

# BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (BRSR)

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## SECTION A: GENERAL DISCLOSURE

### 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	6th Floor, Max House, Okhla Industrial Estate, Phase- III, New Delhi-110020
6	E-mail ID	investordesk@dhampursugar.com
7	Telephone	011-41259400
8	Website	www.dhampursugar.com
9	Financial year for which reporting is being done	1st April 2022 to 31st March 2023
10	Name of the Stock Exchange(s) where shares are listed	BSE Limited; National Stock Exchange of India Limited
11	Paid-up Capital	₹ 66.38 crores
12	Name and contact details of the person who may be contacted in case of any queries on the Business Responsibility and Sustainability Report (BRSR)	Name of the Person : Mrs Aparna Goel, Company Secretary Telephone : +91 011 41259400 Email address: aparnagoel@dhampursugar.com
13	Reporting Boundary: Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Disclosures made in this report are on a Standalone basis

## II. Product/Services

### 14 Details of business activities (Accounting for 90% of the turnover)

Sr. No.	Description of Main Activity	Description of Business Activity	% Turnover of the Entity
1	Manufacturing – FMCG	Manufacturing of Sugar	49.14%
2	Manufacturing of beverages and ethanol	Production of Alcohol including Fuel Grade Ethanol and Potable Alcohol (Country liquor), Ethyl Acetate, Extra Neutral Alcohol	47.68%
3	Generation of power	Sale of renewable energy generated to the Grid	2.37%

### 15 Products/Services sold by the Company (Accounting for 90% of the entity's Turnover)

Sr. No.	Product/Service	NIC Code	% of Total Turnover contributed
1	Sugar	10721	47.29%
2	Mishti	10721	1.85%
3	Power	3510	2.37%
4	Ethanol	20119	20.57%
5	Chemical	20119	10.70%
6	Potable spirit	11012	16.42%

## III. Operations

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

Location	Number of plants	No. of Offices	Total
National	2	1	3
International	The Company does not have offices in international locations as on date		

### 17 Market served by the entity

#### a. No. of Locations

Locations	Numbers
National (No. of States)	22 States and 1 Union Territory
International (No. of Countries)	3 Countries

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

0.11% of total turnover (which amounts to INR 3.2 Cr) of Dhampur Sugar Mill's turnover comes from its exports. This is achieved through the export of Ethyl Acetate (EA).

#### c. A brief on type of Customers

With an experience of 90 years in the sugar industry, from serving a number of sugar consumers we have diversified and gone on to serve the power and chemical needs of our customer base over the years. The Company's reach is spread across 22 states within India and also to 3 other nations. The trust and loyalty exhibited by our customers is a testimonial of our dedication to provide quality products.

Below is a brief product wise spread of our target customer groups:

- **Sugar:** We cater to sugar demands from four segments- Export to overseas customers, Institutional buyers, Indigenous market and Branded sugar mainly for retail customers through B2B segment. Industries that utilise our sugar include but are not limited to beverages, confectionery, bakery, sweet production, etc.
- **Power:** Bagasse, the by-product of sugar can be utilised for power generation, the same is produced and consumed captively, surplus power is sold entirely to the sole entity: state grid i.e., UPPCL (Uttar Pradesh Power Corporation Limited).

- **Ethanol:** We support and promote the Government of India's Ethanol Blending Programme and thus sell Ethanol to oil marketing companies.
- **Ethyl Acetate:** We sell Ethyl Acetate to end consumers and traders. This is primarily used as solvent. The industries that we cater to include packaging, paints, inks, adhesives, pharma, etc.
- **ENA (Extra Neutral Alcohol):** We captively consume ENA in our potable spirits plant. We also sell ENA to country liquor manufacturers.
- **Country Liquor:** We sell Country Liquor to whole sellers/ distributors only in the state of Uttar Pradesh.

#### IV. Employees:

We consider our employees to be our chief resources and believe their dedication and support is the primary ingredient of our success in the past 90 years. We uphold the principles of equality and inclusivity across our value-chain, and we are keen on building on these principles in the years to come. The Company is an equal opportunity employer. However, since majority of our operations occur in factories, on account of non-availability of requisite talent, there is a limited representation of women as part of our employee strength at 5% and worker strength at nearly 1%. We aim to strive and improve this representation through our corporate roles. At Corporate office we have approximately 30% women employees. This signifies our alliance to the United Nations SDG 5 upholding Gender Equality. We also respect the rights and contribution of differently abled individuals and are open to employing such employees. However, as on date we do not have such employees working with us, primarily due to non-availability of trained manpower. The below table includes employees across the organization including corporate office.

#### 18. Details as at the end of financial year 2022-23:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>a.</b>	<b>Employees (including differently abled)</b>					
	<b>Employees</b>					
1	Permanent (D)	276	262	95%	14	5%
2	Other than Permanent (E)	0	0	0%	0	0%
3	Total (D+E)	276	262	95%	14	5%
<b>b.</b>	<b>Workers (including differently abled):</b>					
	<b>Workers</b>					
1	Permanent (F)	917	909	99.13%	8	0.87%
2	Other than Permanent (G)	384	382	99.48%	2	0.52%
3	Total (F+G)	1301	1291	99.23%	10	0.77%
<b>c.</b>	<b>Differently abled Employees</b>					
	<b>Employees</b>					
1	Permanent	-	-	-	-	-
2	Other than Permanent	-	-	-	-	-
3	Total	-	-	-	-	-
<b>d.</b>	<b>Differently abled Workers:</b>					
	<b>Workers</b>					
1	Permanent	-	-	-	-	-
2	Other than Permanent	-	-	-	-	-
3	Total	-	-	-	-	-

### 19. Participation/Inclusion/Representation of women

Sr. No.	Category	Total (A)	No. and % of females	
			No. (B)	% (B/A)
1	Board of Directors	8	1	13%
2	Key Management Personnel *	5	1	20%

\* Includes Managing Director, Whole Time Director, Chief Executive Officer, Chief Financial Officer, and Company Secretary as defined under Section 2(51) of the Companies Act, 2013

To ensure our turnover rates remain minimal and to promote the well-being and growth of our employees, we have several initiatives in place. The turnover data is currently maintained at an overall level but going forward we shall maintain the bifurcation between permanent employees and permanent workers as well. Below stated are the turnover numbers noted for the Company.

### 20. Turnover rate for permanent employees and workers

Category	FY 2022-23 (Turnover rate in current FY)			FY 2021-22 (Turnover rate in previous FY)		
	Male	Female	Total	Male	Female	Total
	Permanent Employees	10.69%	13.04%	10.74%	12.24%	13.04%
Permanent Workers	Included above					

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

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

Sr. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether it is a Holding / Subsidiary / Associate / or 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. Details

### 22 a. Whether CSR is applicable as per the provision of Section 135 of Companies Act, 2013:

Yes

Turnover (in Rs.)	2825.95 Cr
Net worth (in Rs.)	1038.85 Cr

## VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) If Yes, then provide web-link for grievance redress policy	FY 2022-23 (Turnover rate in current FY)		FY 2021-22 (Turnover rate in previous FY)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Farmers	Yes, Cane department is a specific department established which liaises with farmers on a daily basis to understand their concerns and address their grievances	Nil	Nil	Nil	Nil	We haven't received any complaints from farmers
Employees	Yes, we have a detailed employee grievance redressal mechanism in place. This is an internal policy and is accessible to all employees via the Dhampur Intranet however the same is not published in public domain	Nil	Nil	Nil	Nil	We haven't received any complaints from our employees
Investors	Yes Our shareholders can write to us via the email id: investordesk@dhampursugar.com	152	Nil	139	Nil	All of the complaints received were resolved in due time All of the complaints received were resolved in due time
Customers	Yes Customers can use the "Get in touch" option on the website and write to us on any concerns they may have.	Nil	Nil	Nil	Nil	We haven't received complaints from our customers

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

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

Sr. No.	Material Issue Identified (High priority material issues are listed below)	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1.	GHG Emissions	Risk	The greenhouse gases generated from burning of bagasse as well as processing of molasses can pose a risk of environmental harm. It is to mitigate the generated emissions.	To identify sources of scope 1,2 and 3 GHG emissions in Company's operations and to define goals for reducing the same. Suitable environmental control measures have been deployed to minimize these emissions. However, bagasse being green fuel, has lower carbon footprint as compared to fossil fuel. Molasses are largely used to produce ethanol which again being green fuel helps reduce carbon footprint and its use in ethanol blending programme (EBP) helps in conservation of foreign exchange.	Initiatives undertaken to mitigate harm arising from GHG emissions lead to incremental costs. If a given adopted technology fails to perform, there could be losses incurred too.
2.	Water and waste Management	Opportunity	Sugar industry is one of those industries where majority of generated waste byproducts are utilized for alcohol and power generation, Sewage Treatment Plant (STP)- sludge, press-mud, bagasse are all utilized for one or the other beneficial purposes. Zero Liquid Discharge (ZLD) has also been implemented to better manage water resources	ZLD and waste management initiatives have been established at Company's unit at Dhampur and Rajpura	Savings achieved in terms of power consumption and withdrawal of freshwater thus resulting in reduced costs of operations
3.	Energy management	Opportunity	At Dhampur Sugar, we use Renewable Energy (RE) generated from bagasse and other sources and hence we are self-sufficient. There is a significant cost savings potential through various energy optimization initiatives from the use of sugarcane by-products.	Existing generation methods for RE generation	Increased sale of power to the grid results in additional revenue generation

