

## Annexure- 5

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

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## SECTION A: GENERAL DISCLOSURES



### I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Company	L15249UP1933PLC000511
2.	Name of the Company	DHAMPUR SUGAR MILLS LIMITED
3.	Year of Incorporation	22/05/1933
4.	Registered office address	Dhampur, Distt. Bijnor - 246761, U.P.
5.	Corporate office address	6 <sup>th</sup> Floor, Max House, Okhla Industrial Estate, Phase- III, New Delhi-110020
6.	E-mail	investordesk@dhampursugar.com
7.	Telephone	011-41259400
8.	Website	www.dhampursugar.com
9.	Financial year for which reporting is being done	1 <sup>st</sup> April 2024 to 31 <sup>st</sup> March 2025
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited; National Stock Exchange of India Limited
11.	Paid-up Capital	₹65.38 crores
12.	Name and contact details (telephone, email address) of the person for BRSR Reporting	Contact Person Name: Mrs. Aparna Goel, Contact Person Telephone: +91 011 41259400 Contact Person Email Address: aparnagoel@dhampursugar.com
13.	Reporting boundary	The disclosures under this report are made on a Standalone basis
14.	Name of assessment or assurance provider	Not Applicable
15.	Type of assessment of assurance obtained.	Not Applicable

### II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% Of Turnover of the entity
1	Manufacturing - FMCG	Manufacturing of Sugar	40.87%
		Production of Fuel Grade Ethanol and Potable Alcohol (Country liquor), Ethyl Acetate, Extra Neutral Alcohol	56.28%
2	Generation of power	Sale of renewable energy generated to the Grid	2.15%

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

S. No.	Product/Services	NIC Code	% of total turnover contributed
1	Sugar	10721	38.58%
2	Misthi	10721	2.29%
3	Power	3510	2.15%
4	Ethanol	20119	18.32%
5	Chemical	20119	8.51%
6	Portable Spirit	11012	29.46%

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

S. No.	Location	Number of plants	Number of offices	Total
1.	National	2	1	3
2.	International <sup>1</sup>	0	0	0

<sup>1</sup>Currently, Dhampur does not have any international operations.

**19 Markets served by the entity****a. Number of locations**

S. No.	Locations	Number
1.	National (Number of states)	12 - New Delhi, Haryana, Rajasthan, Uttarakhand, Punjab, Himachal, Madhya Pradesh, Bihar, West Bengal, Uttar Pradesh, Jammu & Kashmir, Assam,
2.	International (Number of countries)	No Direct Export Last Year

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

Dhampur Sugar Mill has not made any exports in the current financial year.

**c. A brief on types of customers**

With a legacy spanning 92 years in the sugar industry, our company has evolved from serving traditional sugar consumers to meeting the diverse needs of customers in the power, distillery, country liquor and chemical sectors. Today, our operations extend across 12 Indian states. The continued trust and loyalty of our clientele stand as a testament to our commitment to quality and reliability. Outlined below is a product-wise summary of our key customer segments:

**Sugar:** We cater to four primary segments—institutional clients, the domestic wholesale market, and branded sugar offerings for retail consumers through the B2B channel. Our sugar is used in a wide array of industries such as beverages, confectionery, bakeries, and traditional sweets manufacturing.

**Power:** Utilizing Bagasse & Slop, the by-products of sugar and ethanol production, we generate power primarily for captive consumption. The surplus electricity is sold exclusively to the state electricity board, UPPCL (Uttar Pradesh Power Corporation Limited).

**Ethanol:** Aligned with the Government of India's Ethanol Blending Program, we supply ethanol to various oil marketing companies, supporting the nation's clean fuel initiatives.

**Ethyl Acetate:** We supply ethyl acetate, a widely used solvent, to both end users and traders. Our client base spans industries such as packaging, paints, inks, adhesives, and pharmaceuticals.

**Extra Neutral Alcohol (ENA):** ENA is partly used in-house for producing potable spirits. The remaining volume is supplied to country liquor manufacturers.

**Country Liquor:** We distribute country liquor through a network of wholesalers and distributors, with operations confined to the state of Uttar Pradesh.

## IV. Employees

### 20 Details as at the end of Financial Year:

#### a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	292	277	94.86%	15	5.14%
2.	Other than permanent (E)	0	0	0	0	0
3.	Total employees (D+E)	292	277	94.86%	15	5.14%
Workers						
4.	Permanent (F)	940	929	98.83%	11	1.17%
5.	Other than permanent (G)	502	502	100%	0	0
6.	Total workers (F+G)	1442	1431	99.24%	11	0.76%

#### b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled Employees						
1.	Permanent (D)	0	0	0%	0	0%
2.	Other than permanent (E)	0	0	0%	0	0%
3.	Total Differently abled employees (D+E)	0	0	0%	0	0%
Differently abled Workers						
4.	Permanent (F)	0	0	0%	0	0%
5.	Other than permanent (G)	0	0	0%	0	0%
6.	Total Differently abled workers (F+G)	0	0	0%	0	0%

### 21 Participation/Inclusion/Representation of women

	Total No. (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	7	1	14.29%
Key Management Personnel	3	1	33.33%

### 22 Turnover rate for permanent employees and workers

Category	FY 2025			FY 2024			FY 2023		
	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)	Male (%)	Female (%)	Total (%)
Permanent employees	13.62%	0%	12.93%	16.30%	0%	15.52%	20.66%	6.06%	19.83%
Permanent workers	4.43%	0%	4.43%	6.50%	0%	6.45%	3.21%	0%	3.18%



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

### 23 Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Ehaat Limited	Subsidiary	100	No
2	DETS Limited	Subsidiary	51	No

## VI. CSR Details

- 24 i. Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes  
 ii. If yes, Turnover – (in ₹) 2655.00 Crores  
 iii. Net worth – (in ₹) 1147.28 Crores

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)  (If yes, then provide web-link for grievance redress policy)	FY 2025			FY 2024		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Farmers	Yes <a href="https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf</a>	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes <a href="https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf</a>	0	0	NA	0	0	NA
Shareholders	Yes <a href="https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf</a>	3	1	Received at the end of year and was resolved within timelines.	0	0	NA
Employees and workers	Yes <a href="https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf</a>	0	0	NA	0	0	NA

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)  (If yes, then provide web-link for grievance redress policy)	FY 2025			FY 2024		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Customers	Yes <a href="https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf</a>	0	0	NA	0	0	NA
Value Chain Partners	No	0	0	NA	0	0	NA
Other (please specify)	No	0	0	NA	0	0	NA

