

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT FY 2024-25



**BUSINESS
RESPONSIBILITY AND
SUSTAINABILITY
REPORT**



**DRIVEN BY RESPONSIBILITY,
POWERED BY SUSTAINABILITY.**

Ashapura Minechem Limited



ABOUT US

Ashapura Minechem Ltd. is a globally recognized provider of comprehensive multi-mineral solutions, anchored by abundant mineral reserves and advanced manufacturing capabilities. With operations rooted across India and extended to seven international markets, we are a leading force in the Bentonite, Industrial Minerals, and Refractory Raw Materials segments.

Our workforce of over 2,800 professionals enables us to serve a diverse clientele across 70+ countries, delivering value through innovation, customization, and consistent quality. With a clear vision to lead the global industrial minerals sector, we are committed to creating sustainable solutions that contribute to the well-being of people, communities, and the planet.

SUSTAINABILITY AT OUR CORE

Sustainability is central to Ashapura's purpose. We are actively involved in energy conservation, environmental responsibility, and community development through the Ashapura Foundation. Our initiatives span rural development, cultural preservation, and education, reinforcing our role as a responsible corporate citizen.



ABOUT THIS REPORT

This Business Responsibility and Sustainability Report (BRSR) for FY 2024–25 is published in compliance with Regulation 34(2)(f) of the SEBI (LODR) Regulations, 2015. The report reflects our commitment to ESG principles and outlines our journey in alignment with global frameworks such as the UNSDGs. Prior year data has been rationalized where needed.

For clarity, the terms 'Ashapura', 'the Company', 'we', and 'our' refer collectively to Ashapura Minechem Ltd., Ashapura International Ltd., and Ashapura Perfoclay Ltd.

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity:

- Corporate Identity Number (CIN) of the Listed Entity** - L14108MH1982PLC026396
- Name of the Listed Entity** - Ashapura Minechem Limited
- Year of incorporation** - 1982
- Registered office address** - Jeevan Udyog Building, 278, 3rd Floor, D. N. Road, Fort, Mumbai – 400001, Maharashtra.
- Corporate address** - Jeevan Udyog Building, 278, 3rd Floor, D. N. Road, Fort, Mumbai – 400001, Maharashtra.
- E-mail** - cosec@ashapura.com
- Telephone** - 22-66651700
- Website** - <http://www.ashapura.com/>
- Financial year for which reporting is being done** - 2024-25
- Name of the Stock Exchange(s) where shares are listed :**

Name of the Exchange	Stock Code
BSE Ltd.	527001
National Stock Exchange of India Ltd.	ASHAPURMIN

- Paid-up Capital** - Rs. 19,10,52,196/-
- Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report-**
Name: Shri Hemul Shah
Designation: - Executive Director and CEO
Contact Details: 022-66221700
Email ID: cosec@ashapura.com
- 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). -**

The disclosures in this report are provided on a consolidated basis only for Ashapura Minechem Limited, its wholly-owned subsidiary, Ashapura International Limited (AIL), and its joint venture, Ashapura Perfoclay Limited (APL), unless stated otherwise.
- Name of assurance provider** – Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dated 28th March 2025.
- Type of assurance obtained** – Not Applicable for the reporting period as per SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dated 28th March 2025.

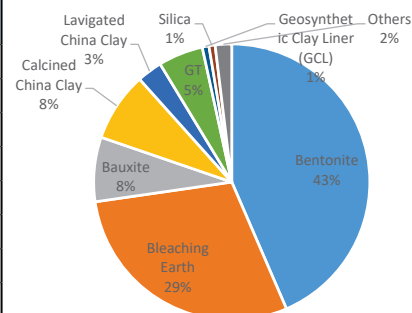
II. Products/services

- 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.	Trade	Wholesale Trading	7.39
2.	Manufacturing & Mining and quarrying	Other manufacturing includes jewellery, musical instruments, medical instruments AND Other Mining and Quarrying Activities	92.61

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Bentonite	Group 239 and 810	45.21
2.	Bleaching Earth	2399	28.32
3.	Bauxite	4662	7.32
4.	Calcined China Clay	2399	7.87
5.	Lavigated China Clay	2399	2.86
6.	GT	2399	5.09
7.	Geosynthetic Clay Liner (GCL)	2399	0.76
8.	Silica	2399	0.70
9.	Others	4662	1.87





III. Operations

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

Location	Number of plants	Number of offices	Total
National	7 (including mines)	1	8
International	-	-	-

17. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States & UTs)	3
International (No. of Countries)	7

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

The Company's contribution of exports is 53.30% of total turnover of the entity.

c. A brief on types of customers:

Ashpaura follows a B2B business model, offering multi-mineral solutions to numerous global and Indian industry leaders in fiberglass, paint, cement, and civil engineering sectors.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1421	1320	92.89	101	7.11
2.	Other than Permanent (E)	20	20	100.00	0	0.00
3.	Total employees (D + E)	1441	1340	92.99	101	7.01
WORKERS						
4.	Permanent (F)	139	138	99.28	1	0.72
5.	Other than Permanent (G)	642	459	71.50	183	28.50
6.	Total workers (F + G)	781	597	76.44	184	23.56

b. Differently abled Employees and workers:

S. No	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	Nil	Nil	Nil	Nil	Nil
2.	Other than Permanent (E)	Nil	Nil	Nil	Nil	Nil
3.	Total differently abled employees (D + E)	Nil	Nil	Nil	Nil	Nil
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	Nil	Nil	Nil	Nil	Nil
5.	Other than permanent (G)	Nil	Nil	Nil	Nil	Nil
6.	Total differently abled workers (F + G)	Nil	Nil	Nil	Nil	Nil

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	6	2	33.33
Key Management Personnel*	3	0	0.00

*KMP mean CS (Company Secretary), CFO (Chief Financial Officer) & HR (Human Resource) Head of Ashapura Minechem Ltd.

Note: The Board and KMP represent the BOD and KMP of Ashapura Minechem Ltd. only

22. Turnover rate for permanent employees and workers (in percent)

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	10.31	19.70	11.02	9.27	8.74	9.23	10.56	5.52	10.24
Permanent Workers	8.81	0.00	8.64	16.45	28.57	16.76	14.14	33.33	14.71

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 (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1.	Ashapura International Limited	Subsidiary	100.00	Yes
2.	Bombay Minerals Limited	Subsidiary	100.00	No
3.	Ashapura Aluminum Limited	Subsidiary	100.00	No
4.	Ashapura Consultancy Services Pvt Limited	Subsidiary	100.00	No
5.	Sharda Consultancy Private Limited	Subsidiary	100.00	No
6.	Peninsula Property Developers Private Limited	Subsidiary	100.00	No
7.	Ashapura Resources Private Limited	Subsidiary	100.00	No
8.	Ashapura Claytech Limited	Subsidiary	99.44	No
9.	Ashapura Minechem (UAE) FZE	Subsidiary	100.00	No
10.	Prashansha Ceramics Limited	Subsidiary	51.00	No
11.	Ashapura Holdings (UAE) FZE	Step Down Subsidiary	-	No
12.	Ashapura Guinea Resources SARL	Step Down Subsidiary	-	No
13.	PT Ashapura Bentoclay Fareast	Step Down Subsidiary	-	No
14.	Ashapura Holdings Fareast Pte Ltd	Step Down Subsidiary	-	No
15.	Ashapura Fareast Sdn Bhd	Step Down Subsidiary	-	No
16.	Ashapura Midgulf NV	Step Down Subsidiary	-	No
17.	Ashapura Perfoclay Limited	Joint Venture	50.00	Yes
18.	APL Valueclay Private Limited	Joint Venture	50.00	No
19.	Ashapura Arcadia Logistic Private Limited	Associate	50.00	No
20.	Shantilal Multiport Infrastructure Private Limited	Associate	50.00	No
21.	Aeon Procure Private Limited	Step Down Subsidiary	-	No
22.	Ashapura Dhofar Resources LLC	Joint Venture	70.00	No
23.	Orient Ceratech Limited	Associate	31.76	No
24.	Orient Advanced Materials Private Limited	Associate	31.76	No
25.	AQ Minerals Private Limited	Subsidiary	100.00	No



VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
(ii) Turnover (in Rs.) – 37151.6 Lakhs (For Ashapura Minechem Ltd.)
(iii) Net worth (in Rs.) – 31285.19 Lakhs (For Ashapura Minechem Ltd.)

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/ No)	FY 2024-25			FY 2023-24		
	(If Yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Employees and workers	Yes, the Company has grievance redressal mechanism. The concerned employee/ worker can reach out to HR head for resolution of the grievance. The existing HR Policies provide for the said mechanism.	NIL	NIL	NA	NIL	NIL	NA
Investors (other than shareholders)	Shareholders can lodge their grievances through cosec@ashapura.com & through SEBI SCORES mechanism	NIL	NIL	NA	NIL	NIL	NA
Shareholders		NIL	NIL	NA	1	NIL	The query related to the Demat request of shares and was addressed by the RTA.
Communities	Yes, the Company has grievance mechanism in place, and the concerned aggrieved can raise the concern by writing to support@ashapura.com	NIL	NIL	NA	NIL	NIL	NA
Customers		NIL	NIL	NA	NIL	NIL	NA
Value Chain Partners		NIL	NIL	NA	NIL	NIL	NA

