Annexure - III

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORTING

Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [SEBI (LODR) Regulations], with amendments to Regulation 34 (2) (f) of LODR Regulations vide Gazette notification no. SEBI/LAD-NRO/GN/2021/22 dated May 05, 2021 introduced new reporting requirements on ESG parameters called the Business Responsibility and Sustainability Report (BRSR). Top 1000 companies based on Market Capitalisation as per NSE / BSE as on March 31 of every Financial Year, are required to have "Business Responsibility & Sustainability Report" (BRSR) as part of their Directors' Report.

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

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity:

1.	Corporate identification number	L21012TZ1960PLC000364
2.	Name of the Company	SESHASAYEE PAPER AND BOARDS LIMITED
3.	Year of incorporation	22 nd June 1960
4.	Registered Address	Pallipalayam, Namakkal District, Cauvery RS PO, Erode 638 007, Tamil Nadu
5.	Corporate Address	Pallipalayam, Namakkal District, Cauvery RS PO, Erode 638 007, Tamil Nadu
6.	E-Mail address	secretarial@spbltd.com
7.	Telephone	04288 240322
8.	Website	www.spbltd.com
9.	Financial Year reported	FY 2022-23
10.	Name of the Stock Exchange(s) where shares are listed	NSE & BSE
11.	Paid-up Capital	`.12,61,36,280
12.	Name and contact details (telephone, email address) of the	Sri. S. Srinivas
	person who may be contacted in case of any queries on the BRSR report	Senior Vice President & CFO
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together):	Standalone

II. Products / Services:

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

SI. Description of		Description of Business Activity	% of Turnover of the	
No.	Main Activity		entity	
1	Manufacturing	Manufacture of Paper and Paper Boards	97 %	

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

SI. No. Product/Service		NIC Code	% of Total Turnover contributed	
1	Paper and Paper Boards	1701	97 %	

III. Operations:

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

Location	Number of plants	Number of offices	Total
National	2	8	10
International			

2. Markets served by the entity in FY 2022-23:

a. Number of locations

Locations	Number
National (No. of States)	23
International (No. of Countries)	37

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

Exports during the FY 2022-23 represented 18 % by value

c. A brief on types of customers :

Mostly Business-to-Business (B2B): Printers, Publishers, Notebook convertors, Packaging material convertors and to retail markets.

IV. Employees

1. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

SI.	Particulars	Total	Male		Female	
No.	Particulars	(A)	Nos. (B)	% (B/A)	Nos. (C)	% (C/A)
		Emplo	oyees	***************************************	•	•
1	Permanent (D)	729	717	98.4 %	12	1.6 %
2	Other than Permanent (E)	286	275	96.2 %	11	3.8 %
3	Total employees (D+E)	1015	992	97.7 %	23	2.3 %
		Wor	kers			
4	Permanent (F)	307	307	100.0 %		
5	Other than Permanent (G)	*1054	*949	90.0 %	*105	10.0 %
6	Total employees (F+G)	1361	1256	92.3 %	105	7.7 %

^{*} Includes 1012 workmen engaged on contract basis (907 Male and 105 Female).

b. Differently abled Employees and workers:

SI.	Particulars	Total	Ma	ale	Female	
No.	Particulars	(A)	Nos. (B)	% (B/A)	Nos. (C)	% (C/A)
	Di	led Employe	es	•		
1	Permanent (D)	3	3	100 %		
2	2 Other than Permanent (E)					
3	Total employees (D+E)	3	3	100 %		
	Γ	Differently A	bled Workers	<u> </u>		
4	Permanent (F)	3	3	100 %		
5	Other than Permanent (G)					
6	Total employees (F+G)	3	3	100 %		

2. Participation / Inclusion / Representation of women:

Particulars	Total	No. and percentage of Females		
Particulars	(A)	Nos. (B)	% (B/A)	
Board of Directors	10	1	10%	
Key Management Personnel	2			

3. Turnover rate for permanent employees and workers:

(Disclose trends for the past 3 years)

Dominuloro	FY 2022-23			FY 2021-22			FY 2020-21		
Particulars	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	7.7%	9.1%	7.7%	5.6%		5.6%	3.8%		3.8%
Permanent Workers	3.9%		3.9%				2.2%		2.2%

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

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

SI. 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	Esvi International (Engineers & Exporters) Limited	Subsidiary	100.00%	No
2	Ponni Sugars (Erode) Limited	Associate	27.45%	No

VI. CSR Details:

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: YES

(ii) Turnover for FY 2022-23: ` 2082.53 Crores

(iii) Net worth as on 31.03.2023: ` 1576.29 Crores

(iv) CSR Spend during FY 2022-23: 3.42 crores

VII. Transparency and Disclosures Compliances:

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

Stakeholder	Grievance	FY 2022-23			FY 2021-22		
group from whom complaint is received	Redressal Mechanism in Place (Yes / No)	Number of complaints filed	Number of complaints pending resolution	Remarks	Number of complaints filed	Number of complaints pending resolution	Remarks
Communities	Yes ⁽¹⁾						
Investors		•	Not .	Applicable	<u>-</u>	-	
Shareholders	Yes ⁽²⁾	2			2		
Employees and workers	Yes						
Customers	Yes ⁽³⁾	76	2		73	1	
Value Chain Partners	Yes ⁽⁴⁾						

- (1) Addressed thro' the CSR Policy of the Company [https://www.spbltd.com/investor-info/policy/index.html]
- (2) As per SEBI Listing Regulations
- (3) Covered in contracts and agreements entered into with the distributors (Indentors), dealers, agents and customers of the company
- (4) Addressed under the Whistle Blower Policy of the Company [https://www.spbltd.com/investor-info/policy/index.html]

2. 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.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
1	Printing and writing paper segment which is the prime grade among company's products, is expected to be negatively impacted in the near future	Opportunity & Risk	Risk: Will affect the margins in the business that the company operates. Opportunity: (i) Provides opportunity to diversify in to other product range to cater to different segments of markets. (ii) To take advantage of restrictions on single use plastic materials, by developing alternatives.	The company has been making necessary investments to diversify its product range and has also been strengthening its marketing network, as well as the supply chain.	Adverse since margins of alternate grades are likely to be lower when compared with printing and writing segment.
2	Failure of Monsoon and absence of water flow in the River Cauvery and River Tamirabarani, from where the Company draws its water requirements	Risk	Since water shortage will directly disrupt the pulp and paper production	The Company is taking various initiatives to curtail quantum of fresh water used in the process.	Adverse

SI. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
3	Wood availability	Risk	Since wood pulp constitutes the major portion in the pulp furnish of the paper manufacturing in the Company	The Company has well defined tree farming strategy to enable marginal land owners in nearby districts to grow trees in about 20000 acres annually. This enables company to be wood positive. This risk is further addressed thro' a 4 pronged strategy: Adding Newer species of wood to its raw material base Enhancing the sourcing of wood from regions outside Tamil Nadu Direct connect with Farmers thro' Contract Farming initiatives Enhancing usage of bagasse & deinked pulp to reduce dependency on wood pulp.	Negative since shortage of wood will result in company resorting to use of costlier sourced pulp.

