b) | | | | Details | of measu | res for the w | ell-being | of work | ers: | | | |

% of Workers Covered by

| Category | Total (A) | Hea Insur | | | cident urance | Mate Bene | • | Pater Ben | - | Day C Facili | |
|----------|------------------------------|--------------|------------|---------|------------------|--------------|------------|--------------|------------|-----------------|------------|
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) |
| | | | | Pe | rmanent Wo | orkers | | | | | |
| Male | 150 | 139 | 93% | 0 | 0 | 0 | 0 | 5 | 3% | 0 | 0 |
| Female | 7 | 7 | 100% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 157 | 146 | 93% | 0 | 0 | 0 | 0 | 5 | 3% | 0 | 0 |
| | Other than Permanent Workers | | | | | | | | | | |
| Male | 39 | 32 | 82% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Female | 2 | 2 | 100% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 41 | 34 | 83% | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

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

| Benefits | | FY 22-23 | | FY 21-22 | | | |
|------------------------------|--|---|---|--|---|--|--|
| | No. of employees covered as a % of total employees | No. of Workers Covered as a % of total workers | Deducted And deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of Workers Covered as a % of total workers | Deducted And deposited with the authority (Y/N/N.A.) | |
| PF | 486 | 100% | 100% | 100% | 100% | 100% | |
| Gratuity | 486 | 100% | 100% | 100% | 100% | 100% | |
| ESI | 203 | 100% | 100% | 100% | 100% | 100% | |
| Other – Please specify | N/A | N/A | N/A | N/A | N/A | N/A | |

3 **Accessibility of workplaces**

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

We are working on absorption and provisions for differently abled friendly and accessible workplace and premises as per the requirements of the Rights of Persons with Disabilities Act, 2016. All future workplace will be provided with differently abled friendly accessibility.

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 has a Policy on Equal Opportunity and Non-Discrimination which is available on the Company's website at https://www.sircapaints.com/investors/#policies

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 | 258 | 100% | 179 | 100% |
| Female | 30 | 100% | 7 | 100% |
| Total | 288 | 100% | 186 | 100% |

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

| | Yes/No | (If Yes, then give details of the mechanism in brief) |
|-----------------------------------|--------|---|
| Permanent Workers | Yes | Yes, there is a Speak Up or vigil mechanism for |
| Other than Permanent Workers | Yes | employees and workers to address grievances. Please refer to the Vigil Mechanism Whistle blower Policy and Other Disclosure section of the Corporate Governance |
| Permanent Employees | Yes | Report for more information. |
| Other than Permanent Employees | Yes | |

| | 7 | Membership of emp | lovees and worker in as | sociation(s) or Unions re | cognised by the listed entity: |
|--|---|-------------------|-------------------------|---------------------------|--------------------------------|
|--|---|-------------------|-------------------------|---------------------------|--------------------------------|

| Category | | FY 22-23 | | FY 21-22 | | | |
|------------------------------|---|---|---------|---|--|---------|--|
| | Total employees /workers in respective category (A) | No. of employees/ workers inrespective category, who are part of association (s) or Union (B) | % (B/A) | Total employees /workers in respective category (C) | No. of employees/ workers inrespective category, who are part of association (s) or Union (D) | % (D/C) | |
| Total Permanent Employees | 239 | 0 | 0% | 205 | 0 | 0% | |
| - Male | 213 | 0 | 0% | 186 | 0 | 0% | |
| - Female | 26 | 0 | 0% | 19 | 0 | 0% | |
| Total Permanent Workers | 157 | 157 | 100% | 221 | 221 | 100% | |
| - Male | 150 | 150 | 100% | 191 | 191 | 100% | |
| - Female | 7 | 7 | 100% | 30 | 30 | 100% | |

8 Details of training given to employees and worker

| | 2014110 01 1141 | ining given to emp | ioyeee ama ironni | - | |
|----------|-----------------|--------------------|-------------------|-------------------------|------------|
| Category | | | FY 22-23 | | |
| | Total (A) | On Health & Sa | fety Measures | On Skill Upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| | | Emp | loyees (Permanei | nt) | |
| Male | 213 | 213 | 100% | 0 | 0% |
| Female | 26 | 26 | 100% | 0 | 0% |
| Total | 239 | 239 | 100% | 0 | 0% |
| | | Wo | rkers (Permanent | t) | |
| Male | 150 | 150 | 100% | 0 | 0% |
| Female | 7 | 7 | 100% | 0 | 0% |
| Total | 157 | 157 | 100% | 0 | 0% |
| Category | | | FY 21-22 | | |
| | Total (A) | On Health & Sa | fety Measures | On Skill U _l | ogradation |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| | | Emp | loyees (Permanei | nt) | |
| Male | 225 | 225 | 100% | 0 | 0% |
| Female | 26 | 26 | 100% | 0 | 0% |
| Total | 251 | 251 | 100% | 0 | 0% |
| | | Wo | rkers (Permanent | t) | |
| Male | 179 | 179 | 100% | 0 | 0 |
| Female | 7 | 7 | 100% | 0 | 0% |
| Total | 186 | 186 | 100% | 0 | 0% |

