

BUSINESS RESPONSIBILITY REPORT

Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [SEBI (LODR) Regulations], as amended on December 26, 2019, prescribe that top 1000 companies based on Market Capitalisation as per NSE / BSE as on March 31 of the every Financial Year, are required to have "Business Responsibility Report" (BRR) as part of their Directors' Report.

Following is the BRR of the Company as the Company is among the top 1000 listed entities as per Market Capitalisation of NSE / BSE as on March 31, 2022. The report has been prepared as prescribed and in accordance with Regulation 34 of the SEBI (LODR) Regulations.

SECTION A : GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate identification number	L21012TZ1960PLC000364
2. Name of the Company	SESHASAYEE PAPER AND BOARDS LIMITED
3. Registered Address	Pallipalayam, Namakkal District, Cauvery RS PO, Erode 638 007, Tamil Nadu
4. Website	www.spbltd.com
5. E-Mail address	edoff@spbltd.com; investor@spbltd.com
6. Financial Year reported	FY 2021-22
7. Sector(s) that the Company is engaged in	Paper is the only reportable segment of operation of the Company.
8. Three key products / services manufactured / provided by the Company	Different grades of Printing and Writing Paper.
9. Total number of locations where the business activity is undertaken by the Company	2 locations (Unit : Erode and Unit : Tirunelveli) in the State of Tamil Nadu, India
10. Markets served by the Company	India, USA, Europe, UAE, Middle East, African countries (Uganda, Nigeria, Kenya, Ghana, Ethiopia, etc.), other Asian countries (Sri Lanka, Afghanistan, etc.)

SECTION B: FINANCIAL DETAILS OF THE COMPANY

1. Paid-up Capital	₹ 12.04 crores
2. Total Income	₹ 1370.63 crores
3. Total Profit After Tax (PAT)	₹ 101.43 crores
4. Total spending on CSR	₹ 4.21 crores
5. Total spending on CSR as % on PAT	4.15 %
6. List of activities in which the CSR expenditure has been incurred	<p>The Company's focussed programmes are in the field of community development, water, sanitation, education, health, rural infrastructure and technical training.</p> <p>For further details, please refer the Corporate Social Responsibility Report. (Annexure - VI of Directors' Report)</p>

SECTION C: OTHER INFORMATION

1. Does the Company have any Subsidiary Company / Companies	<p>The Company has one wholly owned Subsidiary :</p> <ul style="list-style-type: none"> ▪ M/s Esvi International (Engineers & Exporters) Limited
2. Do the Subsidiary Company / Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)	No
3. Do any other entity / entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]	No

SECTION D: BR INFORMATION

1. Details of the Director/s responsible for BR

✦ Details of the Director responsible for implementation of BR policies

a) DIN Number	00003584
b) Name	K S KASI VISWANATHAN
c) Designation	Managing Director

✦ Details of the BR Head

a) DIN Number	00003584
b) Name	K S KASI VISWANATHAN
c) Designation	Managing Director
d) Contact Number	(91) (4288) 240 221-228
e) E-mail	kasi@spbltd.com

2. Principle wise BR Policy / Policies

Principle	Description	Company's Policy
Principle 1	Businesses should conduct and govern themselves with Ethics, Transparency and Accountability	<ul style="list-style-type: none"> ◇ Codes of Conduct ◇ Whistle Blower
Principle 2	Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle	<ul style="list-style-type: none"> ◇ QEEGHS (Quality, Environment, Energy, Green Resources, Occupational Health and Safety Management Systems) Policy ◇ WCM Policy
Principle 3	Businesses should promote the well-being of all employees	<ul style="list-style-type: none"> ◇ QEEGHS Policy ◇ SHAW - Prevention of sexual harassment at workplace