SI. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
4	Dependency on imported Coal	Opportunity & Risk	Risk since this results in increase in energy cost. Opportunity since this opens up avenues to move towards non-fossil fuel based energy sources	The company has continuously taken steps to reduce its dependency on Coal. Today, more than 70% of the energy needs of the Unit: Erode is addressed thro' renewable energy sources and bio-fuels. Further steps are being taken to increase the share by augmenting in-house pulp production.	Neutral since the company's dependency on Coal has come down.
5	Monsoon failures affecting the Sugar Industry thereby restricting the supply of Bagasse	Risk	Risk since Bagasse is a key input material for the company	The Company has its own Captive source with Bagasse sourced from Associate Company. The Bagasse production by the Associate Company is more than the material required by SPB.	Neutral since bagasse represents only about 10% of the pulp mix in Erode operations.

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 MCA's (Ministry of Company Affairs) NGRBC (National Guidelines on Responsible Business Conduct) Principles and Core Elements.

- ♦ P1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
- ♦ P2: Businesses should provide goods and services in a manner that is sustainable and safe.
- ♦ P3: Businesses should respect and promote the well-being of all employees, including those in their value chains.
- ♦ P4: Businesses should respect the interests of and be responsive to all its stakeholders.
- ♦ P5: Businesses should respect and promote human rights.

- ♦ P6: Businesses should respect and make efforts to protect and restore the environment.
- ♦ P7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- ♦ P8: Businesses should promote inclusive growth and equitable development.
- ♦ P9: Businesses should engage with and provide value to their consumers in a responsible manner.

SI.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	Р8	Р9
Policy and Management Processes										
1.	a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ
	b. Has the policy been approved by the Board? (Yes/No)	Υ			Υ	Υ		Υ	Υ	
	c. Web Link of the Policies, if available	ŀ	nttps://v			cies are n/investo			dex.htr	nl
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Υ	Υ	Υ	Υ	Y	Υ	Υ	Υ	Υ
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ
4.	Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance) (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Heal in pl : IS (Env 4500	th and ace ar 900 ironme	Safety nd are 1 (Qua nt Man cupation	(EHS) aligned ality M ageme aal Hea	ties have and qual I with Ir anagem nt Syste Ith & Sa curemer	ality ma nternation ent Sy em), Off fety Ma	inagem onal Sta stem), HSAS 1 nagem	ent sys andard: ISO 1 18001 a ent Sys	stems s like 4001 / ISO stem),
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	"Wood Positive Status". It has also made significant progress								
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Refe	r the de	etails gi	ven und	der each	of the	Principl	e.	

SI.	Disclosure Questions	P1	P2	P3	P4	P	5	P6	P7	P8	Р9
Gov	ernance, leadership and ove	rsight	***************************************	***************************************	***************************************	***************************************		••••••	•	•••••••	***************************************
7.	related challenges, targets as "SPB is committed to be a trul	nd ach y susta	sible for the business responsibility report, highlighting ESG d achievements: sustainable and socially responsible business. The Company's atives / targets have been integrated with the Growth Strategy						oany's		
	Sri.K.S.Kasi Viswanathan Managing Director										
8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The	Mana	ging Dir	ector o	f the C	omp	any			
9.	Does the entity have a specified Committee of the Board / Director responsible for decision making on Sustainability related issues? (Yes / No). If yes, provide details.		Yes, The Managing Director of the Company is responsible for decision making on sustainability related issues.								
10	Details of Review of NGRBC	s by th	ne Co	mpany:			•				
	Subject for Review	/ Co	unde mmitt	wheth ertaken ee of Commit	by Dir		Ha			(Annu arterly/ pecify)	
		: :		P P 4 5	P P 6 7		P 1		P P 4 5	P P 6 7	P P 8 9
••••••	Performance against above policies and follow up action		***************************************	Yes		······································		••••••	Annua	ally	
	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The company complies with all applicable laws.									
11	Has the entity carried out	P1 P2 P3 P4 P5 P6 P7 P8 P9									
	independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	/ In-I Ener from to a	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.				ertified olicies ubject				

SI.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	Р9		
12	If answer to question (1) aborto be stated: NA	ve is "l	re is "No" i.e. not all Principles are covered by a policy, reasons									
	The entity does not consider the Principles material to its business (Yes/No)	o its Not applicable tage n to nent Not applicable										
	The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)											
	The entity does not have the financial or/human and technical resources available for the task (Yes/ No)											
	It is planned to be done in the next financial year (Yes/No)											
	Any other reason (please specify)	ease										

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.

- Commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, Senior Management and all 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.

1

- 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.

	Essential	Indicators					
Percentage cover during the financ	rage by training and awarene ial year:	ss programmes on any	of the Principles				
Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes				
Board of Directors	The Directors of the Compa Visit(s), periodical updates updates including MCA upd SEBI Regulations, amendment	and detailed presentate ates on amendments to	ions, on the Regulatory o Companies Act, 2013,				
Key Managerial Personnel	Industry updates, market d Presentations etc.		3				
The Company has dedicated periodical Internal Company Newsletter (GreenCo Newsletter) covering a variety of resources, including training programs, awareness campaigns, leader talks, contests and more. The learning content addresses the BRSR topics. The Company conducts campaigns throughout the year to encourage employees leverage their							
Workers	learnings. The GreenCo Newsletters www.spbltd.com	s of the Company	are also available @				

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

	Monetary									
	NGRBC Name of Principle Regulatory/ enforcement agencies/ judicial institutions									
Penalty / Fine										
Settlement			Non	ie						
Compounding fee										
	Non - Monetary									
Imprisonment										
Punishment			Non	ie						

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.

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 [https://www.spbltd.com/investor-info/code-of-conduct/index.html.]. All Directors and Senior Management personnel affirm compliance with Code on an annual basis.

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

	FY2022-23	FY 2021-22
Directors	There have been no cases invol	ving disciplinary action taken by any law
KMPs		es of bribery / corruption against Directors /
Employees	KMP / employees / workers that hat	
Workers	Niver / employees / workers that he	ave been brought to our attention.

6 Details of complaints with regard to conflict of interest:

	FY20	FY2022-23)21-22
	Number Remarks Number		Number	Remarks
Number of complaints received in relation				•
to issues of Conflict of Interest of the	None			
Directors / KMPs.				

7 Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest - None.

Leadership Indicators

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

The Company facilitates capacity building workshops for its key value chain partners to educate and create shared awareness on key areas like Human Rights, labour practices and sustainability.

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

Yes. The Company receives an annual declaration from its Board of Directors and KMP on the entities they are interested in and ensures requisite approvals as required under the statute as well as Company's policies are in place before transacting with such entities and individuals.