Details of performance and career development reviews of employees and worker:

| Category | | FY 22-23 | | | FY 21-22 | | |
|----------|-----------|---------------------------|------|-----------|----------|---------|--|
| | Total (A) | Total (A) No. (B) % (B/A) | | Total (A) | No. (B) | % (B/A) | |
| | Employees | | | Employees | | | |
| Male | 213 | 213 | 100% | 186 | 186 | 100% | |
| Female | 26 | 26 | 100% | 19 | 19 | 100% | |
| Total | 239 | 239 | 100% | 205 | 205 | 100% | |

10

Health and safety management system:

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. All manufacturing, offices and RD & I labs are certified for ISO 14001 (Environment) and ISO 45001(Health & Safety) Management system.

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

The Company has Environment, Health and Safety Policy. The health and safety guidelines are applicable to all operating locations of the Company and lay down required parameters to be followed at all locations.

Some of the key processes for identifying work-related hazards and assessing risks on a routine and non-routine basis are given below:

- i) Chemical Risk Assessment is used for identifying health hazards during handling of chemicals;
- ii) Fire Risk Assessment is done for handling fire related risks; and
- iii) Hazard Identification and Risk Assessment (HIRA) is used for routine and non-routine activities.

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

Yes, all workers at plants can report work related hazards through an internal portal. All the work hazards reported are monitored and actioned upon at the plant. A process of 'stoppage of work due to unsafe act and unsafe condition' to safeguard employees' interest is in place to report or remove themselves from situations they believe could cause injury. At non-manufacturing locations, the workers approach the location head to report any work-related hazards and to remove themselves from such risks.

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

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

11

Details of safety related incidents, in the following format:

| Safety Incident/ Number | Category | FY 22-23 | FY 21-22 |
|---|-----------|----------|----------|
| Lost Time Injury Frequency Rate (LTIFR) | Employees | 0 | 0 |
| (per one Million-person hours worked) | Workers | 0 | 0 |
| Total recordable work-related injuries | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High consequence work-related injury or | Employees | 0 | 0 |
| ill-health (excluding fatalities) | Workers | 0 | 0 |

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

In line with the Company's Environment, Health and Safety Policy, there are various measures taken to ensure access to a safe and healthy work-place to all employees and workers. The Company invests in technologies and processes to avoid and minimise the manual interfaces with machines. The Company ensures that all statutorily required norms are complied.

The Company endeavours to design any new facility by using latest technology and include all possible safety measure such that there is near zero risk to human health.

13

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

| | | FY 22-23 | | FY 21-22 | | | |
|--------------------|-----------------------------|--|---------|-----------------------------|---|---------|--|
| | Filed during the year | Pending resolution at the end of the year | Remarks | Filed during the year | Pending resolution at the end of the year | Remarks | |
| Working Conditions | 0 | 0 | - | 0 | 0 | - | |
| Health & Safety | 0 | 0 | - | 0 | 0 | - | |

| 14 | 14 Assessment for the year: | | | | | |
|----|-----------------------------|---|--|--|--|--|
| | | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) | | | | |
| | Working Conditions | 100% | | | | |
| | Health & Safety | 100% | | | | |

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

NIL

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' Group Insurance Policy (EGI):

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 a practice of informing the vendors about the statutory changes affecting their responsibilities in respect of deduction/withholding of tax at source in respect of their transactions with the Company.

Provide the number of employees/workers having suffered high consequence work related injury/ill-health/ 3 fatalities (as reported in Q11 of Essential Indicators 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 | 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 2 | 2-23 | FY | 21-22 |
| 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)

The Company does not provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment

5 Details on assessment of value chain partners on Working Conditions and Health & Safety

The Company has in place a Code of Conduct for Business Partners, Accordingly, business partners are expected to provide a safe and healthy workplace for their employees and contractors. Business Partners must be compliant with local and national laws and regulations on Occupational Health and Safety, and have the required permits, licenses and permissions granted by local and national authorities.

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.

Not Applicable

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.

Company engages with a broad spectrum of stakeholders, to deepen its insights into their needs and expectations, and to develop sustainable strategies for the short, medium and long term. Stakeholder engagement also helps to manage risks and opportunities in business operations. The key stakeholders identified in consultation with the Company's management are: customers, employees, shareholders, academic institutions, staffing firms, other suppliers, technology partners and collaborators, industry bodies, governments, NGOs, local communities, regulators and society at large.

