



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 person who may be contacted in case of any queries on the BRSR report	Sri. S. Srinivas 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

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II. Products / Services:

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the 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):

Sl. 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):

Sl. No.	Particulars	Total (A)	Male		Female	
			Nos. (B)	% (B/A)	Nos. (C)	% (C/A)
Employees						
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 %
Workers						
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).

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b. Differently abled Employees and workers:

Sl. No.	Particulars	Total (A)	Male		Female	
			Nos. (B)	% (B/A)	Nos. (C)	% (C/A)
Differently Abled Employees						
1	Permanent (D)	3	3	100 %	--	--
2	Other than Permanent (E)	--	--	--	--	--
3	Total employees (D+E)	3	3	100 %	--	--
Differently Abled Workers						
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 (A)	No. and percentage of Females	
		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)

Particulars	FY 2022-23			FY 2021-22			FY 2020-21		
	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

Sl. 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 group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes / No)	FY 2022-23			FY 2021-22		
		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						
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

Sl. 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

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Sl. 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	<p>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.</p> <p>This risk is further addressed thro' a 4 pronged strategy :</p> <ul style="list-style-type: none"> -- 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.

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Sl. 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.

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- ◇ 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.

Sl.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes										
1.	a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	--	--	Y	Y	--	Y	Y	--
	c. Web Link of the Policies, if available	All the policies are available @ https://www.spbltd.com/investor-info/policy/index.html								
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4.	Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance) (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	SPB's manufacturing facilities have well defined Environment, Health and Safety (EHS) and quality management systems in place and are aligned with International Standards like : ISO 9001 (Quality Management System), ISO 14001 (Environment Management System), OHSAS 18001 / ISO 45001 (Occupational Health & Safety Management System), FSC Controlled Wood Procurement Policy, BIS Standards.								
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.	The Company has already achieved its vision to reach "Wood Positive Status". It has also made significant progress in having more than 70% of energy needs, in Unit : Erode, addressed thro' renewable energy sources / bio-fuels								
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Refer the details given under each of the Principle.								

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Sl.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9										
Governance, leadership and oversight																				
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements : “SPB is committed to be a truly sustainable and socially responsible business. The Company’s ESG roadmap and Green initiatives / targets have been integrated with the Growth Strategy of the business.” 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 Managing Director of the Company																		
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 NGRBCs by the Company:																			
	Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee								Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)										
		P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	
	Performance against above policies and follow up action	Yes									Annually									
	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 independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9										
		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.																		

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Sl.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
12	If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated: NA									
	The entity does not consider the Principles material to its business (Yes/No)						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)						Not applicable			
	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)						Not applicable			
	Any other reason (please specify)									

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.

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- Remuneration policy.
 - Policy on preservation and archival of documents.
 - Policy for determination of Materiality for Disclosure of Information / Events to Stock Exchanges.
 - Policy on Related Party transactions
 - Policy for determining Material subsidiaries.
 - Prevention of Sexual Harassment at Workplace
- ♦ The Company has a policy to do business with suppliers / contractors and other who are aligned with its value systems.

Essential Indicators			
Percentage coverage by training and awareness programmes on any of the Principles during the financial year:			
Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	The Directors of the Company are given extensive information thro' Plant Visit(s), periodical updates and detailed presentations, on the Regulatory updates including MCA updates on amendments to Companies Act, 2013, SEBI Regulations, amendments to FEMA, Related Party Transactions, etc., Industry updates, market developments, energy initiatives thro' Business Presentations etc.		
Key Managerial Personnel			
Other Employees	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 learnings.		
Workers	The GreenCo Newsletters of the Company are also available @ www.spbltd.com		
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):			

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Monetary					
	NGRBC Principle	Name of Regulatory/ enforcement agencies/ judicial institutions	Amount (in INR)	Brief of the Case	Has an appeal been preferred (Yes/ No)
Penalty / Fine	None				
Settlement					
Compounding fee					
Non - Monetary					
Imprisonment	None				
Punishment					

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

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

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

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 involving disciplinary action taken by any law enforcement agency for the charges of bribery / corruption against Directors / KMP / employees / workers that have been brought to our attention.	
KMPs		
Employees		
Workers		

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6 Details of complaints with regard to conflict of interest:

	FY2022-23		FY 2021-22	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors / KMPs.		None		

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 root 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.