Sr. No.	Material Issue Identified (High priority material issues are listed below)	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4.	Product quality	Opportunity	A high-quality product enhances market image of the company and can fetch higher profits	Strong process and quality systems are in place to ensure top quality product	Brand building and incremental profits due to better product quality
5.	Diversity, equity, and inclusion	Opportunity	We have majority of male employees currently in our workforce, hence, to ensure balance and bring better insights in daily operations we would need to improve our diversity numbers	Incorporating DE&I initiatives to hire more female employees and also employees from varied backgrounds.	Innovation and better ideas from diversified workforce leading to increased profits
6.	Health, safety and well being	Opportunity	Any gaps in the safety arrangements in our units can result in severe harm to the employees and workers	Periodic risk identification done through safety observation report to note the safety incidents and corrective actions taken thereon including implementation of governance mechanism for the noted risk	Increased productivity from satisfied and happy employees leading to increased operational efficiency and growth
7.	Human Rights	Opportunity	Changing regulations around human rights can result in non-adherence and affect our business operations	Defining human rights policy and assessment procedures to avoid any non-compliances	Improved customer faith, specifically from institutional buyers, due to meticulous compliance of human rights issues for the organization leading to increased profits
8.	CSR	Opportunity	Supporting the community through our CSR initiatives can help us develop the local marginalized communities	Partnership with NGOs and interactions with local communities to support and enhance their development	Improved credibility and trust arising from community engagement can enhance our image in the areas around factories which holds potential for higher raw material availability
9.	Ethics and integrity	Opportunity	Reputational risk and regulatory action against any unethical practices noted	Whistleblower mechanism defined for employees and all other stakeholders to freely highlight any unethical practices noted	Compliance with regulatory requirements and mechanism to handle unethical practices prevents dent in company brand image

Sr. No.	Material Issue Identified (High priority material issues are listed below)	Indicate whether risk or opportunity	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
10.	Governance and compliance	Risk	Any new updates to the regulatory framework and the multiple laws, regulations, and local statutes across the geographies we operate in and supply to makes it challenging to adhere to all the new updates and there is always a risk of non-compliance due to the changing scenario.	Periodic and regular liaison with concerned departments along with regular supervision in place to avoid any instances of non-compliance. Structured periodic reporting of compliance status along with exceptions (if any) to Senior Management. Have implemented compliance monitoring IT based tool which is reviewed by senior management on a monthly basis.	Fines and penalties may arise in case of any instances of non-adherence to compliances
11.	Material sourcing and efficiency	Risk	Business continuity risks that can arise in case the procurement is in an inefficient manner. Non-fulfillment or delayed fulfillment of order can create stock out situation and impact manufacturing plan	Cane department to ensure proper supply chain coupled with cordial relations are maintained with farmers, who are our major suppliers, to ensure regular availability of raw material. For other engineering materials to ensure consistent plant operations, a well-planned and established system is in place to ensure no discontinuity in plant operations due to stock outs.	Prevention of any potential financial losses that otherwise may result from hindrances to business continuity
12.	Stakeholder grievance redressal mechanism	Risk	Failure in timely redressal of reported grievance can result in lack of faith of stakeholders	Stringent grievance redressal mechanism established to review, address, and resolve all reported grievances	Stringent controls to help avoid regulatory action and compensation to be paid if stakeholders invite regulatory action against grievance highlighted
13.	Risk management	Risk	Severe effect on organization's sustenance due to inability to deal with adverse situations arising from lack of identification of potential risks and mitigation plans to handle the same	Enterprise Risk Management (ERM) council nominated by the risk management committee of the Board in place and evolving commensurate with dynamic business environment to identify all potential risks and mitigation actions for the most critical risks	Financial loss due to potential risks faced by the organization



## 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.

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and Management Processes</b>										
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
	c. Web Link of the Policies, if available	Business Responsibility Policy: <a href="https://api.dhampursugar.com/uploads/BRR_Policy_654c78dd0c.pdf">https://api.dhampursugar.com/uploads/BRR_Policy_654c78dd0c.pdf</a>								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes								
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	The policies have been shared with key value chain partners; we are in the process of sharing the policies with all value chain partners								
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.	ISO:9001 2015, FSSC:22000 V5.1 (DSM Sugar Rajpura - Rajpura Unit)								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>Dhampur enhances the well-being of communities through socio-economic and ecological development. The corporate social responsibility (CSR) initiatives promote education, sports, modern agricultural practices, skill development, women's empowerment, healthcare, sanitation, rural development, environmental sustainability and other activities. Farmer awareness programmes are conducted to educate them about water conservation and improving yield, thereby increasing farm income, contributing to the vision of our Prime Minister to double farm income.</p> <p><b>CSR activities, FY 2022-23:</b></p> <p><b>Village development programme:</b> The Company partnered with the PHD Rural Development Foundation (PHDRDF) to undertake social welfare, including healthcare, water conservation, and other initiatives. These comprised free mobile health services near its units that provided health, eye, women &amp; childcare and awareness initiatives.</p> <p><b>Pond rejuvenation:</b> The Company promotes sustainable practices in villages near its Dhampur and Rajpura units. To conserve water and recharge ground water, the company partnered with PHD Rural Development Foundation (PHDRDF) to refurbish existing ponds in several villages.</p> <p><b>Promoting education:</b> The Company supported Pushp Niketan School (Dhampur unit), providing quality education to rural students for concessional fees (and free in several cases).</p>								

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	<p>Annual operating targets and certain targets in terms of EHS and HR initiatives have been established at Company's level. These are reviewed during the annual PMS cycle.</p> <p>Additionally, we also have annual CSR targets defined to give back to the community and support their development. With respect to CSR, for FY 2023-24, the Company will be focusing on General Rural Development – i.e., facilitating improved quality of livelihood by providing or helping them in getting required technology and machinery, equipment etc. that can help the farmers, supply of medical facilities to nearby areas (through PHD), water facilities through pond rejuvenation, hand pumps etc. sports infrastructure, etc.</p>								

**Governance, Leadership and Oversight**

7 **Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements:**

The vision and mission of the Company aims at innovation and optimization for the benefit of all stakeholders and making a positive contribution to the environment we operate in. Our business operations encompass our commitment to Environmental, Social, and Governance (ESG) practices. We believe that as a responsible business, it is our duty to balance our economic growth with sustainable development, social responsibility, and environmental stewardship. We prioritize responsible practices, with a commitment to match the highest standards in employee, environment and community health and safety. In doing so, we endeavor to enhance value for all stakeholders. This statement reflects our dedication to these principles.

**Environment responsibility:** We recognize the critical role we play in addressing climate change and reducing greenhouse gas emissions. We have implemented state-of-the-art technologies and processes to optimize energy efficiency, minimize waste generation, and promote the use of renewable resources. Our operations adhere to stringent environmental regulations, and we continually strive to exceed these standards. We continually invest in technologies to implement new ways to reduce our carbon footprint and promote a greener future. The approach is two pronged – continually improve energy and material utilization efficiencies to optimize consumption & increase waste recycling and reutilization.

This has helped us moderate water use, resource depletion and pollution. Several initiatives like rainwater harvesting structures in our plants, development of green belts are regularly taken in our plants. Our company's EHS policy prioritizes employee safety and environmental protection to uphold the value of our products.

**Social Responsibility:** We are committed to being a responsible corporate organization and making a positive impact on the communities in which we operate. We prioritize the well-being, health, and safety of our employees, providing them with a safe working environment and opportunities for growth and development. We engage in fair work practices, promoting diversity, equality, and inclusion within our workforce. We actively support local communities through social initiatives, education programs, and partnerships that promote economic development and enhance quality of life. Being an Agri based business, our teams have a very strong connect with the farmers and we constantly help them in enhancing their efficiencies which result in better income generation for farmers and is also beneficial to the company – a win-win situation for the company and stakeholders both.