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

- 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. Process of manufacture of paper is clean, green and energy efficient.
- Our company manufactures different grades of printing and writing paper using
 - Plantation / 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 / bare roo t seedlings of Eucalyptus and Casuarina at
 subsidized rates to farmers and also assist them with technical help to achieve higher yields
 and revenues.
- Our company is constantly focused on identifying new wood species.
- 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 19.2 crore seedlings were made available during the FY 2022-23 (FY 2021-22 : 17.3 crore seedlings), at subsidized rates, for planting in 22,502 acres of land in FY 2021-22 (FY 2021-22 : 20,042 acres).
- 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 adopted by our company is also environmentally friendly and green. Our process is energy efficient and totally "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 70% of the energy consumed by Unit: Erode is green power generated from 'Black Liquor' in the Chemical Recovery Complex and bio-fuels used in our Power Boilers. 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 Recausticizing 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 5 consecutive years

- b) National Energy Leader 3rd 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.
- IPMA Energy Conservation Award for FY 2021-22.
- CII EHS Excellence Bronze Award for the year 2022
- AEE award Regional Corporate Energy award 2021 by Association of Energy Engineers,
 US

Essential Indicators

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

	FY 2022-23 (` Crores)	FY 2021-22 (` Crores)
R&D (Revenue)	0.83	0.80
R&D (Capex)	0.33	0.10

Details of improvements in environmental and social impacts:

Wood being the most important and sensitive raw material, the company helps farmers to grow trees and a large part of the Company's R&D programs supports farmers. As part of the tree farming activity, the company runs nursery in large scale and 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 the company has identified newer varieties of wood like Melia-Dubia and Subabul as wood 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.

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.

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

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

Yes. The Company has been certified under four standards of FSC (Forest Stewardship Council), viz. FSC-STD-40-004 (Chain of Custody (COC) Certification), FSC-STD-40-005 (Requirements for Sourcing FSC Controlled Wood), FSC-STD-40-003 (COC certification of multiple sites) and FSC-STD-50-001 (Certificate Holder Trademark Requirements). 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 Mix' claim products in Domestic and International Markets.

100% of wood sourced is from sustainable vendors since SPB complied with FSC Controlled wood standard which ensures the wood procure are from acceptable sources.

The Company's FSC Policy governing sourcing of wood is available at Company's website: https://www.spbltd.com/investor-info/corporate-governance/index.html

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.

Company's green procurement guidelines are available in Company's website @ https://www.spbltd.com/investor-info/policy/index.html

Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

The plastic waste, mainly generated from the de-inking process of waste paper, is disposed for co-processing in Cement Kiln thro' an agreement.

The Company has entered in to formal agreement with PCB approved e-waste vendors for disposal of e-waste.

Company has identified waste oil and ETP sludge under Hazardous waste and imported waste paper as Other wastes. The Company has obtained authorization from TNPCB for its disposal and utilization.

Other waste generated in the process (like Chipper Dust, Pith, Screen rejects etc) are used as Biomass in the Company's Captive Power Plant. Limie Sludge / Lime Grits, generated in the process, are supplied as alternate raw material to nearby cement plants. Primary Sludge, generated in the process, is supplied as alternate material to Board making plants / egq-tray making facilities.

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.

The EPR guidelines / regulations are applicable to the company. The Company has entered in to a formal agreement with an authorized service provider for collection & Disposal Of Plastic Waste Generated by the company On a Pan India Level. The program covers the following:

- EPR Report and certificate for collection, storage, transportation, recycling and disposal of Plastic waste.
- Fulfilment of EPR requirements of the COMPANY as per PWM 2016 (and its amendments), and respective state Rules.
- Implementation of the requirements under Central Government Notification {published on 18 th March, 2016, in the Gazette of India, Part II, Section -3, Sub-section (i)} by Ministry of Environment, Forest and Climate Change.
- Collection / Recycling data on the basis of requirement by the COMPANY/ or Central/ State Pollution Control Boards.
- Other EPR services as required.

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 has been undertaking Life Cycle Perspective Assessments (LCA) on its products since the year 2017 with an objective to evaluate the impacts and identify areas for improvement in the value chains. LCA has been carried out for 2 of the major product offerings of the company and these products have been assessed as environment friendly. The Company will continue with its efforts for assessing environmental impact of other products.

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	independent external agency	Results communicated in Public Domain (Yes / No)
1701	Super white & Copier Grades	20 – 30 %	Gate to Gate	3 rd party and internal	No

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 Company has put in place robust guidelines and standards, that are benchmarked against international best practices, with defined Standard Operating Procedures for identifying and mitigating social and environmental risks.

Name of Produc Service	t /	Descr	iption of the	risk / concer	'n	Action Tak	cen		
				NIL					
Percentage of recycled or reused input material to total material (by value) used i production (for manufacturing industry) or providing services (for service industry)									
Indicate input		F	Recycled or	r re-used input material to total material					
material			FY 2022-23			FY 2021-2	22		
Unit : Erode – Integrated Pulp ar Paper Unit	ıd	Erode manı	unit uses B ufacture pulp	agasse, which and about Erode unit is	10% of tota	roduct in Sug I pulp manuf pased	gar mills, to actured in		
Unit : Tirunelveli – Standalone Paper Unit – Usage of recycled fibre as a of total fibre		21%			16%				
Of the products and packaging reclaimed at end of life of products, amount reurecycled, and safely disposed, as per the following format:							unt reused		
			FY 2022-23			FY 2021-22			
	R	e-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed		
Plastics (including packaging)				971.9 MT			516.48 MT		
E-waste				1.64 MT			2.18 MT		
Hazardous waste (Used Spent Oil)				9 MT (approx.)			5 MT (approx		
Hazardous waste (Chemical Sludge)				73596 MT			60430 MT		
Other waste (ESP ash)				18863 MT			13754 MT		
Reclaimed product			r packagino	g materials	(as percen	tage of prod	ducts sold		
Indicate p	rodu	ct categ	jory		ls as % of t	s and their otal produc /e category			
In Unit : Erode						is from Bag Sugar Indus			
In Unit : Erode	•••••			About 20 recovered		pulp furnis	sh is from		

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

				Esse	ntial Ind	icators					
1	a. Detai	ls of m	easures	for the	well-bei	ng of e	mploye	es (Othe	er than	workers	;) :
•••••••••••••••••••••••••••••••••••••••	······································	***************************************	%	of emp	oloyees	covere	d by	•	•		
Category	Total Health (A) insurance			Accident insurance		Maternity benefits		rnity efits	Day Care facilities		
		Nos.	%	Nos.	%	Nos.	%	Nos.	%	Nos.	%
•		•	•	Perma	anent Em	ployee	S	•	•	•••	
Male	717	174	24%	717	100%	NA	NA				
Female	12	1	8%	12	100%	12	100%	NA	NA		
Total	729	174	24%	729	100%						
•	-	1	Oth	er than	Permane	nt emp	loyees	1			
Male	275	275	100%	264	100%						
Female	11	11	100%	11	100%						
Total	286	286	100%	286	100%						
b. Details	of measi	ures for	the wel	l-being	of work	ers:	***************************************	4	•	•••••••••••••••••••••••••••••••••••••••	•
-				Perm	nanent W	orkers/		•			
Category	Total (A)	:	alth rance	:	ident rance		ernity nefits		rnity efits	Day Care facilities	
		Nos.	%	Nos.	%	Nos.	%	Nos.	%	Nos.	%
Male	307			307	100%						
Female											
Total	307			307	100%						
-			Ot	her than	Permar	ent Wo	rkers				
Male	949	949	100%	38	4%						
Female	105	105	100%			105	100%				
Total	1054	1054	100%	38	4%						

2	Details of r	etirement ben	efits, for Cu	rrent FY and	Previous Fina	ncial Year	
	Benefits		FY 2022-23			FY 2021-22	
		No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)	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/NA)
	PF	100%	100%	Yes	100%	100%	Yes
	Gratuity	100%	100%	Yes	100%	100%	Yes
	ESI	14%	15%	Yes	13%	16%	Yes
	Others ^^	82%	85%	Yes	83%	84%	Yes

The above retirement benefits are applicable only for permanent employees.