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	GHG Emissions	Risk	Mining operations are inherently energy-intensive and are a notable source of direct greenhouse gas (GHG) emissions, particularly carbon dioxide, due to the extensive use of fossil fuels in excavation, processing, and associated activities. With the escalating frequency and intensity of climate-related events, climate change has emerged as a critical global concern, posing substantial operational and reputational risks to the mining sector.	To mitigate risks associated with greenhouse gas emissions, the Company places a strong emphasis on GHG reduction and energy efficiency through the adoption of environmentally responsible technologies. The Company uses low-sulfur coal in order to curb GHG emissions. In line with its long-term sustainability vision, the Company has set an ambitious target to achieve net-zero emissions by 2050 and is proactively advancing toward this goal.	Negative *There was no negative financial impact for the reporting year 2024-25
2	Employee Health & Safety	Risk	Safety is of utmost importance in mining operations due to the hazardous working environments often encountered. The mining sector, in particular, experiences higher rates of fatalities compared to other industries, with risks arising from factors such as powered haulage, machinery operation, and mine structural integrity. Poor health and safety records not only put workers at risk but also expose the company to fines, penalties, and increased regulatory scrutiny, leading to higher compliance costs.	Ensuring a safe work environment for employees is a fundamental responsibility. As part of this commitment, the Company consistently strives to provide and maintain safe premises, machinery, systems, and processes across its operational sites. With its open-cast surface mining operations, the Company takes proactive measures to significantly minimize associated risks.	Negative *There was no negative financial impact for the reporting year 2024-25
3	Waste & Hazardous Materials Management	Risk	The mining sector generates significant amounts of both mineral and non-mineral waste, and industrial waste. Some of these materials may contain toxic, hazardous, or chemically reactive substances. Additionally, mineral processing often involves the use of hazardous materials for metal extraction, which can pose risks to life and health. Improper disposal or storage of hazardous materials or mining waste presents a serious long-term risk to human health and ecosystems, potentially contaminating groundwater or surface water used for drinking or agriculture, as well as causing land contamination.	Depending on the nature of the waste, materials generated during mining operations are either treated, disposed of, or stored, either on-site or off-site, typically in impoundments or disused mine pits. The Company ensures proper waste disposal practices are in place at all operational levels. Furthermore, none of the Company's operations generate materials such as sludge or slags. The overburden is responsibly managed by using it for backfilling the mines, contributing to sustainable mining practices.	Negative *There was no negative financial impact for the reporting year 2024-25

¹ Material issues identified are referred from the Sustainability Accounting Standards Board (SASB) 2023-24 version. SASB Standards are maintained and enhanced by the International Sustainability Standards Board (ISSB). This follows the SASB's merger with the International Integrated Reporting Council (IIRC) into the Value Reporting Foundation (VRF) and subsequent consolidation into the IFRS® Foundation in 2022. The latest standards have been accessed at <https://sasb.ifrs.org/> on 16th April, 2025 at 18:40 IST



S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Air Quality	Risk	The mining sector generates non-greenhouse gas (GHG) air emissions and ambient air pollutants that can have significant localized impacts on both human health and the environment. Depending on the type of metal being mined, key pollutants include sulfur dioxide, lead, mercury, cadmium, arsenic, and particulate matter. The release of these emissions—such as sulfur oxides (SOx), nitrogen oxides (NOx), suspended particulate matter (SPM), and particulate matter—poses health risks and potential life hazards to stakeholders both inside and outside the Company's operational premises.	To address the risks associated with air pollution, the Company takes proactive steps to monitor and manage its emissions of sulfur oxides (SOx), nitrogen oxides (NOx), and suspended particulate matter (SPM) and has installed twin bag filters, and cyclone separators to curb emissions. These emissions are regularly monitored through scientific methods to ensure accurate data collection and analysis. The Company has also implemented comprehensive systems aimed at minimizing air pollutants released into the atmosphere, ensuring full compliance with all relevant environmental laws and regulations. Furthermore, by refraining from engaging in smelting or refining activities, the Company significantly reduces the potential for air contamination.	Negative *There was no negative financial impact for the reporting year 2024-25
5	Management of the Legal and Regulatory Environment Compliances	Risk	As a highly regulated industry, the mining sector is subject to frequent revisions and increasingly stringent environmental and operational regulations. These changes present a risk of non-compliance, which could impact the Company's activities and operations if not meticulously managed.	The Company has established a comprehensive compliance management framework, which is consistently updated to align with evolving regulations. This framework is fully integrated with business processes, risk management, and controls. Any changes in regulations are promptly monitored and incorporated into the Compliance Management System, ensuring that the Company's governance mechanisms remain robust and effective.	Negative *There was no negative financial impact for the reporting year 2024-25
6	Employment opportunities for locals	Opportunity	Operating within the mining sector, the Company recognizes the importance of fostering strong partnerships with local communities. This collaboration not only creates employment opportunities but also enhances livelihoods, boosts earning potential, and supports skill development, thereby contributing to the overall welfare of the community.	NA	Positive