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<p><b>Governance and Ethical Practices:</b> Transparent and ethical business practices are at the core of our operations. We maintain the highest standards of corporate governance, ensuring accountability, integrity, and fairness in all our dealings. We have established robust internal control systems, risk management frameworks, and compliance procedures to uphold our commitment to ethics and mitigate any potential risks. Our board of directors is diverse and independent, fostering a culture of responsible decision-making and long-term value creation for our stakeholders.</p> <p><b>Sustainability:</b> We recognize that sustainability is not just a buzzword but a guiding principle for the longevity of our business. We strive for a circular economy, seeking innovative ways to reduce waste and optimize resource utilization. We continuously monitor our processes to minimize water consumption, increase energy efficiency, and reduce our overall ecological impact. We actively engage with stakeholders to understand their concerns and incorporate their feedback into our sustainability strategies. Initiatives on energy and other resources optimization have helped the Company in becoming one of the most efficient manufacturing companies in sugar sector.</p> <p><b>Partnerships and Collaboration:</b> We believe that addressing global challenges requires collaborative efforts. We actively seek partnerships and collaborations with stakeholders, including governments, farmers, local communities, and industry peers. By working together, we create shared value, exchange knowledge, and drive collective action towards a more sustainable future.</p> <p>In conclusion, our company is deeply committed to Business Responsibility &amp; Sustainability, with a focus on ESG principles. We strive to balance economic growth with environmental stewardship, social responsibility, and good governance. We acknowledge the challenges ahead but remain resolute in our determination to be a catalyst for positive change. We have conducted a comprehensive materiality assessment to identify the ESG risks and opportunities based on which business and ESG risks are being mitigated and opportunities will be used to create economic and social values and is also in the process of developing performance monitoring mechanism for all aspects related to ESG.</p> <p>We will continue to invest in sustainable practices, foster innovation, and embrace our responsibility to create long-term value for our stakeholders while contributing to a greener and more inclusive world.</p>										
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	The Company's Chief Executive Officer (CEO) and CSR committee are responsible for implementation of Business Responsibility policy. The policy is assessed on a half yearly basis by Business Responsibility Head (currently the CEO) and placed before CSR committee annually.								
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, CSR committee assesses and takes decisions on the BRSR matters								

#### 10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)																	
		P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes, the policies are reviewed by the Company on an on-going basis and updated for leading practices or statutory requirements as and when needed																		
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Quarterly certifications are shared by all applicable departments confirming their adherence to applicable statutory requirements																		

11	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency	P1	P2	P3	P4	P5	P6	P7	P8	P9
		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)									

### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

#### PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

##### ESSENTIAL INDICATORS

1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	Total 238 trainings were conducted during the current year covering areas of General Awareness, Good Manufacturing Practices (GMP), Internal Auditor - FSSC Training, Internal Auditor - ISO training, Prevention of Sexual Harrasment (POSH) training, Safety, Health & Environment, Tech Centre, TNI (Training Need Identification) basis training, Total Productive Maintenance (TPM) training, and sessions were also conducted for training the trainers.		
Key Managerial Personnel			
Employees other than BODs and KMPs			
Workers (Contractual)			
Total number and bifurcation of employees into Board of Directors, KMP, other employees & workers who attended the trainings is maintained by respective departments. However, we intend to further enhance mechanism to track and document the same going forward.			

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

a. Monetary

Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	Nil, there were no fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings by Dhampur on any of our identified material issues in line with Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations.				
Settlement					
Compounding fee					

**b. Non-Monetary**

Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the case	Has an appeal been preferred? (Yes/No)
Imprisonment Punishment			Nil		

1. 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
Not applicable	Not Applicable

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

Yes, anti-bribery policy is part of Code of Conduct of the company. The Policy is applicable to the Company, its Subsidiaries, any of their respective directors or employees, agents, or other persons acting on behalf of the Company. As per the policy, the persons/entities mentioned above shall not directly, or indirectly, offer or receive any illegal or improper payments or comparable benefits to/from any government or regulatory official or any other party such as vendor, supplier business partner, etc. that are intended for or are perceived as undue favors for the conduct of business of the Company. The policy is available on Company's website of the Company under the head 'Policies' at <https://www.dhampursugar.com/investors/policies>.

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

Category	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
Directors	Nil, no such instances were noted for the Company.	
KMPs		
Employees		
Workers		

6. Details of complaints with regard to conflict of interest:

Topic	FY 2022-23 (Current Financial Year)		FY 2021-22 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil, no such instances were noted for the Company.			
Number of complaints received in relation to issues of Conflict of Interest of KMPs				

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

Not Applicable, as there were no instances of conflicts of interest and corruption against Directors and KMPs.

**LEADERSHIP INDICATORS**

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

Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in value chain covered by the awareness programmes
--	---	--

Our major value chain partners are farmers, being suppliers of sugarcane, which is the major raw material for our production processes. Our Cane department conducts regular meetings/ workshops for them. These are captured in the media (print & electronic), details of which are available. Further, we will develop the mechanism to document the frequency and coverage details of these workshops/meetings.

**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 has defined the process of to avoid/ manage conflict of interests involving members of the Board and Senior Management in its Code of Conduct defined for Board Members and Senior Management.

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

**ESSENTIAL INDICATORS**

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

Type	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)	Details of improvement in social and environmental aspects
Research & Development (R&D)	0.78%	1.66%	Spends on cane development which benefits the society as well as environment
Capital Expenditure (CAPEX)	57.42%	0%	Improvements to steam economy which increases the energy efficiency

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

We have a procurement process defined for sustainable sourcing and a defined policy which highlights Company's criteria for procuring materials sustainably.

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

We are implementing system to track and document the percentage of inputs sourced sustainably.

**2. 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.**

We follow a comprehensive waste reduction strategy that focuses on minimizing waste generation at the source. Sugar industry is one of the manufacturing processes where all process waste either are reused or recycled like, Bagasse, Molasses, Press Mud etc. We do not reclaim our packaging waste; however we have mechanism in place to re-use the waste generated from sugarcane processing.

- **Hazardous Waste Management:** Our company has strict protocols in place for the proper handling, storage, and disposal of hazardous waste. We adhere to all applicable laws and regulations regarding hazardous waste management, including obtaining necessary permits and licenses. We conduct regular training programs for our employees to ensure they are well-versed in the safe handling and disposal of hazardous materials.

- **Zero Liquid Discharge:**
  - 100% treatment of effluent as per statutory requirement
  - Sludge Waste utilization in farming
  - Incineration boilers for treatment of distillery waste which utilize the calorific value available in as fuel to generate energy.
- **Reducing Hazardous and Toxic Chemicals:**
  - Supplier Engagement: We collaborate with our suppliers to ensure they provide materials and chemicals that comply with relevant environmental regulation. We prefer to prioritize suppliers who have a strong environmental record.
  - Process Optimization: Our company constantly reviews and optimizes our manufacturing processes to reduce the use of hazardous waste. This includes third party audit, internal review system etc.

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

Yes, EPR is applicable to us. We have registered with Central Pollution Control Board (CPCB) and have obtained the EPR certification. We execute waste management through a third-party agency who handles the collection and processing of our plastic waste for us at PAN India level.

**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?**

No.

NIC Code	Name of Product/Service	% of total Turnover contributed	Boundary for 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.
-	-	-	-	-	-

**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.**

NA

S,No.	Name of the product	Description of the risk	Action Taken
-	-	-	-

**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 22-23	Previous Financial Year
		-

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:

Topic	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Reused	Recycled	Safely Disposed	Reused	Recycled	Safely Disposed
Plastics (including packaging)	Not Applicable as products are not reclaimed by us.					
E-waste						
Hazardous waste						
Other waste						

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
Not applicable	Not Applicable

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

**ESSENTIAL INDICATORS**

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

The below table covers details for Permanent and contractual employees and workers. Data is separately not maintained for permanent workers and is included in the table for permanent employees, however, going forward we shall maintain the same. For contractual workers, the data is not currently documented however we will document the same in the future.

Category	% of employees covered by Total	Health & Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No.	%	No.	%	No.	%	No.	%
<b>Permanent</b>									
Male	100%	1171	100%	-	-	-	-	-	-
Female	100%	22	100%	22	100%	-	-	-	-
Total	100%	1193	100%	22	100%	-	-	-	-
<b>Other than Permanent (Contractual)</b>									
Male	100%	382	100%	-	-	-	-	-	-
Female	100%	2	100%	NA	NA	-	-	-	-
Total	100%	384	100%	-	-	-	-	-	-

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

Sr. No.	Benefits	FY 2022-23 (Current FY)			FY 2021-22 (Previous FY)		
		No. of employees covered as a % of total employees	No. of workers covered as a % of total worker	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 worker	Deducted and deposited with the authority (Y/N/N.A.)
1	PF	100%	100%	Y	100%	100%	Y
2	Gratuity	100%	100%	Y	100%	100%	Y
3	ESI	0%	0%	N.A.	0%	0%	NA
4	Others – please specify	Not applicable					



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

Dhampur understands the requirements listed by the Persons with Disabilities Act of 2016. We currently do not have any employees who fall under the disability criteria listed by the Act due to unavailability of trained workforce. However, we are keen on hiring differently abled employees and try to ensure that our premises are well equipped with facilities to support them. Ramps and railings have been established to support such employees. Further, we shall incorporate additional facilities to provide the requisite support to such employees.

**4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.**

Yes, [www.dhampursugar.com](http://www.dhampursugar.com)

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

\* Only one employee has taken maternity leave and currently availing the leave since November 2022.

Gender	Permanent employees / workers		
	Total employees who took parental leave	Return to work rate FY 23	Retention Rate FY 22
Male	NA	NA	NA
Female	NA	*	NA
Total	NA	*	NA

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

Yes, we have Employee Grievance Policy which ensures that the complaints are dealt with promptly, fairly and in accordance with other related policies of the organization. The company has also adopted Whistle Blower Policy which ensures that genuine complainants are able to raise their concerns in full confidence, without any fear of retaliation or victimization.