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

| Stakeholder Group | Whether identified as Vulnerable & Marginalised Group (Yes/No) | Channels of communication | Frequency of engagement | Purpose and scope of Engagement includ in key topics and concerns raised during such engagement | | |
|----------------------|--|---|-------------------------------|---|--|--|
| Suppliers | No | • Emails | Quarterly | Supply chain | | |
| | | • Meetings | | Integration, latest market | | |
| | | • Supplier Portal | | innovation,Cost | | |
| | | • Supplier Audits | | Reduction, Social and relationship | | |
| | | Vendor Development | | capital | | |
| | | Programmes • Vendor | | development | | |
| | | Performance/Rating | | | | |
| | | • Multi stake holder Platforms (Conferences, Knowledge Sharing Conclaves) | | | | |
| | | • Joint Value Creation Programme for cost competitiveness | | | | |
| Business Partner | No | • Emails | Quarterly | Critical Disclosures, Growth Status, | | |
| | | Board Meetings | | | | |
| | | • Company Functions | | Strategy, Market | | |
| | | Audits and Review Meets | | Gaps, Technology assistance | | |
| | | • Multi-Stake holder Platforms (Conferences,Knowledge sharing Conclaves) | | | | |
| Shareholder & | No | Board Meetings | Quarterly | Financial | | |
| Investors | | • Investor/Analyst Meets | | Disclosures, Business growth | | |
| | | Annual Report | | plan, Market | | |
| | | • Media Updates and Press Releases | | challenges Operational | | |
| | | • Website | | performance; Corporate Governance any other material information | | |

| Stakeholder Group | Whether identified as Vulnerable & Marginalised Group (Yes/No) | Channels of communication | Frequency of engagement | Purpose and scope of Engagement includ in key topics and concerns raised during such engagement |
|----------------------|--|--|-------------------------------|---|
| Customers | No | • Emails | Regular | New innovations, Grievance |
| | | Meetings | | Redressal, |
| | | •Customer Satisfaction Survey | | Changing |
| | | •Multi-Stakeholder Platforms | | Customer Preferences |
| | | (Conferences, Knowledge sharingConclaves) | | |
| Employees | No | Review Meetings | Regular | Employee Well- being, Improving productivity & |
| | | • Emails | | |
| | | •Appraisals | | morale |
| | | • Employee Engagement Surveys | | |
| | | • Work Line Portal, Training Programmes, Idea Management | | |
| | | • Advanced Business Skills Modules • Great Place to Work Survey | | |
| Community | Yes | Community Welfare Programmes | Quarterly | CSR, Grievances |
| | | • Community visits/meeting | | Redressal, Social and relationship |
| | | • Local authority and town council meetings | | capital development |

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

The Company consults stakeholders on material topics. Stakeholder interactions result in the identification of a broad funnel of issues important to each of the constituencies. The Company's Management & Board uses discussions with internal and external stakeholders, as well as its own judgment, to prioritize and arrive at a list of material topics with significant economic, environmental, or social impacts on Company's business, reputation, and operations. The Company management shares feedback with the Board on these issues.

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, Company's strategy to support the identification and management of environmental, and social topics uses inputs gathered during stakeholder consultations.

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

The Company identifies the need of communities including vulnerable and marginalised groups and accordingly works on various programs through Corporate Social Responsibility initiatives. The initiatives undertaken by the Company under the thrust areas of Corporate Social Responsibility initiatives are undertaken after assessing the need of the communities including the vulnerable/marginalised stakeholder groups and other members of the community.

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 22-23 | FY | | | 21-22 | |
|------------------------|-----------|--|---------|----------|--|---------|--|
| | Total (A) | No. of employees/ workers covered (B) | % (B/A) | Total(C) | No. of employees/ workers covered (D) | % (D/C) | |
| Permanent Employees | 239 | 200 | 83% | 221 | 200 | 90.5% | |
| Permanent Workers | 157 | 157 | 100% | 186 | 186 | 100% | |

