

24th August, 2024**GIL/2024-25/122**

To,

| | |
|--|---|
| The BSE Limited Phiroze Jeejeebhoy Towers Dalal Street Mumbai- 400 001 Fax No.: 022-22721919 Scrip Code- 533282 | The Listing Department The National Stock Exchange of India Ltd. Exchange Plaza, C-1, Block G, Bandra- Kurla Complex Bandra(east), Mumbai- 400 051 Fax No.: 022-2659 8120 Company Code- GRAVITA |
|--|---|

Subject: - Business Responsibility and Sustainable Report (“BRSR”) for the Financial Year 2023-24.

Dear Sir/Ma’am,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Business Responsibility and Sustainability Report (“BRSR”) of the Company for the financial year 2023-24.

The above information will also be available on website of the Company and same can be accessed at <https://www.gravitaindia.com/investors/brsr>

Please take the above on record and oblige.

Yours Faithfully,
For Gravita India Limited

Nitin Gupta
(Company Secretary)
FCS-9984

Encl: As Above**Regd. Office:**

‘SAURABH’, Chittora Road, Diggi-Malpura Road
Tehsil: Phagi, JAIPUR- 303 904, Raj. (INDIA)
Phone: +91 -9928070682 Email: works@gravitaindia.com

Business Responsibility and Sustainability Report (BRSR)

SECTION A General disclosures

SECTION B Management and process disclosures

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 |
| Principle 2 | Businesses should provide goods and services in a manner that is sustainable and safe |
| Principle 3 | Businesses should respect and promote the well-being of all employees, including those in their value chains |
| Principle 4 | Businesses should respect the interests of and be responsive to all its stakeholders |
| Principle 5 | Businesses should respect and promote human rights |
| Principle 6 | Businesses should respect and make efforts to protect and restore the environment |
| Principle 7 | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |
| Principle 8 | Businesses should promote inclusive growth and equitable development |
| Principle 9 | Businesses should engage with and provide value to their consumers in a responsible manner |

SECTION A: General disclosures

I. Details of the listed entity

| | | |
|----|---|--|
| 1 | Corporate Identity Number (CIN) of the Company | L29308RJ1992PLC006870 |
| 2 | Name of the Company | Gravita India Limited |
| 3 | Year of Incorporation | 1992 |
| 4 | Registered office address | "Saurabh", Harsulia Mod, Diggi- Malpura Road, Tehsil - Phagi Jaipur-303904 (Rajasthan) India |
| 5 | Corporate office address | Gravita Tower, A-27B, Shanti Path, Tilak Nagar, Jaipur- 302004 (Rajasthan) India |
| 6 | E-mail | companysecretary@gravitaindia.com |
| 7 | Telephone | 91-141-4057800 |
| 8 | Website | https://www.gravitaindia.com/ |
| 9 | Financial year for which reporting is being done | 2023-24 |
| 10 | Name of the Stock Exchange(s) where shares are listed | NSE & BSE |
| 11 | Paid-up Capital | Rs. 138,075,828 |

| | | |
|----|---|--|
| 12 | Name and contact details (telephone, email address) of the person for BRSR Reporting | Nitin Gupta (Company Secretary), Contact No: +91-7073332660, Email: companysecretary@gravitaindia.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 and pertain only to Gravita India Limited. |
| 14 | Name of assurance provider | Not Applicable |
| 15 | Type of assurance obtained | Not Applicable |

II. Product/Services

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

| S. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|--------|------------------------------|---------------------------------------|-----------------------------|
| 1 | Manufacturing | Manufacturing of lead and Lead alloys | 92.09 |
| 2 | Manufacturing | Manufacturing of Aluminium and alloys | 2.22 |
| 3 | Manufacturing | Manufacturing of plastics products | 2.84 |
| 4 | Manufacturing | Manufacturing of Turnkey solutions | 2.78 |

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

| S. No. | Product/Services | NIC Code | % of Total Turnover contributed |
|--------|------------------|----------|---------------------------------|
| 1 | Lead | 24203 | 92.09 |
| 2 | Aluminium | 24202 | 2.22 |
| 3 | Plastic Products | 22209 | 2.84 |
| 4 | Turnkey Projects | 28230 | 2.78 |

III. Operations

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

| S. No. | Location | Number of plants | Number of offices | Total |
|--------|----------------------------|------------------|-------------------|-------|
| 1 | National | 5* | 1 | 6 |
| 2 | International [#] | 7 | 3 | 10 |

* The plants in India are located in Phagi-Jaipur, SEZ- Jaipur, Mundra-Gujarat, Chittoor-Andhra Pradesh, Kathua- Jammu

These are on a consolidated basis as the Company is not having direct plants overseas. Globally we operate in Ghana, Senegal, Mozambique, Tanzania, Sri Lanka, Togo, Nicaragua, USA, Singapore, Netherlands.

19. Markets served by the entity

a. Number of locations served

| S. No. | Locations | Number |
|--------|-------------------------------------|--------|
| 1 | National (Number of states) | 23 |
| 2 | International (Number of countries) | 35 |

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

Exports contributed 39.55% of the total turnover of the entity for the period on a standalone basis.

c. Briefly explain the types of customers

Gravita India Limited today operates and provides services in the following key segments: Battery Manufacturers, Cable manufacturing Industries, Paint & Pigment industries, Die Casting Industry and Plastic industries.

IV. Employees**20. Details as at the end of Financial Year:****a. Employees and workers (including differently abled):**

| S. No. | Particulars | Total | Male | | Female | |
|-----------|--------------------------|---------|---------|---------|---------|---------|
| | | No. (A) | No. (B) | % (B/A) | No. (C) | % (C/A) |
| Employees | | | | | | |
| 1 | Permanent (D) | 541 | 513 | 94.82% | 28 | 5.18% |
| 2 | Other than permanent (E) | 0 | 0 | 0% | 0 | 0% |
| 3 | Total employees (D+E) | 541 | 513 | 94.82% | 28 | 5.18% |
| Workers | | | | | | |
| 4 | Permanent (F) | 1754 | 1670 | 95.21% | 84 | 4.79% |
| 5 | Other than permanent (G) | 156 | 154 | 98.72% | 2 | 1.28% |
| 6 | Total workers (F+G) | 1910 | 1824 | 95.50% | 86 | 4.5% |

b. Differently abled Employees and workers:

| S. No. | Particulars | Total | Male | | Female | |
|-----------------------------|---|---------|---------|---------|---------|---------|
| | | No. (A) | No. (B) | % (B/A) | No. (C) | % (C/A) |
| Differently abled Employees | | | | | | |
| 1 | Permanent (D) | 2 | 2 | 100% | 0 | 0% |
| 2 | Other than permanent (E) | 0 | 0 | - | 0 | - |
| 3 | Total Differently abled Employees (D+E) | 2 | 2 | 100% | 0 | 0 |
| Differently abled Workers | | | | | | |
| 4 | Permanent (F) | 0 | 0 | - | 0 | - |
| 5 | Other than permanent (G) | 0 | 0 | - | 0 | - |
| 6 | Total Differently abled workers (F+G) | 0 | 0 | - | 0 | - |

21. Participation/Inclusion/Representation of women

| | Total | No. and percentage of Females | |
|----------------------------|---------|-------------------------------|---------|
| | No. (A) | No. (B) | % (B/A) |
| Board of Directors | 6 | 1 | 16.67% |
| Key Management Personnels* | 5 | 0 | 0% |

*As per the Companies Act 2013, KMP includes the MD and WTD. So, the MD & WTD is included in the board also as well as in the KMP head also.