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

Category	FY 2022-23 (Current FY)			FY 2021-22 (Previous FY)		
	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)
<b>Permanent Employees</b>						
Male	262	0	0	270	0	0
Female	14	0	0	14	0	0
Others	-	0	0	-	0	0
Total	276	0	0	284	0	0
<b>Permanent Workers</b>						
Male	909	102	11%	771	102	13%
Female	8	0	0%	8	0	0%
Others	-	0	0%	-	0	0%
Total	917	102	11%	779	102	13%

**8. Details of training given to employees and workers:**

A number of trainings were conducted during the current year covering areas of General Awareness, POSH, Safety, Health & Environment and TNI. For Skill upgradation, 238 trainings were conducted on areas such as ISO, Kaizen, Electrical equipment, etc. On Safety Health & Environment, there are periodic trainings conducted to train all the personnel on required precautions to be undertaken. Presently, respective departments track and maintain the training details however, going forward we intend to document the same in a more comprehensive manner.

**9. Details of performance and career development reviews of employees and worker:**

We understand that timely appreciation and rewards play a key role in building employee motivation and enhancing productivity. In line with the same we have a defined set of targets, goals and review parameters on which our employees are assessed, These assessment criteria are mapped into comprehensive competency assessment matrices which differ basis the department and workstream applicable to the employee. The details on employees and workers who underwent career development reviews are as listed below:

Category	FY 2022-23 (Current FY)			FY 2021-22 (Previous FY)		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who had a career review (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who had a career review (D)	%(D/C)
<b>Employees</b>						
Male	1171	1171	100%	1041	1041	100%
Female	22	22	100%	22	22	100%
<b>Total</b>	<b>1193</b>	<b>1193</b>	<b>100%</b>	<b>1063</b>	<b>1063</b>	<b>100%</b>
<b>Contractors</b>						
Male	382	382	100%	380	380	100%
Female	2	2	100%	2	2	100%
<b>Total</b>	<b>384</b>	<b>384</b>	<b>100%</b>	<b>382</b>	<b>382</b>	<b>100%</b>

**10. Health and safety management system:**

**a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No)**

We have a robust mechanism and a Environment, Health & Safety (EHS) Policy defined to address any concerns regarding employee health and safety.

**a. What is the coverage of such system?**

The policy is applicable to all workers and employees at both Dhampur and Rajpura units and the Corporate office

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

Periodic HIRA assessment is done by under the guidance of a Designated Safety officer. This includes the following measures:

1. Identification of existent hazard potential in the workplace and work activities
2. Evaluation, and documentation of the severity of the risks involved
3. Reviewing the risk assessment report, carrying out Job Safety Analysis for Critical Jobs, documentation of Operation Control Procedures and their implementation
4. Ensuring the execution of safe work procedures identified post the analysis of risk assessment

The Company's supervisors are trained to identify hazardous situations. Head of Department (HOD)/ Manager (MR) review the risk assessment done by the team. HOD also reviews the plan defined to implement the corrective actions based on the risk severity.

**c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Yes/No)**

Yes, we have a safety incident reporting mechanism, as per which employees & workers can report any accidents, near miss incidents or identified safety hazards (unsafe acts & unsafe conditions).

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

Yes, all Employees are covered under Mediclaim Policy and have access to take treatment anywhere through the insurance coverage provided.

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

Below details are for Rajpura and Dhampur unit including the cases for workers. Going forward, we shall separately capture the cases for worker category and maintain bifurcation for the same:

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
		Current Financial Year	Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	7.99	11.99
Total recordable work-related injuries	Employees	0	0
	Workers	15	19
No. of fatalities	Employees	0	0
	Workers	0	0
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.**

The Company has implemented a Safety, Health, and Environment Policy which highlights the responsibilities of all employees to ensure a safe working environment. We have a comprehensive HIRA process in place to ensure timely identification and mitigation of risks.

Additionally, there are certain periodic measures undertaken to ensure a safe and healthy working environment:

- Periodic checks on use of PPEs
- Display safety signages, SOP, boards to create the safety culture
- Regular mock drills conducted
- Quarterly safety committee meetings conducted to discuss the safety incidents & their action plans
- Site emergency exit plan review

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

At both the plants we have demands/ suggestion which are documented and shared by the Union representing the employees. The same are further mutually discussed and resolved basis feasibility of the demand. Separately, there were no complaints that were reported by the employees.

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	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	NA	NA	NA	NA	NA	NA
Health & Safety	NA	NA	NA	NA	NA	NA

**14. Assessments for the year:**

Topic	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices Working Conditions	<p>50%; Safety audit was conducted for Dhampur unit by third party agency as per the conditions laid down under BIS – 14489-2018 CODES OF PRACTICES On Occupational Safety and Health. Audit scope included (but was not limited to) the following areas:</p> <ul style="list-style-type: none"> <li>• Occupational safety and health policy</li> <li>• Organisational safety setup</li> <li>• Accident reporting, investigation and analysis</li> <li>• Training and awareness, compliance to statutory requirements, first aid facilities</li> <li>• PPE, housekeeping, ventilation, noise and illumination</li> <li>• Prevention of occupational diseases, fire prevention, protection and fighting system</li> </ul> <p>For Rajpura unit, the safety audit was conducted in January 2021 and covered a similar scope of audit.</p> <p>Daily checks are additionally conducted at both plants as part of business as usual. This is conducted by the Plant Safety team and is reviewed by Unit Head. Inter- department meetings are conducted on a daily basis (DMR: Daily Monitoring Report) to review any safety incidents to be taken up on priority for resolution.</p>

**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.**

Apart from the safety assessments conducted by the third-party agency, the safety committee meets on a periodic frequency to discuss any risks/ concerns identified and to ensure timely resolution of the same. A number of safe practices/ measures were adopted as an outcome of these meetings which included development of the emergency exit plan, safety instructions displayed at key locations, fire siren systems installed, safety quizzes and exhibitions introduced for better awareness among employees, space trainings for Cogen and boiling house conducted, root cause identification for Solid Retention Time (SRT) - Sludge, etc. were a few examples of the same.

**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, fair compensation is provided to the kin of the employees and workers

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

The Company is compliant with deduction of statutory dues of employees towards income tax, provident fund, ESIC etc. as applicable from time to time

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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	Current FY 23	Previous FY 22	Current FY 23	Previous FY 22
Employees	0	0	0	0
Workers	0	0	0	0

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

No, we do not have explicit training assistance programmes for employees terminated or retiring. This is because retired employees – if retained as consultants – are retained within similar roles of which they have experience (for ease of their functioning) and hence specific training is not needed in such a scenario.

**5. Details on assessment of value chain partners:**

Topic	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices Working Conditions	We assess our value chain partners on quality parameters but going forward we shall also be assessing them on their safety and working conditions.

**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.**

Not applicable

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

**ESSENTIAL INDICATORS**

**1. Describe the processes for identifying key stakeholder groups of the entity:**

The Company recognizes the value of stakeholder engagement and acknowledges the importance of timely feedback from the various stakeholder groups that can support to enhance our operations in a robust and effective manner. Dhampur aims to strengthen the partnership that it has with the below identified stakeholders:

- Farmers
- Government and regulatory bodies
- Customers
- Employees
- Shareholders and investors
- Suppliers of goods and services including transporters
- Media

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency 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	Ongoing	<p>We interact with farmers on an ongoing basis as they are the most important stakeholders to our business. The cane department meets with the farmer community on a daily basis.</p> <p><b>Scope:</b> Any issues pertaining to sugarcane growth, plant diseases, cultivation enhancement, pest control, seed innovation and development, any other grievances that they might face, etc.</p>
Government and regulatory bodies	No	Periodic meetings with regulatory authorities, conferences, ISMA meets, etc.	Ongoing	<p>We interact with regulatory authorities on a regular basis to ensure compliance to all statutory requirements. Additionally, we also interact with government representatives as part of the ISMA and other industry organizations.</p> <p><b>Scope:</b> Interactions pertaining to the sugar industry, changing government norms or policies, compliance to rules and regulations, submission of statutory details.</p>
Customers	No	Emails, Phone No. on bag of products, Regular interaction through meetings, Regular feedback from customers	Ongoing	<p>Customers are at the heart of our business, and we work towards the fulfillment of their demands. In order to stay up to date with the industry trends, our Sales Representatives are constantly in touch with our customers to ensure they are duly satisfied.</p> <p><b>Scope:</b> Feedback on product quality and pricing, Sales development, any after sales services needed, addressing complaints, building client trust and loyalty.</p>

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	Periodic review meetings, trainings, workshops, induction programme, grievance redressal mechanism	Ongoing	We will thrive in our operations if our employees are content in the work environment. We thus ensure regular interactions with our employees to address their concerns and imbibe their feedback. <b>Scope:</b> Operational efficiency, challenges faced in daily work environment, suggestions, and feedback to improve any existing procedures, training and awareness sessions, health and safety initiatives, performance development reviews, etc.
Shareholders and investors	No	Emails, Annual report, Website, Announcements, Media releases	Quarterly basis	We interact with our Shareholders on a quarterly basis to update them about the profitability and growth as well as any significant changes in the organization. <b>Scope:</b> Annual general meetings, profitability and growth insights, governance mechanism, earning calls, updates to company's strategy, etc.
Suppliers of goods and services including transporters	No	Interactions with procurement/supply chain team via calls and emails and forums conducted for interactions.	Quarterly/ Ongoing	Transactional interactions on delivery of products and regarding quality and pricing <b>Scope:</b> Quality of goods and services, Delivery timelines and payments, Compliances to norms, collaboration and opportunities
Media	No	Media release interactions	On need basis	Local media houses regularly publish updates on developments in sugar cultivation and the farmer conditions. They also capture our responses, and we regularly interact with media representatives for the same. <b>Scope:</b> Press release regarding product launches, news on farmer interactions, transparency on pricing and operations.