Principle	Description	Company's Policy
Principle 4	Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized	<ul style="list-style-type: none"> ◇ CSR Policy ◇ SHAW - Prevention of sexual harassment at workplace
Principle 5	Businesses should respect and promote human rights	<ul style="list-style-type: none"> ◇ CSR Policy ◇ WCM Policy
Principle 6	Business should respect, protect and make efforts to restore the environment	<ul style="list-style-type: none"> ◇ Water Conservation Policy ◇ Material Conservation Recycling and Recyclability Policy ◇ Green Procurement Policy ◇ Waste Management Policy ◇ FSC Controlled Wood Procurement Policy ◇ ISO 14001 Certification
Principle 7	Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner	<ul style="list-style-type: none"> ◇ Codes of conduct
Principle 8	Businesses should support inclusive growth and equitable development	<ul style="list-style-type: none"> ◇ CSR Policy ◇ FSC – Controlled Wood Procurement Policy
Principle 9	Businesses should engage with and provide value to their customers and consumers in a responsible manner	<ul style="list-style-type: none"> ◇ QEEGHS Policy

Details of compliance :

Sl.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have policy / policies for.	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy been formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Does the policy conform to any national / international standards? If yes, specify?	Most of the policies are aligned to various Standards like : ISO 18001 (Quality Management System), ISO 14001 (Environment Management System), OHSAS 18001 (Occupational Health & Safety Management System), FSC Controlled Wood Procurement Policy								
4	Has the policy been approved by the Board? If yes, has it been signed by the MD / owner / CEO / appropriate Board Director?^^	Y	--	--	Y	Y	--	Y	Y	--
5	Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	Indicate the link for the policy to be viewed online?*	*	*	*	*	*	*	*	*	*
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	Does the Company have in-house structure to implement the policy / policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	Does the Company have a grievance redressal mechanism related to the policy / policies to address stakeholders' grievances related to the policy / policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y

Sl.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
10	Has the Company carried out independent audit / evaluation of the working of this policy by an internal or external agency?	The Auditors of the Company (ISO Auditors / Internal Auditors / In-house ISO and WCM co-ordinators / In-house Certified Energy Auditors) review the implementation of the policies from time to time. The Company's 2 units have been subject to audit by external certification agencies. No dedicated Business Responsibility Audit has been conducted.								

^^ All the policies are signed by an Executive Director in the Board.

* All the policies are available in Company's website : www.spbltd.com

3. Governance related to BR

a)	Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year.	◇	The Company does not have a Committee of Board for dealing with this matter specifically. ◇ However, aspects of Business Responsibility are reviewed by various other committees of the Executives / Board.								
b)	Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?	◇	This is the Company's first foray into publishing the Business Responsibility Report for the year under review.								

SECTION E: PRINCIPLE WISE GOVERNANCE

PRINCIPLE 1: BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH ETHICS, TRANSPARENCY AND ACCOUNTABILITY.

1. Does the policy relating to ethics, bribery and corruption cover only the Company? Yes / No. Does it extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?

- ◇ Commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, Senior Management and all other employees of the Company. It is embedded in the Company's Vision, Mission and Values Statement. The Values of the Company, as in this statement, start with "Ethical Practices". The Company's Vision is "To excel as a trusted, socially responsible and customer driven organisation providing maximum value to all stakeholders."

- ◇ The Company has adopted the 'Code of Conduct', to ensure ethics, transparency and accountability in all aspects of the business and create value for its stakeholders in a sustainable manner. All Directors and Senior Management personnel shall affirm compliance with Code on an annual basis.
- ◇ The Company has well established policies, in accordance with the statutory guidelines and relevant SEBI regulations.
 - Whistle Blower policy
 - Code of Conduct
 - Code of practices for fair disclosure of unpublished price sensitive information.
 - Remuneration policy.
 - Policy on preservation and archival of documents.
 - Policy for determination of Materiality for Disclosure of Information / Events to Stock Exchanges.
 - Policy on Related Party transactions
 - Policy for determining Material subsidiaries.
 - Prevention of Sexual Harassment at Workplace
- ◇ The Company has a policy to do business with suppliers / contractors and other who are aligned with its value systems.