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- 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, Hydrogen Peroxide, Chlorine Di-oxide, etc. which make our process green. The process adopted 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 reburied 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

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

2 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®) FSC- C084458, 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>

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

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 / egg-tray making facilities.

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

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	Whether conducted by independent external agency (Yes/No)	Results communicated in Public Domain (Yes / No)
1701	Super white & Copier Grades	20 – 30 %	Gate to Gate	3 rd party and internal	No

- 2 If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

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.

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Name of Product / Service	Description of the risk / concern	Action Taken				
NIL						
Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).						
Indicate input material	Recycled or re-used input material to total material					
	FY 2022-23	FY 2021-22				
Unit : Erode – Integrated Pulp and Paper Unit	Erode unit uses Bagasse, which is a by-product in Sugar mills, to manufacture pulp and about 10% of total pulp manufactured in Erode unit is bagasse based					
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 reused, recycled, and safely disposed, as per the following format:						
	FY 2022-23		FY 2021-22			
	Re-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 products and their packaging materials (as percentage of products sold) for each product category.						
Indicate product category			Reclaimed products and their packaging materials as % of total products sold in respective category			
In Unit : Erode			About 10% of the pulp is from Bagasse, which is a by-product of the Sugar Industry.			
In Unit : Erode			About 20% of the pulp furnish is from recovered paper.			

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

Essential Indicators											
1	a. Details of measures for the well-being of employees (Other than workers):										
% of employees covered by											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Nos.	%	Nos.	%	Nos.	%	Nos.	%	Nos.	%
Permanent Employees											
Male	717	174	24%	717	100%	NA	NA	--	--	--	--
Female	12	1	8%	12	100%	12	100%	NA	NA	--	--
Total	729	174	24%	729	100%						
Other than Permanent employees											
Male	275	275	100%	264	100%	--	--	--	--	--	--
Female	11	11	100%	11	100%	--	--	--	--	--	--
Total	286	286	100%	286	100%						
b. Details of measures for the well-being of workers:											
Permanent Workers											
Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Nos.	%	Nos.	%	Nos.	%	Nos.	%	Nos.	%
Male	307	--	--	307	100%	--	--			--	--
Female	--	--	--	--				--	--	--	--
Total	307	--	--	307	100%						
Other than Permanent Workers											
Male	949	949	100%	38	4%	--	--			--	--
Female	105	105	100%	--	--	105	100%	--	--	--	--
Total	1054	1054	100%	38	4%						

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2	Details of retirement benefits, for Current FY and Previous Financial 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. ^^ Related to the exclusive Superannuation Program that the company offers to its 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 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%	

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	As mentioned above
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2022-23			FY 2021-22		
	Total employee / workers	Part of association or Union	%	Total employee / workers	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	--	--	--	--	--	--

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8 Details of training given to employees and workers:										
Category	FY 2022-23					FY 2021-22				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (A)	On Health and safety measures		On Skill upgradation	
		Nos. (B)	% (B/A)	Nos. (C)	% (C/A)		Nos. (E)	% (E/D)	Nos. (F)	% (F/D)
Employees										
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 performance and career development reviews of employees and 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%
	Workers						
	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.

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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 injuries	Employees	--	1
	Workers	--	--
No. of fatalities	Employees	--	1
	Workers	--	--
High consequence work-related injury or ill-health (excluding fatalities)	Employees	--	--
	Workers	--	--

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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:

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

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

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.

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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:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	<p>The key suppliers of the company are covered in the GreenCo Supply Chain Program and accordingly given awareness programs and undergo detailed evaluation by GreenCo auditors.</p> <p>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</p>
Working Conditions	

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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

1 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	<ul style="list-style-type: none"> Appraisals and feedback Career management Building a safety culture and inculcating safe work practices. On the Job training

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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
Collaborators	No	Video Conferences, Meetings / Calls, visits	As and when needed	<ul style="list-style-type: none"> 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

- 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.