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.

The establishments / offices of the company are accessible to differently abled employees and the management continuously works towards improving infrastructure for eliminating barriers to 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 policy is available @

https://www.spbltd.com/investor-info/policy/index.html

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

	Permanent e	employees	Permanent workers		
Gender	Return to work rate	Retention rate	Return to work rate	Retention rate	
Male	NA	NA	NA	NA	
Female	100%	100%	100%	100%	
Total	100%	100%	100%	100%	

^{^^} Related to the exclusive Superannuation Program that the company offers to its employees

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. The Company's grievance redressal procedure is available to employees and workmen. The objective of the policy is to facilitate open and structured discussion on employees' work-related grievances with the intent of ensuring that the grievance is dealt with a fair and just manner while being in compliance with the company's policies. The company's practices encourage an amicable and fair resolution of grievances. Employees are encouraged to first discuss the grievance with their immediate reporting authority and attempt to arrive at a resolution before invoking a formal grievance redressal mechanism.

	Yes / No (If Yes, then give details of the mechanism in brief)
Permanent Workers	
Other than Permanent Workers	As montioned above
Permanent Employees	As mentioned above
Other than Permanent Employees	

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

Category	F	Y 2022-23		F	Y 2021-22				
		Part of association or Union	%		Part of association or Union	%			
Total Permanent Employees	729	578	79%	747	599	80%			
- Male	717	566	79%	735	587	80%			
- Female	12	12	100%	12	12	100%			
Total Permanent Workers	307	307	100%	316	316	100%			
- Male	307	307	100%	316	316	100%			
- Female									

Category		ı	FY 2022-2	23				FY 2021-2	22	
: -	Total (A)	and s	lealth safety sures		Skill dation	Total (A)	and	On Health On Sk and safety upgrada measures		
		Nos. (B)	% (B/A)	Nos. (C)	% (C/A)		Nos. (E)	% (E/D)	Nos. (F)	% (F/D)
				Em	ployees					
Male	981	487	50%	590	60%	735	312	42%	516	70%
Female	23	11	48%	11	48%	12	9	75%	10	83%
Total	1004	498	50%	601	60%	747	321	42%	526	70%
Workers										
Male	994	528	53%	550	55%	963	765	79%	602	63%
Female	72	68	94%	72	100%	75	75	100%	75	100%
Total	1066	596	56%	622	58%	1038	840	81%	677	65%

9	Details of per	formance and	career developr	ment reviews o	f employees and	d worker:		
	Category		FY 2022-23			FY 2021-22		
		Total (A)	Nos. (B)	% (B/A)	Total (C)	Nos. (D)	% (D/C)	
•••••		•		Employees		***************************************	••••	
•••••	Male	717	333	46%	747	348	46%	
••••••	Female	12	10	83%	12	6	50%	
•••••	Total	729	343	47%	759	354	47%	
			<u> </u>	Workers	•	4		
	Male	307	81	26%	316	76	24%	
•••••	Female							
•••••	Total	307	81	26%	316	76	24%	

10 Health and safety management system:

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

Yes. The Company has implemented Occupational, Health and Safety Management System. The company is certified since year 2007 under Occupational Health and Safety Assessment series 18001/45001 (OHSAS) which is an international standard that facilitates management of Occupational Health and Safety risks associated with the business of the organization

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

For Routine work: Hazard Identification and Risk Analysis (HIRA) is carried out for each activity, prescribed in SOPs (Standard Operating Procedures). Suitable Control measures are implemented.

For Non-routine work: Job Safety Analysis Tool is used to identify the hazards and risks involved in the job. Suitable control measures have been placed.

Further, both the units of the company undergo periodic Environment, Health and Safety audits. Several national awards and certifications acknowledge SPB's commitment and efforts towards providing a safe and healthy workplace to all.

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

Yes. A system is in place in both the units of the company to spot and report work related hazards and offer suggestions for improvements. Necessary training is given to all employees in recognizing hazards and issues. Joint inspections by management representatives and employees on the shop floor are also carried out at regular intervals and respective corrective and preventive measures are undertaken to mitigate the identified risks.

Formal Safety Committee is formed and operational in both the units thro' which work representatives can address their safety related issues during committee meetings.

Tool Box meetings are conducted regularly, wherein the workers can raise their safety issues to their managers.

Company has a separate safety department, comprising of a Safety Manager and trained safety executives, which does independent audit and champions the safety related programs across the organization.

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

All the employees are covered under the Group Personal Accident Policy taken by the Company with well recognized insurers. All employees, permanent and temporary and their family members, have access to company provided (thro' medical centers run by the company in around the plants) or company supported medical benefits

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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees		0.31 in Unit : Erode and Nil in Unit : Tirunelveli
	Workers		
Total recordable work-related	Employees		1
injuries	Workers		
No. of fatalities	Employees		1
	Workers		
High consequence work-related	Employees		
injury or ill-health (excluding fatalities)	Workers		

The Company's Safety Department carries out detailed investigations for all accidents, for both reportable and non-reportable to identify the root causes and to understand the measures to prevent recurrence. The learnings from all accidents are disseminated across the organization. Detailed presentation on Safety incidents / inquires / investigations / programs is made by the Safety Manager in the fortnightly Technical Review / Head-Of-Department Meetings, which is chaired by the Managing Director of the Company.

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

Company runs comprehensive programs to ensure safe and healthy workplace and those programs covers the following: machineries and equipment safety, walkway and access staircases, storage tanks safety, work environment, work place illumination, comprehensive safety management system under ISO 45001, safety promotional activities, fire protection systems and training programs, emergency preparedness programs, emergency response teams, etc

13	Number of Complaints on the following made by employees and workers:								
	Category		FY 2022-23	FY 2021-22					
		Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks		
	Working Conditions		NIL						
	Health& Safety								

14	Assessments for the year:	Assessments for the year:						
		% of your plants and offices that were assessed (by entity or statutory authorities or third parties)						
	Health and safety practices	100%						
	Working Conditions	100%						

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.

The Company periodically undergo assessment programs by independent third party assessors and follow-up actions are taken and reported to the Risk Management Committee, comprising of 3 Independent Directors and the Managing Director of the Company.

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).

Yes. In the unfortunate event of death of an employee, including workers, the company extends financial support to family members of the employee. All the permanent employees of the company are covered under the Group Personal Accident Insurance Policy taken by the Company. All the temporary employees of the company are covered under the Statutory Employees State Insurance (ESI) program.