## 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.

Our engagement with our broader stakeholder community is undertaken by respective functions in consultation with the leadership team. Feedback from different stakeholder groups on environmental, social or economic topics is shared with the CSR Committee of the Board. The CSR committee also reviews, monitors, and provides strategic direction to our CSR practices and social initiatives.

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. For instance, the ESG reviews sought by our customers help us in defining our future sustainability initiatives and updating policies like the Human Rights Policy.

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

We have a dedicated Cane Department who liaises with the farmers daily. There are societies established by the government which act as a medium between the Private Industry (sugar manufacturers) and the farmers. The society represents the rights of the farmers. In case of any grievance, the farmer shall first raise the same to the society's government representative who will then communicate the same to the Company's Cane department personnel for resolution. However, we at Dhampur Sugar try to go an extra mile via the cane department and ensure we are in touch with the farmers on a daily basis to ensure their needs and demands are duly cared for. All kinds of grievances – relating to seeds, plant diseases, raising of timely payment indents, etc. are noted and resolved by the Cane department representative. Apart from farmers, if there is a grievance from any other member of the community, they directly reach out to the respective department representative at the plant offices – who shall then address and resolve the same.

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

### ESSENTIAL INDICATORS

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

Training on various issues related to human rights are covered under new employee induction, POSH, code of conduct etc. Presently, limited records are being maintained by respective departments. However, we have initiated process for monitoring the attendance in various human right trainings.

As per the training register, total 238 trainings were conducted during the current year covering areas of General Awareness, GMP, POSH, Safety, Health & Environment, Tech Center, TNI Basis, TPM and trained the trainers sessions.



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

Category	FY 2023 (Current FY)				FY 2022 (Previous FY)					
	Total Count in Current FY	Number of Employees Paid Minimum wage	% age of Employees Paid Minimum wage	Number of Employees Paid more than Minimum wage	% age of Employees Paid more than Minimum wage	Total Count in Previous FY	Number of Employees Paid Minimum wage	% age of Employees Paid Minimum wage	Number of Employees Paid more than Minimum wage	% age of Employees Paid more than Minimum wage
<b>Employees Permanent</b>										
Male	262	0	0%	262	100%	270	0	0%	270	100%
Female	14	0	0%	14	100%	14	0	0%	14	100%
<b>Other than permanent</b>										
Male	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0
<b>Workers Permanent</b>										
Male	909	0	0	909	100%	771	0	0%	771	100%
Female	8	0	0	8	100%	8	0	0%	8	100%
<b>Other than permanent</b>										
Male	382	0	0	382	100%	380	0	0%	380	100%
Female	2	0	0	2	100%	2	0	0%	2	100%

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

We respect the rights of all our employees and want to ensure that they are fairly compensated for all their efforts and contribution to the firm.

	Male No.	Median remuneration/ salary/ wages of respective category	Female No.	Median remuneration/ salary/ wages of respective category
Board of Directors (sitting fee only)	4	1,55,000	1	1,10,000
Key Managerial Personnel (WTD , MD, CEO, CFO, CS)	5	1,87,37,439	1	19,20,600
Employees other than BoD and KMP	262	5,59,880	14	5,99,171
Workers	909	3,57,456	8	2,69,566

**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. We have the Whistle Blower mechanism & Employee Grievance Redressal committee established which addresses these concerns.

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

The Company has policies relating to Whistle Blower, Employee Grievance Mechanism and Prevention of Sexual Harassment (POSH), which promote a free, fair and discrimination free working environment for employees and provide a mechanism for raising concerns and resolution of disputes. The policy covers complaints of sexual harassment not only in the workplace, but also includes any place visited by the employee arising out of, or during the course of employment including transportation provided by the employer for undertaking such journey. The committees remain common for discussing all types of issues - including safety, working conditions, etc. The Grievance Redressal committee consists of a chairman and 8 members who have been designated to hear, investigate, and resolve any issues faced by the employee. The employee can first reach out to their line manager/supervisor and the HR representatives who are expected to provide complete support in resolution of any such issues faced by the employee. In case the issue still prevails or is sensitive and cannot be disclosed to either of these sources, then the employee may reach out to the Grievance redressal committee directly for support.

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

We respect the rights of our employees and uphold and promote the principles of fairness, equality, freedom of thought and expression as well as equal pay. In line with the same, we are ever open to receive feedback, suggestions and complaints from our employees and workers on any factors causing dissatisfaction and hindrances in their daily work environment. We have not received any complaints pertaining to the below listed issues in the current and previous years as specified below:

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil		Nil	Nil	
Discrimination at workplace	Nil	Nil		Nil	Nil	
Child Labour	Nil	Nil		Nil	Nil	
Forced Labour / Involuntary Labour	Nil	Nil		Nil	Nil	
Wages	Nil	Nil		Nil	Nil	
Other human rights related issues	Nil	Nil		Nil	Nil	

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

We have a Whistle Blower Policy in place which assures that the employees are fully protected against any type of reprisals, punishment, intimidation, coercive action, dismissal, or victimization for reporting genuine concerns. The Company also has in place a policy on prevention of sexual harassment in line with the requirements of the Sexual Harassment of women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Policy).

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

Yes. Although our contracts do not have an explicit clause highlighting the need for the vendors/ business partners to adhere to human rights requirements, we do require them to comply to all laws, regulations and rules – whether local or national as prescribed by the government agencies and we believe this covers their adherence to all human rights requirements as well. Further, we will also be defining a formal supplier code of conduct which will include the human rights coverage.

### 9. Assessments for the year: (CE)

A SGP (Supplier Guiding Principles) & Human Rights Policy Assessment audit was conducted by an independent 3rd party which was nominated by one of our customers on human rights policy covering areas of minimum wages, child labor, worker privacy, disciplinary policies, working hours, health & safety etc. This was conducted for the Rajpura unit.

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	50%
Forced/involuntary labor	50%
Sexual harassment	50%
Discrimination at workplace	50%
Wages	50%
Others – please specify	50%

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

No such instances were highlighted from the above-mentioned assessment for correction.

### Leadership Indicators

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

Not Applicable as no such instances were noted

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

No such due diligence check was conducted

#### 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 our plant units are accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016.

#### 4. Details on assessment of value chain partners:

Assessment criteria	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	Our value chain partners are primarily assessed on quality parameters. However, going forward we shall consider assessing key partners on Human Rights parameters as well.
Discrimination at workplace	
Child labour	
Forced labour/involuntary labour	
Wages	
Others – please specify	

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

Not applicable

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

**Essential Indicators**

**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

the Company produces energy from bagasse and other by-products which is further exported to the Uttar Pradesh Power Corporation Limited (UPPCL) and hence we are glad to share that we majorly utilize renewable energy for consumption. This is also aligned with the United Nations SDG 7 focused on sustainable and clean energy. We understand the need to reduce our carbon footprint and to use eco-friendly alternatives wherever feasible, in line with the same we utilize waste generated power and below is a breakup of our energy consumption:

Parameter	FY 2022-23	FY 2021-22
	Current Financial Year	Previous Financial Year
Total electricity consumption (A) (Gigajoules)	7,49,296.78	7,24,278.60
Total fuel consumption (B) (Gigajoules)	94,44,892.65	89,23,051.91
Energy consumption through other sources (C) (Gigajoules)	0.98	0
Total energy consumption (A+B+C) (Gigajoules)	1,01,94,190.40	96,47,330.51
Energy intensity per rupee of turnover [in Gigajoule/Rupees] (Total energy consumption/turnover in rupees)	0.00036	0.00044

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

No

**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 have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India as we are not an energy-intensive industry as specified by the scheme.