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

- ◇ 2 Complaints (1 in SCORES & 1 in BSE Website) were received by the Company, from shareholders during the financial year. Based on replies by the Company, both the complaints were dropped by SEBI / BSE. No complaint was pending for resolution as on March 31, 2022.
- ◇ All the queries, from other stakeholders, were promptly responded to the stakeholder concerned.

PRINCIPLE 2: BUSINESSES SHOULD PROVIDE GOODS AND SERVICES THAT ARE SAFE AND CONTRIBUTE TO SUSTAINABILITY THROUGHOUT THEIR LIFE CYCLE.

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

- ◇ Paper is a noble Product. The printing and writing grades of paper that our Company manufactures go to educate Children and inculcate good reading habits. Paper is biodegradable, recyclable and an environmentally friendly product.

- ◇ Our company manufactures different grades of printing and writing paper using
 - Farm forestry based wood
 - Sugar cane bagasse [a by-product of a Sugar Mill] and
 - Recycled waste paper.
- ◇ Our company helps farmers to grow trees. As part of our tree farming activity, our company provides quality Clonal seedlings of Eucalyptus and Casuarina breed at subsidized rates to farmers and also assist them with technical help through Agricultural University to achieve higher yields and revenues.

Our company is constantly focused on identifying new wood species. Recently we have identified Melia-Dubia, a high yielding fast growing species, suitable for pulp production.
- ◇ Technical support to the farmers for this initiative is being provided in association with the Department of Tree Breeding of Forest College and Research Institute, attached to Tamil Nadu Agricultural University, Coimbatore, through a Collaborative Research Project.
- ◇ In accordance with the Company's vision to achieve wood positive status, over 17.3 crore seedlings were made available during the FY 2021-22 (FY 2020-21 : 16.4 crore seedlings), at subsidized rates, for planting in 20042 acres of land in FY 2021-22 (FY 2020-21 : 19015 acres).
- ◇ Our company has a structured, innovative Lift Irrigation Scheme by which our treated waste water is used to irrigate nearly 1500 acres of land in which local farmers grow sugar cane. The sugar cane produced is procured by our associate Company viz. Ponni Sugars(Erode) Limited which in turn gives bagasse, a residue left after extraction of sugar from sugar cane. Bagasse is used by our Company to produce paper, and in turn, our Company gives treated waste water to the farmers to grow sugar cane. This tripartite arrangement between our Company, Ponni Sugars (Erode) Limited and the nearby Farmers has been in operation for over 35 years. This innovative Lift Irrigation Scheme is a unique and innovative irrigation scheme and has caught the attention of Overseas Experts and UNDP as a Role Model.
- ◇ Our Unit : Tirunelveli has a modern De-inking Plant in which recycled waste paper is de-inked(removal of ink) and reused for manufacture of high quality printing and writing paper grades.
- ◇ As can be seen from the above, the three primary fibrous raw materials viz. Wood, Sugar cane Bagasse and Waste Paper are obtained through a sustainable process model helping the local community.
- ◇ The paper manufacturing process adaptable by our company is also environmentally friendly and green. Our process is higher energy efficient and completely "Elemental Chlorine Free". Our process uses environmentally friendly chemicals viz. Oxygen, Hydrozen Peroxide,

Chlorine Di-oxide, etc. which make our process green. The process adapted by our company generates a liquor called "Black Liquor" which is a biomass rich in lignin is burnt in a boiler to produce green power.