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

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

The above are few of the instances of engagement with vulnerable / marginalized stakeholder groups.

Essential Indicators

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

Category	FY 2022-23			FY 2021-22		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
Employees / Workmen						
Permanent	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.					
Other than permanent						
Total						

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

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		Nos. (B)	% (B/A)	Nos. (C)	% (C/A)		Nos. (E)	% (E/D)	Nos. (F)	% (F/D)
Permanent employees (other than workmen)										
Male	717			717	100%	735			735	100%
Female	12			12	100%	12			12	100%
Other than Permanent (Other than workmen)										
Male	275			275	100%	268			268	100%
Female	11			11	100%	11			11	100%
Permanent workmen										
Male	307			307	100%	316			316	100%
Female	--					--				
Other than Permanent workmen										
Male	949	907	96%	42	4%	916	861	94%	55	6%
Female	105	105	100%			108	108	100%		

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	Refer Annexure VIII to Board's Report for report on Managerial Remuneration.			
Key Managerial Personnel				
Employees other than BoD and KMP	943	₹ 599,697	17	₹ 153,470
Workers	346	₹ 598,667	--	

4 Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

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

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

	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	NIL					
Discrimination at workplace						
Child Labour						
Forced Labour / Involuntary Labour						
Wages						
Other human rights related issues						

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.

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9	Assessments for the year:	
		% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
	Child labour	100%.
	Forced/involuntary labour	The company undertook internal assessment thro' its HR and IR function.
	Sexual harassment	
	Discrimination at workplace	
	Wages	
	Others - please specify	
10	Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.	
	No significant risks / concerns observed in internal evaluations.	
Leadership Indicators		
1.	Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.	
	No complaint has been received for human rights violation.	
2.	Details of the scope and coverage of any Human rights due-diligence conducted.	
	Internal assessment covers all plant locations and offices.	
3.	Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?	
	Our establishments / offices are accessible to the differently abled and we are continuously working towards improving infrastructure for eliminating barriers to accessibility.	
4.	Details on assessment of value chain partners:	
		% of value chain partners (by value of business done with such partners) that were assessed
	Sexual Harassment	Currently, this is not being addressed.
	Discrimination at workplace	However, the company's suppliers Code of Conduct addresses many of these aspects.
	Child Labour	
	Forced Labour/Involuntary Labour	
	Wages	
	Others - please specify	
5.	Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.	
	Not applicable.	

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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 consumption / turnover in rupees</i>)	0.00040 GJ per Rupee of turnover	0.00055 GJ 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. 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 (<i>Water consumed / turnover</i>)	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

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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/nm ³	26.0	29.0
SOx – Erode unit	Mg/nm ³	119.5	117.5
Particulate matter (PM) – Erode unit	Mg/nm ³	21.0	32.0
NOx – Tirunelveli unit	Mg/nm ³	38.7	66.9
SOx – Tirunelveli unit	Mg/nm ³	13.3	40.0
Particulate matter (PM) – Tirunelveli unit	Mg/nm ³	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.

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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 CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	359986	351157
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	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 bio-fuels.

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

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For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	--	--
(ii) Re-used	--	--
(iii) Other recovery operations	--	--
Total		
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
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.

Sl. 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

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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.

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2. Provide the following details related to water discharged:

Parameter	FY 2022-23	FY 2021-22
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment		
- With treatment - please specify level of treatment		
(ii) To Groundwater		
- No treatment		
- With treatment - please specify level of treatment		
(iii) To Seawater		
- No treatment		
- With treatment - please specify level of treatment		
(iv) Sent to third-parties 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 CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , 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.

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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:**

Sl. 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 Energy			

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.