22. Turnover rate for permanent employees and workers
(Disclose trends for the past 3 years)

| Category | FY 2024 (Turnover rate in current FY) | | | FY 2023 (Turnover rate in previous FY) | | | FY 2022 (Turnover rate in the year prior to the previous FY) | | |
|---------------------|---------------------------------------|----------|---------|--|----------|---------|--|----------|---------|
| | Male % | Female % | Total % | Male % | Female % | Total % | Male % | Female % | Total % |
| Permanent employees | 11.4% | 0.4% | 11.8% | 11% | 0.5% | 11% | 11% | 2% | 13% |
| Permanent workers | 27.7% | 0.4% | 28.2% | 29% | 0.2% | 30% | 41% | 1% | 42% |

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

23. (A) Names of holding / subsidiary / associate companies / joint ventures

| S. no. | Name of the holding / subsidiary / associate companies / joint ventures | Indicate whether holding/subsidiary/ associate/joint venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|---|--|---|--|
| 1 | Gravita Infotech Limited | Wholly Owned Subsidiary | 100% | No |
| 2 | Noble Build Estate Private Limited | Wholly Owned Subsidiary | 100% | No |
| 3 | Gravita Ghana Limited | Wholly Owned Subsidiary | 100% | No |
| 4 | Gravita Senegal SAU | Wholly Owned step-down Subsidiary | 100% (through Gravita Netherlands BV) | No |
| 5 | Gravita Mozambique LDA | Wholly Owned step-down Subsidiary | Through Gravita Netherlands BV 96.38%, through Gravita Global Pte Limited 3.62% | No |
| 6 | Gravita Global Pte. Limited | Wholly Owned Subsidiary | 100% | No |
| 7 | Gravita Netherlands B.V | Wholly Owned step-down Subsidiary | 100% (through Gravita Global PTE Limited) | No |
| 8 | Navam Lanka Limited | Step down Subsidiary | 52% (through Gravita Netherlands BV) | No |
| 9 | Gravita Ventures Limited | Wholly Owned step-down Subsidiary | 99% (through Gravita Netherlands BV) | No |
| 10 | Gravita USA Inc. | Wholly Owned step-down Subsidiary | 100% (Through Gravita Netherlands BV) | No |
| 11 | Gravita Jamaica Limited | Wholly Owned step-down Subsidiary | 100% (through Gravita Netherlands BV) | No |
| 12 | Recyclers Ghana Limited | Wholly Owned step-down Subsidiary | 100% (through Gravita Netherlands BV) | No |
| 13 | Gravita Conakry SAU | Wholly Owned step-down Subsidiary | 100% (through Gravita Netherlands BV) | No |
| 14 | Green Recyclers Mozambique LDA | Wholly Owned step-down Subsidiary | Through Gravita Netherlands BV 99%, Through Gravita Global Pte Limited 1% | No |

| S. no. | Name of the holding / subsidiary / associate companies / joint ventures | Indicate whether holding/subsidiary/ associate/joint venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|---|--|--|--|
| 15 | Gravita Tanzania Limited | Wholly Owned step-down Subsidiary | Through Gravita Netherlands BV 99%, Through Gravita Global Pte Limited 1% | No |
| 16 | Mozambique Recyclers LDA | Wholly Owned step-down Subsidiary | Through Gravita Netherlands BV 98%, Through Gravita Global Pte Ltd 2% | No |
| 17 | Gravita Togo SAU | Wholly Owned step-down Subsidiary | 100% by Gravita Netherlands BV | No |
| 18 | Recyclers Costa Rica SA | Wholly Owned step-down Subsidiary | 100% (Through Gravita Netherlands BV) | No |
| 19 | M/s Gravita Infotech | Wholly Owned Subsidiary | 49% share through Gravita India Limited & 51% Through Gravita Infotech Limited | No |
| 20 | M/s Recycling Infotech LLP | Wholly Owned Subsidiary | 51% share through Gravita India Limited & 49% Through Gravita Infotech Limited | No |
| 21 | M/s Gravita Metal Inc | Wholly Owned Subsidiary | 95% share through Gravita India Limited & 5% Through Gravita Infotech Limited | No |
| 22 | Gravita Dominicana S.A.S. | Wholly Owned step-down Subsidiary | Through Gravita Netherlands BV 99%, Through Gravita Global Pte Limited 1% | No |
| 23 | Gravita Gulf DMCC | Wholly Owned step-down Subsidiary | 100% by Gravita Netherlands BV | No |
| 24 | Green Recyclers LLC | Wholly Owned step-down Subsidiary | 51% by Gravita Netherlands BV | No |
| 25 | Recyclers South Africa (PTY) Ltd. | Wholly Owned step-down Subsidiary | 100% by Gravita Netherlands BV | No |

Note: the above details are as on March 31, 2024.

VI. CSR Details

24.

i. **Whether CSR is applicable as per section 135 of Companies Act, 2013:** Yes

ii. **Turnover** - Rs. 2,679.07 Crores

iii. **Net worth** - Rs. 456.5 Crores

VII. Transparency and disclosure compliances

25. Complaints/grievances on any of the Principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGRBC) –

| 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 2024 | | | FY 2023 | | |
|---|--|--|--|---|--|--|---|
| | | No of complaints filed during the year | No of complaints pending resolution at close of the year | Remarks | No of complaints filed during the year | No of complaints pending resolution at close of the year | Remarks |
| Communities | Yes, Gravita India Limited has a Grievance redressal mechanism in place for all of its stakeholders. The policy can be accessed through below web link: https://www.gravitaindia.com/Upload/PDF/whistle-blower-policy.pdf | NIL | NIL | - | NIL | NIL | - |
| Investors (other than Shareholders) | | NIL | NIL | - | NIL | NIL | -- |
| Shareholders | | 15 | NIL | Most of the complaints are of non-receipt of Annual reports & clarification regarding shares. | 14 | NIL | Most of the complaints are of non-receipt of dividend warrant, Annual reports & clarification regarding shares. |
| Employees and workers | | 41 | 1 | - | NIL | NIL | - |
| Customers | | NIL | NIL | - | NIL | NIL | - |
| Value Chain Partners | | NIL | NIL | - | NIL | NIL | - |
| Other (please specify) | | NIL | NIL | - | NIL | NIL | - |