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

| Category | | | FY 22-23 | | | | | FY 21-22 | | |
|----------------------|-----------|---------|------------------|----------------|------------|-----------|----------------|------------|---------|-----------------|
| | Total (A) | | al to ım wage | More minimu | | Total (D) | Equa minimu | | | than ım wage |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| | | | Employees | | | | ı | Employees | | |
| Permanent | 239 | 210 | 87% | 29 | 12% | 221 | 196 | 86% | 25 | 14% |
| Male | 213 | 200 | 94% | 13 | 6% | 196 | 184 | 56% | 0 | 0% |
| Female | 26 | 10 | 38% | 16 | 62% | 25 | 20 | 5% | 0 | 0% |
| Other than permanent | 49 | 49 | 100% | 0 | 0% | 34 | 18 | 33% | 0 | 0% |
| Male | 45 | 45 | 100% | 0 | 0% | 30 | 15 | 32% | 0 | 0% |
| Female | 4 | 4 | 100% | 0 | 0% | 4 | 3 | 6% | 0 | 0% |
| | | | Workers | | | | | Workers | | |
| Permanent | 49 | 49 | 100% | 0 | 0% | 205 | 180 | 88% | 25 | 12% |
| Male | 45 | 45 | 100% | 0 | 0% | 191 | 173 | 91% | 0 | 9% |
| Female | 4 | 4 | 100% | 0 | 0% | 14 | 7 | 50% | 7 | 50% |
| Other than permanent | 41 | 41 | 100% | 0 | 0% | 41 | 41 | 100% | 0 | 0% |
| Male | 39 | 39 | 100% | 0 | 0% | 39 | 39 | 100% | 0 | 0% |
| Female | 2 | 2 | 100% | 0 | 0% | 2 | 2 | 100% | 0 | 0% |

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

| Benefits | | Male | Female | | |
|--------------------------------|--------|--|--------|---|--|
| | Number | Median remuneration/ salary/wages of respective category | Number | Median remuneration/salary/ wages of respective category | |
| Board of Directors (BoD) | 7 | 57% | 1 | 0% | |
| Key Managerial Personnel | 3 | 21.51% | 1 | 20% | |
| Employees other than BoD & KMP | 255 | 0.28% | 29 | 0% | |
| Workers | 189 | 0.32% | 9 | 29% | |

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, Respective HR Partners are responsible for addressing human rights and concerns raised by the employees or workers. They play a crucial role in ensuring that human rights are respected in the workplace and that employees' or workers concerns are addressed. They are responsible for maintaining a safe and healthy work environment, promoting diversity and inclusion, and ensuring that employees are treated fairly and with dignity and respect.

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

Whenever employees or workers raise concern related to human rights, such as discrimination, harassment, or other violations of their rights, HR Partners takes these concerns seriously and investigate them promptly and thoroughly. They also provide support and resources to employees who are in need of assistance.

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

| | | FY 22-23 | | FY 21-22 | | |
|--------------------------------------|-----------------------------|--|---------|-----------------------------|--|---------|
| | Filed during the year | Pending Resolution at the end of the year | Remarks | Filed during the year | Pending Resolution at the end of the year | Remarks |
| Sexual Harassment | 0 | 0 | - | 0 | 0 | - |
| Discrimination at Workplace | 0 | 0 | - | 0 | 0 | - |
| Child Labor | 0 | 0 | - | 0 | 0 | - |
| Forced Labour/ Involuntary Labour | 0 | 0 | - | 0 | 0 | - |
| Wages | 0 | 0 | - | 0 | 0 | - |
| Other human rights related issues | 0 | 0 | - | 0 | 0 | - |

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

The Company believes in the principle of natural justice and ensures full confidentiality of complainant is maintained during and after resolution of complaint. Such complaints are usually handled by senior members in the organisation. These members are trained on aspects like how such complaints must be handled, the rights of complainants, and manner of dealing with complaints and respondents, sensitivity and judgement to be applied on such matters.

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

Yes, all critical human rights requirements are part of business agreements, purchase orders and contracts with suppliers. Further the Code of Conduct for Business Partners is applicable to all the suppliers and service providers according to which suppliers are expected to respect human rights and avoid causing/contributing to human rights infringements through their business actions.

9 Assessment for the year:

| | %of your plants and offices that were assessed (by entity or statutory authorities or third parties) | | |
|-----------------------------|--|--|--|
| Child Labour | | | |
| Forced/ Involuntary Labour | _ | | |
| Sexual Harassment | - 00/ | | |
| Discrimination at Workplace | — 0% | | |
| Wages | _ | | |
| Others - Please specify | _ | | |

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

Not Applicable

LEADERSHIP INDICATORS

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

No process introduced or modified as no observations reported

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

The Company is committed to protecting and respecting Human Rights and remedying rights violations in case they are identified; for example, issues relating to human trafficking, forced labour, child labour, freedom of association, right to collective bargaining, equal remuneration and discrimination. The Company works towards providing equal employment opportunity, ensuring distributive, procedural, and interactional fairness, creating a harassment-free, safe environment and respecting fundamental rights. As an equal opportunity employer, no discrimination is tolerated on any aspect

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?

Currently as an organisation, we are working on absorption and provisions for differently abled friendly and accessible work place and premises as per the requirements of the Rights of Persons with Disabilities Act, 2016.