## 26 Overview of the entity's material responsible business conduct issues

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	Employee Health & Safety	Risk & Opportunity	<b>Risk:</b> <u>Lack of Comprehensive Safety Controls</u> – Workforce injuries can disrupt operations  <b>Opportunity:</b> <u>Alignment with Statutory Safety Requirements</u> – a safe workplace boosts morale and retention.	<u>Ongoing Safety Education</u> – Organize sessions on workplace safety, manage permits for work activities, and lead workshops on reporting incidents.  <u>Identifying and Addressing Hazards</u> – Detect potential near-miss situations and put preventive actions in place.  <u>Safety Reviews and Risk Evaluations</u> – Assess risks within the workplace to safeguard employee health and safety.  <u>Distribution of Protective Gear (PPE)</u> – Provide safety equipment customized to specific tasks and associated hazards.	<b>Negative:</b> Unaddressed safety issues can lead to significant injury-related expenses and regulatory fines, impacting financial stability and reputation.  <b>Positive:</b> Implementing robust safety protocols enhances workplace productivity and boosts employee retention by fostering a secure work environment.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2.	Business Ethics & Resilience	Risk & Opportunity	<p><b>Risk:</b>  <u>Legal Actions</u> - Engaging in unethical practices can expose an organization to serious legal repercussions, including fines and lawsuits, while damaging its reputation and eroding shareholder value.</p> <p><b>Opportunity:</b>  <u>Builds Trust</u> - By adhering to ethical standards and transparent governance, organizations can foster trust among stakeholders, enhance brand reputation, and drive sustainable growth, leading to increased long-term value.</p>	<p><u>Code of Conduct Implementation</u> - Develop and communicate a comprehensive set of ethical guidelines that set expectations for employee behavior and decision-making.</p> <p><u>Grievance Redressal Mechanisms</u> - Establish and maintain transparent processes for employees to report concerns and complaints, ensuring timely and fair resolution.</p> <p><u>Board Oversight and Governance</u> - Ensure active involvement of the board in monitoring ethical practices and compliance, providing strategic direction and accountability.</p> <p><u>Ethics Training Programs</u> - Conduct regular training sessions to enhance employee understanding of ethical standards, fostering a culture of integrity and compliance.</p>	<p><b>Negative:</b>  <u>Reputational Loss</u> - Severely damage reputation, diminishing trust among customers, partners, and the public, ultimately affecting its market position and long-term viability.</p> <p><u>Legal Compliance</u> - Significant legal challenges, including lawsuits, fines, and regulatory action, which drain resources and distract from core business pursuits.</p> <p><b>Positive:</b>  <u>Investor Confidence</u> - Bolsters investor confidence, as stakeholders perceive the organization as reliable and well-managed, translating into greater investment potential and market stability.</p>
3.	Sustainable Supply Chain, Sourcing & Innovation	Risk & Opportunity	<p><b>Risk:</b>  <u>Revenue Losses</u> - Supply chain interruptions, such as delays, quality issues, or sourcing challenges, can significantly impact production schedules, leading to potential revenue loss and customer dissatisfaction.</p> <p><b>Opportunity:</b>  <u>Mitigate Risks</u> - Mitigate supply chain risks and enhance long-term stability.</p> <p><u>Enhance Operational Efficiency</u> - Implementing innovative approaches and</p>	<p><u>Supplier Audits</u> - Conduct regular evaluations of suppliers to ensure compliance with quality, ethical, and environmental standards, safeguarding the integrity of the supply chain</p> <p><u>Farmer Training Programs</u> - Implement training initiatives to educate farmers on sustainable practices, improving agricultural outcomes and supporting community development.</p> <p><u>Innovation in Material Inputs</u> - Invest in research and development to explore innovative material.</p>	<p><b>Negative:</b>  <u>Supply Shocks</u> - Unexpected disruptions in the supply chain, such as natural disasters, geopolitical events, or supplier failures, can result in severe supply shocks</p> <p><b>Positive:</b>  <u>Efficiency, cost saving:</u> By optimizing supply chain processes and adopting efficient practices, organizations can enhance operational efficiency, reducing waste and resource consumption.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			technologies within the supply chain can optimize efficiency, reduce costs, and improve responsiveness to market changes.	alternatives, enhancing efficiency and reducing environmental impact throughout the production process	
4.	Emissions and Energy Management	Risk & Opportunity	<p><b>Risk:</b>  <u>Increased Regulatory Scrutiny</u> – Dhampur may face increased inspections, fines, or mandatory compliance requirements if emissions exceed legal limits.</p> <p><b>Opportunity:</b>  <u>Operational Efficiency</u>            By lowering energy use, companies can significantly reduce their operational expenses, leading to improved profitability.</p> <p><u>Lower Carbon Footprint</u>            – Energy efficiency contributes to a smaller carbon footprint, enhancing the company's sustainability profile and ensuring alignment with environmental regulations and consumer expectations for greener operations</p>	<p><u>Energy Audits</u> – Perform comprehensive evaluations of energy usage to identify inefficiencies and opportunities for reduction, enhancing operational efficiency and cutting costs.</p> <p><u>Shift to Renewables</u> – Transition to renewable energy sources to reduce reliance on fossil fuels, minimize environmental impact, and achieve sustainability goals.</p> <p><u>GHG Tracking</u> – Implement systems to monitor and measure greenhouse gas emissions, ensuring compliance with environmental standards and informing strategies to lower carbon output.</p>	<p><b>Negative:</b>  <u>Rising Fuel Costs</u> – Increasing carbon taxes and rising fuel costs pose significant financial challenges for organizations reliant on conventional energy sources.</p> <p><b>Positive:</b>  <u>Efficiency Gains:</u>            Achieve substantial efficiency gains that streamline operations and reduce waste, by investing in energy-efficient technologies and practices</p>
5.	Product Safety & Lifecycle Management	Risk & Opportunity	<p><b>Risk:</b>  <u>Product Recalls</u> – Failing to adhere to regulatory standards and safety requirements can result in product recalls, which are costly and damage an organization's reputation.</p> <p><b>Opportunity:</b>  <u>Market Competitiveness</u> – Companies demonstrating commitment to sustainability and ethics are better positioned to attract environmentally conscious customers and differentiate themselves from competitors.</p>	<p><u>Proactive Compliance Monitoring</u> – Regularly track regulatory requirements to ensure adherence.</p> <p><u>Industry Awareness</u> – Organize expert-led sessions on sugar industry regulations.</p> <p><u>Regulatory Framework Adoption</u> – Implement and oversee a structured compliance system.</p> <p><u>Compliance Record-Keeping</u> – Maintain and update a register for ongoing regulatory alignment.</p>	<p><b>Negative:</b>  <u>Legal Fines</u> – Failure to comply with legal and regulatory standards risk significant legal exposure, including lawsuits, fines, and penalties.</p> <p><b>Positive:</b>  <u>Increased Brand Equity</u>            Enhances brand equity by building a reputation for reliability and trustworthiness.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Water and Wastewater Management	Risk & Opportunity	<p><b>Risk:</b></p> <p><u>Ecological Imbalance</u> – Over-extraction often results in depletion of local water sources, adversely affecting ecosystems, communities, and agricultural activities.</p> <p><u>Reputational Loss</u> – Severely damage a company's reputation, leading to public backlash, loss of consumer trust, and scrutiny from regulatory bodies.</p> <p><b>Opportunity:</b></p> <p><u>Alignment to Global SDGs</u>– By optimizing water usage, companies can reduce costs and minimize environmental impact, aligning with global sustainability targets.</p> <p><u>Strengthened Stakeholder Relationships</u>–Communities and partners value organizations that contribute positively to environmental and social welfare.</p>	<p><u>ZLD Systems</u> – Implement Zero Liquid Discharge systems to eliminate liquid waste, enhancing water conservation efforts and promoting sustainable resource management.</p> <p><u>Water Metering</u> – Utilize advanced water metering technologies to accurately monitor consumption, identifying areas for improvement and optimizing operational efficiency.</p> <p><u>Reuse Strategies</u> – Develop and deploy strategies for water reuse, ensuring sustainable utilization of resources and reducing demand on freshwater supplies.</p> <p><u>ETP Optimization</u> – Optimize Effluent Treatment Plant operations to maximize efficiency and effectiveness, reducing environmental impact and ensuring compliance with water quality standards.</p>	<p><b>Negative:</b></p> <p><u>Regulatory Scrutiny</u> – Failing to comply with environmental regulations or industry standards can result in significant regulatory fines</p> <p><b>Positive:</b></p> <p><u>Builds Resilience</u> – By prioritizing sustainable practices, organizations build resilience against external pressures and uncertainties.</p>
7.	Human Capital Development	Opportunity	<p><b>Opportunity:</b></p> <p><u>Increased Business Growth</u> – Investing in employee growth leads to a more engaged, skilled, and loyal workforce, which ultimately enhances overall business performance and success.</p>	<p><u>Learning &amp; Development Programs</u> – Establish comprehensive Learning and Development initiatives to enhance employee skills and capabilities, driving growth and adaptability within the organization.</p> <p><u>Internal Career Mobility</u> – Facilitate opportunities for internal role transitions to foster diverse career paths, enhancing employee satisfaction and retention.</p> <p><u>Leadership Development Initiatives</u> – Implement structured programs to cultivate future leaders, equipping them with the skills and vision necessary to drive organizational success and culture.</p>	<p><b>Positive:</b></p> <p><u>Higher Productivity</u> – When employees are equipped with the right skills through training and learning programs, they perform tasks more efficiently and effectively, leading to improved operational outcomes.</p> <p><u>Lower Employee Turnover</u> – Providing opportunities for career advancement, competitive benefits, and a positive company culture helps retain top talent and reduces the costs associated with recruiting and training new employees.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8.	Human Rights	Risk & Opportunity	<p><b>Risk:</b>  <u>Lowers Reputation</u> – Failure to uphold human rights standards risk facing significant repercussions such as penalties imposed by regulatory authorities, including fines or sanctions, affecting the company's financial status and public standing.</p> <p><b>Opportunity:</b>  <u>Enhanced Trust</u> – By integrating respect for human rights into corporate policies and supply chain management, companies demonstrate transparency and integrity, increasing their attractiveness to socially responsible investors.</p>	<p><u>Human Rights Policy</u> Develop and enforce a robust human rights policy to ensure ethical standards and practices across all organizational activities and partnerships.</p> <p><u>Supplier Screening</u> – Implement rigorous screening processes to assess suppliers' adherence to human rights and ethical standards, ensuring responsible sourcing and collaboration.</p> <p><u>Grievance Mechanisms</u> – Establish transparent and accessible grievance mechanisms to address and resolve human rights concerns, promoting fairness and accountability throughout the organization.</p>	<p><b>Negative:</b>  <u>Business Impact</u> – Significant impacts such as customer attrition, challenges in attracting and retaining talent, and potential financial losses as partners and investors may distance themselves.</p> <p><b>Positive:</b>  <u>Global Access</u> – By adhering to high standards of ethical conduct and social responsibility, an organization can enhance its reputation, opening pathways to global market access.</p>
9.	Community Relations	Risk & Opportunity	<p><b>Risk:</b>  <u>Disrupt Operations</u> Poor relations may result in labor strikes, community opposition, regulatory scrutiny, or even boycotts, which can halt production, delay projects, and increase operational costs.</p> <p><b>Opportunity:</b>  <u>Enhanced Trust</u> – Through transparent communication, collaboration, and addressing stakeholders' concerns, the organization can nurture strong, mutually beneficial relationships.</p>	<p><u>CSR Programs</u> – Design and implement comprehensive Corporate Social Responsibility initiatives to contribute positively to communities</p> <p><u>Stakeholder Engagement</u> – Develop proactive strategies to engage with stakeholders through regular communication and collaboration.</p> <p><u>Impact Assessments</u> – Conduct thorough assessments to evaluate the social and environmental effects of organizational activities</p>	<p><b>Negative:</b>  <u>Operational Disruptions</u> – Protests can arise from community dissatisfaction, environmental concerns, or perceived injustices, leading to operational disruptions leading to project delays, increased costs, and legal battles, all of which hinder the organization's ability to meet deadlines and achieve objectives</p> <p><u>Increased Goodwill</u> – Actively engaging with stakeholders builds a foundation of trust and goodwill.</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
10.	Customer Relationship Management	Opportunity	<p><b>Opportunity:</b></p> <p><u>Feedback Loops</u> – Creates open channels of communication allowing organizations to regularly gather valuable insights and input from their stakeholders.</p> <p><u>Builds Loyalty</u> – Strong relationships foster high levels of loyalty among stakeholders,</p> <p><u>Brand Differentiation</u> – Helps create a unique brand identity characterized by integrity, reliability, and customer-centricity</p>	<p><u>Customer Relationship Management Tools</u> – Implement advanced Customer Relationship Management systems to enhance customer interactions and streamline processes, ensuring personalized experiences and building long-term loyalty.</p> <p><u>Customer Grievance Redressal</u> – Establish robust mechanisms for addressing customer complaints and concerns promptly, fostering trust and improving satisfaction through transparency and accountability.</p> <p><u>Customer-Centric Culture</u> – Cultivate an organizational culture that prioritizes customer needs and preferences, driving innovation and differentiation.</p>	<p><b>Positive:</b></p> <p><u>Revenue Stability</u> – Acts as a consistent revenue stream, as a loyal customer base provides predictable sales and reduces the volatility associated with acquiring new customers</p> <p><u>Repeat Purchases</u> – Satisfied and engaged customers are more likely to return for additional purchases, generating repeat business</p>
11.	Chemical and Waste Management	Risk & Opportunity	<p><b>Risk:</b></p> <p><u>Legal Risks</u> – Pose serious threats to environmental and public health, triggering fines, increased scrutiny from regulatory agencies, and potential lawsuits.</p> <p><b>Opportunity:</b></p> <p><u>Regulatory Compliance</u> – Implementing robust chemical and waste management practices minimizes the risk of spills and mishandling, enhancing workplace safety and environmental protection.</p>	<p><u>Hazardous Waste SOPs</u> – Develop and implement Standard Operating Procedures for handling hazardous waste to ensure safety and consistency.</p> <p><u>Inventory Tracking</u> – Establish comprehensive systems for monitoring and tracking inventory levels of hazardous substances, promoting accountability and preventing mishandling or loss.</p> <p><u>Secure Storage</u> – Implement secure storage solutions designed to contain hazardous materials safely, preventing spills.</p> <p><u>Regulatory Compliance</u> – Ensure adherence to all relevant regulations governing hazardous waste management, maintaining compliance.</p>	<p><b>Negative:</b></p> <p><u>Cleanup Costs</u> – Can lead to costly cleanup operations, involving substantial financial outlays and resource allocation to remediate environmental damage and restore public safety.</p> <p><u>Reduced Compliance Risks</u> – Adhering to stringent waste management practices minimizes the likelihood of regulatory violations, thereby lowering compliance risks</p>



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
12.	Cybersecurity	Risk & Opportunity	<p><b>Risk:</b>  <u>Data Loss</u> – Severe consequences, including the loss of sensitive data compromising proprietary information, customer privacy, and intellectual property, leading to significant operational disruptions.</p> <p><b>Opportunity:</b>  <u>Operational Integrity</u> – Implementing robust cybersecurity measures safeguards digital assets and maintains the integrity of business operations.</p>	<p><u>Firewalls</u> – Deploy robust firewall solutions to create a secure perimeter, preventing unauthorized access</p> <p><u>Data Encryption</u> – Implement advanced encryption technologies to safeguard sensitive information</p> <p><u>Employee Awareness</u> – Conduct regular training sessions to enhance employee awareness of cybersecurity risks and best practices</p> <p><u>Incident Response Protocols</u> – Develop and maintain comprehensive incident response protocols to swiftly address and mitigate cybersecurity breaches</p>	<p><b>Negative:</b>  <u>Financial Losses</u> – Significant financial repercussions, including costs associated with data recovery, system repairs, regulatory fines, and legal actions.</p> <p><b>Positive:</b>  <u>Resilience</u> – Implementing strong cybersecurity practices enhances organizational resilience, enabling the company to withstand and quickly recover from potential cyber threats.</p>
13.	Sustainable Packaging	Opportunity and Risk	<p><b>Risk:</b>  <u>Reliance on Plastics</u> – Relying heavily on plastic packaging may face compliance challenges, financial penalties, and reputational damage.</p> <p><b>Opportunity:</b>  <u>Alignment with SDGs</u> – By adopting materials that are recyclable, biodegradable, or sourced sustainably, companies can align their practices with global sustainability standards and consumer expectations.</p>	<p><u>Vendor Engagement</u> – Collaborate with vendors and suppliers to integrate eco-friendly practices, ensuring that packaging meets sustainability standards and supports collective environmental goals.</p> <p><u>Packaging Audits</u> – Conduct thorough packaging audits to assess and improve material usage, identifying opportunities for waste reduction and alignment with global sustainability trends.</p>	<p><b>Negative:</b>  <u>Non-compliance Costs</u> – Include fines levied by regulatory authorities, expenses related to legal proceedings, and the potential for increased scrutiny and audits</p> <p><b>Positive:</b>  <u>Market Differentiation</u> – By adopting eco-friendly packaging solutions and sustainable practices, companies can achieve significant market differentiation</p>



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
14.	Biodiversity Management	Risk & Opportunity	<p><b>Risk:</b>  <u>Opposition</u> -            Poor biodiversity management can result in substantial opposition from local communities, environmental groups, and regulatory bodies.</p> <p><b>Opportunity:</b>  <u>Increased Credibility</u>            Conservation efforts enhance a company's environmental credibility, demonstrating commitment to safeguarding natural habitats and supporting ecological balance.</p>	<p><u>Green Belt Development</u>            - Implement green belt development initiatives to enhance local biodiversity, support ecosystem restoration, and create sustainable, environmentally enriched zones.</p> <p><u>Ecological Surveys</u> - Conduct comprehensive ecological surveys to assess biodiversity health, identify conservation priorities, and guide responsible management of natural habitats.</p> <p><u>Compliance with Biodiversity Guidelines</u> - Ensure strict adherence to biodiversity guidelines and regulations, fostering environmental stewardship and minimizing impacts on ecosystems.</p>	<p><b>Negative:</b>  <u>Project Restrictions</u> -            Stringent project restrictions imposed by regulatory authorities seeking to protect sensitive ecosystems.</p> <p><b>Positive:</b>  <u>Enhanced Goodwill</u> -            Enhances stakeholder goodwill by demonstrating a company's commitment to environmental preservation and sustainability.</p>