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

Gravita India Limited has conducted its comprehensive materiality assessment in FY 2024 to identify their ESG-related material topics which have been further categorized as per their business impact and priorities of implementation. We have identified 12 material issues imperative for our sustainable business operations, and which create long term impact. The top 3 material issues are detailed in the following table:

| S. No. | Material issue identified | Is it risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|----------------------------|---------------------------------|--|--|---|
| 1 | Employee health and safety | R | Has an impact on the overall productivity and wellbeing of employees | Focusing on training and awareness programs to reduce the instances of accidents, as well as wellbeing programs. The Company has made it mandatory to use Personal | Negative: Any workplace incident that impacts an employee's health and safety will result in hospitalization charges, litigation charges, |

| S. No. | Material issue identified | Is it risk or opportunity (R/O) | Rationale for identifying the risk / opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|---------------------------------|---|--|---|
| | | | | Protection Equipment kit for safety of workers. Safety SOP's are being put in place at all locations and special focus in on reporting of all type of safety incidents. | regulatory charges, long term health impacts to employee, and damage to Company's reputation |
| 2 | GHG Emissions | R & O | <p>Opportunity:</p> <p>The Company is uniquely positioned in the market for reclamation of scrap, thereby ensuring a second life of the materials and reducing the primary extraction and the emissions from it. Recycling reduces energy consumptions upto 90% as compared to production through primary sources and reduces GHG emissions</p> <p>Risk:</p> <p>During the process of recycling there is GHG emission due to which Company has to focus on reduction of emissions, improved energy management and adoption of renewable energy in the operations. Use of coal and other fossil fuels for heating purpose present risk for decarbonization due to lack of technological solutions or higher cost of available solutions.</p> | Company is striving to reduce its GHG emissions from use of solar power. In FY24, company generated ~1.68 Million units of clean power resulting in reduction of 1192 MT CO2. We aim to produce 30% of our power requirement through renewables in next 2-3 years. We are also exploring options for decarbonization of heating requirement through use of suitable cost effective technology. | <p>Positive:</p> <p>Through its advanced State of the art environment-friendly processes and use of renewable energy Company is able to ensure a positive financial impact. The cost of own generated solar power is cheaper than grid purchased power resulting in financial savings for the company. For the decarbonization of heating requirement, the exact cost will be known once we finalize the technology and other details.</p> |

SECTION B: Management and process disclosures

| | |
|-----------|---|
| P1 | Businesses should conduct and govern themselves with integrity and in a manner that is ethical, transparent, and accountable |
| P2 | Businesses should provide goods and services in a manner that is sustainable and safe |
| P3 | Businesses should respect and promote the well-being of all employees, including those in their value chains |
| P4 | Businesses should respect the interests of and be responsive to all its stakeholders |
| P5 | Businesses should respect and promote human rights |
| P6 | Businesses should respect and make efforts to protect and restore the environment |
| P7 | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |
| P8 | Businesses should promote inclusive growth and equitable development |
| P9 | Businesses should engage with and provide value to their consumers in a responsible manner |

[illegible]

[illegible]

| | Points | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|--|--|----|----|----|----|----|----|----|----|
| 4 | Name of the national and international codes/certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | <p>Company has adopted various standards specified by the International Organization for Standardization (ISO). These are:</p> <p>a. ISO 9001: 2015 for Quality management system.</p> <p>b. ISO 14001: 2015 for Environment management system.</p> <p>c. ISO 45001: 2018 Health and Safety management system.</p> <p>d. 2 (Two) International Lead Associations approved plants Phagi, Rajasthan & Chittoor, Andhra Pradesh</p> <p>Apart from these, the Company also adheres to the following standards:</p> <p>National Voluntary Guidelines (NVG) given by Ministry of Corporate Affairs for Social, Environment and Economic responsibility of business. The policies related to all principles are formulated with detailed consultation with relevant stakeholders as per industry framework and market standards, as per management guidelines within the applicable legal and regulatory framework requirements, at national and international level.</p> | | | | | | | | |
| 5 | Specific commitments, goals and targets set by the entity with defined timelines, if any. | Company is in the process of defining an overall ESG strategy with goals and targets on material issues. | | | | | | | | |
| 6 | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. | The Company will start measuring their performance against the KPIs defined for the ESG targets and disclose them in the subsequent years. | | | | | | | | |

Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)

We are committed to align our operations with the business responsibility principles, accordingly we have taken steps in the recent past. We are a Recycling Company; hence, it is critical as well as challenging for us to keep our operations environmentally and socially sustainable and comply with national standards in the regions we operate in. To address these challenges systematically and identify our most critical intervention areas, we performed ESG materiality assessment for this year. This materiality assessment has led to finalization of our ESG goals for short/ medium & long term which will guide our future actions. Along with that, we are taking measures to eliminate any levels of discrimination and human rights violations not only in the Company but also in our supply chain. The Company is taking feedback from all stakeholders, employees and workers for the business to grow sustainably and equitably.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).

Mr. Rajat Agrawal (DIN: 00855284), Managing Director & Mr. Yogesh Malhotra (DIN: 05332393), WTD & CEO, of the Company will oversee the implementation of Business Responsibility policies.

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.

The relevant policies are administered by the Departmental Heads who report to the Management of the Company who is responsible for monitoring and overseeing all policy implementation.

10. Details of Review of NGRBCs by the Company

| | Subject for Review | a. Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee | | | | | | | | |
|---|---|--|----|----|----|----|----|----|----|----|
| | | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| 1 | Performance against above policies and follow up action | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| 2 | Compliance with statutory requirements of relevance to the principles and rectification of any non-compliances | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| | Subject for Review | b. Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify) | | | | | | | | |
| | | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| 1 | Performance against above policies and follow up action | Policies of the Company are reviewed periodically or on a need basis by department heads, business heads or the functional heads. During this review, the efficacy of the policy is reviewed, and necessary changes are implemented. | | | | | | | | |
| 2 | Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances | As per the requirement of laws applicable to the Company | | | | | | | | |

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

No.

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

Not Applicable

SECTION C: Principle-wise performance disclosure

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

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

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

| S. No | Segment | Total number of training & awareness programmes held | Topics / principles covered under the training and its impacts | % age of persons in respective category covered by the awareness programmes |
|-------|--------------------|--|---|---|
| 1 | Board of Directors | 2 | They have been given awareness trainings for the Code of conduct policy and prevention of Insider trading. They were provided with brief synopsis of the business segments of the Company along with training programmes being conducted by the Company in this FY. | 100% |

| S. No | Segment | Total number of training & awareness programmes held | Topics / principles covered under the training and its impacts | % age of persons in respective category covered by the awareness programmes |
|-------|-----------------------------------|--|---|---|
| 2 | Key Managerial Personnel | 3 | They have been given awareness trainings for the 1. Code of conduct policy. 2. Prevention of Insider trading. 3. ESG basics and ESG roadmap. | 100% |
| 3 | Employees other than BOD and KMPs | 18 | Trainings are imparted through online and classroom modes, as well as on the job as per requirement. They include: 1. Induction 2. NEEV 3. Plant Visit 4. Workplace Communication-Do's and Don'ts 5. Presentation Skills 6. Email Etiquettes 7. POSH 8. PF-password and Id Creation 9. HR Task Flow-Darwin Box. 10. ESG Basics & ESG Roadmap 11. Time Management 12. Risk management & Customer Complaint Analysis 13. Conflict Management 14. Code of Conduct 15. Prevention of insider trading 16. Workshop on sustainability 17. General working Institution on OEs 18. UDAAN Workshop | 100% |
| 4 | Workers | 15 | 1. The Smart Worker 2. EHS-Environment, Health and Safety Management 3. PPAP-Production Part Approval Process 4. PF-Password and Id Creation 5. Quality Policy and Objective 6. Safety at Workplace 7. 5S-Sort, Set in Order, Shine, Standardize and sustain 8. HIRA (Hazard Identification and Risk Assessment Training)-Aspect & Impact 9. Health & safety 10. Security Procedures 11. Firefighting & Safety 12. Human Rights Training. 13. Housekeeping Training. 14. Emergency response 15. First aid | 100% |

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

No material monetary & non-monetary fines/penalties were paid in F.Y. 2024.