- ◇ Nearly 50% of the energy consumed by our Mill is green power generated from 'Black Liquor' in the Chemical Recovery Complex. Nearly 96% of the Chemicals used in pulping process are recovered back in the Chemical Recovery Complex and recycled.
- ◇ The Lime Sludge which is a waste product from our Reausticizing Plant is reburnt in a Rotary Lime Kiln which again uses about 20% biogas from the Anaerobic Digestion System.
- ◇ The solid waste viz. effluent sludge from waste water treatment plant is the primary raw material for hundreds of small board manufacturers and the board produced is used for Egg tray, Hosiery packing, Footwear packing, etc.
- ◇ Our company has a unique waste water treatment facility. The waste water from the Mill is classified into three categories viz. (i) High COD, (ii) Medium COD & (iii) Low COD.
- ◇ The high COD stream is taken to Anaerobic Lagoon which generates Methane gas which is used in Rotary Lime Kiln to replace fossil fuel viz. Furnace Oil.
- ◇ The low COD stream is taken to Clarifier and is recycled back in the process.
- ◇ The medium COD stream is treated in the waste water treatment facility meeting the standards prescribed by the Pollution Control Board and the treated waste water is used for irrigating the waste land around the Mill through Lift Irrigation Scheme.
- ◇ Our company has bagged several awards for excellent Environment performance, safety, energy efficiency, etc. Notable Awards received by the Company in recent years are:
 - CII GreenCo Gold Rating Award during GreenCo Summit held at Pune in the year 2017.
 - Green Award 2017 by Tamil Nadu Pollution Control Board for Environment Protection.
 - CII - National Award for Excellence in Energy Management:
 - a) Excellence in Energy Management - for the past 4 consecutive years
 - b) National Energy Leader - 2nd time in row
 - c) Innovation award - Digester modification to enhance pulp production and green energy

- Paper Mill of the year award for FY 2019-20, awarded by Indian Paper Manufacturers Association.
- AEE award - Regional Corporate Energy award 2021 by Association of Energy Engineers, US

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):

(a) Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain?

- ◇ The Company, vide its QEEGHS Policy, TPM Policy, Energy Policy, etc. believes that optimising production efficiency delivers value to customers and minimises environmental impact, thereby driving the Company towards the goal of long term sustainability.
- ◇ Raw material: The Company, in its Unit : Erode which has an integrated pulp mill, consumes about 2.2 tonnes (BD tonnes) of wood per ton of Paper produced.
- ◇ In this context, it is important to note that the Company has won the "Tamil Nadu Pollution Control Board Green Award" for the year 2017 for the excellent contribution to the Environmental protection.
- ◇ The Company had earlier been awarded "GOLD" Rating under CII Greenco Award recognizing the excellent performance in conservation of all input resources such as Steam, Power and Water.
- ◇ The Company also educates and motivates their suppliers / vendors to become Green.

(b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

- ◇ Owing to the nature of the product, it is not feasible to identify the reduction during usage by consumers.

3. Does the Company have procedures in place for sustainable sourcing (including transportation)?

(a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

- ◇ The Company has been certified under three standards of FSC (Forest Stewardship Council) [®], viz. FSC-STD-40-004, FSC-STD-40-005, FSC-STD-50-001 and FSC-STD-40-003. By this, the Company assures its stakeholders that the wood and wood fibre (pulp) purchased by it are traceable to responsibly managed plantations and that adequate controls are in place to ensure identification and traceability throughout the Chain of Custody. This also means that the Company is capable of manufacturing and selling FSC pure products in Domestic and International Markets.

- ◇ The Company policy on Green Procurement guidelines underlines the following :
 - Sourcing of raw materials from Environmentally and socially responsible sources.
 - Maximising the usage of Eco friendly chemicals and energy efficient equipments
 - Maximising the use of recovered paper in paper furnish.
 - Following the 3R principles of Reduce, Reuse and Recycle.
 - Conducting awareness programs on Environmental impacts for vendors / suppliers.
 - Creating awareness about GSC (Green Supply Chain) to critical vendors and to help them for ISO 14000 certification and to prioritise buying from ISO vendors.
 - Improving the efficiency of the suppliers by audit, training and improvement suggestions.