## Section B: Management and process disclosures



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

### Policy and Management processes

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	(a) Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(b) Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	(c) Web Link of the Policies, if available	<a href="https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_a3b5b6964e.pdf</a>								
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4	Name of the national and international codes/certifications/ labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<p>Dhampur Sugar Mills Limited maintains a strong focus on quality and food safety across its operations. Our ISO 9001:2015 certification reflects our commitment to robust quality management systems that drive operational efficiency and elevate customer satisfaction.</p> <p>Additionally, the FSSC 22000 V5.1 certification held by our Rajpura unit (DSM Sugar Rajpura) underscores our dedication to upholding stringent food safety protocols, ensuring that our products meet the highest standards of hygiene and safety for consumers.</p> <p>The following are the key standards and codes adhered to by us, aligned with each principle of the National Guidelines on Responsible Business Conduct.</p> <p><b>Principle 1:</b> Code of Conduct to ensure highest standards of Corporate Governance</p> <p><b>Principle 2:</b> Adopted sugar grading standards as mandated by National Sugar Institute, based on which we produce L-31, M-31, S-31, L-30, and M-30 grades of sugar.</p> <p><b>Principle 3:</b> Implemented Health, Safety &amp; Environment Policy safeguarding the health and wellbeing of our employees, and workers ensuring a safe workplace.</p> <p><b>Principle 4:</b> Our stakeholder identification &amp; engagement plan helps in continuous dialogue with all our stakeholders protecting their interest, better decision making and value creation.</p> <p><b>Principle 5:</b> Whistle blower policy upholds the highest standards of moral and ethical business conduct through transparent and trustworthy communication.</p> <p><b>Principle 6:</b> Adhere environmental laws &amp; regulations and comply to pollution control board norms.</p> <p><b>Principle 7:</b> Compliant with all legal regulations and ensure ethical business and regulatory conduct.</p> <p><b>Principle 8:</b> Implemented CSR policy for upliftment of marginalized/vulnerable groups by conducting education, women empowerment and skill development projects.</p> <p><b>Principle 9:</b> As a responsible corporate, we deliver the best quality products through sustainable operations in a timely manner.</p>								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p><b>Core Commitments:</b></p> <ul style="list-style-type: none"> <li>• <b>GHG Emission Reduction:</b> We are dedicated to lowering greenhouse gas emissions through diverse methods, such as shifting towards renewable energy sources like bagasse and slop, enhancing energy efficiency, and initiating carbon offset initiatives.</li> <li>• <b>Water &amp; Waste Management:</b> Dhampur Sugar is devoted to recycling waste products and upholding its zero liquid discharge policy.</li> </ul>								

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
		<ul style="list-style-type: none"> <li>• <b>Energy Management:</b> Our focus lies in adopting energy-efficient technology and practices to reduce energy usage and lessen reliance on non-renewable energy sources.</li> <li>• <b>Product Quality:</b> We are committed to delivering products or services of superior quality that meet or exceed industry benchmarks while minimizing environmental effects throughout the entire product lifecycle.</li> <li>• <b>Diversity, Equity &amp; Inclusion:</b> We are devoted to fostering diversity, equity, and inclusion within our organization and throughout our supply chain.</li> <li>• <b>Health, Safety &amp; Well-being:</b> Our priority is to ensure the health, safety, and welfare of our employees, consumers, and communities by implementing comprehensive safety measures, wellness programs, and responsible product/service offerings.</li> <li>• <b>Human Rights:</b> We uphold respect for human rights across all company operations and within our supply chain, with a focus on preventing and addressing human rights violations and promoting fair labor practices.</li> <li>• <b>Corporate Social Responsibility (CSR):</b> We are committed to engaging in philanthropic efforts and community projects that support social and environmental welfare, in alignment with the company's values and core business activities.</li> <li>• <b>Ethics &amp; Integrity:</b> We adhere to high standards of ethics and integrity in all business interactions, emphasizing transparency, honesty, and accountability.</li> <li>• <b>Risk Management:</b> Our company rigorously identifies, evaluates, and mitigates environmental, social, and governance (ESG) risks, safeguarding our operations, reputation, and stakeholders from both external and internal risks.</li> </ul>								
6	Performance of the entity against the specific commitments, goals, and targets along-with reasons in case the same are not met.	<p><b>GHG Emission Reduction-</b> Optimized usage of bagasse and slop as renewable fuel. Improved energy efficiency through overall process enhancement.</p> <p><b>Water &amp; Waste Management-</b> Reduced Groundwater withdrawal by increasing the use of treated water for our processes.</p> <p><b>Energy Management-</b> Actively enhanced our energy management process by utilizing distillery waste alongside bagasse as fuel for steam generation in the boilers.</p> <p><b>Product Quality-</b> Maintained ISO 9001:2015, FSSAI and FSSC 22000:2018 certifications. Conducted regular internal quality audits.</p> <p><b>Health, Safety &amp; Well-being-</b> Conducted safety drills and training across all units. Organized regular health check-ups and wellness programs</p> <p><b>Ethics &amp; Integrity-</b> Operational whistleblower mechanism in place. Conducted anti-corruption and ethical conduct training for staff.</p> <p><b>Corporate Social Responsibility-</b> Dhampur Sugar Mills is committed to community welfare through its diverse CSR initiatives. For the fiscal year 2024-2025, our focus spans areas such as education, sports, modern agriculture, women's empowerment, healthcare, rural development, environmental sustainability, and more.</p> <p><b>CSR Initiatives:</b></p> <p><b>Rural Development Projects:</b> Collaborating with the PHD Rural Development Foundation (PHDRDF), we are implementing targeted development programs for marginalized and vulnerable communities. We engaged with various rural communities to impart information about best agronomy practices, water conservation, inter cropping and other crop care initiatives.</p>								

S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
		<p><b>Sports Promotion:</b> We are maintaining a sports complex at Pushp Niketan School to foster local sports talent and support the growth of sports in rural regions besides promoting various national /international events in other sports.</p> <p><b>Education Support:</b> We assist Pushp Niketan School in providing quality education at an affordable cost. We also facilitated computer learning programs aimed at the children of farmers to support their educational development.</p> <p><b>Healthcare and Sanitation Promotion:</b> We engage in efforts to promote preventive healthcare foreseeing aspects such as general health, eye care, women and child care and enhance sanitation standards within communities. .</p> <p><b>Women Empowerment :</b> We are engaging with under privileged women in local communities to impart livelihood skills.</p>								

#### Governance, leadership, and oversight

7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	<p>At Dhampur Sugars, sustainability continues to remain at the core of our vision and mission in 2024-2025. We firmly believe that our growth and resilience as a business are intrinsically linked with our commitment to Environmental, Social, and Governance (ESG) principles. These principles form the foundation of our long-term strategy, shaping every decision and guiding every initiative across our operations.</p> <p><b>Environmental Stewardship:</b></p> <p>In response to the escalating global concerns around climate change, energy security, and resource depletion, Dhampur Sugar has further strengthened its environmental responsibility agenda this year. We have expanded the integration of cutting-edge technologies aimed at enhancing energy efficiency, reducing emissions, and minimizing waste generation across our facilities. Our continued reliance on renewable energy sources—especially through cogeneration—has enabled us to maintain our status as a responsible energy producer. We remain committed to not only meeting but exceeding environmental regulations, setting new benchmarks through proactive investments in sustainability-led innovation.</p> <p><b>Social Responsibility:</b></p> <p>In 2025, we continue to place the highest priority on the well-being, safety, and development of our workforce and extended value chain. Our people-centric policies, workplace safety protocols, and structured training programs have been further enhanced to adapt to evolving needs. We maintain strong engagement with local communities, working collaboratively on initiatives that promote health, education, and economic development. Our cane development department continues to act as a vital link with the farming community, offering timely support, technical know-how, and assistance in improving agricultural practices and productivity.</p> <p><b>Governance &amp; Ethical Conduct:</b></p> <p>Sound governance remains a cornerstone of our operations. We uphold robust frameworks that ensure transparency, accountability, and fairness in all aspects of decision-making. Our Board of Directors reflects diversity and depth of experience, enabling strategic oversight in a rapidly changing business environment. During the year, we have continued to review and strengthen our governance policies, stakeholder mechanisms, and employee rights protections to align with evolving regulatory standards and stakeholder expectations.</p>								
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S. No.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
		In conclusion, Dhampur Sugar reaffirms its unwavering commitment to sustainability. Guided by ESG principles, we are building a future that balances profitability with responsibility. Through bold environmental action, inclusive growth, and ethical governance, we aim to deliver enduring value for our stakeholders while contributing to a more resilient and sustainable tomorrow.								
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	<p>The CSR committee oversees the implementation of the Business Responsibility policy. The policy is assessed half-yearly jointly by the Chief Operating Officer and VP-Finance of the company.</p> <p>Name: Mr. Akshat Kapoor Designation: Chief Operating Officer, Email: akshatkapoor@dhampursugar.com, Phone No.: 011-41259400</p> <p>Name: Mr. Vineet Kumar Gupta, Designation: Vice-President Finance, Email Id: vineetgupta@dhampursugar.com, Phone No.: 011-41259400</p>								
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 CSR committee at the Board level assesses and makes decisions on sustainability matters.								

## 10 Details of Review of NGRBCs by the Company

	Subject for Review	a. Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Performance against above policies and follow up action	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2	Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

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

		P1	P2	P3	P4	P5	P6	P7	P8	P9
11	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	No, an independent assessment by external agency was not conducted, however the policies are periodically reviewed by the Senior Management								

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)	Not Applicable since the Business Responsibility policy of the Company covers all principles of NGRBC								
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)									

#### Note 1:

**P1:** Related Party Transactions Policy; Anti-corruption Policy; Anti-Bribery Policy; Archival Policy; Dividend Distribution Policy. Code of Conduct for Regulation Monitoring and Reporting of Insider Trading, Code of Conduct for Employees.

**P2:** Sustainable Procurement Policy.

**P3:** Equal Opportunity Policy; Whistle Blower Policy; Grievance Redressal Policy; Sustainable Procurement Policy.

**P4:** Familiarization Program; Dividend Distribution Policy.

**P5:** Equal Opportunity Policy; Whistle Blower Policy; POSH Policy.

**P6:** BRR Policy.

**P7:** Codes of Fair Disclosure of UPSI.

**P8:** CSR Policy; BRR Policy.

**P9:** I.T. Policy

## Section C: Principle-wise performance disclosure

**Principle 1:** Business should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.



### ESSENTIAL INDICATORS

1. Percentage coverage by training and awareness programs on any of the principles during the FY 2025

Segment	Total number of training & awareness programs held	Topics / principles covered under the training and its impact	%age of persons in respective categories covered by the awareness programs
Board of Directors	4	Familiarization programs, Business Ethics and Code of Conduct	100%
Key Managerial Personnel	2	POSH, Business Ethics and Code of Conduct	100%

Segment	Total number of training & awareness programs held	Topics / principles covered under the training and its impact	%age of persons in respective categories covered by the awareness programs
Employees other than BoD and KMPs	126	Business Ethics and Code of Conduct, General Awareness, Skill Enhancement Program (SEP), Standard Operating Procedures (SOP), Total Productive Maintenance (TPM), Safety Health and Environment (SHE) and Training Needs Identification Program (TNI), Anti-Corruption and Anti-Bribery Compliance	100%
Workers	69	Business Ethics and Code of Conduct, General Awareness, SEP, SOP, TPM, SHE, & TNI Anti-Corruption and Anti-Bribery Compliance	100%

**2 Details of fines / penalties / punishment / award / compounding fees / settlement amount paid in proceedings (by the entity or by its directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions in FY 2024**

	Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ Judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/ No)
	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA

	Non – Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ Judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? / (Yes/ No)
	NA	NA	NA	NA	NA
	NA	NA	NA	NA	NA

**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
NA	NA

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

Dhampur Sugar is resolute in its dedication to fostering a culture of integrity and ethical business practices. At the heart of this commitment is our Anti-Bribery and Anti-Corruption (ABAC) Policy, which serves as a fundamental framework guiding all our operations.

Our policy articulates a clear and uncompromising stance against any form of bribery or corruption. We are steadfast in maintaining a zero-tolerance approach, ensuring that all transactions and dealings are conducted with the utmost honesty and transparency. This foundational principle governs our interactions with stakeholders, suppliers, and regulatory bodies, reinforcing our reputation as a responsible and trustworthy entity.

Dhampur Sugar actively promotes ethical behavior by vigorously enforcing our policy across all operational levels. Employees are provided with comprehensive training and resources to recognize and resist unethical practices, empowering them to uphold the company's high standards. Additionally, we implement robust internal controls and auditing processes to monitor compliance and address any potential infractions promptly. Our ABAC Policy can be accessed at [https://api.dhampursugar.com/uploads/Anti\\_Bribery\\_and\\_Anti\\_Corruption\\_Policy\\_007d9c5f9c.pdf](https://api.dhampursugar.com/uploads/Anti_Bribery_and_Anti_Corruption_Policy_007d9c5f9c.pdf)



5. Number of Directors/KMPs/Employees/Workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery / corruption

	Segment	FY 2025	FY 2024
1	Directors	0	0
2	Key Managerial Personnel	0	0
3	Employees	0	0
4	Workers	0	0

6. Details of complaints with regard to conflict of interest

	Segment	FY 2025		FY 2024	
		Number	Remarks	Number	Remarks
1	Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
2	Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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.

Not Applicable, as there are no corruption and conflict of interest cases.