4 Details on assessment of value chain partners on Child Labour, Forced/ Involuntary Labour, Sexual Harassment, Discrimination at Workplace, Wages.

| | % of Value chain partners (by value of business done with such parameters) that were assessed |
|----------------------------------|---|
| Sexual Harassment | 0% |
| Discrimination at workplace | 0% |
| Child Labour | 0% |
| Forced Labour/Involuntary Labour | 0% |
| Wages | 0% |
| Others – please specify | 0% |

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

Not Applicable

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 - in KWH | FY 22-23 | FY 21-22 |
|--|----------|----------|
| Total electricity consumption (A) – (KWH) | 313083 | 186395 |
| Total fuel consumption (B) (Diesel in LTR) | 15800 | 6400 |
| Energy consumption through other sources (C) LPG in KG | 6000 | |
| Total energy consumption (A+B+C) | 334883 | 192795 |
| Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees) | 1254.24 | 963.97 |
| Energy intensity (optional) – the relevant metric may be selected by the entity | | |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) – Not Applicable

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

No, the entity does not have any site/facility identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

| Parameter | FY 22-23 | FY 21-22 |
|--|----------|----------|
| Water Withdrawal by sources (in kilol | itres) | |
| (i) Surface water | NA | NA |
| (ii) Groundwater | 900 | 750 |
| (iii) Third party water | 150 | 150 |
| (iv) Seawater/desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 1050 | 900 |
| Total volume of water consumption (in kilolitres) | 1050 | 900 |
| Water intensity per rupee of turnover (Water consumed/turnover) | 3.93 | 4.50 |
| Water intensity (optional) – the relevant metric may be selected by the entity | - | - |

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agenc: Not Applicable

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

Our all-manufacturing plants are Zero Liquid Discharge facilities. Recognising the importance of water as a resource, we undertake several initiatives to optimise the consumption and reduce resultant wastewater generation through our reuse or recycle schemes. Such wastewater is further recovered and used back in process.

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

| • | • | | • |
|--|--------------------|----------|----------|
| Parameter | Pleasespecify unit | FY 22-23 | FY 21-22 |
| NOx | μg/m3 | NA | NA |
| Sox | μg/m3 | NA | NA |
| Particulate Matter (PM) | 2.5 PM 10 PM | 25 50 | 30 60 |
| Persistent Organic Pollutants (POP) | - | - | - |
| Volatlie Organic Compounds (VOC) ppm - | - | - | - |
| Hazardous air Pollutants (HAP) | - | - | - |
| Others - please specify | - | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: Not Applicable

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

| | Please specify unit | FY 22-23 | FY 21-22 |
|--|------------------------------------|----------|----------|
| Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if | Metric tonnes of CO2 equivalent | - | - |
| available) | | | |
| Total Scope 2 emissions | Metric tonnes of | + | - |
| (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | CO2 equivalent | | |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | | + | - |
| Total Scope 1 and Scope 2 emission intensity | MTCO2e/KL of FG | - | - |
| (optional)- MTCO2e/KL of FG | | | |

The above emissions are on standalone basis.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency: Not Applicable

| Does the entity have any project related to reducing Gre details. | en House Gas em | ission? If Yes, then pro |
|---|---------------------|--------------------------|
| Not Applicable | | |
| Provide details related to waste management by the ent | ity, in the followi | ng format: |
| Total Waste generated (i | in metric tonnes) | |
| Plastic waste (A) | 2.1 | 1.2 |
| E-waste (B) | 0.02 | 0.01 |
| Bio-medical waste (C) | 0 | 0 |
| Construction and demolition waste (D) | 0 | 0 |
| Battery Waste (E) | 0.02 | 0.01 |
| Radioactive waste (F) | 0 | 0 |
| Other Hazardous waste. Please specify, if any. (G) | 5.4 | 4.5 |
| ETP sludge | 0 | 0 |
| Waste Oil (ETP), Spent/Lube Oil 16- | 25 | 30 |
| Solvent Recovery Residue | 0 | 0 |
| Dirty Resin | 0.085 | 0.125 |
| Mixed Paint | 0.175 | 0.225 |
| Contaminated cotton waste | 1.275 | 1.525 |
| Filter Cartridge | 0 | 0 |
| Barrels, Tins Drums | 189.6 | 112.3 |
| Other Non-hazardous waste generated (H). Please specify if any | | 1.10 |
| Powder Waste (Damaged Powder, powder coating fine chips and harden lumps) | s 1.50 | 0.85 |
| Metal Scrap(MS,Tin,SandIron Scrap; Aluminium Sheet,other metal scrap) | 1.50 | 1.20 |
| Wooden Scrap | 2.50 | 1.50 |
| Paper Waste | 1.50 | 1.10 |
| Carton Waste (Scrap&Empty Carton) | 2.25 | 1.65 |
| Food Waste | 0 | 0 |
| Non-Commercial Value Scrap(Garbage Etc.) | 0 | 0 |
| Boilerash | 0 | 0 |
| Mix Garbage | 0.95 | 0.75 |
| MEE Salt | 0 | 0 |
| Total (A + B + C + D + E + F + G + H) | 10.20 | 7.05 |
| For each category of waste generated, total waste recover operations (in metric tonnes) | ered through recy | cling, re-using or other |
| Category of v | waste | |
| (i) Recycled | | |
| (ii) Re-used | | |
| (iii) Other recovery operations | | |
| Total | | |
| For each category of waste generated, total waste dispose | ed by nature of dis | posal method (in metr |
| Category of v | waste | |
| (i) Incineration | | |
| (ii) Landfilling | | |
| (iii) Other disposal operations | | |
| | | |