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

The Company recognizes that water being a shared resource, it is our duty to ensure that it is used judiciously, and any kind of wastage is strictly avoided. Although we do not operate in any area which are classified under water-stress category, we do our best to ensure that we use minimal quantity and try to re-use the same to reduce withdrawals wherever possible. As part of our CSR activities, we have undertaken efforts to replenish the water supply in areas that we operate at. Four existing water ponds were percolated through large pits to ensure rejuvenation and beautification at Harah Ahmedpur and Gajupara in Dhampur villages and at Singholi Kallu and Singholi Poorvi in Rajpura villages. We also focused on biological sewage treatment that cleans the wastewater by absorbing nutrients dissolved in the water and thereby supporting living species inside the pond. We have also implemented Zero Liquid Discharge to recycle and re-use water to the maximum possible extent.

Further, by optimizing our power consumption by using steam generated power we have achieved a significant reduction in our water usage thus helping to conserve water and demonstrating our alignment to UN SDG 12 based on Responsible Production and Consumption.

Below are details of water usage for the Company

Parameter	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	0	0
(ii) Groundwater	496,292	770,312
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i+ii+iii+iv+v)	496,292	770,312
Total volume of water consumption (in kilolitres)	496,292	770,312
Water intensity per rupee of turnover (Water consumed in kilolitres / turnover in crores)	175.619	350.430
Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency?	Yes	Yes

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

Yes, Zero Liquid Discharge has been implemented at both Dhampur and Rajpura plants. Nearly 100% of the water is recycled at both the plants and hence the freshwater demand has significantly reduced as can be seen in the table above.

**ZLD process followed for Distillery operations:** A condensate polishing unit has been installed which takes care of spent lees (sediment of alcohol generated from molasses), blow down generated from cooling tower, as well as the washing and process condensate from evaporation plant. After treatment of the streams at CPU, treated condensate is recycled to process for dilution and as cooling tower make up which helps achieve zero liquid discharge (ZLD). Due to recycle of the process condensate, freshwater demand is reduced to a large extent. Spent wash is treated by multi effect evaporator followed by slop fired boiler and grain slop (Spent Wash) is passed through decanters for separation of suspended solids. Thin slops from decanter is partly recycled back to process and the balance fed to Thin Slop Evaporation Plant for concentration of remaining solids to form Syrup (20 - 30% w/w TS). The thin slop and syrup mixture is dried in Steam Tube Bundle Dryer for producing DDGS which is used as Animal Feed Supplement (AFS). The AFS is utilized as cattle-feed, poultry-feed and fish feed ingredients. The process condensate is recycled back in the process after treatment in CPU.

**ZLD process followed for Sugar operations:** Sugar is made by the processes of milling, clarification, evaporation, crystallization, and centrifugation. Mill house and Boiling house are some sources which lead to the generation of effluent. Physio-chemical and biological processes are used in the process designed for Zero Liquid Discharge System. The steps are following:

**Step-1- Screening:** Untreated wastewater has more suspended particles and floatable components, which contribute to organic and inert matter in the released effluent that must be removed. The untreated effluent is initially passed through fixed bar screens, which separate and remove all of the larger suspended solids and floatable materials. Gravity transports the screened effluent to the oil and grease removal tank.

**Step-2- Oil & Grease trap:** With the help of gravity, the sugar effluent from the bar screen chamber would enter the O & G treatment chamber. During the detention time (half an hour), oil and grease will float to the surface of the tank and be removed using mechanical equipment such as an oleophilic, belt-type oil skimmer.

**Step-3- Equalization tank:** The raw effluent is let into the equalization tank, where it is continuously mixed with a floating aerator or an air diffused system to homogenize the combined effluent from various plant sources and preserve homogeneous effluent characteristics.

**Step-4- pH neutralization:** The pH of the effluent is usually low. So, before letting the raw effluent into the other

subsequent units, the equalization tank content is neutralized by dosing lime, caustic soda or soda ash in the equalization tank to neutralize the pH of the raw effluent.

**Step-5- Primary clarifier:** The primary clarifier receives the neutralized effluent from the Equalization Tank. To remove suspended materials, many types of primary clarifiers (such as conventional or lamella) are used. The clarifier’s supernatant is pumped to the next treatment unit. The clarifier sludge is delivered to the sludge drying beds.

**Step-6- Aerobic treatment:** In anaerobic treatment, organic matter decomposes in the absence of oxygen while as in aerobic treatment, it decomposes in the presence of oxygen. The sludge is biologically transformed into a range of end products, including methane and CO<sub>2</sub>. The treatment processes include Upflow Anaerobic Sludge Blanket (UASB) reactor, activated sludge process, bio-towers, extended aeration tanks, etc.

**Step-7- Secondary clarifier:** Depending on the operating conditions, each kilogram of Biological Oxygen Demand (BOD) removed produces 0.45–0.80 kg of sludge. The surplus sludge generated must be evacuated to maintain a sufficient Mixed Liquor Suspended Solids (MLSS) concentration in the aeration tank; otherwise, the bacterial population in the aeration tank will be quite high.

**Step-8- Multi-grade filter (MGF):** The suction of the multi-grade filter feed transfer pump will receive treated wastewater. Filter feed pumps transport treated wastewater and treated water collected upstream of the MGF to downstream.

**Step-9- Activated carbon filter:** Suspended solids, color and odor are all removed using an activated carbon filter. A cylindrical mild steel vessel with dished ends makes up an activated carbon filter. For advanced treatment, membrane processes like reverse osmosis is used to further treat wastewater for re-use.

**Step-10-Irrigation:** The final treated water is now ready to be utilized for irrigation purposes.

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

Parameter	Please specify unit	FY 2022-23	FY 2021-22	FY 2022-23	FY 2021-22
		(Current Financial Year)	(Previous Financial Year)	(Current Financial Year)	(Previous Financial Year)
		Sugar		Distillery	
<b>Operating entity</b>					
NO <sub>x</sub>	Mg/Nm <sup>3</sup>	43.95	62.6	31.6	42.1
SO <sub>x</sub>	Mg/Nm <sup>3</sup>	23.7	26	26.8	36.4
Particulate matter (PM)	Mg/Nm <sup>3</sup>	74.25	94	42.9	48
Persistent organic pollutants (POP)	Mg/Nm <sup>3</sup>	Not tested	Not tested	Not tested	Not tested
Volatile organic compounds (VOC)	Mg/Nm <sup>3</sup>	Not tested	Not tested	Not tested	Not tested
Hazardous air pollutants (HAP)	Mg/Nm <sup>3</sup>	Not tested	Not tested	Not tested	Not tested
Others – please specify (CO)	Mg/Nm <sup>3</sup>	1.195	0.30	2.3	1

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

Yes, these were conducted by NABL and MOEF approved labs

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

The Scope 1 and 2 details were not tracked in FY 2021-22. For FY 2023, details are as below:

Parameter	Unit	FY 2022-23	FY 2021-22
		Current Financial Year	Previous Financial Year
<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 tonnes of CO <sub>2</sub> equivalent	4,65,986.70	NA
<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 tonnes of CO <sub>2</sub> equivalent	39.29	NA
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover (CO<sub>2</sub>e ton/rupee)</b>		0.0000165 (MT/ rupee)	NA
<b>Total Scope 1 and Scope 2 emissions</b>	Metric tonnes of CO <sub>2</sub> equivalent	4,66,025.99	NA

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

The Company being a part of sugar industry, we have implemented several measures in this direction including lowering the consumption of steam in production process, thereby reducing consumption of fuel of all types. We have zero to minimal fossil fuels burned for our production purpose, which in turn helps to reduce the GHG emissions. We generate energy from Bagasse and Molasses which helps us to efficiently manage our energy needs. Excess of this generated renewable energy is, in fact, exported by us to the state grid (UPPCL). This also demonstrates our alignment to the UN SDG7 focusing on sustainable and clean energy usage. We have techniques such as slop boiler, condensation units and other such mechanisms to reduce the energy consumption. All of these are steps the Company has taken towards reduction of GHG emissions and efficient energy management. To further identify improvement opportunities, we have got energy audits conducted. From the recommendations of these studies various steam and power reduction schemes have been implemented/ are under implementation to minimise energy consumption thereby reducing GHG emissions. Use of energy efficient equipment like high efficiency motors, LED lightings etc further help in power reduction and minimising GHG emissions. We shall also initiate emission tracking of our of non-manufacturing locations such as offices to identify emission reduction sources at these sites.