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

	FY 2025	FY 2024
Number of days of accounts payables	20.98	17.29

9. Open-ness of business

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

Parameter	Metrics	FY 2025	FY 2024
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0%	0%
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	64.46%	44.69%
	b. Number of dealers / distributors to whom sales are made	884	748
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	52.42%	47.29%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.04%	0.03%
	b. Sales (Sales to related parties / Total Sales)	4.44%	4.63%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	0%	0%
	d. Investments (Investments in related parties / Total Investments made)	16.24%	10.02%



## LEADERSHIP INDICATORS

## 1. Awareness programs conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programs held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programs
743	Awareness to enhance the cane area and production, Pest and Disease control, planting methods, Nutrient Management, Irrigation, Harvest Management, By-product utilization	100%

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

Yes, the Company maintains a Code of Conduct specifically designed for the Board of Directors and senior management. This code outlines clear directives for identifying and disclosing any real or potential conflicts of interest with the Company. The guidelines within this Code of Conduct are tailored for board members and senior executives, ensuring transparency and straightforward navigation of conflicts that may arise in these positions. Our Code of Conduct can be accessed at <https://dhampursugar.com/investors/code-of-conduct>.

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



## ESSENTIAL INDICATORS

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

Segment	FY 2025	FY 2024	Details of improvements in environmental and social impacts
R&D	15.34%	5.09%	Spends on cane development which benefits the society as well as environment
Capex	26.15%	0%	Improvements to power economy which increase fuel saving

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

Our organization has crafted a procurement strategy centered on sustainable sourcing, underpinned by a detailed policy that specifies standards for acquiring materials responsibly. This framework directs our sourcing activities, with an emphasis on environmental, social, and economic impacts. By prioritizing partnerships with suppliers who champion sustainable methods, we aim to minimize our environmental footprint and uphold social responsibility throughout our supply chain, ensuring that our operations reflect our commitment to sustainability and ethical business operations.

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

The company relies heavily on sugarcane, which constitutes about 90% of its total input costs. This essential resource is acquired by encouraging sustainable farming practices and ensuring responsible sourcing methods.

**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**

Given the specific nature and operational framework of our business, product reclamation is not a viable option for Dhampur Sugar. The intricacies involved in our production processes and the types of products we generate make direct reclamation impractical. However, we have effectively adopted a sustainability-focused approach by prioritizing the reuse and recycling of all byproducts associated with our core production lines.

1. Plastic Waste: Covered through the EPR targets provided by the Central Pollution Control Board
2. E-waste: This is achieved through collaboration with a specialized third-party agency dedicated to recycling.
3. Hazardous Waste: We implement a comprehensive hazardous waste management program, strictly adhering to regulatory standards to ensure safe handling, storage, and disposal. Our team is regularly trained and equipped with the necessary skills to manage hazardous materials responsibly and effectively.

Our byproducts, including bagasse, molasses, and press mud, are systematically repurposed to maximize environmental and economic efficiency. This strategy not only aligns with our commitment to sustainability but also enhances the overall value derived from our production processes.

**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.**

We have established a comprehensive strategy for waste collection that aligns closely with Pollution Control Board standards and the EPR guidelines. By joining forces with a licensed third-party waste recycler, we effectively manage the recycling of plastic waste generated before and after consumer use, in line with our Extended Producer Responsibility commitments. This partnership allows us to confidently ensure that our recycling practices are both robust and compliant with the regulatory framework of the Central Pollution Control Board.

## 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?**

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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No, our company has not conducted Life Cycle Assessments for our products

**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.**

Name of Product / Service	Description of the risk / concern	Action Taken
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Not applicable.

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

Indicate input material	Recycled or re-used input material to total material	
	FY 2025	FY 2024

In our sugar production, we prioritize resource efficiency by innovatively using by-products such as bagasse and distillery slop to generate electricity, significantly covering our energy demands. We further extend this sustainable approach by converting molasses into ethanol, which exemplifies our focus on maximizing resource use and curbing waste. Our practices ensure that by-products are utilized effectively within the production cycle, minimizing waste and enhancing operational efficiency. This commitment not only strengthens our sustainability initiatives but also contributes to environmental protection efforts.

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

	FY 2025			FY 2024		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed
E-waste	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed
Hazardous waste	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed
Other Waste	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed	Not Reclaimed

5. 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
NA	NA

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



ESSENTIAL INDICATORS

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

Category	% of employees Covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	277	277	100%	277	100%	0	0	0	0%	0	0%
Female	15	15	100%	15	100%	15	100%	0	0%	0	0%
Total	292	292	100%	292	100%	15	100%	0	0%	0	0%

Category	% of employees Covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Other than Permanent Employees											
Male	0	0	0%	0	0%	0	0%	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0	0%	0	0%	0	0%	0	0%	0	0%

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

Category	% of employees Covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Workers											
Male	929	929	100%	929	100%	0	0%	0	0%	0	0%
Female	11	11	100%	11	100%	11	100%	0	0%	0	0%
Total	940	940	100%	940	100%	11	100%	0	0%	0	0%
Other than permanent workers											
Male	502	502	100%	502	100%	0	0%	0	0%	0	0%
Female	0	0	100%	0	0%	0	0%	0	0%	0	0%
Total	502	502	100%	502	100%	0	0%	0	0%	0	0%

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

	FY 2025	FY 2024
Cost incurred on wellbeing measures as a % of total revenue of the company	0.06%	0.03%

**2. Details of retirement benefits for Current and Previous Financial Years**

S. no.	Benefits	FY 2025			FY 2024		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	100%	Yes	100%	100%	NA
2	Gratuity*	100%	100%	Yes	100%	100%	NA
3	ESI	NA	NA	NA	NA	NA	NA
4	Others – please specify	NA	NA	NA	NA	NA	NA

\* Gratuity is a terminal benefit which is paid by the Company to the employee and the same is over and above the CTC as contractually agreed.

3. **Accessibility of workplaces – Are the premises / offices of the entity accessible to differently abled employees, 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.**

DSML is committed to creating an inclusive and accessible workplace environment. Our facilities have been thoughtfully designed to ensure accessibility for differently abled employees and visitors. Key areas, such as entry gates and office entrances, are equipped with ramps and smooth surfaces to facilitate easy access for individuals with mobility challenges. This infrastructure reflects our dedication to supporting a diverse workforce and providing equal opportunities for all.

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.**

At DSML, we believe that diversity enriches our organization and drives innovation. We are dedicated to fostering an inclusive work environment through our robust Equal Opportunity Policy. This policy underscores our commitment to providing a fair and equitable workplace for all employees, regardless of their gender, age, disability, ethnicity, or any other characteristic. The Equal Opportunity Policy can be accessed at [https://api.dhampursugar.com/uploads/Equal\\_Opportunity\\_Policy\\_c99bf07282.pdf](https://api.dhampursugar.com/uploads/Equal_Opportunity_Policy_c99bf07282.pdf)

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

Gender	Permanent Employees		Permanent Workers	
	Return to work Rate (%)	Retention Rate (%)	Return to work Rate (%)	Retention Rate (%)
Male	0	0	0	0
Female	100%	100%	0	0
<b>Total</b>	100%	100%	0	0

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

		Yes/No (If yes, then give details of the mechanism in brief)
1	Permanent Workers	<ul style="list-style-type: none"> <li>We are dedicated to managing our affairs with fairness and transparency, upholding the highest standards of professionalism, honesty, integrity, and ethical conduct.</li> <li>Central to this commitment is our Whistleblower Committee, which ensures that any reports of misconduct or unethical behavior are handled with diligence and confidentiality, reinforcing our organization's integrity and trust.</li> <li>The grievance can be submitted to the Compliance Officer or Chairman of Audit Committee who will take the necessary action to resolve the concern.</li> <li>The above points are enshrined in our Whistle Blower Policy, reinforcing our commitment to accountability and trust within the organization, ensuring that concerns are appropriately addressed and resolved. The Whistle Blower Policy can be accessed at <a href="https://api.dhampursugar.com/uploads/Whistle_Blower_Policy_26c5968a74.pdf">https://api.dhampursugar.com/uploads/Whistle_Blower_Policy_26c5968a74.pdf</a>.</li> <li>We also operate HR-Sathi, a newly launched platform designed to promote open communication with employees and workers, ensuring that grievances are addressed promptly and effectively. Each issue is carefully documented, resolved, and closed with an appropriate solution to foster employee satisfaction and trust.</li> <li>Alongside HR-Sathi, we have instituted four trade unions specifically focused on handling workers' grievances.</li> <li>Additionally, we have set up a Grievance Redressal Committee at the plant level to systematically oversee and resolve issues, ensuring a comprehensive approach to grievance management.</li> <li>For direct communication, employees can also reach out via our designated email address at <a href="mailto:grievances@dhampursugar.com">grievances@dhampursugar.com</a>.</li> </ul>
2	Other than Permanent Workers	
3	Permanent Employees	
4	Other than Permanent Employees	

7. Membership of employees and workers in association(s) or Unions recognized by the listed entity

Category	FY 2025			FY 2024		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / Workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	292	0	0%	294	0	0%
Male	277	0	0%	279	0	0%
Female	15	0	0%	15	0	0%
Total Permanent Workers	940	102	10.85%	924	102	11.04%
Male	929	102	10.98%	915	102	11.15%
Female	11	0	0%	9	0	0%

8. Details of training given to employees and workers

Category	FY 2025					FY 2024				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	277	277	100%	274	93.86%	279	279	100%	239	86%
Female	15	15	100%	15	100%	15	15	100%	11	73%
Total	292	292	100%	289	98.9%	294	294	100%	250	85%
Workers										
Male	1431	1431	100%	1396	98%	915	915	100%	678	74%
Female	11	11	100%	11	100%	9	9	100%	7	78%
Total	1442	1442	100%	1417	98%	924	924	100%	685	74%

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

Category	FY 2025			FY 2024		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	277	277	100%	279	279	100%
Female	15	15	100%	15	15	100%
<b>Total</b>	292	292	100%	294	294	100%
<b>Workers</b>						
Male	1431	1431	100%	915	915	100%
Female	11	11	100%	9	9	100%
<b>Total</b>	1442	1442	100%	924	924	100%

## 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?

DSML has established a comprehensive Health and Safety (HSE) Policy to effectively manage occupational health and safety across its operations. This Policy reflects the company's commitment to ensuring a safe and healthy work environment for all its employees.

#### Scope of the Occupational Health and Safety Management System (OHSMS):

- Applies to all employees across the Dhampur and Rajpura units, and the corporate office.
- Covers all workplaces and operational areas under Dhampur's control.
- Identifies and addresses all potential occupational health and safety hazards.
- Ensures compliance with all applicable legal and regulatory requirements.
- Promotes a consistent and proactive safety culture across locations.

#### Key Components of our OHSMS:

##### Policy and Commitment

- A formal health and safety policy signed by top management, demonstrating commitment to worker well-being and regulatory compliance.

##### Risk Assessment and Hazard Identification

- Systematic processes to identify, assess, and mitigate occupational hazards and risks across operations.

##### Training and Awareness

- Regular training programs and awareness sessions to educate employees on safety protocols, emergency preparedness, and use of PPE.

##### Incident Reporting and Investigation

- Mechanisms for reporting, recording, and investigating incidents, near misses, and unsafe conditions to prevent recurrence.

##### Emergency Preparedness and Response

- Plans and drills in place for managing fire, chemical spills, medical emergencies, and other crises.

##### Monitoring and Evaluation

- Ongoing safety performance tracking through inspections, internal audits, and corrective/preventive actions.

##### Worker Participation and Consultation

- Active involvement of employees and safety committees in decision-making related to health and safety matters.

##### Continuous Improvement

- Periodic reviews of the system to ensure effectiveness, address gaps, and improve overall safety outcomes.

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

DSML has established robust processes to identify and assess work-related hazards on both routine and non-routine bases. The entity employs the Hazard Identification and Risk Assessment (HIRA) methodology as a core mechanism to proactively detect potential risks and implement control measures before work begins. In addition:

- ❖ **Periodic Health and Safety Inspections** are carried out across operational sites to identify unsafe conditions and ensure compliance with safety standards.
- ❖ **Job Safety Analysis (JSA)** is conducted for non-routine and high-risk tasks to evaluate hazards at each step of the job.
- ❖ **Permit-to-Work Systems** are enforced for specific high-risk activities such as hot work, confined space entry, Work at Height, and electrical maintenance.



- ❖ **Employee Reporting Mechanisms** are in place to capture near-misses, unsafe practices, or conditions, enabling timely risk mitigation.
- ❖ **Our Safety Committees**, which include worker representatives, actively review near-miss incidents and propose preventive measures. We are in the process of implementing HIRADeC to identify hazards in industrial processes and procedures, assessing risk probability, severity and its consequences. We conduct monthly assessments to identify and monitor Air Quality Index, high noise areas, and appropriate illumination levels.
- ❖ **Regular safety patrols** are carried out by the relevant authorities to identify any safety gaps and implement Corrective and Preventive Actions (CAPA).
- ❖ **Routine health checkups** are conducted for workers to identify health issues and monitor workplace environments for hazards that could lead to work-induced health concerns.