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

The bills raised by the service providers are settled by the company only on submission of proof by the service providers that the statutory dues have been deducted and deposited for all the contract workmen engaged in the company. These documents are also subject to the Internal Audit done by third party independent auditors, appointed by the Board of Directors of the Company.

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

Category		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 2022-23	FY 2021-22	FY 2022-23	FY 2021-22		
Employees		1				
Workers						

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)

Yes. The company continually invests in human capital development which includes building skills and capabilities that are contemporary while providing employees with a diversity of experiences. These enhance the employability of the workforce and enable a smooth transition to alternate opportunities where sought. A large number of managerial employees are also retained as consultants, beyond their superannuation, to help them with continued financial support and this also enables the company and the new incumbent managers to be benefitted by the experience of the retiring personnel.

5. Details on assessment of value chain partners:

J. Details off assessificing	or value chain partiers.
	% of value chain partners (by value of business done with such partners) that were assessed
 Health and safety practices	The key suppliers of the company are covered in the GreenCo
Working Conditions	Supply Chain Program and accordingly given awareness programs and undergo detailed evaluation by GreenCo auditors.
	Also, the Company continue to be certified under four Standards of FSC, viz. FSC-STD-40-004 (Chain of Custody (COC) Certification), FSC-STD-40-005 (Requirements for Sourcing FSC Controlled Wood), FSC- STD-40-003 (COC certification of multiple sites) and FSC-STD-50-001 (Certificate Holder Trademark Requirements). 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 document 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 Mix' claim Products in the domestic and international markets

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

Corrections actions are identified thro' periodic GreenCo and FSC audits, as mentioned above, and follow-up actions taken and reported

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

Essential Indicators

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

The Company engages with a broad spectrum of stakeholders to deepen its insights in to their needs and expectations and to develop sustainable strategies for the short, medium and long term. Stakeholder engagement also helps manage risks and opportunities in business operations. The key stakeholders identified are: Customers, Dealers (Indentors), Employees, shareholders, related academic institutions, supply chain partners, collaborators, industry bodies, Government, 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 & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board website), other	Frequency engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Emails, customer visits, relationship meetings and reviews	Continuous	Understanding customers' expectations and the gaps, if any, in company's product offerings.
Shareholders	No	Emails	Quarterly	Informing the shareholders about the performance indicators of the company and update them on company's strategies
Employees	No	Notices, Meetings, Newsletters	Continuous	 Appraisals and feedback Career management Building a safety culture and inculcating safe work practices. On the Job training

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board website), other		Purpose and scope of engagement including key topics and concerns raised during such engagement
Collaborators	No	Video Conferences, Meetings / Calls, visits	As and when needed	Stronger partnership.Joint development projects
Academic Institutions	No	Academic Interface / Plant visits / Class sessions	As and when needed	Knowledge sharing and improving awareness about Paper, its eco-friendly use and paper manufacturing.
Industry Bodies	No	Conferences, Seminars, Meetings	Quarterly	For discussions on macro trends impacting Paper Industry
Government bodies and regulators	No	Meetings, visits	As and when needed	To ensure 100% compliance to all rules, regulations and laws
Local communities and society at large	No	Presentations, press conferences, media interviews, social welfare events	As and when needed	Understand areas of sustainable development; communicate on company's ESG initiatives and strategy; Implementation of CSR programs
Farmers / Aggregators / Supply Chain Partners	No	Visits by Company's managers; Awareness Meetings; One-to-One meetings	As and when needed	Review of supply performance; Green initiatives and updates; Price negotiations; Joint product developments / process upgradation; Project execution.

Leadership Indicators

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

The Board of Directors of the Company, thro' the CSR committee, reviews, monitors and provides strategic direction to Company's CSR programs. The Company's fortnightly Review Meetings, chaired by the Chairman and Managing Director, reviews in greater details all the ESG initiatives of the company and the issues, if any, raised by any of the stakeholders of the organization.

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.

Company has an Environment Management team, headed by a person in Senior Management level. This team actively interacts with nearby villagers / government authorities and gets their feedback on the effectiveness of the company's ESG initiatives and ascertain their needs requiring support from the company. These are then formalized thro' the CSR programs of the company, which are reviewed and approved by the CSR Committee / the Directors.

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

Based on the requirement stated by nearby villagers, the Company, for may years, has been supplying treated drinking water to near-by villages free of cost, to address the water needs for domestic use by the villagers.

Based on request received from Government schools, the company has constructed toilets, donated land, supplied new equipments free of cost for operation of Smart Class Rooms, supplied RO Water Plant to Panchayat Schools, supplied key medical equipments to Government Hospitals / Primary Health Centers etc.

The Company responded with financial support in Water Body development work and various other social works in Sivakasi, when request was received from "Sivakasi Green Forum".

The Company also runs 4 Community Health centers in nearby villages, providing medical treatment and free medicines.

As explained earlier, the 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 above are few of the instances of engagement with vulnerable / marginalized stakeholder groups.

PRINCIPLE 5: Businesses should respect and promote human rights

	Essential Indicators							
1	1 Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:							
С	ategory	gory FY 2022-23			FY 2021-22			
		Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C) No. of employees / workers covered (D)		% (D/C)	
	•		Employe	ees / Workn	nen	•		
Pe	ermanent	Through re	aular trada union	meetings /	ISO awarone	see eaccions / on	the ich	
	her than rmanent	Through regular trade union meetings / ISO awareness sessions / on-the-job training sessions / GreenCo awareness meetings, all the employees have been provided training on sexual harassment, avoidance of discrimination, freedom of association, forced labour, child labour, etc.						
То	ital		association	, forced lab	our, child labo	our, etc.		

Category		F	Y 2022-2	3			F	Y 2021-2	2	
	Total (A)	: •		More than Minimum Wage		Total (D)	I Equal to Minimum Wage		More than Minimum Wage	
		Nos. (B)	% (B/A)	Nos. (C)	: :		Nos. (E)	% (E/D)	Nos. (F)	% (F/D)
	•	Pe	ermanent e	employe	es (other	than w	orkmen)		-	•
Male	717			717	100%	735			735	100%
Female	12			12	100%	12			12	100%
	•	Otl	her than F	Permane	ent (Other	than w	orkmen)		•	•
Male	275			275	100%	268			268	100%
Female	11			11	100%	11			11	100%
	•		***************************************	Perman	ent workm	nen			•	•
Male	307			307	100%	316			316	100%
Female										
			Other	than Pe	ermanent v	workme	en		•	•
Male	949	907	96%	42	4%	916	861	94%	55	6%
Female	105	105	100%			108	108	100%		
3 Deta	ails of rem	uneratio	on/salary/	wages,	in the fol	lowing	format:			
				Mal	e			Fema	le	
			Number	re S	Median emunerationalary/ wag of respection category	jes ve	Number	sala	remune ry/ wage ctive cat	es of
Board of D)irectors (B	BoD)	Refer A	Annexui	e VIII to B			r report or	n Manag	jerial
Key Mana	gerial Pers	onnel				Remur	neration.			
	s other tha	_	943		` 599,69 ⁷	,	17		153,47	^

346

BoD and KMP

Workers

The HR Head of the respective units is responsible for addressing the human rights issues.