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

Not Applicable

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

The policy related to the prevention of bribery and corruption is embedded in the Company's Codes of Conduct (viz, Code of Conduct for Employees, Code of Conduct for Directors and Senior Management and Supplier Code of Conduct), Whistle Blower Policy and HR policies and practices. The required steps to ensure proper reporting of incidents are outlined in the Whistle Blower policy. All complaints received from whistleblowers are placed before the Audit Committee and the Board of Directors on a quarterly basis. The Company also creates awareness about the Whistle Blower mechanism and Code of Conduct to ensure proper implementation of the Codes. The relevant policies can be accessed at <https://www.gravitaindia.com/Upload/PDF/whistle-blower-policy.pdf> and <https://www.gravitaindia.com/Upload/PDF/code-of-conduct.pdf>

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

| S. No. | Segment | FY 2024 | FY 2023 |
|--------|--------------------------|---------|---------|
| 1 | Directors | NIL | NIL |
| 2 | Key Managerial Personnel | NIL | NIL |
| 3 | Employee | NIL | NIL |
| 4 | Workers | NIL | NIL |

6. Details of complaints with regard to conflict of interest

| S. No. | Segment | FY 2024 | | FY 2023 | |
|--------|--|---------|---------|---------|---------|
| | | Number | Remarks | Number | Remarks |
| 1 | Number of complaints received in relation to issues of Conflict of Interest of the Directors | NIL | NA | NIL | NA |
| 2 | Number of complaints received in relation to issues of Conflict of Interest of the KMPs | NIL | NA | NIL | NA |

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

Not Applicable

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

| | FY 2024 | FY 2023 |
|--|---------|---------|
| Number of days of accounts payables | 15.93 | 27.08 |

9. Openness of Business Provide details of concentration of purchases and sales with trading houses, dealers and related parties along-with loans and advances & investments, with related parties

| Parameter | Metrics | FY 2024 | FY 2023 |
|----------------------------|--|---------|---------|
| Concentration of Purchases | a. Purchases from trading houses as % of total purchases | 35.55% | 29.13% |
| | b. Number of trading houses where purchases are made | 128 | 96 |
| | c. Purchases from top 10 trading houses as % of total purchases from trading houses | 50.82% | 58.31% |
| Concentration of Sale | a. Sales to dealers/ distributors as % of total sales | 14.24% | 18.86% |
| | b. Number of dealers/ distributors to whom sales are made | 34 | 37 |
| | c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors | 98.05% | 97.75% |
| Share of RPTs in | a. Purchases (Purchases with related parties/Total Purchases) | 30.75% | 34.58% |
| | b. Sales (Sales to related parties/Total Sales) | 1.87% | 2.09% |
| | c. Loans & advances (Loans & advances given to related parties/Total Loans & advances) | 0% | 57.30% |
| | d. Investments (Investments in related parties/Total Investments made) | 92.91% | 88.47% |

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.

| S. No. | Segment | FY 2024 | FY 2023 | Details of improvements in environmental and social impacts |
|--------|---------|---------|---------|---|
| 1 | R&D | NIL | 100 % | No major update |
| 2 | Capex | 16.1% | 10% | Key capex went into installation of solar projects, Auxiliary Pollution control systems, Scrubbers, filter press, Flue gas analyzers, etc |

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

Yes, Gravita India Limited has the proper procedure for sustainable sourcing. The Company endeavors to focus on protection of environment, stakeholders' interest and cost effectiveness while procuring any raw material or goods. The main raw materials – Battery, Aluminum and plastic scrap are collected from traders, Corporates and OEM's who are well-reputed global players. Adequate steps are taken for safety during transportation and optimization of logistics, which, in turn, help to mitigate the impact on climate.

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

At present, 43% of inputs sources are sourced sustainably.

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

Gravita India Limited engages certified e-waste handlers for disposal of e-waste. The Hazardous waste is sent to government authorized agencies for environmentally safe disposal. In case of other waste which includes food waste, it gets converted to manure.

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

Not Applicable as Gravita India does not come in the "Producer Category" for which the EPR is applicable.

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

ESSENTIAL INDICATORS

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

| Category | % of workers covered by | | | | | | | | | | |
|---------------------------------|-------------------------|------------------|------------|--------------------|------------|--------------------|------------|--------------------|------------|---------------------|------------|
| | Total (A) | Health Insurance | | Accident Insurance | | Maternity Benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) |
| Permanent Employees | | | | | | | | | | | |
| Male | 513 | 513 | 100% | 513 | 100% | - | - | 513 | 100% | NIL | - |
| Female | 28 | 28 | 100% | 28 | 100% | 28 | 100% | NIL | - | NIL | - |
| Total | 541 | 541 | 100% | 541 | 100% | 28 | 5.18% | 513 | 94.82% | NIL | - |
| Other than Permanent Employees* | | | | | | | | | | | |
| Male | - | - | - | - | - | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | - | - | - | - | - | - | - | - | - | - | - |

*Non-Permanent employees – Non-Permanent Employees are contracted via a 3rd party and the responsibility related to the information shared above lies with the contractor. Gravita ensures that the contractors meet the statutory requirements.

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

| Category | % of workers covered by | | | | | | | | | | |
|-------------------------------|-------------------------|------------------|------------|--------------------|------------|--------------------|------------|--------------------|------------|---------------------|------------|
| | Total (A) | Health Insurance | | Accident Insurance | | Maternity Benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) |
| Permanent workers | | | | | | | | | | | |
| Male | 1670 | 1670 | 100% | 1670 | 100% | - | - | NIL | - | NIL | - |
| Female | 84 | 84 | 100% | 84 | 100% | 84 | 100% | NIL | - | NIL | - |
| Total | 1754 | 1754 | 100% | 1754 | 100% | 84 | 4.79% | NIL | - | NIL | - |
| Other than permanent workers* | | | | | | | | | | | |
| Male | 154 | 154 | 100% | - | 0% | - | - | NIL | - | NIL | - |
| Female | 2 | 2 | 100% | - | - | 2 | 100% | - | - | - | - |
| Total | 156 | 156 | 100% | - | 0% | 2 | 1.28% | - | - | - | - |

*Non-Permanent Workers – Non-Permanent workers are contracted via a 3rd party and the responsibility related to the information shared above lies with the contractor. Gravita ensures that the contractors meet the statutory requirements.