These structured processes form an integral part of Dhampur's Occupational Health and Safety Management System, helping maintain a safe work environment and comply with applicable legal requirements.

Additionally, employees at Dhampur Sugar Mills receive training to recognize potentially hazardous situations within their work environment, enhancing on-ground vigilance and safety responsiveness.

Risk assessments conducted by teams are reviewed and validated by the respective Heads of Department (HODs) or reporting managers to ensure accuracy and completeness. Furthermore, the HODs evaluates the corrective/ preventive action plans proposed, considering the severity of the identified risks, to ensure appropriate and timely mitigation measures are implemented.

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

Yes, Dhampur Mills has established a structured Safety Incident Reporting System that enables workers to proactively report work-related hazards. The system allows for the reporting of accidents, near-miss incidents, unsafe conditions, and unsafe acts observed during both routine and non-routine activities.

To ensure accessibility and participation, the process supports both anonymous and direct reporting, thereby fostering a culture of openness and shared accountability. Workers are also made aware of their right to refuse or remove themselves from work situations where there is a reasonable belief of imminent risk to their health and safety, without fear of retaliation.

This reporting mechanism is an integral part of Dhampur's Occupational Health and Safety Management System and reflects the company's commitment to maintaining a safe, inclusive, and responsive work environment.

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

Yes, DSML provides its employees access to non-occupational medical and healthcare services through the following initiatives:

- ❖ **Health Insurance Coverage:** All employees are covered under a comprehensive Mediciam policy and insurance plan, ensuring access to medical care beyond workplace-related injuries.
- ❖ **Routine Health Screenings:** The company conducts regular health check-ups to monitor employee well-being and detect health issues at an early stage.
- ❖ **Accident Monitoring and Root Cause Analysis:** Comprehensive records of both major and minor incidents are maintained, with detailed root cause analysis conducted to prevent recurrence and promote continuous improvement.
- ❖ **Daily Safety and Health Briefings:** Daily meetings are held at operational sites to emphasize the importance of health, safety, and personal well-being, reinforcing a preventive and proactive culture.

These measures reflect Dhampur's commitment to employee welfare beyond occupational health and support a holistic approach to workforce well-being.



**11. Details of Safety related incidents**

S. no.	Safety Incident/Number	Category	FY 2025	FY 2024
1	Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	1.74	1.02
		Workers	0.68	0
2	Total recordable work-related injuries	Employees	2	2
		Workers	8	0
3	No. of fatalities	Employees	0	0
		Workers	0	0
4	High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
		Workers	0	0

**12. Describe the measures taken by the entity to ensure a safe and healthy workplace**

We are committed to maintaining a safe, healthy, and compliant work environment for all its employees and workers. The following measures have been implemented to uphold occupational health and safety standards across its operations:

- ❖ **Regular Monitoring of PPE Usage:** Periodic checks are conducted to ensure the correct and consistent use of personal protective equipment (PPE) such as helmets, gloves, goggles, ear protection, safety shoes, by all workers.
- ❖ **Display of Safety Signages and SOPs:** Clear and prominent safety signages, standard operating procedures (SOPs), and information boards are displayed across operational areas to promote awareness and reinforce safety protocols.
- ❖ **Emergency Preparedness Drills:** Routine mock drills are conducted to train employees for various emergency scenarios such as fire, chemical spills, and equipment failures. Our facilities are equipped with fire extinguishers, fire hydrants, and sprinkler systems, ensuring a comprehensive approach to fire safety.
- ❖ **Safety Committee Engagement:** Quarterly safety committee meetings are held to review safety incidents, assess trends, and formulate corrective and preventive action plans.
- ❖ **ISO 9000 Certification:** The company's facilities are ISO 9000 certified, underscoring adherence to international quality and safety management standards.
- ❖ **Safety Measures for Heavy Machinery:** We have installed guards and safety interlocks on all heavy machinery to ensure operational safety. Regular maintenance and servicing are conducted to prevent mechanical failures and ensure the machinery remains in optimal condition.
- ❖ **Chemical Safety:** We implement safe storage practices and labeling for all chemicals to minimize risk and enhance safety.
- ❖ **Medical Facilities:** On-site first aid rooms are equipped with trained medical staff to address health needs immediately.

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

	FY 2025			FY 2024		
	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	1	0	0	3	0	0
Health & Safety	16	0	0	20	0	0

**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.**

While a formal health and safety risk assessment has not been conducted, Dhampur Mills has proactively implemented several corrective and preventive measures to address safety-related concerns identified through regular monitoring and internal reviews. These include:

- ❖ **Prominent Display of SOPs:** Standard Operating Procedures (SOPs) have been clearly displayed in operational zones to reinforce compliance and reduce procedural errors.
- ❖ **Enhanced Machine Guarding:** Safety guards have been installed and upgraded on machinery to minimize the risk of accidental contact and operational hazards.
- ❖ **Visual Management Improvements:** High-visibility painting and hazard visualization have been carried out in plant areas to improve hazard identification and awareness.
- ❖ **Structural Repairs:** Platforms and staircases in operational areas have been maintained to eliminate tripping and falling hazards, improving structural safety.
- ❖ **Expanded Fire Safety Measures:** Additional fire extinguishers have been strategically placed to ensure comprehensive fire protection coverage throughout the plant.
- ❖ **Installation of Safety Eye Showers:** Emergency eye wash stations have been installed on the operational floor of the chemical plant to allow immediate response to chemical exposure.
- ❖ **Wind Direction Indicators:** Wind socks have been installed to improve awareness of wind direction, particularly in chemical handling zones, to manage potential airborne risks.
- ❖ **Installation of Jumpers in Chemical Areas:** Safety jumpers have been installed in the chemical plant to enhance operational safety during routine maintenance and production activities.
- ❖ **Periodic Safety Walks and Spot Checks:** Supervisors conduct regular safety walkthroughs to identify potential risks and ensure timely rectification.
- ❖ **Employee Awareness and Safety Talks:** On-ground teams are periodically engaged through toolbox talks and safety briefings to reinforce safe behavior and procedures.

#### 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, Dhampur Sugar Mills extends life insurance coverage and compensation benefits to its employees in the unfortunate event of death. The company has a structured group insurance policy in place, which provides financial support to the nominee or legal heir of the deceased employee, ensuring security and assistance during such critical times.

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

Dhampur Sugar Mills has instituted stringent compliance protocols to ensure that all statutory dues are accurately deducted and timely deposited by its value chain partners. Also, we include compliance clauses in partner contracts. The organization places significant emphasis on the oversight and verification of statutory obligations, particularly in the areas of:

- ❖ **Goods and Services Tax (GST):** Regular monitoring is conducted to ensure accurate deduction and remittance of GST by vendors and contractors, which also facilitates smooth and compliant acquisition of input tax credits.
- ❖ **Employee State Insurance Corporation (ESIC) and Provident Fund (PF):** Dedicated checks are in place to confirm that contributions to social security schemes such as ESIC and PF are being properly deducted and deposited by all applicable partners through PF challans.

- ❖ **Robust Verification System:** A strong due diligence and verification mechanism has been implemented to assess compliance documents, challans, and filings submitted by value chain entities.
- ❖ **Vendor Onboarding and Compliance Checks:** At the time of vendor registration, statutory compliance credentials are thoroughly verified, and vendors are periodically evaluated to ensure continued adherence.
- ❖ **Transparency and Accountability:** Through transparent documentation and regular audits, the company ensures accountability across the supply chain and reduces the risk of non-compliance.
- ❖ **Preventive Risk Management:** These processes help mitigate regulatory risks and prevent any breaches of tax or labor laws, reinforcing Dhampur's commitment to ethical and responsible business practices.

Collectively, these measures enable Dhampur to maintain a reliable, transparent, and compliant value chain ecosystem.

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 rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025	FY 2024	FY 2025	FY 2024
Employees	0	0	0	0
Workers	0	0	0	0

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

While DSML does not have a formal career transition program, the company ensures compliance with all mandated regulations by providing retirement benefits, gratuity, and provident fund support to employees at the end of their careers.

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	NA
Working Conditions	

\*No social impact assessments were carried out for our value chain partners

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.

NA

## 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.

We are committed to engaging meaningfully with our stakeholders and value the timely input they provide. This feedback plays a crucial role in helping us improve our operations effectively and sustainably. To ensure structured and inclusive engagement, the Company has adopted the following stakeholder identification process:

- ❖ **Stakeholder Mapping**  
Recognize individuals or groups with a meaningful connection to DSML's growth and direction.
- ❖ **Evaluating Relevance**  
Consider how each stakeholder contributes to or is affected by DSML's long-term vision.
- ❖ **Setting Priorities**  
Determine which stakeholders require focused attention based on their expectations, influence, and business relevance.
- ❖ **Revisiting Relationships**  
Stay responsive to changes in the business environment by reassessing stakeholder importance regularly.
- ❖ **Building Engagement**  
Foster ongoing dialogue to understand stakeholder perspectives and strengthen mutual trust.

Key stakeholder groups include:

- ❖ Farmers
- ❖ Government authorities and regulatory agencies
- ❖ Customers
- ❖ Employees
- ❖ Shareholders and investors
- ❖ Suppliers and service providers, including transport partners
- ❖ Media outlets

#### 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	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Farmers	Yes	SMS, pamphlets, community meetings, notice board	Regular	<p>We maintain regular interaction with farmers, who are among our most critical stakeholders. The Cane Department engages with the farming community daily.</p> <p><b>Scope:</b> Discussions include sugarcane cultivation practices, plant health issues, pest management, seed development, productivity enhancement, and resolution of grievances.</p>

Stakeholder group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Government and regulatory bodies	No	Periodic meetings, conferences, ISMA forums	Regular	<p>We engage regularly with regulatory authorities to ensure full compliance with statutory requirements. We also interact with government representatives through ISMA and other industry bodies.</p> <p><b>Scope:</b> Discussions include sugar industry regulations, policy updates, compliance matters, and submission of statutory information.</p>
Customers	No	Emails, contact number on product packaging, meetings, feedback collection	Regular	<p>Customers are central to our business, and we strive to meet their expectations consistently. Our Sales Representatives maintain regular contact to ensure satisfaction and stay aligned with market trends.</p> <p><b>Scope:</b> Engagement includes feedback on product quality and pricing, sales development, after-sales support, complaint resolution, and fostering customer trust and loyalty.</p>
Employees	No	Review meetings, trainings, workshops, induction program, grievance redressal	Regular	<p>Employee well-being is essential to our operational success. We maintain regular interaction with employees to address concerns and incorporate their feedback into workplace improvements.</p> <p><b>Scope:</b> Engagement covers operational efficiency, daily work challenges, suggestions for process improvement, training and awareness sessions, health and safety initiatives, and performance development reviews.</p>
Shareholders and investors	No	Emails, annual report, website updates, announcements, media releases	Quarterly	<p>We engage with our shareholders on a quarterly basis to share updates on profitability, growth, and any significant organizational developments.</p> <p><b>Scope:</b> Engagement includes annual general meetings, financial performance insights, governance updates, earnings calls, and strategic direction of the Company.</p>
Suppliers and service providers, including transport partners	No	Calls, emails, supply chain team interactions, engagement forums	Regular/ Quarterly	<p>We maintain transactional interactions with suppliers and service providers, focused on product delivery, quality, and pricing.</p> <p><b>Scope:</b> Engagement includes quality assurance, delivery timelines, payment coordination, regulatory compliance, and exploring collaboration opportunities.</p>

Stakeholder group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Media outlets	No	Media releases, press interactions	On need basis	<p>We engage with local media representatives who report on developments in sugar cultivation and farmer welfare. Our responses and updates are often featured in their coverage.</p> <p><b>Scope:</b> Engagement includes press releases on product launches, updates on farmer interactions, and communication to ensure transparency in pricing and operations.</p>

## 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.**

We approach stakeholder engagement as a shared responsibility across our teams. Each function interacts with its relevant stakeholder groups, ensuring that concerns and insights are heard and addressed. Our leadership team remains closely involved, guiding these interactions to align with our broader goals. The CSR committee plays a key role in shaping our social initiative, reviews ongoing efforts, monitors progress and helps us stay focused on creating meaningful impact through our sustainability strategy.

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

Yes, stakeholder consultation is actively used to support the identification and management of environmental and social topics.

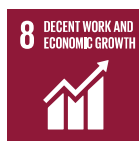
During the reporting year, we conducted materiality assessment that incorporated feedback from various stakeholder groups, both internal and external. This process helped us identify key priority areas that are most relevant to both our stakeholders and our business. Further, ESG reviews received from customers guided us in refining our sustainability initiatives and updating policies such as the Human Rights Policy. Additionally, inputs from farmers and regulatory bodies influenced our approach to environmental practices in sugarcane cultivation and compliance mechanisms. These consultations have directly shaped our CSR activities, operational strategies, and long-term sustainability goals.