- 4. Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**
 - ◇ The Company is investing in efforts in carrying out research and development to ensure long term sustainability of raw materials for operations via responsible sourcing and promote local procurement.
 - ◇ The Company also encourages farmers to directly sell their wood produce to the Company. The Company is working towards developing clones for the improvement of plantation yields, which results in increased returns to farmers.

- 5. Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as < 5%, 5-10%, > 10%). Also, provide details thereof, in about 50 words or so.**
 - ◇ Non-hazardous solid wastes such as bamboo and hard wood dust, screen rejects, fly-ash, lime sludge, and effluent sludge are re-used in various processes either directly by the Company or disposed to the manufacturers, who use these as input materials in their processes.
 - ◇ Company has a specific policy towards “Material Conservation Recycling and Recyclability”. Through this policy, the Company is committed to improve material conservation, recycling and recyclability by reducing cellulosic fibre content in paper, reducing process input per ton of product and reducing packing material consumption per ton of finished paper.
 - ◇ The focus is also on increasing the wood availability within close proximity through plantation initiatives, increasing the pulp yield, increasing bagasse furnish in paper to maximise our “Waste to Wealth

potential", increasing recycled paper content, increasing the use of eco-friendly packing materials, etc.

PRINCIPLE 3: BUSINESSES SHOULD PROMOTE THE WELL-BEING OF ALL EMPLOYEES.

1. **Please indicate the total number of employees.**
 - ◇ No. of employees on the rolls of the Company, as on March 31, 2022 : 1300
2. **Please indicate the total number of employees hired on temporary / contractual / casual basis.**
 - ◇ No. of employees hired on temporary / contractual / casual basis as on March 31, 2022 : 1248
3. **Please indicate the number of permanent women employees.**
 - ◇ No. of permanent women employees on the rolls of the Company, as on March 31, 2022 : 22
4. **Please indicate the number of permanent employees with disabilities.**
 - ◇ No. of permanent employees with disabilities on the rolls of the Company, as on March 31, 2022 : 12
5. **Do you have an employee association that is recognised by management?**
 - ◇ Yes. There are recognised trade unions / Staff Association affiliated to various trade union bodies.
6. **What percentage of your permanent employees is members of this recognised employee association?**
 - ◇ % of permanent employees as members of a recognised employee association : 76%
7. **Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.**
 - ◇ No such complaints pertaining to child labour, forced labour, involuntary labour, sexual harassment were reported in the current financial year / were pending as at the end of the financial year.

8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?

Sl.No	Category of Employees	Safety Training	Skill upgradation
1	Permanent Employees	82 %	79 %
2	Permanent Women Employees	80 %	100 %
3	Casual / Temporary / Contractual Employees	88 %	69 %
4	Employees with disabilities	90 %	80 %

PRINCIPLE 4: BUSINESSES SHOULD RESPECT THE INTERESTS OF, AND BE RESPONSIVE TOWARDS ALL STAKEHOLDERS, ESPECIALLY THOSE WHO ARE DISADVANTAGED, VULNERABLE AND MARGINALISED.

- Has the Company mapped its internal and external stakeholders? Yes/No
 - Yes, the company has identified its internal and external stakeholders.
- Out of the above, has the Company identified the disadvantaged, vulnerable & marginalised stakeholders?
 - The Company's CSR policy drives the initiatives undertaken by the Company towards the benefit of the disadvantaged, vulnerable and marginalised stakeholders. The systems and process are in place to systematically identify stakeholders and for understanding their concerns and for engaging with them, is reviewed from time to time.
- Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalised stakeholders? If so, provide details thereof, in about 50 words or so.
 - The Company on a periodical basis undertakes dedicated activities as a part of its CSR initiatives for the disadvantages, vulnerable and marginalized stakeholders in and around the Company's plants.
 - Education, Sports and health aids are provided to schools in rural / under-developed areas and to schools supporting differently abled children. The Company also does Lift-Irrigation programs on a large scale to support the local farming community.

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS.

- Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?
 - The Company's policy on human rights is imbibed in its values and beliefs. The alignment with this value system is expected out of any person dealing with the Company.

2. **How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?**

◇ NIL under this principle.

PRINCIPLE 6: BUSINESS SHOULD RESPECT, PROTECT, AND MAKE EFFORTS TO RESTORE THE ENVIRONMENT.

1. **Does the policy related to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others.**

◇ The Company is committed towards environmental protection and has a well-defined corporate environmental policy in place. The policy covers the Company and its employees. The Company encourages its subsidiaries, suppliers and contractors to employ environment friendly measures in their day to day operations.

2. **Does the Company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc.? Y/N. If yes, please give hyperlink for webpage etc.**

◇ Yes. The details on the initiatives have been explained in detail under Principle No. 2.

3. **Does the Company identify and assess potential environmental risks? Y/N**

◇ Yes. The details on the initiatives have been explained in detail under Principle No. 2.

◇ Also, the Company uses environmental impact assessments, recognised environmental management standards, ISO 9001 (Quality Management System), ISO 14001 (Environmental Management System), and OHSAS 18001 (Occupational Health & Safety Management System) to sharpen its focus towards achieving sustainability goals.

◇ For more details on the energy conservation initiatives, please refer Annexure - VI of the Directors' report for the Financial Year 2021-22.

4. **Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if yes, whether any environmental compliance report is filed?**

◇ Energy reduction, Environment protection and water conservation are always on our focus.

◇ The Company utilises its resources in an optimal and responsible manner ensuring sustainability through reduction / re-use / re-cycling / managing waste. The Company seeks to improve its environmental performance by adopting cleaner production methods, promotion of energy efficient and environmental friendly technologies.

◇ For details on the energy conservation initiatives, please refer Annexure - V of the Directors' Report for the Financial Year 2021-22.

5. **Has the Company undertaken any other initiatives on - clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.**
- ◇ For details on the energy conservation initiatives and initiatives on Newer Technologies, please refer Annexure - V of the Directors' report for the FY 2021-22.
6. **Are the Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?**
- ◇ Yes. The Company being in manufacturing business, at all times ensures compliance with the applicable environmental laws. The Environmental policy of the Company and the ISO-1001 certification of its plants reiterates its commitment to be an environment friendly organisation setting standards in Environment management.
7. **Number of show cause/ legal notices received from CPCB / SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.**
- ◇ NIL

PRINCIPLE 7: BUSINESS, WHEN ENGAGED IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A RESPONSIBLE MANNER.

1. **Is your Company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:**
- ◇ The Company is member of the following associations:
 - Indian Paper Manufacturers Association (IPMA)
 - Indian Pulp and Paper Technical Association (IPPTA)
 - Confederation of Indian Industry (CII)
 - Hindustan Chamber of Commerce and Industry
 - Bombay Chamber of Commerce and Industry
 - Indo-American Chamber of Commerce and Industry
 - Indo-German Chamber of Commerce and Industry
2. **Have you advocated / lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)**
- ◇ The Company is not actively involved in lobbying. However, as a responsible Corporate Citizen, the Company as part of Industry associations / chambers makes recommendations / representations before regulators and associations for advancement and improvement of the Industrial Climate in India.

- ◇ The Company also represents its views / opinions on Energy Security and Management, water security and sustainable business principles through various forums.

PRINCIPLE 8: BUSINESS SHOULD SUPPORT INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT.

1. Does the Company have specified programmes / initiatives / projects in pursuit of the policy related to Principle 8? If yes details thereof.

- ◇ The Company is a pioneer, in the State of Tamil Nadu, in ensuring overall development and welfare of the society in the fields of environment, conservation of natural resources, health, education, rural development and livelihood interventions etc.
- ◇ The Company's CSR programmes are in the field of community development, water, sanitation, education, health, rural infrastructure and technical training.
- ◇ The Company has a Corporate Social Responsibility (CSR) Policy in accordance with the provisions of the Companies Act 2013 and Rules made there under. The contents of the CSR Policy are disclosed on the website of the Company.