Briefly describe the waste management practices adopted in your establishments. Describe the strategy 9 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:

Waste generation is an inevitable part of manufacturing process, the Company segregate waste at source, minimise waste and safe disposal thereof.

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

| 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. |
|---------------------------------|--------------------|---|
| N. C / | | A A I I. I. |

None of our operations/ offices are located in/ around ecologically sensitive areas

Not Applicable

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

Not Applicable

11

Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such 12 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:

Yes, we ensure 100% compliances with all the statutory requirements. During the reporting period, no fines were levied by government or regulatory authorities. (FY 22-23)

LEADERSHIP INDICATORS

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

| Parameter | FY 22-23 | FY 21-22 |
|--|----------|----------|
| From renewable sour | rces | |
| Total electricity consumption (A) | - | - |
| Total fuel consumption (B) | - | - |
| Energy consumption through other Sources (C) | - | - |
| Total energy consumed from renewable sources (A + B + C) | - | - |
| Total electricity consumption (D) | - | - |
| Total fuel consumptions (E) | - | - |
| Energy consumption through other Sources (F) | - | - |
| Total energy consumed from non-renewable sources (D + E + F) | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency - Not Applicable

2 Provide the following details related to water discharged:

| Parameter | FY 22-23 | FY 21-22 |
|--|---------------------------|----------|
| Water discharge by destination and level | of treatment (in kilolitr | es) |
| (i) To Surface water | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (ii) To Groundwater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iii) To Seawater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iv) To Seawater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (v) Others | - | |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| Total water discharged (in kilolitres) | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency – Not Applicable

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

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

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

| Parameter | FY 22-23 | FY 21-22 |
|---|---------------------------|----------|
| Water Withdrawal by sources | (in kilolitres) | |
| (i) Surface water | - | - |
| (ii) Ground water | - | - |
| (iii) Third party water | - | - |
| (iv) Seawater/desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) | - | - |
| Total volume of water consumption (in kilolitres) | - | - |
| Water intensity per rupee of turnover (Water consumed/turnover) | - | - |
| Water intensity (optional) – Total fresh water consumption/ Production of FG (KL/KL of FG) | - | - |
| Water discharge by destination and level o | of treatment (in kilolitr | es) |
| (i) Into Surface water | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (ii) Into Groundwater | - | - |
| - No treatment | - | - |
| - With treatment – please specify level of treatment | - | - |
| (iii) Into Seawater | - | - |
| - No treatment | - | - |

| Total water discharged (in kilolitres) | - | - |
|--|---|---|
| - No treatment | _ | _ |
| - With treatment - please specify level of treatment | - | - |
| - No treatment | - | - |
| (v) Others | - | - |
| - With treatment – please specify level of treatment | - | - |
| - No treatment | - | - |
| (iv) Sent to third-parties | - | - |
| - With treatment – please specify level of treatment | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency – Not Applicable

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

| Parameter | Please specify unit | FY 22-23 | FY 21-22 |
|--|---------------------|----------|----------|
| Total Scope 3 emissions | - | - | - |
| (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | | | |
| Total Scope 3 emissions per rupee of turnover | - | - | - |
| Total Scope 3 emission intensity | - | + | - |
| (optional)– the relevant metric may be selected by the entity | | | |

The above emissions figures also includes Scope 3 emissions from OPCs. Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency -Not Applicable

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

Not applicable, since None of our operations/offices are located in/around ecologically sensitive areas

If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve 6 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 | Outcome of the initiative |
|--------|--------------------------------|------------------------------------|
| 1 | Improvised automation in plant | Reduction in energy consumption |
| 2 | Advanced Grinding machines | Reduction in cycle time |
| 3 | Advanced Safety Systems | Reduction in incidents & accidents |

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

Yes, advanced state-of-the-art safety system, monitoring round the clock, CCTV surveillance to minimize the impact during disaster and fast recovery for business continuity and proper planning and auditing for improvement.