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

Our Cane Department plays a vital role in maintaining daily communication with farmers. To support this, government-established societies act as intermediaries between sugar manufacturers and the farming community, representing farmers' interests. If a farmer faces any issue, they first approach the cane society's government representative, who then coordinates with our Cane Department for resolution.

Beyond this formal channel, we make proactive efforts to stay directly connected with farmers every day, ensuring their concerns whether related to seeds, crop health, payment schedules, or other matters are addressed promptly by our team. Additionally, if any member of the local community has a grievance, they can reach out to the relevant department at our plant offices, where their issue is handled and resolved accordingly.

## Principle 5: Businesses should respect and promote human rights



### ESSENTIAL INDICATORS

#### 1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity

Category	FY 2025			FY 2024		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (C)	No. of employees / workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	292	292	100%	294	294	100%
Other than permanent	0	0	0%	0	0	0%
<b>Total employees</b>	<b>292</b>	<b>292</b>	<b>100%</b>	<b>294</b>	<b>294</b>	<b>100%</b>
<b>Workers</b>						
Permanent	940	940	100%	924	924	100%
Other than permanent	502	502	100%	384	384	100%
<b>Total workers</b>	<b>1442</b>	<b>1442</b>	<b>100%</b>	<b>1,308</b>	<b>1,308</b>	<b>100%</b>

#### 2. Details of minimum wages paid to employees and workers

Category	FY 2025					FY 2024				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No (B)	% (B/A)	No (C)	% (C/A)		No (E)	% (E/D)	No (F)	% (F/D)
	Employees									
Male	277	0	0%	277	100%	279	0	0%	279	100%
Female	15	0	0%	15	100%	15	0	0%	15	100%
	Other than permanent									
Male	0	0	0%	0	0%	0	0	0%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%
	Permanent									
Male	929	0	0	929	100%	915	0	0%	915	100%
Female	11	0	0	11	100%	9	0	0%	9	100%
	Other than permanent									
Male	502	0	0%	502	100%	382	0	0%	382	100%
Female	0	0	0%	0	100%	2	0	0%	2	100%



### 3. Details of remuneration/salary/wages

#### a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (INR lakhs)	Number	Median remuneration/ salary/ wages of respective category (INR lakhs)
Board of Directors (BoD*)	3	31,101,308	-	-
Key Managerial Personnel	2	99,17,021	1	29,51,595
Employees other than BoD and KMP	273	7,09,995	14	9,06,184
Workers	892	388,751	9	308,015

\* Excludes Independent Directors as they are entitled to sitting fees and commission as per statutory provisions and limits subject to approval of shareholders.

#### b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2025	FY 2024
Gross wages paid to females as % of total wages	3.31%	2.03%

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

Yes, Dhampur Mills has established mechanisms to address human rights-related concerns arising from its business operations. The company has a Whistleblower Mechanism and an Employee Grievance Redressal System, which serve as key channels for reporting and resolving any human rights impacts or issues. These provisions are part of our Whistleblower Policy, ensuring adherence to guidelines and redressal of grievances in a timely, confidential, and impartial manner. All matters requiring redressal can be addressed to the Chairman of the Audit Committee.

The contact details of the Chairman of Audit Committee are as under: -

Mr. Anuj Khanna, Chairman of Audit Committee, 222, Okhla Industrial Estate New Delhi - 110020.

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

There are comprehensive systems to address human rights grievances and uphold the principles of fairness, dignity, and non-discrimination across its operations. Key mechanisms include:

- ❖ **Employee Grievance Redressal Mechanism:** A formal and structured grievance process is available to all employees, enabling them to report concerns related to human rights, workplace conduct, or unfair treatment. Grievances are addressed in a time-bound and impartial manner. Employees and stakeholders can report human rights-related concerns through confidential channels such as HR-Sathi, email helplines, and grievance boxes.
- ❖ **Whistleblower Protection Policy:** The company has a whistleblower framework that allows employees to confidentially report ethical violations, rights infringements, or misconduct, without fear of retaliation.
- ❖ **Prevention of Sexual Harassment (POSH) Policy:** A dedicated policy ensures protection from sexual harassment in the workplace and beyond. It applies to all work-related settings, including off-site locations visited during official duties and transportation provided by the company, reinforcing the organization's commitment to employee safety and dignity.
- ❖ **Employee Awareness Programs:** We conduct comprehensive employee awareness programs designed to educate and empower employees on various human rights issues.
- ❖ **Escalation Mechanism for Sensitive Cases:** Employees who are unable to raise sensitive or unresolved issues through routine channels can directly approach their respective Unit Heads/ Department Heads/ Senior Management. This ensures that no concern goes unheard, particularly those of a confidential or sensitive nature.
- ❖ **Awareness and Accessibility:** Policies are clearly communicated to all employees, and support is provided to help them understand their rights and the procedures available to seek redressal.



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

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

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

	FY 2025	FY 2024
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0%	0%
Complaints on POSH upheld	0	0

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

We have instituted strong safeguards to ensure that employees, workers, and stakeholders who raise concerns related to discrimination or harassment are protected from any form of adverse consequence.

- ❖ **Whistleblower Protection:** The company's Whistleblower Policy guarantees protection against retaliation, coercion, intimidation, dismissal, or victimization for individuals who report genuine concerns. All complaints are handled confidentially, and appropriate disciplinary action is taken against those attempting to retaliate against a whistleblower.
- ❖ **POSH (Prevention of Sexual Harassment) Compliance:** Dhampur strictly adheres to the provisions of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 through a robust POSH policy framework. The policy ensures:
  - ✎ **Wide Applicability:** The policy extends to all employees across roles, including advisors, consultants, contract workers, trainees, retainers, and associates.
  - ✎ **Extended Coverage:** It applies to all work-related locations, whether within office premises or outside, including business trips and assignments.
  - ✎ **Incorporated into Employment Terms:** POSH provisions are formally included in the service conditions of all employees, reinforcing its importance and binding nature.
  - ✎ **Inclusion of External Stakeholders:** The policy also covers external parties such as vendors, suppliers, contractors, and other stakeholders who interact with Dhampur's workforce or premises.
  - ✎ **Protection of Complainants:** All complaints are investigated by the Internal committees with strict confidentiality, ensuring that the complainant is not subjected to any form of retaliation or disadvantage.
  - ✎ **Internal Complaints Committee:** Bodies such as the Internal Complaints Committee (ICC) under the Prevention of Sexual Harassment (POSH) framework, along with HR grievance panels, are dedicated to ensuring that complaints are handled with fairness and impartiality.

- ☞ **Awareness and Education:** Regular workshops and communications are conducted to ensure all employees are well-informed about their rights, the grievance process, and the protections available to them.

These integrated mechanisms reflect Dhampur's commitment to fostering a workplace culture that is safe, respectful, and free from discrimination or harassment, while actively encouraging individuals to speak up without fear.

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

At Dhampur Sugar, respect for human rights forms a vital part of our business agreements and contractual obligations. Our sustainable procurement policy ensures that Environmental, Social, and Governance (ESG) principles—including human rights, ethical conduct, and environmental stewardship—are embedded into every stage of our supply chain decision-making.

We are committed to lawful, fair, and transparent business practices, and we expect our suppliers to uphold the same standards. Our policy goes beyond basic legal compliance, aligning with internationally recognized norms and best practices. Through our contracts and agreements, we aim to build long-term, responsible partnerships that promote shared growth and a commitment to sustainable and ethical operations.

**10. Assessments for the year**

Section	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	100%
Forced Labour/ Involuntary Labour	100%
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%

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

NA

**LEADERSHIP INDICATORS**

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

As of now, Dhampur Sugar Mills has not received any grievances related to human rights concerns. Therefore, no modifications to existing business processes have been necessary in this context. However, the company maintains a strong commitment to ethical practices and full compliance with human rights standards. Dhampur continues to monitor its operations and value chain proactively and stands prepared to revise or implement new processes if any human rights issues are identified in the future.

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

We have not conducted human rights related due diligence.

**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?**

Yes, Dhampur Sugar has taken steps to ensure that its premises are accessible to individuals with disabilities. Most of the company's facilities have been developed keeping inclusive access in mind, with features such as gently sloped ramps and leveled entry points at gates and office areas to support safe and convenient movement.

## 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	We have a sustainable sourcing policy in place that encompasses robust procurement practices prioritizing human rights considerations. This policy ensures that our procurement processes adhere to ethical standards and uphold human rights principles. By integrating human rights criteria into our sourcing practices, we affirm our commitment to responsible sourcing and ethical business conduct.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others	

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

No significant risks or concerns were identified during the financial year FY 2024-25. Business operations remained stable, and no major disruptions were reported. As a result, no corrective actions are required at this time.

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

**ESSENTIAL INDICATORS**

## 1. Details of total energy consumption (in GJ) and energy intensity

Parameter	FY 2025	FY 2024
<b>From renewable sources</b>		
Total electricity consumption (A)(GJ)	-	-
Total fuel consumption (B)(GJ)	6,830,507	9,766,380
Energy consumption through other sources (C)(GJ)	-	-
<b>Total energy consumed from renewable sources (A+B+C)(GJ)</b>	<b>6,830,507</b>	<b>9,766,380</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	216	219
Total fuel consumption (E)	166,263	11,717
Energy consumption through other sources (F)	-	-
<b>Total energy consumed from non-renewable sources (D+E+F)</b>	<b>166,479</b>	<b>11,936</b>

Parameter	FY 2025	FY 2024
<b>Total energy consumed (A+B+C+D+E+F)</b>	6,996,986	9,778,316
<b>Energy intensity per rupee of turnover</b> (Total energy consumed / Revenue from operations)	0.000264	0.000370
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)	0.005371	0.007537
<b>Energy intensity in terms of physical output</b>	Sugar: 17.99 GJ/MT of Sugar Ethanol: 18.90 GJ/KL of Ethanol Chemical: 18.63 GJ/MT of Chemical Potable Spirit: 0.66 GJ/Number of cases of potable spirit	Sugar: 10.26 GJ/MT of Sugar Ethanol: 23.96 GJ/KL of Ethanol Chemical: 29.38 GJ/MT of Chemical Potable Spirit: 0.89 GJ/Number of cases of potable spirit
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

\* FY2023-24 data have been re-calculated .

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

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.

The company does not own any sites or facilities classified as designated consumers (DCs) under the Government of India's Performance, Achieve, and Trade (PAT) Scheme. As outlined by the PAT scheme, the company does not fall under the category of energy-intensive industries.

3. Provide details of the following disclosures related to water

Parameter	FY 2025	FY 2024
<b>Water withdrawal by source (in kiloliters)</b>		
(i) Surface water	0	0
(ii) Groundwater	38,11,02	63,98,35
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)</b>	38,11,02	63,98,35
<b>Total volume of water consumption (in kiloliters)</b>	38,11,02	63,98,35
<b>Water intensity per rupee of turnover</b> (Total water consumption / Revenue from operations)	0.0000143	0.0000242
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP)	0.00029	0.00049

Parameter	FY 2025	FY 2024
<b>Water intensity in terms of physical output</b>	Sugar: 0.98 KL/MT of Sugar Ethanol: 1.03 KL/KL of Ethanol Chemical: 1.01 KL/MT of Chemical Portable Spirit: 0.04 KL/Number of cases of potable spirit	Sugar: 0.67 KL/MT of Sugar Ethanol: 1.57 KL/KL of Ethanol Chemical: 1.92 KL/MT of Chemical Potable spirit: 0.06 KL/Number of cases of potable spirit
<b>Water intensity (optional)</b> – the relevant metric may be selected by the entity	-	-

\*We have calculated Water Intensity in terms of physical output as per percentages of revenue contribution product-wise.

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, we have conducted independent assessment through an external agency, the names of the same are mentioned below:

Dhampur Unit: Water Audit- M/s ETRC Consultants private limited

Unit Rajpura-Water Audit- Suraj Kumar Upadhyay, Certified Water Auditor – CGWA

#### 4. Provide the following details related to water discharged

Parameter	FY 2025	FY 2024
<b>Water discharged by destination and level of treatment (in kiloliters)</b>		
<b>(i) To Surface water</b>		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(ii) To Groundwater</b>	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(iii) To Seawater</b>	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(iv) Sent to third-parties</b>	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>(v) Others</b>	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>Total water discharged (in kiloliters)</b>	0	0

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, we have conducted independent assessment through an external agency, the names of the same are mentioned below:

Dhampur Unit: Water Audit- M/s ETRC Consultants private limited

Unit Rajpura-Water Audit- Suraj Kumar Upadhyay, Certified Water Auditor – CGWA

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

Dhampur Sugar Mills Limited has implemented Zero Liquid Discharge (ZLD) systems at both its Dhampur and Rajpura plants, in alignment with its commitment to environmental stewardship and efficient water resource management. Through ZLD initiatives, nearly 100% of wastewater is treated and recycled, resulting in a significant reduction in freshwater intake across operations.