` 598,667

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)

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

All grievances are addressed as and when received by the respective unit HR Heads thro' the Plant / department Heads. All the grievances are duly investigated and appropriate actions are taken to resolve the issue / complaint.

The Company has a structured grievance redressal mechanism, with 4 layers of managerial intervention in review / redressal of issues.

6	6 Number of Complaints on the following made by employees and workers:								
••••••	4		FY 2022-23			FY 2021-22			
		:	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks		
	cual rassment			i	i	<u>i</u>			
	crimination at kplace								
Chi	ld Labour								
	ced Labour / oluntary Labour	NIL							
Wa	ges	•							
	ner human nts related Jes								

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

The Company has a structured grievance redressal mechanism, with 4 layers of step-by-step managerial intervention to review / redressal of issues as well as to safeguard the identity and to prevent adverse consequences of the complainant.

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

Yes. The contract / agreements with suppliers / service providers, which involve supply of labour, addresses the human rights requirements.

		% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Chile	d labour	100%.
Forced/involuntary labour		The company undertook internal assessmen
Sexual harassment		thro' its HR and IR function.
Discrimination at workplace		
Wages		
Othe	ers - please specify	
10		ve actions taken or underway to address significan e assessments at Question 9 above.
	No significant risks / concerns obs	served in internal evaluations.
	Le	eadership Indicators
1.	Details of a business process thuman rights grievances/comp	peing modified / introduced as a result of addressing laints.
	No complaint has been received f	or human rights violation.
2.		or human rights violation. Ige of any Human rights due-diligence conducted.
2.		ge of any Human rights due-diligence conducted.
2.	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent	ge of any Human rights due-diligence conducted.
	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a	ity accessible to differently abled visitors, as per the tersons with Disabilities Act, 2016?
	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? ccessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility.
3.	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a working towards improving infrast	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? accessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility. chain partners:
3 .	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a working towards improving infrast	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? ccessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility. chain partners:
3. 4.	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a working towards improving infrast Details on assessment of value	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? ccessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility. chain partners: % of value chain partners (by value of businessed done with such partners) that were assessed Currently, this is not being addressed.
3. 4. Sexi	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a working towards improving infrast Details on assessment of value ual Harassment	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? ccessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility. chain partners: % of value chain partners (by value of businessed done with such partners) that were assessed Currently, this is not being addressed.
3. 4. Sexu	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a working towards improving infrast Details on assessment of value ual Harassment crimination at workplace	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? ccessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility. chain partners: % of value chain partners (by value of businessed done with such partners) that were assessed Currently, this is not being addressed. However, the company's suppliers Code of
3. 4. Sexu	Details of the scope and covera Internal assessment covers all pla Is the premise/office of the ent requirements of the Rights of P Our establishments / offices are a working towards improving infrast Details on assessment of value ual Harassment crimination at workplace d Labour ced Labour/Involuntary Labour	ity accessible to differently abled visitors, as per the ersons with Disabilities Act, 2016? ccessible to the differently abled and we are continuously ructure for eliminating barriers to accessibility. chain partners: % of value chain partners (by value of businessed done with such partners) that were assessed Currently, this is not being addressed. However, the company's suppliers Code of

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

1. Details of total energy consumption and energy intensity, in the following format:

Parameter	FY 2022-23	FY 2021-22
Total electricity consumption (A)	1124373 GJ	999466 GJ
Total fuel consumption (B)	7212865 GJ	6431179 GJ
Energy consumption through other sources (C)		
Total energy consumption (A+B+C)	8337238 GJ	7430645 GJ
Energy intensity per rupee of turnover (<i>Total energy</i> consumption / turnover in rupees	0.00040 GJ per Rupee of turnover	0.00055 GJ per Rupee of turnover

Note: IIndicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. Energy Audits are done periodically by external energy auditors, certified by BEE.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Both the units of the company are covered the PAT Scheme of Govt. of India. In both the units, PAT cycle targets have been achieved.

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

Parameter	FY 2022-23	FY 2021-22				
Water withdrawal by source						
(i) Surface water	113 lakh KL	108 lakh KL				
(ii) Groundwater	0.005 KL	0.003 KL				
(iii) Third party water						
(iv) Seawater / desalinated water						
(v) Others						
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	113 lakh KL	108 lakh KL				
Total volume of water consumption (in kilolitres)	113 lakh KL	108 lakh KL				
Water intensity per rupee of turnover (Water consumed / turnover)	0.0005 litre per Rupee of turnover	0.0008 litre per Rupee of turnover				

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

- 4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.
 - The Company practices ZLD in its Unit: Tirunelveli, where treated waste water, after recycled / reused in the process and discharged, is used for plantation within the mill premises.
 - The Company's unit in Erode is an integrated pulp and paper mill. The practice of ZLD has not been achieved in any integrated pulp and paper mill so far (Reference : Central Pulp & Paper Research Institute (CPPRI), Saharanpur, report on the subject).
 - However, the company, in its Erode unit, 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.

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

Parameter	Unit	FY 2022-23	FY 2021-22
NOx – Erode unit	Mg/nm³	26.0	29.0
SOx – Erode unit	Mg/nm³	119.5	117.5
Particulate matter (PM) – Erode unit	Mg/nm³	21.0	32.0
NOx – Tirunelveli unit	Mg/nm³	38.7	66.9
SOx – Tirunelveli unit	Mg/nm³	13.3	40.0
Particulate matter (PM) – Tirunelveli unit	Mg/nm³	36.2	15.5
Others			

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.

Yes. Assessments carried out by TNPCB (Advance Environmental Laboratory) – For both units, Enviro Care Laboratory (Madurai) – For Tirunelveli unit and Excellence Care Laboratory (Madurai) – For Tirunelveli unit.

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO ₂ equivalent	359986	351157
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO ₂ equivalent	59555	36169
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent	0.000020 per Rupee of turnover	0.000029 per Rupee of turnover

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.

Yes. By Excellence Laboratory (Madurai) for Unit: Tirunelveli.

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

The company continuously works on reduction in usage of fossil fuel, thro' increased use of biofuels

In FY 2022-23, the Company has also installed a PCC (Precipitated Calcium Carbonate) Plant capturing the CO2 from the Stack of the Lime Kiln, reducing thereby the overall emission of GHG from the unit

The Company is evaluating installation of a plant for gasification of bio materials for replacement of fossil fuels, in its lime kiln.

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

Parameter	FY 2022-23	FY 2021-22				
Total Waste generated (in metric tonnes)						
Plastic waste (A)	971.9	516.48				
E-waste (B)	1.64	2.18				
Bio-medical waste (C)						
Construction and demolition waste (D)						
Battery waste (E)						
Radioactive waste (F)						
Other Hazardous waste. Please specify, if any.(G)	73605	60435				
Other Non-hazardous waste generated (H). Please specify, if any. (ESP ash)	18863	13754				
Total (A+B+C+D+E+F +G+H)	93441.54	74707.66				

For each category of waste generate or other recover	d, total waste recovered thro	
Category of waste		
(i) Recycled		
(ii) Re-used		
(iii) Other recovery operations		
Total		
For each category of waste generated,	total waste disposed by nat metric tonnes)	ure of disposal method (in
Category of waste		
(i) Incineration		
(ii) Landfilling		
(iii) Other disposal operations	93441.54	74707.66
Total	93441.54	74707.66

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No.