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

| | FY 2024 | FY 2023 |
|---|----------------|----------------|
| Cost incurred on well-being measures as a % of total revenue of the company | 0.26 | 0.20 |

2. Details of retirement benefits for Current and Previous FY

| S. No. | Benefits | FY 2024 | | | FY 2023 | | |
|--------|----------|--|--|--|--|--|--|
| | | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| 1 | PF | 100% | 100% | Y | 100% | 100% | Y |
| 2 | Gratuity | 100% | 100% | Y | 100% | 100% | Y |
| 3 | ESI | 9% | 66% | Y | 11% | 56% | Y |

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

The Company is committed to embracing inclusion and diversity in its campuses. The Company's facilities have the necessary infrastructure in place to ensure access and inclusion for differently abled staff and visitors.

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.

The Company encourages diversity in the workplace. Gravita India Limited is an Equal Opportunity Employer and does not follow or support any discrimination based on caste, gender, sexual orientation, religion, ethnicity or physical disabilities. All employees are expected to be respectful towards each other and not promote or tolerate any form of discrimination. The Policy can be accessed here: <https://www.gravitaindia.com/Upload/PDF/Code-of-Conduct-Employee.pdf>

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

Total fifteen (15) employees has taken a parental leave in the financial year 2024 with 100% return to work and retention rates.

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

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

Yes

| | | |
|---|--------------------------------|--|
| 1 | Permanent employee | We have established the Grievance Redressal Mechanism in place to resolve the issues of employees. It covers violation of the Company's Code, such as Business Integrity, Sexual Harassment, Prevention of Fraud, Rights to Intellectual Property and Data Protection. The contact details and channels for raising grievances are mentioned in our Whistle Blower Policy. The investigation of the complaints are done both internally as well as through an external investigator if decided by the Audit committee. The investigation is generally completed within 45 days after filing of the complaint. https://www.gravitaindia.com/Upload/PDF/whistle-blower-policy.pdf |
| 2 | Other than Permanent Employees | Non-permanent employees on Gravita India Limited Plants are contracted via a 3rd party and their grievance redressal mechanism rests with the contractors. Gravita India Limited ensures that all norms and regulations while working on plants are met and safety precautions are adhered to. |

| | | |
|---|------------------------------|---|
| 3 | Permanent Workers | The Grievances/Works Committee is in force under the Factories Act 1948, to redress any grievance. The committee for workers is filed level committee within the reach of workers. Permanent workers are also covered under Whistle blower policy. It covers Violation of the Company's Code, such as Business Integrity, Sexual Harassment, Prevention of Fraud, Rights to Intellectual Property and Data Protection. The contact details are mentioned in our Whistle Blower Policy. https://www.gravitaindia.com/Upload/PDF/whistle-blower-policy.pdf |
| 4 | Other than Permanent Workers | Workers engaged on contractual basis can report their grievances to their respective contractor representative or the Plant Head. The contractor is expected to take the required action to address the worker grievances, and if required, can raise the grievance to HR and respective functional heads. |

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

The Company has one registered trade union in our operations.

| Category | FY 2024 | | | FY 2023 | | |
|----------------------------------|--|--|-----------|--|--|-----------|
| | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B / A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D / C) |
| Total Permanent Employees | 541 | 0 | 0 | 427 | 0 | 0 |
| - Male | 513 | 0 | 0 | 413 | 0 | 0 |
| - Female | 28 | 0 | 0 | 14 | 0 | 0 |
| Total Permanent Workers | 1754 | 400 | 22.81% | 1351 | 350 | 25.91% |
| - Male | 1670 | 386 | 23.11% | 1300 | 336 | 25.85% |
| - Female | 84 | 14 | 16.67% | 51 | 14 | 27.45% |

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

| Category | FY 2024 | | | | | FY 2023 | | | | |
|------------------|-----------|-------------------------------|---------|----------------------|---------|-----------|-------------------------------|---------|----------------------|---------|
| | Total (A) | On Health and safety measures | | On Skill upgradation | | Total (D) | On Health and safety measures | | On Skill upgradation | |
| | | No (B) | % (B/A) | No (C) | % (C/A) | | No (E) | % (E/D) | No (F) | % (F/D) |
| Employees | | | | | | | | | | |
| Male | 513 | 314 | 61.2% | 513 | 100% | 417 | 259 | 62.11% | 417 | 100% |
| Female | 28 | 28 | 100% | 28 | 100% | 16 | 16 | 100% | 16 | 100% |
| Total | 541 | 342 | 63.2% | 541 | 100% | 433 | 275 | 63.51% | 433 | 100% |
| Workers | | | | | | | | | | |
| Male | 1824 | 1824 | 100% | 1824 | 100% | 1245 | 1245 | 100% | 1245 | 100% |
| Female | 86 | 86 | 100% | 86 | 100% | 55 | 55 | 100% | 55 | 100% |
| Total | 1910 | 1910 | 100% | 1910 | 100% | 1300 | 1300 | 100% | 1300 | 100% |

*The above data excludes non-permanent employees and workers

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

The Company has an inbuilt procedure for ensuring the conduct of Performance Appraisal of employees and workers by the respective head of the department/Company in a fair and impartial manner. Every employee and worker has to submit a self-evaluation, post which it is evaluated by their Head of the Department against their performance in the respective tenure.

| | FY 2024 | | | FY 2023 | | |
|------------------|-------------|-------------|---------------|-------------|-------------|-------------|
| Category | Total (A) | No (B) | % (B/A) | Total (C) | No (D) | % (D/C) |
| Employees | | | | | | |
| Male | 513 | 449 | 87.52% | 417 | 417 | 100% |
| Female | 28 | 24 | 85.71% | 16 | 16 | 100% |
| Total | 541 | 473 | 87.43% | 433 | 433 | 100% |
| Workers | | | | | | |
| Male | 1824 | 1208 | 66.23% | 1245 | 1245 | 100% |
| Female | 86 | 79 | 91.86% | 55 | 55 | 100% |
| Total | 1910 | 1287 | 67.38% | 1300 | 1300 | 100% |

Note: Performance review conducted for 100% eligible employees.

10. Health and Safety Management System

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

Yes, all plants of Company have implemented ISO 45001: 2018 – Occupational, Health and Safety Management System and the scope of certification covers product manufacture and supply.

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

To ensure adherence to prescribed safety norms, teams visit workplaces/locations to carry out inspections and assessments of potential hazards that could harm workers. Teams interact with the workmen and explain hazards and risks involved in allocated activities. The Company also has a Hazard Identification and Risk Assessment (HIRA) process that involves identification of existing as well as potential routine and non-routine workplace hazards viz., periodic review of risks, determining and implementing a hierarchy of controls for safe operations. Hazards related to working at height, working in confined spaces, hot works, conveyor belts, inadequate guarding, maintenance, etc. are covered under the HIRA register. We have also initiated safety audits at site from 3rd Party to find systematic safety issue in our operations for corrective measures.

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

Yes, the workers and employees can report any work-related hazards to the head through our online data portal called "GRID" and also via direct communication to managers/ supervisors. The management takes immediate action on receiving any such complaint and records of such hazards are being maintained.