### ZLD in Distillery Operations:

#### Process Overview:

- ❖ Installation of Condensate Polishing Unit (CPU) for treatment of spent lees, cooling tower blowdown, and process condensate.
- ❖ Treated water is reused for process dilution and as cooling tower makeup water.
- ❖ Spent wash is processed through multi-effect evaporators and slop-fired boilers.
- ❖ Grain slop undergoes decantation; thin slop is partly recycled, and the rest is concentrated into syrup.
- ❖ Syrup and slop mixture is dried to produce Distillers Dried Grains with Soluble (DDGS), used as Animal Feed Supplement (AFS).
- ❖ Condensate from evaporation is treated in CPU and reused, supporting complete ZLD.

#### Impact:

- ❖ Drastic reduction in freshwater dependency in distillery operations.
- ❖ Value-added reuse of by-products like DDGS in the animal feed sector.

### ZLD in Sugar Manufacturing Operations:

#### Process Steps:

- ❖ Screening – Removes larger solids via fixed bar screens.
- ❖ Oil & Grease Removal – Uses mechanical skimmers for surface pollutants.
- ❖ Equalization Tank – Homogenizes effluent from various sources.
- ❖ pH Neutralization – Achieved using lime/caustic to stabilize effluent.
- ❖ Primary Clarification – Settles solids; sludge directed to drying beds.
- ❖ Biological Treatment – Involves UASB reactors, extended aeration, and bio-towers.
- ❖ Secondary Clarification – Ensures optimum bacterial population control.
- ❖ Multi-Grade Filtration (MGF) – Removes residual solids.
- ❖ Activated Carbon Filtration & RO – Eliminates color, odor, and organic load.
- ❖ Final Use – Treated water is reused for irrigation purposes, ensuring zero liquid discharge.

#### Impact:

- ❖ Enables sustainable water use within sugar manufacturing.
- ❖ Contributes to soil moisture conservation through irrigation reuse.

## 6. Provide details of air emissions (s than GHG emissions) by the entity

Parameter	Please specify unit	FY 2025	FY 2024
NOx	mg/nm <sup>3</sup>	89.31	280.35
SOx	mg/nm <sup>3</sup>	20.14	117.70
Particulate matter (PM)	mg/nm <sup>3</sup>	195.1	224.89
Persistent organic pollutants (POP)	mg/nm <sup>3</sup>	-	-
Volatile organic compounds (VOC)	mg/nm <sup>3</sup>	-	-
Hazardous air pollutants (HAP)	mg/nm <sup>3</sup>	-	-
Others – Carbon Monoxide	mg/nm <sup>3</sup>	-	-

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.

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity**

Parameter	Units	FY 2025	FY 2024
<b>Total Scope 1 emissions*</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonne of CO <sub>2</sub> equivalent (or TCO <sub>2</sub> e)	32303.68	20165.93
<b>Total Scope 2 emissions**</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonne of CO <sub>2</sub> equivalent (or TCO <sub>2</sub> e)	43.68	43.62
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations)	(Metric tonne of CO <sub>2</sub> equivalent (or TCO <sub>2</sub> e)/ Inr)	0.00000122	0.00000076
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	(Metric tonne of CO <sub>2</sub> equivalent (or TCO <sub>2</sub> e)/ Inr)	0.00002483	0.00001558
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	tCO <sub>2</sub> e/MT of Sugar (i)	0.083146(i)	0.021196(i)
	tCO <sub>2</sub> e/KL of Ethanol (ii)	0.087356(ii)	0.049513(ii)
	tCO <sub>2</sub> e /MT of Chemical (iii)	0.086109(iii)	0.060713(iii)
	tCO <sub>2</sub> e/Number of cases of potable spirit (iv)	0.003044(iv)	0.001839(iv)
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	-	-

\*Fy2023-24 data have been re-calculated

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, we have conducted independent assessment through an external agency, the names of the same are mentioned below:

Dhampur – M/s Global Enviro Laboratories

Rajpura – Ms/ SCS Enviro services private limited (Jaipur)

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

To enhance the overall efficiency of our manufacturing processes, we have undertaken several strategic initiatives aimed at optimizing energy usage and reducing emissions. These efforts have primarily focused on reducing steam consumption in our production lines, which has directly contributed to lower fuel consumption and a measurable decline in greenhouse gas (GHG) emissions.

A significant share of the energy used in our operations is derived from renewable sources such as bagasse, slop, and molasses—by-products of our own processes. This not only ensures energy self-sufficiency but also supports our commitment to cleaner, more sustainable production practices. Importantly, any surplus renewable energy generated is exported to the state electricity grid (UPPCL), thereby contributing to the broader goal of clean energy access in line with UN Sustainable Development Goal 7 (Affordable and Clean Energy).

To further strengthen our energy management practices, we have conducted detailed energy audits at our facilities. These audits have provided actionable insights into areas where energy efficiency can be improved and waste minimized. Based on the audit recommendations, several targeted measures—such as steam and power reduction schemes—have already been implemented, while others are currently in progress. These efforts are not only helping us to reduce our carbon footprint but are also enhancing cost-effectiveness and operational resilience.



9. Provide details related to waste management by the entity

Parameter	FY 2025	FY 2024
	Total Waste generated (in MT)	
Plastic waste (A)	2396.06	1231
E-waste (B)	0.33	0.44
Bio-medical waste (C)	0.098	0.10
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	0.76 (used oil)	0.49 (used oil)
Other Hazardous waste. Please specify, if any. (H)	0.091 (oil-soaked cotton)	0.14 (oil-soaked cotton)
Other Non-hazardous waste generated (I). Please specify, if any.*	7030 (Carton Box)	394.60 (Carton Box)
<b>Total (A+B + C + D + E + F + G + H+I)</b>	<b>9427.338</b>	<b>1626.77</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations)	0.00000037	0.00000006
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	0.00000075	0.00000013
<b>Waste intensity in terms of physical output</b>	Sugar: 0.025 MT/MT of Sugar(i) Ethanol: 0.026 MT/KL of Ethanol(ii) Chemical: 0.026 MT/MT of Chemical(iii) Potable spirit: 0.001 MT/ Number of cases of potable spirit(iv)	Sugar: 0.0017 MT/MT of Sugar(i) Ethanol: 0.0040 MT/KL of Ethanol(ii) Chemical: 0.0049 MT/MT of Chemical(iii) Potable spirit: 0.0001 MT/ Number of cases of potable spirit(iv)
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity	-	-

\* The process for Carton Boxes disposal has been streamlined, leading to increased generation of carton boxes

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste	FY 2025	FY 2024
	Total Waste generated (in MT)	
(i) Recycled	482.2	1626.53
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
<b>Total</b>	<b>482.2</b>	<b>1626.53</b>

For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)

Category of waste	FY 2025	FY 2024
	Total Waste generated (in MT)	
(i) Incineration	847.8	0.24
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
<b>Total</b>	<b>847.8</b>	<b>0.24</b>

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 independent assessment has been carried out by any external agency.

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

At Dhampur Sugar Mills Limited, environmental responsibility is embedded in our operational ethos. We have adopted an integrated waste management framework aimed at minimizing environmental impact through responsible handling of waste and chemicals. Our approach is rooted in the principles of sustainability, regulatory compliance, and continuous improvement.

#### **Integrated Waste Handling and Utilization**

We follow a structured approach that emphasizes reducing waste generation at the source, followed by maximization of reuse and recycling. In line with industry best practices, most by-products and process residues from sugar and distillery operations are either reused internally or converted into value-added products. For instance:

- ❖ Bagasse, a fibrous by-product, is used as a renewable fuel in boilers.
- ❖ Filter cake is utilized in composting.
- ❖ Ash and treated sludge are applied in agriculture, contributing to circularity.

This efficient material recovery ensures that minimal waste is left for disposal, supporting both environmental and economic objectives.

#### **Responsible Management of Hazardous Substances**

Although hazardous chemical usage is limited in our operations, we maintain a strong compliance-driven system to manage associated risks. Key measures include:

- ❖ **Controlled handling and secure storage** of hazardous materials, in accordance with applicable laws and with all required permissions in place.
- ❖ **Routine employee training** to ensure safe practices in material handling, emergency response, and use of personal protective equipment (PPE).
- ❖ **Internal audits** and checks are regularly carried out to assess effectiveness and address potential safety gaps.

#### **Minimizing Dependence on Toxic Chemicals**

In our effort to reduce the use of hazardous substances, we have adopted several forward-looking initiatives:

- ❖ **Eco-conscious procurement:** Emphasis is given on prioritizing partnership with suppliers based on their environmental performance, and to those offering safer, compliant alternatives.
- ❖ **Process refinement:** Manufacturing workflows are continuously reviewed and optimized to reduce chemical dependency and emissions.
- ❖ **Employee sensitization:** Awareness campaigns and periodic training sessions empower our workforce to contribute actively to safe chemical management and waste reduction.

#### **Effluent Treatment and Water Recovery**

We have implemented Zero Liquid Discharge (ZLD) systems across key sites, ensuring that no untreated water leaves our premises. Effluents undergo rigorous treatment, and by-products such as treated sludge and slop are repurposed:

- ❖ Slop is used as boiler fuel.
- ❖ Treated water is reused in processes or for irrigation.
- ❖ This closed-loop system enhances resource efficiency while ensuring compliance with environmental norms.

#### **Commitment to Environmental Responsibility**

Our waste and chemical management practices are driven by a commitment to reduce our environmental footprint and protect ecosystem and community health. Through preventive action, process efficiency, and continuous innovation, we strive to maintain high standards of environmental performance across all aspects of our operations.

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

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N). If no, the reasons thereof and corrective action taken, if any.
1.	Dhampur Sugar Mills, Dhampur	Distillery Division	Yes

12. Details 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)	Relevant Web link
NA					

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

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
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The organization fully complies with all relevant environmental laws, regulations, and guidelines. Throughout the year, the company's emissions and waste generation remained within the limits set by the State Pollution Control Board (SPCB). Additionally, periodic certifications confirming compliance with SPCB guidelines are routinely obtained.

## LEADERSHIP INDICATORS

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

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

- (i) Name of the area: Not Applicable
- (ii) Nature of operations: Not Applicable
- (iii) Water withdrawal, consumption, and discharge: Not Applicable

Parameter	FY 2025	FY 2024
<b>Water withdrawal by source (in kiloliters)</b>		
(i) To Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kiloliters)</b>	0	0
<b>Total volume of water consumption (in kiloliters)</b>	0	0
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover)	0	0
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	0	0

Parameter	FY 2025	FY 2024
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into Surface water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) Into Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) Into Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
<b>Total water discharged (in kiloliters)</b>	<b>0</b>	<b>0</b>

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 independent assessment has been carried out by an external agency.

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

Parameter	Unit	FY 2025	FY 2024
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	0	0
<b>Total Scope 3 emissions per rupee of turnover</b>		0	0
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity		0	0

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 independent assessment has been carried out by an external agency.

**3. With respect to the ecologically sensitive areas reported at Question 11 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.**

We do not have any substantial direct or indirect effects on biodiversity in ecologically sensitive regions. Nevertheless, to ensure regulatory compliance and affirm our dedication to conserving biodiversity, we have secured a No Objection Certificate (NOC) from the Forest Department.

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

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Biomass Utilization for Renewable Energy	We are committed to minimizing our environmental impact by using bagasse and slop—by-products from our production—as fuel for our boilers. This approach reduces our dependence on fossil fuels and supports eco-friendly practices. By leveraging these renewable sources, we contribute to a cleaner energy landscape while managing waste responsibly, reflecting our commitment to sustainability and reducing our ecological footprint.	This strategy leads to lower greenhouse gas emissions, a reduced carbon footprint, and decreased waste production, fostering a cleaner environment overall.
2	Implementation of a Zero Liquid Discharge (ZLD) System	Our production water is fully treated in Effluent Treatment Plants (ETP). The treated water is then used for irrigation on our own land and provided to neighboring farms as needed. We strictly avoid discharging treated water into any natural water bodies.	This system repurposes treated water for agricultural use on our land and nearby farms, conserving water resources and preventing pollution, while bolstering sustainable farming practices.
3	Reutilization of Water through Condensate Polishing Units (CPU)	We have installed Condensate Polishing Units (CPU) with capacities of 600 KLD at Rajpura, 1728 KLD at Dhampur Sugar, and 4500 KLD at Dhampur Distillery. These units treat and purify condensate water from our evaporation and crystallization processes. The purified water is then reused within the plant in cooling towers and various other applications.	By utilizing CPUs, we optimize water reuse, reduce wastewater discharge, and ensure efficient water management, fostering operational effectiveness and sustainability.
4	Installation of Sewage Treatment Plants (STP)	Our Sewage Treatment Plants (STP), with capacities of 50 KLD in Rajpura and 220 KLD in Dhampur, are employed to process domestic grey and black water. The treated water is subsequently used for landscaping within our factory premises.	These facilities facilitate complete treatment of domestic wastewater, enabling its reuse in horticultural and gardening applications, promoting environmental sustainability.
5	Sulphate Recovery System	We have implemented Sulphate Recovery Systems (SRS) with capacities of 1000 KLD in Rajpura and 1400 KLD in Dhampur to specifically treat cooling tower overflow. This treatment process involves micro-settlers followed by secondary aerobic treatment for effective sulphate removal.	This enables complete reuse of cooling tower overflow, reducing fresh water consumption and boosting overall water efficiency.
6	Green Belt Development at Factory Premises	At the onset of each monsoon season, we plant thousands of trees using the Miyawaki method to enhance biodiversity and rejuvenate soil on our premises. This effort has successfully allowed us to have over 33% of our area covered by a green belt.	The initiative fosters a clean and vibrant environment around the factory premises.
7	Utilizing Fly Ash as Fertilizer	Dhampur's initiative repurposes fly ash from boilers by converting it into fertilizer suitable for agricultural use. After processing to meet agricultural standards, it is distributed to local farmers to boost soil health and crop production.	This practice delivers considerable environmental gains by minimizing waste, enhancing soil fertility, increasing crop yields, and offering financial savings for farmers, thereby supporting sustainable agricultural practices.