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

Parameter	FY 2022-23	FY 2021-22
	Current Financial Year	Previous Financial Year
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste	691.63	Not tracked
E-waste	0.24	0.15
<b>Bio-medical waste</b>	-	-
Construction and demolition waste	Not applicable	Not applicable
Battery waste	0.3	-
Radioactive waste	Not applicable	Not applicable
Other Hazardous waste. Please specify, if any. (Used cotton)	0.14	0.17
Other Hazardous waste generated. Please specify, if any. (Used Oil)	0.68	1.27
<b>Total</b>	693.95	3.62

Parameter	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
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For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)

Category of waste		
(i) Recycled	692.70	
(i) a. Recycled (through TSD (Used Oil & Cotton))	0.94	2.37
(i) b. Recycled (Plastic Waste)	691.63	0
(i) c. Recycled (E-Waste)	0.13	0.15
<b>(ii) Re-used</b>	<b>10,27,696</b>	
Molasses	1,86,820	Not tracked
Bagasse	6,46,664	Not tracked
(iii) Other recovery operations (Press Mud)	1,52,132	NA
(iv) Other recovery operations (Ash)	42,080	Not tracked
<b>Total</b>	<b>10,28,388.7</b>	<b>NA</b>

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

Category of waste		
(i) Incineration (slop/spent wash)	1,16,328.84	52646.40
(ii) Landfilling	Not applicable	Not applicable
(iii) Other disposal operations (fly ash)	17,198.11	10068.14
<b>Total</b>	<b>1,33,526.95</b>	<b>62,714.54</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

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

The Company follows the long-recognized hierarchy of management of wastes, in order of preference which consists of prevention, minimization, recycling and reuse, biological treatment and disposal. We have a comprehensive waste reduction strategy that focuses on minimizing waste generation at the source. Sugar industry is one of those manufacturing industries where all process wastes can be either reused or recycled like completely. We at Dhampur Sugar use this advantage to the fullest and try to generate maximum benefits from our waste sources.

**Hazardous Waste Management:** We have strict protocols in place for proper handling, storage, and disposal of hazardous waste. We adhere to all applicable laws and regulations regarding hazardous waste management, including obtaining necessary permits and licenses. We conduct regular training programs for our employees to ensure they are well-versed in the safe handling and disposal of hazardous materials.

**Zero Liquid Discharge:** 100% treatment of effluent as per statutory requirements is ensured. Generated sludge waste is further utilized in farming and slop is used in boilers.

**Reducing Hazardous and Toxic Chemicals:**

- **Supplier Engagement:** We collaborate with our suppliers to ensure they provide materials and chemicals that comply with relevant environmental regulation. We prioritize suppliers who have a strong environmental record through our vendor evaluation program.



- **Process Optimization:** Dhampur Sugar constantly reviews and optimizes our manufacturing processes to reduce the use of hazardous waste. This includes third party audit, internal review system, etc.
- **Employee Training and Awareness:** We conduct regular training sessions for our employees to create awareness about the importance of reducing hazardous waste in our processes. We provide training on safe handling, storage, and disposal of chemicals, as well as the proper use of personal protective equipment (PPE) to minimize exposure to hazardous chemicals.

In summary, our company follows a comprehensive waste management strategy that includes waste reduction, recycling, waste segregation and proper hazardous waste management. We are committed to environmental sustainability and strive to minimize the impact of our operations on the environment and human health.

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

Not applicable, Dhampur does not have operations/offices in/ around ecologically sensitive areas

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

There were no applicable expansions or modifications undertaken requiring an assessment as per applicable laws. Therefore, there were no environmental impact assessments conducted in the current year for Dhampur as there were no applicable expansions or modifications undertaken requiring an assessment as per applicable laws.

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	NA	NA	NA	NA	-

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

Dhampur Sugar is committed towards ensuring compliance to all applicable laws/ regulations/ guidelines prescribed by the Government of India.

Instances of noncompliance - wherever noted – were rectified with necessary steps taken by the company to correct the same as soon as any such instance was noticed and subsequently, we have tried to remain careful to avoid any such instance that may cause harm to the environment.

Sr. 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
Not applicable				

**Leadership Indicators**

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

Parameter	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
<b>From renewable sources</b>		
Total electricity consumption (Gigajoules)	7,49,098.55	7,23,704.13
Total fuel consumption	94,44,892.65	89,23,051.91
Energy consumption through other sources		
<b>Total energy consumed from renewable sources</b>	<b>1,01,93,991.20</b>	<b>96,46,756.04</b>
<b>From non-renewable sources</b>		
Total electricity consumption	198.23	574.47
Total fuel consumption	0	0
Energy consumption through other sources	0.98	0
<b>Total energy consumed from non-renewable sources</b>	<b>199.21</b>	<b>574.47</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

2. Provide the following details related to water discharged:

Parameter	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) To Groundwater		
- No treatment	NA	NA
- With treatment – Aerobic biological treatment conducted	4,70,955	6,93,894
(iii) To Seawater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(v) Others		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
<b>Total water discharged (in kiloliters)</b>	<b>4,70,955</b>	<b>6,93,894</b>

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

The Company's plants do not fall under the water stress areas listed by Central Ground Water Board (CGWB)

Parameter	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres)	NA	NA
Total volume of water consumption (in kilolitres)	NA	NA
Water intensity per rupee of turnover (Water consumed / turnover)	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) into Surface water		
No treatment		
With treatment – please specify level of treatment		
(ii) into Groundwater		
No treatment		
With treatment – please specify level of treatment		
(iii) into Seawater		
No treatment		NA
With treatment – please specify level of treatment		
(iv) Sent to Third parties		
No treatment		
With treatment – please specify level of treatment		
(v) Others		
No treatment		
With treatment – please specify level of treatment		
Total water discharged (in kilolitres)		

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

NA

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

The Company has initiated tracking of its Scope 1 and 2 emissions. Our next plan of action is to identify the Scope 3 emission sources and track and report the same.

Parameter	Unit	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	tCO2e	-	
<b>Total Scope 3 emissions per rupee of turnover</b>	tCO2e / INR	-	
<b>Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity</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

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

N.A

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

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	ZLD System	The Company is complying with the conditions of consent for ZLD and have 1800 KLD (Rajpura) & 4500 KLD (Dhampur Sugar) ETP for treatment of effluents. Effluents conform to the prescribed norms. Dhampur Sugar does not discharge treated water in any water body, Treated water is used in irrigation in own land and given to nearby farmers as per their demand.	100% treatment of industry waste and helps keep the environment clean
2	CPU Plant	The Company has taken up water conservation actions and minimizing the consumption of water by carrying out maximum recirculation. The company has installed 600 KLD (Rajpura), 1728 KLD (Dhampur Sugar) & 4500 KLD (Dhampur Distillery) condensate polishing unit (CPU) for treatment of excess condensate for reuse in cooling tower and other processes.	100% treatment of excess condensate water for reuse in process.
3	STP Plant	The Company has installed 50 KLD (Rajpura) & 220 KLD (Dhampur) STP plant for separate treatment of domestic wastewater and we use the treated water for horticulture in factory campus	100% treatment of domestic wastewater for reuse in horticulture/ gardening
4	SRS Plant	The Company has installed 1000 KLD (Rajpura) & 1400 KLD (Dhampur) SRS plant for separate treatment of cooling tower overflow through micro settlers followed by secondary aerobic treatment for removing sulphate in cooling tower overflow wastewater.	100% treatment of cooling tower overflow wastewater.

Sr. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
5	Green belt	The Company has developed adequate greenery which is more than 33% of our premises area. As per UP Pollution Control Board (UPPCB) instructions, at the beginning of monsoons, we plant thousands of plants every year. One of the best techniques for quickly establishing a forest cover on degraded land that has previously been used for construction or agriculture is the Miyawaki method. It works well because it follows the principles of natural forestry, which include employing local plants and imitating the processes of how forests regenerate naturally. In comparison to traditional forests, Miyawaki developed forest areas have been found to have more biodiversity and are proved to capture more carbon emissions	To help develop clean & green environment around us.
6	Slop Boiler & Cogen	The unit operations that make up the overall system, are the growing and harvesting of sugar cane, transport of the harvested cane to sugar mills, production of bagasse as a by-product from the sugar milling process, and the combustion of bagasse to generate heat and electricity. Dhampur Sugar considered 60 MW of electricity exported to the national electricity grid as the functional unit of study. The characterised data for 60MW of bagasse-derived electricity were compared with data for 60MW of coal-derived electricity, using the same set of characterisation factors. The results of this comparison indicated that bagasse-derived electricity performs well in the areas of greenhouse gas emissions, acidification, and non-renewable energy inputs. The Company has installed the slop boiler of capacity 55 TPH & 75 TPH with Cogen and all slope of distillery process is constipated in this feed as a fuel.	Reduced GHG emissions

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

Yes, The Company has an Enterprise Risk Management (ERM) council nominated by the Risk Management Committee. The ERM council has defined a comprehensive policy covering various business risks and its mitigation plans. These are covered under the Enterprise Risk Management and Business Continuity Management Policy. The policy defines the Business Continuity assessment procedure followed by Dhampur Sugar Mills. Additionally, it also highlights the risk assessment and business impact analysis requirements to respond, recover, resume, and restore to a pre-defined level of operation following disruption. Disaster Recovery Plan (to restore IT application and infrastructure services following a disruption) & Crisis Management Plan (to manage a wide range of crises, from health and safety incidents to business disruptions and reputational damage) are also covered under this policy to ensure continuity and a comprehensive management process is in place to deal with both digital and physical issues faced by the organization.

Operational checks and control and management review is in place to control, mitigate and reduce the materiality risks & impacts and enhance the business opportunities. Regular trainings and Mock Drills are conducted for all the concerned on regular basis. Audits are carried out to check the health of the emergency response procedure.

**2. 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.**

Majorly renewable energy is utilized and water treatment is also extensively executed - so no environmental impacts will arise from Company's operations apart from transportation of final product. Details are covered in the Risk Management Plan.