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

Essential Indicators					
1. a. Number of affiliations with trade and industry chambers / associations.					
b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.					
Sl. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)			
1	Confederation of Indian Industry	National			
2	Indian Pulp and Paper Technology Association	National			
3	Indian Paper Manufacturers Association	National			
4	Indo American Chamber of Commerce	National			
5	Indo German Chamber of Commerce	National			
6	National Safety Council	National			
7	Employers Federation of Southern India	National			
8	Indian Agro & Recycled Paper Manufacturers association	National			
9	Federation of Indian Export Organisation	National			
10	CAPEXIL	National			
2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.					
Name of authority	Brief of the case	Corrective action taken			
Competition Commission of India	Allegation, leveled against large paper manufacturers in India (including our Company) of simultaneous price increases during the period January 2012 - December 2013, is currently under evaluation by the Competition Commission of India				
Leadership Indicators					
1. Details of public policy positions advocated by the entity:					
Sl.No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board	Web link, if available
Given the Company's experience and expertise over more than 6 decades, the company proactively, thro' the associations in which it has membership, engages with various stakeholders and provide its inputs on various areas such as renewable energy space, health and safety, etc. Over the years, the company's Chairman and Managing Director have played key roles in leading industry associations. The Company is committed to engage in the public policy advocacy process in a responsible and ethical manner.					

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

Essential Indicators						
1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.						
Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link	
None of the projects undertaken by the company in FY 2022-23 require Social Impact Assessments.						

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:						
Sl. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amount paid to PAFs in the FY (In INR)
Not applicable						

3. Describe the mechanisms to receive and redress grievances of the community.		
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.		
4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:		
	FY 2022-23	FY 2021-22
Directly sourced from MSMEs/ small producers	11 % approx.	17 % approx.
Sourced directly from within the district and neighbouring districts	64 % approx.	84 % approx.

Leadership Indicators	
1 Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):	
Details of negative social impact identified	Corrective action taken
Not applicable.	

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2	Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:			
	Sl.No.	State	Aspirational District	Amount spent (In INR)
	Refer Annexure - VI to Board's Report for details on CSR activities.			

3	<p>(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes/No)</p> <p>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.</p>
	<p>(b) From which marginalized /vulnerable groups do you procure?</p> <p>Refer notes given above.</p>
	<p>(c) What percentage of total procurement (by value) does it constitute?</p> <p>Our procurement from small farmers, direct and thro' aggregators, represent about 30% of our total wood procurement for the year.</p>

4	Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:				
	Sl. No.	Intellectual Property based on traditional knowledge	Owned / Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
	Not applicable				

5	Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.		
	Name of authority	Brief of the Case	Corrective action taken
	Not applicable		

6	Details of beneficiaries of CSR Projects:			
	Sl. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
	Refer Annexure - VI to Board's Report for details on CSR activities.			

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

Essential Indicators							
1	<p>Describe the mechanisms in place to receive and respond to consumer complaints and feedback.</p> <p>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.</p> <p>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 / one-to-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.</p>						
2	<p>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.</p> <table> <tr> <th colspan="2">As a percentage to total turnover</th></tr> <tr> <td>Environmental and social parameters relevant to the product</td><td rowspan="3">Products of the company contain all relevant information as required under applicable laws.</td></tr> <tr> <td>Safe and responsible usage</td></tr> <tr> <td>Recycling and/or safe disposal</td></tr> </table>	As a percentage to total turnover		Environmental and social parameters relevant to the product	Products of the company contain all relevant information as required under applicable laws.	Safe and responsible usage	Recycling and/or safe disposal
As a percentage to total turnover							
Environmental and social parameters relevant to the product	Products of the company contain all relevant information as required under applicable laws.						
Safe and responsible usage							
Recycling and/or safe disposal							

3	Number of consumer complaints in respect of the following:					
	FY 2022-23		Remarks	FY 2021-22		Remarks
	Received during year	Pending resolution at end of year		Received during year	Pending resolution at end of 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.

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4	Details of instances of product recalls on account of safety issues:		
		Number	Reasons for recall
	Voluntary recalls	NIL	
	Forced recalls		
5	Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy. 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 .		
6	Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services. 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.		
4	Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No) 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.		

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