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

Yes, employees and workers have access to non-occupational medical and healthcare services. Medically qualified doctors, paramedics and support staff cover all shifts to support any medical emergencies. The Company has tied up with well-established hospitals to deal with any kind of incident, accident or medical emergency. Employees are required to undergo an annual health check-up and healthcare advice is provided. Medical insurance facilities are provided to employees and their dependents.

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

| | Safety Incident/Number | Category* | FY 2024 | FY 2023 |
|---|---|-----------|---------|---------|
| 1 | Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 2.6 | 0 |
| | | Workers | 0 | 0 |
| 2 | Total recordable work-related injuries | Employees | 25 | 0 |
| | | Workers | 0 | 0 |
| 3 | No. of fatalities | Employees | 0 | 0 |
| | | Workers | 0 | 0 |
| 4 | High consequence work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | | Workers | 1 | 0 |

*Including in the contract workforce

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

As a responsible employer, we conduct various health and medical checkups on regular basis by recognized institutions rolled out across different locations. Moreover, employees have access to various wellness workshops. We also

1. Conducted safety audits and emergency drills at site to deal with emergency situations.
2. We have conducted first aider certification at all our locations through St. John Ambulance of Indian Red Cross society.
3. We have all P&C cranes fitted with Safe Load Indicators at all our locations.

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

There was no complaint received by employees & workers regarding health & safety and working conditions across the different locations in the current year as well as in the previous year.

14. Assessments for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|--|
| Health and safety practices | 100% of plants were assessed on ISO 45001 by the Company |
| Working Conditions | 100% of plants were assessed by the Company as per IS 14489 |

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.

Following initiatives are being taken to minimize safety related incidences and for reduction in safety risk in operations:

1. Internal electrical audits at sites and corrective actions as per audit findings
2. Internal mechanical safety audits at site and corrective actions as per audit findings
3. 3rd party safety audits
4. SLI installation in hydras
5. Awareness sessions on Health-related risk in operations
6. Awareness session on waste management
7. Safety SOP trainings
8. Horizontal deployment of LTI incident recommendations.

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.**

Gravita's stakeholder groups are those which are directly or indirectly impacted by it or can impact our value creation in the short, medium, or long term. Our relations with them are based on mutual trust and understanding their priorities in creating shared value.

Gravita India Limited has identified internal stakeholders like employees, workers, and board of directors, as well as external stakeholders that impact our business, like investors, suppliers, and communities, independent directors. The Company has also engaged with these stakeholders through different channels for conducting the materiality assessment in FY 2024.

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 |
|--|---|---|--|--|
| Employees | No | Website, Intranet, Email, Training and Development programs, Cultural events, Employee engagement activities, Flyers and banners, notice boards Employee engagement survey | Regularly | Learning and growth, Remuneration and benefits, Equal opportunities, Promotion of occupational, health and safety practices |
| Investors & Stakeholders | No | Quarterly Results, Annual Reports, Earnings Call, Analyst Meet, Press Releases, Investor Presentations, stock exchange filings, notice to shareholders, Postal Ballots, Email | Quarterly/ half Yearly/ Annually | Strategy and business operations, Transparency, Governance, Credit rating, Earnings Per Share (EPS), Communication with investors, Press Release, Performance and financial results, Complaints and grievances |
| Customer & Vendors | No | Regular Business Meetings, Customer Satisfaction Survey, Vendor satisfaction survey, Emails, website, telephonic conversations | Regularly | Timely payments and delivery of products, quality assurance, vendor satisfaction and customer satisfaction expectations |
| Bankers and other financial institutions | No | Consortium meetings, Investor presentations | Regularly | Performance and financial results, approval of funding requirements |
| Society | Yes | Through CSR Programmes and NGO partners | Regularly | Improved employment opportunities, Enhanced Income, Enhanced Standard of Living |

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

All employees & workers of Gravita India Limited are provided with Human Rights training. Human Rights awareness is part of the induction session by HR department. Our Human Rights Policy can be accessed at <https://www.gravitaindia.com/wp-content/uploads/2022/08/Human-Rights-policy.pdf>

| Category | FY 2024 | | | FY 2023 | | |
|----------------------|-----------|--|---------|-----------|--|---------|
| | Total (A) | No. of employees / workers covered (B) | % (B/A) | Total (C) | No. of employees / workers covered (D) | % (D/C) |
| Employees | | | | | | |
| Permanent | 541 | 541 | 100% | 433 | 433 | 100% |
| Other than permanent | 0 | 0 | 0% | 14 | 0 | 0% |
| Total employees | 541 | 541 | 100% | 447 | 433 | 96.87% |

| | FY 2024 | | | FY 2023 | | |
|----------------------|-------------|--|-------------|-------------|--|---------------|
| Category | Total (A) | No. of employees / workers covered (B) | % (B/A) | Total (C) | No. of employees / workers covered (D) | % (D/C) |
| Workers | | | | | | |
| Permanent | 1754 | 1754 | 100% | 1300 | 1300 | 100% |
| Other than permanent | 156 | 156 | 100% | 51 | 0 | 0% |
| Total workers | 1910 | 1910 | 100% | 1351 | 1300 | 96.23% |

2. Details of minimum wages paid to employees and workers

All the workers are paid in compliance with the Minimum Wages Act, 1948. Additional perks and benefits like food allowances are provided to them in addition. Our employees are paid as per industry standards and do not fall in the hourly wages category.

| Category | FY 2024 | | | | | FY 2023 | | | | |
|-----------------------------|-----------|-----------------------|---------|------------------------|---------|-----------|-----------------------|---------|------------------------|---------|
| | Total (A) | Equal to minimum wage | | More than minimum wage | | Total (D) | Equal to minimum wage | | More than minimum wage | |
| | | No (B) | % (B/A) | No (C) | % (C/A) | | No (E) | % (E/D) | No (F) | % (F/D) |
| Employees | | | | | | | | | | |
| Permanent | 541 | 0 | 0% | 541 | 100% | 433 | 0 | 0% | 433 | 100% |
| Male | 513 | 0 | 0% | 513 | 100% | 417 | 0 | 0% | 417 | 100% |
| Female | 28 | 0 | 0% | 28 | 100% | 16 | 0 | 0% | 16 | 100% |
| Other than permanent | 0 | 0 | 0% | 0 | 0% | 14 | 0 | 0% | 14 | 100% |
| Male | 0 | 0 | 0% | 0 | 0% | 14 | 0 | 0% | 14 | 100% |
| Female | 0 | 0 | 0% | 0 | 0% | 0 | 0 | 0% | 0 | 0% |
| Workers | | | | | | | | | | |
| Permanent | 1754 | 0 | 0% | 1754 | 100% | 1300 | 0 | 0% | 1300 | 100% |
| Male | 1670 | 0 | 0% | 1670 | 100% | 1245 | 0 | 0% | 1245 | 100% |
| Female | 84 | 0 | 0% | 84 | 100% | 55 | 0 | 0% | 55 | 100% |
| Other than permanent | 156 | 0 | 0% | 156 | 100% | 51 | 0 | 0% | 51 | 100% |
| Male | 154 | 0 | 0% | 154 | 100% | 51 | 0 | 0% | 51 | 100% |
| Female | 2 | 0 | 0% | 2 | 100% | 0 | 0 | 0% | 0 | 0% |

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

(a) Medium Remuneration/wages

| | Male | | Female | |
|----------------------------------|--------|---|--------|---|
| | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| Board of Directors (BoD) | 3 | Rs. 320 Lacs per annum | 0 | 0 |
| Key Managerial Personnel | 5 | Rs. 150.06 Lacs per annum | 0 | 0 |
| Employees other than BOD and KMP | 513 | Rs. 4.58 Lacs per annum | 28 | Rs. 3.41 Lacs per annum |
| Workers | 1670 | Rs. 1.91 Lacs per annum | 55 | Rs. 1.55 Lacs per annum |

*We have 3 executive directors who are paid compensation, rest are independent directors to whom no sitting fees is paid.