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

We have not currently monitored the impacts to the environment arising from the value chain of the entity.

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

Not Applicable

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

Company engages with the public and regulatory bodies in a responsible manner. It participates in the same on a need basis. Company is a member of the following mentioned 8 trade associations

1(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

We are currently associated with the following Industry chambers/associations:

| S. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|--------|---|---|
| 1 | The Indian Paint Association | National |
| 2 | Federation of Indian Export Organisations (FIEO) | National |
| 3 | Indo Italian Chamber of Commerce and Industry | National |
| 4 | Indian Chemical Council | 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.

| <u> </u> | | | | |
|-------------------|---|-------------------------|--|--|
| FY 22-23 | | | | |
| Name of Authority | Brief of Case | Corrective Action Taken | | |
| - | No case related to anti- competitive conduct by the entity reported in FY 22-23 | - | | |

LEADERSHIP INDICATORS

1 Details of public policy positions advocated by the entity:

Your Company participates in various programmes of the Industry/Trade associations for development of balanced regulations by engaging with the regulatory bodies in a responsible manner. The Company has advocated the following public policies:

- Plastic Waste Management through Extended Producer Responsibility;
- Changes in Legal Metrology (Packaged Commodities) Rules, 2011.

This information is not available in public domain as these representations have been though Industry Associations.

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

ESSENTIAL INDICATORS

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

Not Applicable

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

Not Applicable

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

The Company works closely with the community in the identified areas of contribution in the thrust areas for carrying out the Corporate Social Responsibility initiatives. Within the area of work, the employees of the Company work with the communities to understand the impact of the projects on the intended beneficiaries. These interactions provide the people with ample opportunities to gauge and address community concerns. Based on these interactions, we have not encountered any specific grievances from the community at present.

| F | Percentage of input material (inputs to total inputs by value) sourced from suppliers: | | | |
|--|--|-------------------|--------|--|
| | | FY 22-23 FY 21-22 | | |
| [| Directly sourced from MSMEs/small producers | 30.76% | 42.21% | |
| Sourced directly from within the district and neighbouring districts Majority of PM is sourced from neighbouring districts within 10km range from plant | | | | |
| The Company gives priority to suppliers in local community for sourcing of input material, baring specialty chemicals which are procured from buyers who may not be available in local vicinity. | | | | |

Age wise debtors outstanding as per books and what steps taken for recovery of long pending debtors and likely instances of debtors turning bad, if any.

Steps taken for debt recovery

Dedicated Credit Control Department: we have formed a dedicated department who expertise in handling difficult debtors and may have more success in recovering the debt.

Due Diligence: CC team makes sure to collect all the required documents for KYC and follows the strict process of account opening, CD/CL assigning.

Maintain Accurate Records: Ensuring accurate records of all outstanding debts, including the amount owed, due dates, payment history, and any communication with the debtor.

Communication: Initiating communication with the debtor early on. Sending reminders via letters, emails, or phone calls, politely requesting payment and providing necessary details of the debt. We have recovered a huge some by constant reminding the dealers.

Payment Plans: Some debtor were facing financial difficulties, consider negotiating a payment plan that allowed them to repay the debt in smaller, manageable installments over an extended period.

Offer Incentives: To encourage prompt payment, offer discounts or incentives for early settlement of the debt.

Legal Action: As a last resort, legal actions have been taken after consulting with a lawyer experienced in debt recovery.

Likely instances of debtors turning bad

Financial Difficulties: sometimes debtors faces financial difficulties due to poor market conditions or some internal reasons.

Lack of Communication: Ignoring reminders and avoiding communication.

Disputes or Service Issues: Unresolved disputes or issues with the product or some sales person can lead to delayed or withheld payments.

Fraudulent Intent: In some cases, debtors may intentionally default on their obligations, committing fraud.

| Particulars | <30 Days | 30-60 Days | 60-180 Days | >180 Days | Total Amount |
|---------------------------------|--------------|--------------|--------------|-------------|---------------------|
| Sundry Debtors-as on 31.03.2023 | 24,59,07,427 | 10,47,37,354 | 10,61,40,598 | 5,68,62,061 | 51,36,47,440 |

LEADERSHIP INDICATORS

1 Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question1 of Essential Indicators above):Details of public policy positions advocated by the entity:

Not Applicable

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

| Sr. No. | State | Aspirational District |
|---------|------------------|-----------------------|
| 1 | Delhi | West Delhi |
| 2 | Himachal Pradesh | Sirmaur |
| 3 | Uttar Pradesh | Gautam Buddha Nagar |
| 4 | Maharashtra | Dhule |
| 6 | Uttarakhand | Rudraprayag |

Oo you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised/vulnerable groups? (Yes/No)

Currently, there is no preferential procurement policy in place. However, Company does not discriminate against any groups for sourcing we use a variety of variables like Quality, service, technical competence, and price to decide the vendors.