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

The Company is certified under ISO 14001:2015 and the scope covers its entire operations. Under the Environmental Management System, the company has guidelines for comprehensive waste management for the identification, segregation, collection, recycling and final disposal

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:

The Company doesn't have operations in above mentioned ecologically sensitive areas. Both the units of the company have obtained the requisite environmental clearances.

SI. No.	Location of operations / offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
1	Unit Erode	Industrial Facility	Yes
2	Unit Tirunelveli	Industrial Facility	Yes

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

Name and brief details of project	EIA Notification No	Date	Whether conducted by independent external agency (Yes/ No)	Results communicated in public domain (Yes/No
		NIL		

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

Both the units of the company follow the applicable environmental law / regulations / guidelines in India such as Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution Act), Environment Protection Act and rules thereunder. No cases of non-compliances have been observed in FY 2022-23.

Leadership Indicators

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

Parameter	FY 2022-23	FY 2021-22
From renewable sources		
Total electricity consumption (A)	534979 GJ	393820 GJ
Total fuel consumption (B)	4716048 GJ	3522348 GJ
Energy consumption through other sources (C)		
Total energy consumed from renewable sources (A+B+C)	5251027 GJ	3916168 GJ
From non-renewable sources		
Total electricity consumption (D)	589395 GJ	605645 GJ
Total fuel consumption (E)	2496817 GJ	2908832 GJ
Energy consumption through other sources (F)		
Total energy consumed from non-renewable sources (D+E+F)	3086212 GJ	3514477 GJ

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.

Yes. Energy Audits are done periodically by external energy auditors, certified by BEE.

2. Provide the following details related to water discharged:

Parameter	FY 2022-23	FY 2021-22
Water discharge by destination and lev	el of treatment (in k	ilolitres)
(i) To Surface water		
- No treatment		
 With treatment - please specify level of treatment 		
(ii) To Groundwater		
- No treatment		
 With treatment - please specify level of treatment 		
(iii) To Seawater		
- No treatment		
 With treatment - please specify level of treatment 		
(iv) Sent to third-parties for Lift Irrigation purposes		
- No treatment		
 With treatment - please specify level of treatment 	6565175 KL	6302090 KL
(v) Others		
- No treatment		
 With treatment - please specify level of treatment 	946628 KL	1143179 KL
Total water discharged (in kilolitres)	7511803 KL	7445269 KL

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): Not applicable.

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

Parameter	Unit	FY 2022-23	FY 2021-22
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO ₂ equivalent	* 22610	* 21469
Total Scope 3 emissions per rupee of turnover		0.000001 per rupee of turnover	0.000002 per Rupee of turnover

^{*} This is measured in Unit : Erode, to the extent possible and reported herewith. Data to be collected for Unit : Tirunelveli.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

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

Not applicable

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

SI. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
	Refer the annexure	to Board's report on Conservation of Ener	Э

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

Yes. The Company has a Business Continuity, Emergency Preparedness and Disaster Management Plan designed to address the threat of disruptions to business activities or processes. The Business Continuity Plans validates the adequacy of the existing systems and processes to prevent and recover from potential threats.

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.

No significant adverse impact reported by any value chain partners.

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

100% of the wood suppliers are covered under FSC audits, as mentioned earlier. Suppliers for other materials have not been formally assessed by the company, for environmental impacts.

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

				Esso	ential Ind	icators		
1.	a. Nui	mber of affil	iations with	trade and in	dustry cl	nambers	/ associations.	
b. List the top 10 trade and industry chambers/ associations (comembers of such body) the entity is a member of/ affiliated								n the total
	SI. No.			le and indust ssociations	e and industry Reach o sociations chaml (S			tions
į	1 Confederation of Indian			n Industry				
***************************************	2	, and the second				National		
	3	Indian Pap	er Manufac	turers Associa	ation		National	
7	4	Indo Amer	ican Chamb	er of Commer	ce		National	
	5	Indo Germ	an Chambe	r of Commerc	е		National	
	6	National S	afety Counc	il			National	
‡	7	Employers	Federation	of Southern I	ndia		National	
	8		o & Recycle rers associa				National	
***************************************	9	Federation	of Indian E	xport Organis	ation	National		
	10	CAPEXIL					National	
2.	Provid compe	le details of etitive condu	corrective act by the e	action taker ntity, based o	or unde on advers	erway on e orders	any issues relat from regulatory a	ed to anti- outhorities.
••••••	Nar	ne of author	ity	Brief	of the cas	se	Corrective act	ion taken
Со	mpetitic	n Commissio	on of India	in India (incl increases du	uding our uring the p	Company period Jar	e paper manufactu y) of simultaneous nuary 2012 - Decer the Competition C	price nber 2013,
······				Leadership	Indicato	rs		
1. [Details (of public po	licy positio	ns advocated	l by the e	ntity:		
SI.N		Public Policy resorted advocated for such advocacy		avai	Whether information available in public domain? (Yes/No)		Frequency of Review by Board	Web link, if available
thro its i Ove ind	o' the as inputs o er the ye ustry as	sociations in n various are ears, the com	perience an which it has as such as apany's Cha he Compan	d expertise ov s membership renewable en irman and Ma y is committed	, engages ergy spac inaging Di	s with vari e, health irector ha	ndes, the company ous stakeholders a and safety, etc. ve played key role ublic policy advoca	and provide s in leading

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development.

				E	ssentia	I Indic	ators			
1.	Deta on a	ils o pplic	f Social Impac cable laws, in t	t Assessme he current f	nts (SI/ inancia	A) of polyel	rojects ur	nderta	aken by the	entity based
	and b detail	lame SIA Date of d brief Notification tails of No.		i	: 3 :		in p	Results mmunicated ublic domai (Yes/No)	:	
	None of the projects undertaken by the company in FY 2022-23 require Social Impact Assessments.						cial Impact			
2.	Prov (R&	/ide R) is	information o being underta	n project(s) ken by your	for wh entity,	ich on in the f	going Re	habil form	itation and	Resettlemen
	SI. No.	for v	ne of Project vhich R&R is ongoing	State	Dist	rict	No. o Projed Affecte Familie (PAFs	t ed es	% of PAFs covered by R&R	Amount paid to PAFs in the FY (In INR)
		Not applicable								
3.	Desc	cribe	the mechanis	ms to receiv	e and r	edress	grievano	es of	the comm	unity.
	level feed requ	. This back iring	has an Enviror s team actively on the effectiv support from th , which are revi	interacts with veness of the e company.	n nearby e compa These a	village any's E re then	ers / gover ESG initiat formalize	nmen ives a d thro	t authorities and ascerta ' the CSR p	and gets their in their needs rograms of the
4. Percentage of input material (inputs to total inputs by value) sourced						al inpu	ts by valu	ie) so	urced from	suppliers:
4.						•	FY 2022	-23	I	Y 2021-22
4.			Directly sourced from MSMEs/ small producers							
4.				n MSMEs/	small	_	11 % app	rox.	1	7 % approx.
4.	prod Sour	ucers ced (11 % app			7 % approx. 4 % approx.
4.	prod Sour	ucers ced (directly from wi	thin the distri		Indica	64 % app			
1	Sour neight	rced of the control o	directly from wi	thin the distri Lead	ct and dership	any n	64 % app tors	rox.	impacts id	4 % approx. entified in the
	Sour neight Prov Soci	rced (hbou	directly from wi ring districts	Leadens taken to nents (Refere	ct and dership mitigate	any n	64 % app tors egative s n 1 of Ess	rox. ocial centia	impacts id	4 % approx. entified in the above):