**We have one female independent Director, to whom no sitting fees is paid.

(b) Gross wages paid to female as % of total wages paid by the entity, in the following format:

| | FY 2024 | FY 2023 |
|--|---------|---------|
| Gross wages paid to female as % of total wages | 2.93 % | 2.54 % |

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, the entity has its Human Resource department to take care of human rights of the employees & workers and resolve their grievances in the workplace.

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

All the staff members and workers have a secure and 24x7 access to raise grievances and to report anonymously in suggestion boxes and grievance registers put up at site. Trainings are given on different level to female employees & workers on Prevention of Sexual Harassment. The process to raise any grievances related to human rights is provided in our policy here: <https://www.gravitaindia.com/Upload/PDF/human-rights-policy.pdf>

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

| | FY 2024 | | | FY 2023 | | |
|-----------------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Sexual Harassment | 0 | 0 | - | 0 | 0 | - |
| Discrimination at workplace | 0 | 0 | - | 0 | 0 | - |
| Child Labour | 0 | 0 | - | 0 | 0 | - |
| Forced Labour/ Involuntary Labour | 0 | 0 | - | 0 | 0 | - |
| Wages | 0 | 0 | - | 0 | 0 | - |
| Other human rights related issues | 0 | 0 | - | 0 | 0 | - |

7. Complaint filed under sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

| | FY 2024 | FY 2023 |
|--|---------|---------|
| Total complaints reported under sexual harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, (POSH) | 0 | 0 |
| Complaints on POSH as a % of female employees / workers | 0 | 0 |
| Complaints on POSH upheld | 0 | 0 |

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

Our whistleblower policy has clearly laid down the guidelines to prevent retaliation against a complainant. A Complainant is saved from physical harm, loss of job, punitive work assignments, or impact on salary or wages. A complainant not satisfied with the redressal may file a written complaint to the chairman of the Audit committee. The Policy can be found here: <https://www.gravitaindia.com/Upload/PDF/whistle-blower-policy.pdf>

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

Yes, in certain business agreements and contracts where relevant. It is clearly written that all the statutory obligations applicable at the place of work have to be followed.

10. Assessments for the year

| Section | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-------------------|---|
| Sexual Harassment | 100 % of our plant sites were assessed by the Company |

| Section | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|---------------------------------|---|
| Discrimination at workplace | 100 % of our plant sites were assessed by the Company |
| Child Labor | 100 % of our plant sites were assessed by the Company |
| Forced Labor/ Involuntary Labor | 100 % of our plant sites were assessed by the Company |
| Wages | 100 % of our plant sites were assessed by the Company |
| Others – please specify | - |

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

There was no need to take any corrective actions as no significant risk/ concern arose from the above assessment. Effective system of internal control is placed to improve the efficiency of work.

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:

| Parameter | FY 2024 | FY 2023 |
|--|--------------------|--------------------|
| From renewable sources | | |
| Total electricity consumption (A) | 6,047.05 | 4,325.19 |
| Total fuel consumption (B) | 0 | 0 |
| Energy consumption through other sources (C) | 0 | 0 |
| Total energy consumed from renewable sources (A+B+C) | 6,047.05 | 4,325.19 |
| From non-renewable sources | | |
| Total electricity consumption (D) | 54,719.85 | 45,144.83 |
| Total fuel consumption (E) | 6,39,027 | 6,29,005.52 |
| Energy consumption through other sources (F) | 20,096 | 13,542.21 |
| Total energy consumed from non- renewable sources (D+E+F) | 7,13,842.85 | 6,87,692.56 |
| Total energy consumed (A+B+C+D+E+F) | 7,19,889.90 | 6,92,017.75 |
| Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) | 2.687E-05 | 2.741E-05 |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) | 0.000543329 | 0.0005544 |
| Energy intensity in terms of physical Output (GJ/MT) | 6.4 | 6.97 |
| Energy intensity (optional) – the relevant metric may be selected by the entity | | |

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

No. The entity is not covered under Performance, Achieve and Trade (PAT) Scheme of the Government of India.

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

| Parameter | FY 2024 | FY 2023 |
|--|-------------|-------------|
| Water withdrawal by source (in kiloliters) | | |
| (i) Surface water | - | - |
| (ii) Groundwater | 28,084 | 31,547 |
| (iii) Third party water | 5,543 | 3,915 |
| (iv) Seawater / desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v) | 33,627 | 35,462 |
| Total volume of water consumption (in kiloliters) | 33,627 | 35,462 |
| Water intensity per rupee of turnover (Total Water consumption /Revenue from operations) | 1.25514E-06 | 1.40478E-06 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) | 2.53789E-05 | 2.84046E-05 |
| Water intensity in terms of physical output | 0.30 | 0.36 |
| Water intensity (optional) – the relevant metric may be selected by the entity | | |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) : No

4. Provide the following details related to water discharge

| Parameter | FY 2024 | FY 2023 |
|--|---------|---------|
| Water discharge by destination and level of treatment (in kiloliters) | | |
| (i) To Surface water | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (ii) To Groundwater | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (iii) To Seawater | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (iv) Sent to third-parties | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| (v) Others | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of treatment | | |
| Total water discharged (in kiloliters) | NA | 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

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

All our plants are Zero Liquid Discharge plants. The entity has adopted Acid Nitration System for ensuring Zero Liquid discharge. We have installed Sewerage Treatment and Effluent Treatment Plant in factory premises. The STP will be used for domestic usage water treatment purpose and ETP will be used for process water treatment purpose. The ETP

treated water re-used in the process and STP treated water used for gardening purpose. Apart from these, we installed Neutralization system for BHS purpose washing the battery boxes and used water will be treated through neutralization system.