3(b) From which marginalised/vulnerable groups do you procure?

Not Applicable

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

Not Applicable

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 | Owned/ | Benefit | Basis of |
|--------|--------------------------------|----------|----------|---------------|
| | traditional knowledge | Acquired | Shared | calculating |
| | | (Yes/No) | (Yes/No) | benefit share |

Not Applicable

5

6

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

Not Applicable

Details of beneficiaries of CSR Projects:

The Annual Report on CSR activities undertaken by the Company during the financial year ended March 31, 2023 is given in **Annexure D** to the Boards Report which forms part of this Annual Report.

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

ESSETNIAL INDICATORS

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

The Company treats customer complaints with utmost importance and believes that it needs to be agile, transparent, and solution-oriented to resolve them efficiently and satisfactorily. The Company ensures to keep the customer informed throughout the entire process of complaint resolution and focus on resolving retail customer complaints within five working days, which includes calling the customer within four hours, connecting with the customer within two days, and providing the final resolution to the customer. These timelines are relevant to our décor category's customer/applicator/trade expectations. The Company also maintains multiple points of communication with the customer, that is through SMS/Email/Whats App, to keep the customer informed of all actions taken on the complaint.

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

| | As a %age of total turnover |
|---|-----------------------------|
| Environmental and Social parameters relevant to the product | All of our Products |
| Safe and responsible usage | All of our Products |
| Recycling and/or safe disposal | All of our Products |

3 Number of consumer complaints in respect of the following:

| | FY 22-23 | | FY21-22 | | | |
|-----------------------------------|--------------------------------|--|--|--------------------------------|--|---|
| | Received during the year | Pending Resolution at end of year | Remarks | Received during the year | Pending Resolution at end of year | Remarks |
| Data Privacy | Nil | - | | Nil | - | |
| Advertising | Nil | - | | Nil | - | |
| Cyber-Security | Nil | - | | Nil | - | |
| Delivery of essential Services | Nil | - | | Nil | - | |
| Restrictive Trade Practices | Nil | - | | Nil | - | |
| Unfair Trade Practices | Nil | - | | Nil | - | |
| Other* | 250 | 39 | Product complaints relating products, packaging, technical attributes and colour | 100 | 23 | Product complaints relating products, packaging, technical attributes and colour |

^{*}Company has tracked & reviewed Customer Complaints for FY 2022-23 for all the Business units.

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

| | Number | Reason for Recall |
|-------------------|--------|-------------------|
| Voluntary Recalls | NIL | - |
| Forced Recalls | NIL | - |

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

Our Company has a comprehensive framework in place to manage cyber security and data privacy in alignment with Group policies. Cyber security and data privacy are identified as risks in our Risk Management framework. We are committed to protecting the personal data of our consumers, employees, and business partners, adhering to global standards on data privacy. Regular awareness and training sessions are conducted for our employees to ensure compliance with these standards.

Refer Section on Risks and Opportunities for more details.

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

No issues have been reported during the year regarding advertising and delivery of essential services, cyber security, and data privacy of customers. There have been no instances of product recalls or penalties/actions taken by regulatory authorities concerning the safety of products/services that would require corrective actions.

LEADERSHIP INDICATORS

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

The platforms used for the information are the Company's website, Annual Report, social media platforms and media advertisement/publications. Information relating to all the products and services provided by the Company are available on the Company's website at https://www.sircapaints.com/

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

Safety applications and procedures are clearly stated on our livery and websites. Additionally, we conducted awareness campaigns for painters and contractors throughout the year to ensure their understanding and adherence to safety protocols. Moreover, few of these information such as description, performance features & benefits, application & safe usage instructions are also provided on the product packaging to inform and educate consumers about safe and responsible usage of products or services.

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

There was no risk of disruption/discontinuation of essential services and hence no requirement of informing consumers on actions required in such an eventuality.

Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

The entity complies with the local laws by displaying mandated information on product labels. In addition to the required declarations, additional information related to the products and their usage is provided on the labels

- 5 Provide the following information relating to data breaches:
- **Number of instances of data breaches along-with impact** Zero(0), no instances of data breaches reported in FY22-23.
- 5(b) Percentage of data breaches involving personally identifiable information of Customer $_{\mbox{\footnotesize Nil}}$

For and on behalf of the Board Sirca Paints India Limited

Place: New Delhi Date: June 30, 2023 Sd/- **Sanjay Agarwal** DIN: 01302479 Chairman cum Managing Director Sd/-**Apoorv Agarwal**DIN: 01302537
Joint Managing Director