2. Are the programmes / projects undertaken through in-house team / own foundation / external NGO / government structures / any other organisation?

- ◇ The Company's in-house cross-functional teams comprising of Human Resources function / Environment Management function / Operations, in each of the plants of the Company, tailor their own approach and CSR initiatives. Frequent meetings, interaction programs, field visits are conducted with focus groups to make an assessment of the needs, aspirations and requirements of the people.

3. Have you done any impact assessment of your initiative?

- ◇ The Company adopts Participatory Rural Appraisal to involve people in prioritising their needs and defining type of development initiatives suited to local needs.
- ◇ For most contributions by the Company, the beneficiary sends a detailed report to the Company on how the contributions have been deployed, along with photos, wherever possible, on the results of such programs / projects.
- ◇ The Company's contribution to programs like Rural School Infrastructure Development, Lift Irrigation Schemes for farmers are resultant of the impact assessment undertaken by the Company in the relevant areas.

4. **What is your Company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken?**
- ◇ 100% of the CSR Spend by the Company is thro' Direct Contribution to Community Development Projects.
 - ◇ Please refer CSR Report in Annexure VI of the Directors' Report for Financial Year 2021-22 for complete details on the spend made by the Company during the financial year ended March 31, 2022.
5. **Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.**
- ◇ The Human Resource function / Environment Management function / Operations team, at the manufacturing locations, regularly interact with the local communities to assess the impact of community development projects undertaken by these units to ensure that the objectives and benefits of these projects are being met.
 - ◇ The Company has a well-defined, transparent monitoring and review mechanism to ensure that each CSR project / program has :
 - Clear sustainable objectives developed out of societal needs that may be determined through discussions with the local communities and need assessment studies.
 - Clear targets, timelines and measurable indicators, wherever possible.
 - A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014.

PRINCIPLE 9 : BUSINESS SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CUSTOMERS AND CONSUMERS IN A RESPONSIBLE MANNER.

1. **What percentage of customer complaints / consumer cases are pending as on the end of financial year.**
- ◇ The key strengths of the Company are : Development of new products, actively participating in product trials along with the customers and prompt resolution of customer complaints, if any.
 - ◇ The total number of Customer complaints which were pending at the end of the year constitutes less than 5%. Company has a well-established process whereby a cross-functional team, involving Marketing and Technical personnel, analyse each Customer Complaint in detail. The action points are identified and implemented immediately with a quick turnaround time.
 - ◇ The entire process is reviewed by the Top Management on a monthly basis.

- 2. Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes/ No / N.A. /Remarks (additional information)**
- ◇ Yes. Wherever relevant, the Company encourages that its packaging / labelling contain detailed information regarding safe handling, storage and use, which are over and above what is mandated as per local laws.
- 3. Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year? If so, provide details thereof, in about 50 words or so.**
- ◇ There have been no cases filed against the Company, by any stakeholder, during the year, on issues relating to unfair trade practices, irresponsible advertising and / or anti-competitive behaviour.
 - ◇ Allegation, leveled against large paper manufacturers in India (including our Company) of simultaneous price increases during the period January 2012 - December 2013, is currently under evaluation by the Competition Commission of India.
- 4. Did your Company carry out any consumer survey / consumer satisfaction trends?**
- ◇ The Company is focused on delivering value to its customers and, therefore, customer satisfaction surveys are carried out on an annual basis. Through this annual customer surveys, feedback is obtained from our Channel Partners (Indentors) and Customers on Sales Process, Marketing Policies, Sales Accounting and Settlements, Delivery / Order fulfillment, Product Quality, Service & Support, Compliant handling process and overall Customer Satisfaction.
 - ◇ In addition, the Company also has a systematic quarterly interactions with all the Channel Partners on Market feedback, Product Development, Price indications, etc.