6. Provide details of air emissions (other than GHG emissions) by the entity, in the following format.

| Parameter | Locations | Units | FY 2024 | FY 2023 |
|--|-----------------|--------|---------|---------|
| NOx | Phagi | mg/nm3 | 161 | 136 |
| | Chittoor | mg/nm3 | 185 | 323 |
| | Mundra | mg/nm3 | 39 | 28.25 |
| SOx | Phagi | mg/nm3 | 114 | 48 |
| | Chittoor | mg/nm3 | 43 | 3* |
| | Mundra | mg/nm3 | 157 | 45.66 |
| Particulate matter (PM) | Phagi | mg/nm3 | 22 | 32.94 |
| | Chittoor | mg/nm3 | 17 | 16.2 |
| | Mundra | mg/nm3 | 78 | 67.74 |
| Persistent organic pollutants (POP) | - | - | - | - |
| Volatile organic compounds (VOC) | - | - | - | - |
| Hazardous air pollutants (HAP) | - | - | - | - |
| Others – please specify | - | - | - | - |

*Sox Value of Chittoor plant is BLQ (Below Limit Qualification i.e. Less Than 3)

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

Yes, an Environmental Monitoring for the plants situated at Phagi, Chittoor and Mundra are done by Team Test House, A unit of Team Institute of Science & Technology Private Limited; Environment Analyst; M/s. SMS Labs Services Private Limited and Analytical & Environmental Engineering laboratory respectively.

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

| Parameter | Unit | FY 2024 | FY 2023 |
|--|--------------------------------------|------------|------------|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tonnes of CO ₂ equivalent | 61,785 | 63,711.09 |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tonnes of CO ₂ equivalent | 12,510 | 10,321 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations) | TCO ₂ e / Rs. | 0.00000277 | 0.00000293 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | TCO ₂ e / Rs. | 0.00005607 | 0.0000593 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | TCO ₂ e/MT | 0.66 | 0.75 |
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity | TCO ₂ e/MT | NA | 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.

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

The Company has a solar power project of capacity of 1,300 kW at its manufacturing facilities located in India. Through this project we aim to reduce our consumption from the State Distribution Company (DISCOM) and in turn reduce our Scope 2 emissions substantially. For FY24, we generated 1.68 million units of solar power and abetted 1192 MT of CO₂. We are also working on following 3 GHG emissions reduction projects:

1. Installation of ~550 KwP Solar Plant at our Mundra Facility.
2. Conversion of oil-fired refining pots into electricity powered one.
3. Oxy fuel combustion for smelting rotary furnaces to improve efficiency and reduce energy consumption and GHG emissions.

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

| Parameter | FY 2024 | FY 2023 |
|---|---|--------------------------------|
| | Total Waste generated (in MT) | |
| Plastic waste (A) | NIL | NIL |
| E-waste (B) | NIL | NIL |
| Bio-medical waste (C) | NIL | NIL |
| Construction and demolition waste (D) | NIL | NIL |
| Battery waste (E) | NIL | NIL |
| Radioactive waste (F) | NIL | NIL |
| Other Hazardous waste. Please specify, if any. (G) | 1,719.36 (Lead slag + Aluminium dross quantity in MT) | 1,065.33 (Lead Slag Qty in MT) |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) | NA | NA |
| Total (A+B + C + D + E + F + G + H) | 1,719.36 | 1,065.33 |
| Parameter | FY 2024 | FY 2023 |
| Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) | 6.41775E-08 | 4.22015E-08 |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) | 1.2976E-06 | 8.53314E-07 |
| Waste intensity in terms of physical output (Kg/MT) | 15.29 | 10.7 |
| Waste intensity (optional) – the relevant metric may be selected by the entity | NA | NA |

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

| Category of waste | FY 2024 | FY 2023 |
|---------------------------------|-------------------------------|-------------|
| | Total Waste generated (in MT) | |
| (i) Recycled | 0.000 | 0.000 |
| (ii) Re-used | 4.437 | 2.70 |
| (iii) Other recovery operations | 0.000 | 0.000 |
| Total | 4.437 | 2.70 |

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

| Category of waste | FY 2024 | FY 2023 |
|--|-------------------------------|----------|
| | Total Waste generated (in MT) | |
| (i) Incineration | - | - |
| (ii) Landfilling | - | - |
| (iii) Other recovery operations Send to TSDF for Disposal | 1569.72 | 1191.27 |
| Total | 1569.72* | 1191.27* |

*The balance slag which is lying at our plants will be disposed in due course of time.

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.

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

Lead slag is produced as a byproduct of our manufacturing and processing activities. The Company is promoting research for recycling of slag to check the viability of using lead slag in various products like cement etc. The company is in discussions with various stakeholders for use of this slag material in their process as raw material after due approvals from relevant authorities.

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

No, We do not have any office or plant location around ecologically sensitive areas

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

Not Applicable

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

| S. No. | Specify the law / regulation / guidelines which was not complied with | Provide details of the noncompliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action taken, if any |
|--------|---|---|---|---|
| 1 | CTO Non Compliance | Discharge of treated waste water outside premises | Fine of Rs. 7.60 Lacs was levied | Necessary arrangements were done to prevent water discharge outside premises. |

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

Gravita India Limited is affiliated with 5 trade and industry chambers/ associations.

- b. List the top 10 trade and industry chambers / associations (determined based on the total members of such a body) the entity is a member of / affiliated to.

| S. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|--------|---|---|
| 1 | Confederation of Indian Industry (CII) | National |
| 2 | Federation of Indian Export Organization (FIEO) | National |
| 3 | Rajasthan Chamber of Commerce Industries (RCCI) | State |
| 4 | Material Recycling Association of India (MRAI) | National |
| 5 | Employers Association of Rajasthan | State |

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

There were no such adverse order issued by any regulatory authority relating to anti-competitive conduct of the entity. Our entity is following all the regulations of Competition Act 2002.

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 FY 2024.

Not Applicable

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

Not Applicable

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

Gravita India Limited has a mechanism to receive and address the grievances. Local communities can raise their grievances via dedicated email-id as per the Human Rights Policy. The email id is – companysecretary@gravitaindia.com.

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

| Category of waste | FY 2024 | FY 2023 |
|--|---------|---------|
| Directly sourced from MSMEs/ small producers | 7.79% | 3.40% |
| Directly from within the India | 31.92% | 30.97% |

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

| Location | FY 2024 | FY 2023 |
|--------------|---------|---------|
| Rural | 53.2 | 53.6 |
| Urban | 0 | 0 |
| Semi-urban | 0 | 0 |
| Metropolitan | 46.8 | 46.4 |

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

ESSENTIAL INDICATORS

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

The Company has a defined mechanism to receive and respond to consumer feedback and complaints. Consumers can directly reach out to Company on the number and email address mentioned on invoice/website. Our link to consumer complaints and feedback: <https://www.gravitaindia.com/contact-us/#>

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

| Particulars | As a percentage to total turnover |
|---|--|
| Environmental and social parameters relevant to the product | Since we provide services in a B2B market such information on products is provided by the aggregators/final product manufacturers. |
| Safe and responsible usage | |
| Recycling and/or safe disposal | |

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

We have received zero complaints in the aspects of Data Privacy, Advertising, Cybersecurity, Restrictive Trade Practices and Unfair Trade Practices in previous and Current financial year. Our products and services do not fall under delivery of essential services.

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

There is no instance of Voluntary as well as forced product recall on account of safety issues. Proper Testing of our product is undertaken for safety purpose.

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

The Company has an internally available policy on cyber security.

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.

Not Applicable

7. Provide the following information relating to data breaches

- Number of instances of data breaches: None.
- Percentage of data breaches involving personally identifiable information of customers: None.
- Impact, if any, of the data breaches: None.