	Provide the following information on CSR projects designated aspirational districts as identified by govern							
	SI.No.	Sta	te	Aspirational	District	Amoun	t spent (In INR)	
	Refer An	nexure - VI to	Board's Repor	rt for details on	CSR activit	ies.		
3							ve preference to oups? (Yes/No)	
	The Company is committed to collaborate with small farmers (growing varieties of wood for pulping), by supplying them Clones / seedlings at concessional rates and also enters contracts with them to buyback wood at Minimum Support Prices or Ruling market prices, whichever is higher.							
	(b) Fro	m which mar	ginalized /vulr	nerable groups	s do you pr	ocure?	•	
	Ref	er notes given	above.					
	(c) What	at percentage	e of total proce	urement (by va	alue) does	it constitute	e?	
	 (c) What percentage of total procurement (by value) does it constitute? Our procurement from small farmers, direct and thro' aggregators, represent about 30% of our total wood procurement for the year. 							
	01 0	ui totai wood	procurement to	or the year.			-	
4	Details (of the benefi	ts derived an	d shared from			perties owned o	
4	Details (of the benefi I by your ent Intellectua based on	ts derived an	d shared from	/ear), based Bene			
4	Details of acquired	of the benefi I by your ent Intellectua based on	ts derived an ity (in the curral Property traditional	d shared from ent financial y Owned / Acquired	/ear), based Bene (Y	d on tradition	Basis of calculating	
4 5	Details of acquired SI. No.	of the benefit by your enting the lecture of the benefit based on known of corrective a	ts derived an ity (in the curr al Property traditional vledge	d shared from ent financial y Owned / Acquired (Yes/No) Not applicable	Bene (Yo	d on tradition fit shared es/No) adverse or	Basis of calculating benefit share	
	Details of acquired SI. No. Details of property	of the benefit by your enting the lecture of the benefit based on known of corrective a	ts derived an ity (in the curr al Property traditional vledge	d shared from ent financial y Owned / Acquired (Yes/No) Not applicable	Bene (Yo	fit shared es/No) radverse or radverse is in	Basis of calculating benefit share	
	Details of acquired SI. No. Details of property	Intellectual based on know of corrective as related disp	ts derived an ity (in the curr al Property traditional vledge	d shared from ent financial y Owned / Acquired (Yes/No) Not applicable or underway, bausage of tradi	Bene (Y	fit shared es/No) radverse or radverse is in	Basis of calculating benefit share rder in intellectua volved.	
	Details of acquired SI. No. Details of property Name	of the benefit by your enti- Intellectual based on known with the known of corrective at related dispute of authority	ts derived an ity (in the curr al Property traditional vledge	Owned / Acquired (Yes/No) Not applicable or underway, bausage of tradit of the Case Not applicab	Bene (Y	fit shared es/No) radverse or radverse is in	Basis of calculating benefit share rder in intellectua volved.	
5	Details of acquired SI. No. Details of property Name	of the benefit by your enti- Intellectual based on known with the known of corrective at related dispute of authority	ts derived an ity (in the curr al Property traditional vledge	d shared from ent financial y Owned / Acquired (Yes/No) Not applicable or underway, bausage of tradit of the Case Not applicab jects: rsons d from	Bene (Your sased on any tional known ble % of benefit	d on tradition fit shared es/No) radverse or raddes is in the corrective	Basis of calculating benefit share rder in intellectua volved. action taken	

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

Essential Indicators Describe the mechanisms in place to receive and respond to consumer complaints and feedback. A well established system is in place for dealing with consumer feedback. Customers are provided multiple options to connect with the company through email, telephone, feedback forms, personal visit by company's branch officers / managers, etc. In addition, the Top management team conducts quarterly dealers' conference wherein all the dealers (Indentors as called by the company) participate and have both group discussions / oneto-one discussion with the Top Management team. This particular initiative has been extremely effective and important for the Top Management team of the company to receive direct unfiltered feedback on the company's products, quality issues, logistics issues if any and so on. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about Environmental and social parameters relevant to the product, safe and responsible usage and recycling and / or safe disposal. As a percentage to total turnover Environmental and social parameters relevant Products of the company contain all relevant to the product information as required under applicable laws. Safe and responsible usage Recycling and/or safe disposal

3 Number of cons	Number of consumer complaints in respect of the following:								
	FY 20	FY 2022-23		FY 20	Remarks				
	during	Pending resolution at end of year		Received during year					
Data privacy									
Advertising									
Cyber-security									
Delivery of essential services									
Restrictive Trade Practices									
Unfair Trade Practices									
Others **	76	2		73	1				

^{**} All these complaints relate to either product not meeting customer expectation on the performance or logistics gaps like wrong supply / short supply. Company has robust systems put in place to address these issues on priority basis directly and thro' the company's dealer network.

4	Details of instances of product recalls on account of safety issues:					
		Number	Reasons for recall			
	Voluntary recalls	NIII				
	Forced recalls	INIL				

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

The Company's ERP (Database and applications) is fully operational in the Cloud Network and accordingly the company doesn't have any requirement for On-Premises Cyber Security and Risk policy. The Company's ERP is fully governed by the cyber security frameworks / audit trails programs / logics provided by the Cloud Service Providers (Oracle and AWS).

Also, the company has a framework / policy on cyber security and risks related to data privacy, available at www.spbltd.com.

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.

None.

Leadership Indicators

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

Details available at https://www.spbltd.com/products/index.html

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

The company's communications are aimed at enabling consumers to make informed purchase decisions. The company also makes efforts to educate consumers on responsible usage of its products and services.

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

The company operates dedicated web portals for the company's indentors, thro' which necessary informations are shared. The company also operates WhatsApp Group facilities to get in touch with Indentors / Customers.

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)

Product Information displayed on the products, as required under applicable laws.

The Central Marketing Office and the Branch Offices spend a lot of time and attention on product information, labelling and customer engagement. The quarterly Indentor conferences act as a major event for discussions on all points concerning products, quality, complaints etc.

	rovide the following information relating to data breaches
а	. Number of instances of data breaches along-with impact
	NIL
b	. Percentage of data breaches involving personally identifiable information of customers
	NIL