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

We assess value chain partners on quality parameters but intend to assess our value chain partners also on their environmental impact going forward.

**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.**

The Company is affiliated with 2 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.

Sr. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Indian Sugar Mills Association (ISMA)	National
2	Uttar Pradesh Sugar Mills Association (UPSMA)	State

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

Not Applicable as there were no orders were received from the regulatory authorities pertaining to anti-competitive conduct.

**LEADERSHIP INDICATORS**

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

All such interactions with the regulatory body occur through our representation in associations like ISMA. There is no explicit instance that can be highlighted here.

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

**Essential Indicators**

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

Not Applicable; During FY 2022-23 we did not undertake any projects which required us to conduct a Social Impact Assessment

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

Not Applicable; During FY 2022-23, we have not undertaken any projects that require Rehabilitation and Resettlement (R&R).

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

For Dhampur Sugar, the local community primarily consists of farmers from whom we procure sugarcane. We have a dedicated Cane Department which liaises with the farmers daily. There are societies established by the government which act as a medium between the Private Industry (sugar manufacturers) and the farmers. The society represents the rights of the farmers. In case of any grievance, the farmer shall first raise the same to the society's government representative who will then communicate the same to Company's Cane department personnel for resolution. However, we at Dhampur Sugar try to go an extra mile via the cane department and ensure we are in touch with the farmers on a daily basis to ensure their needs and demands are duly cared for. All kinds of grievances – relating to seeds, plant diseases, raising of timely payment indents, etc. are noted and resolved by the Cane department representative. Apart from farmers, if there is a grievance from any other member of the community, they directly reach out to the respective department representative at the plant offices – who shall then address and resolve the same.

### 4. Percentage of input material (inputs to total inputs by value) sourced from local or small-scale suppliers:

Parameter	FY 2022-23 Current Financial Year	FY 2021-22 Previous Financial Year
Directly sourced from MSMEs/ Small producers	19.44%*	13.07%*
Sourced directly from within the district and neighboring districts	16.08%*	7.87%*

*\*This excludes sugarcane purchase, which is the basic raw material procured from farmers and constitutes nearly 90% of total raw material cost*

## 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):

Not Applicable

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

Not applicable – our CSR activities are majorly engaged in Bijnor and Sambal where the local community that we interact with resides

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

No

### (b) From which marginalized /vulnerable groups do you procure?

Not Applicable

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

Not Applicable

### 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

Not applicable.

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

Not applicable

### 6. Details of beneficiaries of CSR Projects.

At Dhampur Sugar, it is our ingrained philosophy to ensure that as we develop, so does the local community and people who support us should develop and grow. Aligned with this motto, we have a number of CSR activities planned in a year to give back to the community. Our CSR activities are closely inspired by the United Nations Sustainable Development

Goals. We support a school – Pushp Niketan which is situated at the Company’s campus at Dhampur, District Bijnor. It has emerged as a unique model which is based on thematic, student-centered learning, project-based studies and learning journeys creating a holistic experience for imparting world class education to the rural population. This initiative is aligned to UN SDG 4 of Quality Education. We are also committed to SDG 3 of ensuring Good Health and Well Being of the local communities. In FY 2021-22, the Company partnered with PHDRDF to implement a project for ‘Free Mobile Health Services’ to provide improved healthcare facilities to the less privileged and low-income groups in the villages near the plants at Rajpura and Dhampur.

The project reached out to more than 30,000 people in 20 villages of Dhampur and Rajpura Block in Bijnor and Sambhal districts respectively, who were unable to access healthcare easily. It provided generic health care services to the people through mobile medical vans with testing devices like ECG, blood testing facilities. It was supported by a qualified medical team consisting of a medical doctor and paramedical staff including a lab technician and ANM. Through our Pond Development projects, we are also trying to contribute towards SDG 6 of ensuring sustainable management of water resources. In order to revive and sustain groundwater in the areas around Dhampur and Rajpura we have adopted local ponds and have undertaken conservation initiatives for the same.

Sr. No.	CSR Project	No of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized group
1	Pond Developed at Sindholi Poorv, Sindholi Kallu, Morha & Harra Ahamadpur Jalal	Approximately 10,000	100% (farmers and local village members)
2	Free Mobile Health Services	19,945	100% (farmers and local village members)
3	Rural Schools/ Education	865	17%
4	Sports training for village students	640 Students	100%

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

**Essential Indicators**

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

The Company’s corporate website has a “Get in touch” tab through which our consumers can write to us about any concerns, feedback, suggestions or complaints that they would want us to address. It can be accessed through the link: <https://www.dhampursugar.com/contact-us>. Other than the website, any complaints received verbally or through letters are investigated, corrective actions taken and feedbacks provided to the customers.

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

	As a percentage to total turnover
Environment and Social parameters relevant to product	NA
Safe and responsible usage	Country liquor sales – 16.42% of total turnover The packets carry information on the harms of liquor consumption to human health and to avoid drink and driving
Recycling and/or safe disposal	Sugar bags – 49.14% of turnover The sugar bags carry information on the use of PP5 plastic which can be recycled



### 3. Number of consumer complaints:

We did not receive any consumer complaints on any of the below categories during FY 2022–23. Our consumers can reach out to us through the email ID published on the website as well as through our Sales representatives who are available to resolve the same.

Category	FY 2022-23 (Current Financial Year)			FY 2021-22 (Previous Financial Year)		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Others	0	0	-	0	0	-

### 4. Details of instances of product recalls on account of safety issues

The Company has well established procedures in place to ensure only premium quality of products are associated with our brand name. We have adequate levels of internal testing to ensure compliance to regulatory and safety requirements, not just within India but also in line with requirements of the countries we export to. All these measures have helped us to avoid any instances of voluntary or forced recalls in the reporting year.

	Number	Reason 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, The Company has a comprehensive IT security policy in place which covers critical aspects such as guidance on handling of customer sensitive information, confidentiality of data, NDAs for third party accessing client data and guidelines for managing the same and finally disposal guidelines for such sensitive data. This is applicable to all employees across the organization. The policy is available on the company's intranet and accessible to all employees.

### 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.

There were no instances noted pertaining to advertising, cyber security, data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products during the reporting period.

## LEADERSHIP INDICATORS

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

Details of all our products are easily available on our website: [www.dhampursugar.com](http://www.dhampursugar.com)

Additionally, we can also be contacted via the following mediums:

- Corporate office address: Dhampur Sugar Mills Ltd. 6th Floor, Max House, Okhla Industrial Estate, Phase III New Delhi - 110020
- Telephone: +91 011-41259400
- Email: [investordesk@dhampursugar.com](mailto:investordesk@dhampursugar.com)
- Dhampur Plant: Dhampur Sugar Mills Limited, Distt. Bijnor, Dhampur (U.P.) – 246761
- Rajpura Plant: DSM Sugar Rajpura, Village & Post - Rajpura, Distt. Sambhal-243727

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

Our products carry information on their nutritional content, package recycling, shelf life, batch, and lot details. Additionally, we share a safety guidelines factsheet with our Ethyl Acetate transport vendors to ensure all safe measures are duly practiced.

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

Sugar being an essential commodity, we have tried to ensure through our management processes to avoid any disruptive situations and have so far been 100% successful in our attempts to achieve the same. Even during the global pandemic, the Company's functions continued smoothly and without any disruptions.

However, if and in case any such instance arises, we have the following mechanism defined to inform our consumers of the same:

- Our bulk customers shall be informed through email notifications by our Sales and Marketing teams
- If it is a mandate coming from the government, we shall then publish a notification regarding the same in newspapers and through social media platforms.

## 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.

**Sugar:** Sugar being our major product, is a harmless commodity which does not require explicit information to be published on the packaging for customers. We ensure to display all the requisite information as per mandatory laws on all our Sugar packaging: which includes the FSSAI label, best before details, manufacturing season details, plant code, lot and batch number for product traceability as well as the HDPE plastic packaging grade on all sugar bags. Over and above these details, the Mishti sugar packets also publish disclaimer of the product being untouched by hand as it is being produced and packed in world class environment, that it is free from impurities and meets the highest standards. Nutritional details of sugar are also published on the packaging.

**Ethyl Acetate:** In case of Ethyl Acetate supply, we do provide adequate guidelines and factsheet (which includes detailed guidance on care to be taken while handling ethanol) to the transport vendors who support in the supply of same. The EA drums also carry Hazard Classification details along with precautionary statements.

**Country Liquor:** On our country liquor packaging we publish details such as the logo for package recycling, license number, FSSAI label, percentage concentration, ingredients, shelf life and product consumption warning.

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)

No, we did not conduct any survey regarding customer satisfaction relating to major products. However, our Sales team is continuously in touch and ever attentive to the customer demands. Customers directly reach out to our Sales and Marketing representatives in case of any concerns and the same is duly resolved by the team.

## 5. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along-with impact – Nil, no data breach incidents reported in the current year.
- b. Percentage of data breaches involving personally identifiable information of customers – Nil, no data breach incidents involving personally identifiable information of customers reported in the current year.