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
8	Press Mud Used in Agriculture	Press mud, a byproduct from sugar production, is converted into organic soil conditioner and fertilizer through composting and processing, aimed at improving soil fertility and promoting sustainable farming techniques.	This program has effectively cut down waste from sugar production, improved soil quality by enriching it with organic content and nutrients, increased agrarian productivity, and provided local farmers with economic benefits through reduced input costs.
9	CO2 Bottling for Industry	In Dhampur, carbon dioxide emissions from industrial activities are captured, purified to meet industry specifications, bottled, and distributed for various industrial applications.	This effort has notably diminished local carbon emissions by repurposing CO2 for industrial needs, offering an eco-friendly and cost-effective supply while contributing to environmental conservation in the region.

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

The Enterprise Risk Management Council of the company, appointed by the Risk Management Committee, has developed a thorough policy addressing diverse business risks and mitigation tactics, as outlined in the Enterprise Risk Management and Business Continuity Management Policy.

This policy details the business continuity evaluation process and necessitates risk analysis alongside business impact assessments to enable efficient responses, recovery, and return to established operational levels following disruptions. It encompasses Disaster Recovery and Crisis Management Plans, aimed at tackling both digital and physical challenges faced by Dhampur Sugar Mills.

To mitigate significant risks, amplify business opportunities, and lessen impacts, operational checks, control measures, and management evaluations are in place. Regular stakeholder training sessions and mock drills are held, complemented by audits that evaluate the efficacy of emergency response protocols. The Policy can be accessed at <https://dhampursugar.com/investors/policies>

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

Dhampur Sugar Mills expects a negligible environmental impact from its value chain due to the nature of the products it sources. The central aspect of Dhampur Sugar's operations is the procurement of sugarcane, the primary raw material, directly from farmers within its command area. This direct sourcing approach enables Dhampur to effectively manage and minimize associated risks.

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

None of our value chain partners were assessed for environmental impacts.

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

By the organization	NA
By the top ten value chain partners	NA

**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:**

We are affiliated as members of 2 (two) 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.**

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1.	Indian Sugar & Bio-energy Manufacturers Association.	National
2.	Uttar Pradesh Sugar Mills Association (UPSMA)	State

**2. Provide details of corrective action taken or underway on any issues related to anticompetitive conduct by the entity, based on adverse orders from regulatory authorities.**

Name of Authority	Brief of the case	Corrective action taken
We have not received any notifications from regulatory bodies concerning anti-competitive conduct, antitrust breaches, conflicts of interest, or monopolistic activities. Consequently, no corrective measures were required or implemented.		

## LEADERSHIP INDICATORS

**1. Details of public policy positions advocated by the entity:**

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
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Our interaction with regulatory authorities primarily occurs through our active participation in industry associations. While specific examples are not detailed here, these associations facilitate our collaboration with regulatory bodies, ensuring that we consistently comply with industry standards and regulations.



## 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 FY 25

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	Relevant Web link
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Not applicable. The relevant laws do not require Social Impact Assessments (SIA) for the projects carried out by DSML.

#### 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity

S. No	Name of project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY 24 (in INR)
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We did not initiate any project necessitating Rehabilitation and Resettlement in the fiscal year 2024-2025, hence, this is Not Applicable.

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

Our operations are deeply intertwined with the local farming community, especially those who supply sugarcane. Our Cane Department maintains open lines of communication with farmers, coordinated through government-formed societies that advocate for their rights. Concerns raised by farmers are addressed through a structured process where they report issues to the society's government representative, who then collaborates with our Cane Department to find solutions.

##### Key Aspects of Our Engagement:

- ❖ **Proactive Farmer Support:** Beyond formal processes, we take proactive measures to engage with farmers and swiftly address concerns related to seed quality, crop management, and prompt payments.
- ❖ **Direct Access to Support:** Community members are encouraged to contact departmental representatives at our plant offices to resolve broader issues promptly.
- ❖ **Continuous Engagement:** We maintain ongoing formal and informal interactions with the farming community to gather feedback and address concerns spanning education, healthcare, infrastructure, and more.
- ❖ **Integration with CSR Initiatives:** By aligning local challenges with our Corporate Social Responsibility efforts, we incorporate them into our grievance redressal mechanisms. This strategy not only enhances our capacity to resolve grievances effectively but also emphasizes our dedication to responsible and community-focused practices.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers

	FY 2025	FY 2024
Directly sourced from MSMEs/ small producers	16.47%	21.10%
Directly from within India	99.92%	98.42%

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in following locations, as % of total wage cost

Location	FY 2025	FY 2024
Rural	100%	100%
Semi-urban	NA	NA
Urban	NA	NA
Metropolitan	NA	NA

## 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, as we did not conduct Social Impact Assessments	

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

S. no	State	Aspirational District	Amount Spent (in INR)
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None of our Corporate Social Responsibility (CSR) initiatives are situated within the designated aspirational districts.

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

We are committed to fostering a supplier selection process that is fair and inclusive, providing equal opportunities for all potential suppliers without any form of discrimination. Our approach emphasizes collaboration with local suppliers or those situated close to our facilities, as this not only supports regional economies but also enhances logistical efficiency.

While our current supplier qualification criteria do not specifically emphasize partnerships with marginalized or vulnerable groups, we are continually evaluating our procurement practices to identify areas for improvement.

Our operations are heavily dependent on sugarcane, and we procure all our supply from local communities. This approach ensures that our sourcing practices are community-focused and support local economies.

b. From which marginalized /vulnerable groups do you procure?

100% of sugarcane is sourced from local farmers.

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

100% of our procurement are from local farmers from within the districts or neighboring districts.

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

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
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Not applicable. In the financial year 2024-25, we neither owned nor acquired any intellectual property assets.

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. In the financial year 2024-25, we neither owned nor acquired any intellectual property assets.		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	Project on rural development	20184	100%
2	Promotion of preventive healthcare and sanitation	25325	100%
3	Women Empowerment and Child Care	64	100%

\* Beneficiaries in some of our projects are not ascertainable and have not been mentioned here.

\*\*Weblink of the CSR Policy can be accessed at [https://api.dhampursugar.com/uploads/CSR\\_Policy\\_bb2d0ee58e.pdf](https://api.dhampursugar.com/uploads/CSR_Policy_bb2d0ee58e.pdf)

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



**ESSENTIAL INDICATORS**

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

Our corporate website features a "Get in Touch" section, allowing consumers to share their concerns, suggestions, feedback, or complaints directly with us. This can be accessed at: <https://www.dhampursugar.com/contact-us>. In addition to the website, we also address complaints received verbally or through written communication by investigating the issue, taking corrective action, and providing timely responses.

Our sales teams and distributors maintain regular contact with customers through in-person meetings and focused group discussions, helping us proactively identify areas for improvement in our products and services.

We actively encourage our customers, sugarcane farmers, and value chain partners to use our grievance redressal channels to ensure their concerns are addressed promptly and effectively.

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

State	As a percentage to total turnover
Environmental and social parameters relevant to the product	97.71 %
Safe and responsible usage	97.71 %
Recycling and/or safe disposal	97.71 %

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

	FY 2025			FY 2024		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	0	0	NA	0	0	NA
Advertising	0	0	NA	0	0	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	0	0	NA	0	0	NA
Restrictive trade practices	0	0	NA	0	0	NA
Unfair trade practices	0	0	NA	0	0	NA

**4. Details of instances of product recalls on accounts of safety issues**

	Number	Reasons for recall
Voluntary recalls	0	Not Applicable
Forced recalls	0	Not Applicable

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

Yes, we have established a robust IT security policy that covers critical aspects such as the protection of sensitive customer data, confidentiality protocols, and the use of non-disclosure agreements (NDAs) for third parties with access to client information. The policy also outlines procedures for the secure handling, management, and disposal of such data.

This policy is applicable to all employees across the organisation and is readily accessible through the Company's intranet to ensure awareness and compliance. The policy is also available on our website at: [https://api.dhampursugar.com/uploads/IT\\_Policy\\_d1d0f70509.pdf](https://api.dhampursugar.com/uploads/IT_Policy_d1d0f70509.pdf)

**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**

We have established clear protocols for managing customer complaints, product recalls, and withdrawals. This includes conducting thorough Root Cause Analysis (RCA) and implementing Corrective and Preventive Actions (CAPA) for issues reported by our channel partners.

To ensure readiness, we regularly conduct mock traceability exercises—both during and outside the production season—tracking materials from raw inputs to finished goods. These exercises help us respond swiftly and effectively in the event of a product recall.

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

- Number of instances of data breaches - 0
- Percentage of data breaches involving personally identifiable information of customers - NA
- Impact, if any, of the data breaches - NA

## LEADERSHIP INDICATORS

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

We have ensured that comprehensive information regarding our product portfolio is readily accessible on our official website: [www.dhampursugar.com](http://www.dhampursugar.com).

For any further queries or correspondence, stakeholders may reach out to us through the following channels:

- ❖ Corporate Office: Dhampur Sugar Mills Ltd., 6<sup>th</sup> Floor, Max House, Okhla Industrial Estate, Phase III, New Delhi – 110020
- ❖ Telephone: +91 011-41259400
- ❖ Email: investordesk@dhampursugar.com
- ❖ Dhampur Unit: Dhampur Sugar Mills Limited, District Bijnor, Dhampur (U.P.) – 246761
- ❖ Rajpura Unit: DSM Sugar Rajpura, Village & Post – Rajpura, District Sambhal – 243727

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

All our product packaging includes detailed information pertaining to nutritional values, recyclability of the packaging material, shelf life, and batch and lot identification. Furthermore, to uphold safety standards during the transportation of Ethyl Acetate, we provide our logistics partners with a comprehensive safety guidelines factsheet, ensuring adherence to all prescribed safety protocols.

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

Given that sugar is a essential commodity, our internal management systems are designed to proactively prevent any operational disruptions. To date, we have successfully maintained uninterrupted operations, including during the global pandemic, when all business functions continued without hindrance.

In the unlikely event of a disruption, we have established a clear communication protocol to ensure transparency with our stakeholders:

- ❖ **Bulk Customers:** Will be promptly notified via email by our Sales and Marketing teams.
- ❖ **Public Notifications:** In case of government directives or broader mandates, we will issue public notices through print media and official social media channels.

**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)**

Our packaging strategy is tailored to the specific requirements of each product category, reflecting our commitment to regulatory compliance, consumer safety, and transparency.

For sugar, our principal product, we ensure that all packaging includes mandatory regulatory information such as the FSSAI label, manufacturing details, plant identification codes, batch numbers, and best-before dates to facilitate traceability. Additionally, we specify the grade of packaging material used, reinforcing our dedication to quality assurance. Our Mishti sugar variant includes disclaimers that affirm hygienic, untouched production in advanced facilities, thereby assuring customers of product purity. Nutritional information is also prominently displayed to support informed consumer choices.

In the case of Ethyl Acetate (EA), safety remains our highest priority. We provide transport vendors with detailed safety guidelines and fact sheets to ensure proper handling of ethanol-based products. Each EA drum is clearly labeled with hazard classification details and precautionary statements, thereby maintaining safety standards across the supply chain with a supporting MSDS attached.

For our country liquor offerings, we emphasise both transparency and regulatory adherence. Packaging includes recycling symbols, license numbers, FSSAI labels, alcohol content, ingredient disclosures, shelf-life information, and consumption warnings. This comprehensive labeling approach ensures consumer awareness and compliance with applicable regulations at every stage.

**5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operations of the entity or the entity as a whole?**

Yes. We have instituted a structured system for collecting feedback from our key channel partners and major buyers. As part of this process, a customer feedback form or survey is circulated annually. This survey includes an objective questionnaire through which customers evaluate our products and services, enabling us to assess performance and identify areas for improvement.