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
Policy and management processes										
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										
Sr. No.	Name of policy	Link to Policy						Which Principles each policies goes into		
1	Code of Conduct for Prevention of Insider Trading	All the policies specified are available on Company's website and can be accessed via https://www.ashapura.com/codepolicy.php						P1, P4, P7		
2	Code of Conduct and Ethics							P1, P4, P7		
3	Risk Management Policy							P1, P2		
4	Dividend Distribution Policy							P3, P4		
5	Social Accountability Policy							P3, P4, P5, P7		
6	Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information							P1		
7	Corporate Social Responsibility Policy							P4, P8		
8	Policy on Determination of Materiality of Events and Information							P1, P4		
9	Nomination & Remuneration Policy ²							P1, P5		
10	Performance Evaluation Policy							P3		
11	Policy on Related Party Transactions ³							P1, P4, P7		
12	Prevention of Sexual Harassment Policy							P5		
13	Policy on Preservation of Documents							P1, P9		
14	Whistle Blower Policy							P1		
15	Policy for Determining Material Subsidiary							P1		
16	EHS Policy	Internal						P6		
17	Information Technology Policy & Procedures	Internal						P9		
18	Policy on Recruitment and Compensation	Internal						P5		
19	Policy on Leaves	Internal						P3		
20	Workplace Discipline Code	Internal						P3, P5		
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	No	No	No	No	No	No	No	No	No

² Amended in accordance with Regulation 17 of the SEBI (LODR) Regulations, as per the Third Amendment notified on 12th December 2024.

³ Amended in accordance with Regulation 23 of the SEBI (LODR) Regulations, as per the Third Amendment notified on 12th December 2024.



<p>4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.</p>	<p>Ashapura’s manufacturing facilities have undergone thorough evaluation and have been certified under various ISO standards, reflecting the Company’s commitment to quality, environmental responsibility, and workplace safety. The standards held by the Company is as follows:</p> <p>Ashapura International Limited (AIL):</p> <ul style="list-style-type: none">• ISO 9001:2015 - Quality Management System – P2, P6• ISO 14001:2015 - For Environment Management System – P6• ISO 45001:2018 – Occupational Health & Safety Management Systems – P3, P5 <p>Ashapura Minechem Limited (AML):</p> <ul style="list-style-type: none">• ISO 9001:2015 - Quality Management System – P2, P6• ISO 14001:2015 - For Environment Management System – P6• ISO 45001:2018 – Occupational Health & Safety Management Systems – P3, P5 <p>Ashapura Perfoclay Limited (APL):</p> <ul style="list-style-type: none">• ISO 9001:2015 - Quality Management System – P2, P6• ISO 14001:2015 - For Environment Management System – P6• ISO 45001:2018 – Occupational Health & Safety Management Systems – P3, P5• ISO 22000:2018 – Food Safety Management Systems (FSMS)
<p>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</p>	<p>The Company is committed to strengthening its ESG (Environmental, Social, and Governance) agenda through a structured, data-backed approach that defines clear goals and measurable outcomes. This framework guides the identification and management of environmental and social risks, promotes responsible business conduct, and supports sustainable long-term growth.</p> <p>As part of this commitment, the Company has set an ambitious target to achieve net-zero emissions by 2050 and has already begun implementing initiatives to move steadily toward this goal.</p>
<p>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</p>	
<p>Governance, leadership and oversight</p>	
<p>7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements</p> <p>At Ashapura Minechem Limited, our commitment to Environment, Social, and Governance (ESG) principles is a fundamental part of our strategy and day-to-day operations. ESG is not a box to be checked but a responsibility that we carry with sincerity and foresight.</p> <p>We understand the environmental challenges associated with mining and remain focused on reducing our ecological impact through efficient resource utilization, strong waste management practices, and sustained efforts in land rehabilitation. Our goal is to reach net-zero emissions by the year 2050. We have begun this journey by identifying our indirect emission sources and supporting carbon offset initiatives to ensure meaningful progress.</p> <p>On the social front, the welfare and safety of our employees and the communities we serve continue to be our priority. We have created a workplace culture that promotes inclusivity, ethical conduct, and mutual respect. Our initiatives reflect a belief that people are the foundation of long-term sustainability.</p> <p>From a governance perspective, we have built a robust framework that emphasizes integrity, transparency, and responsible leadership. We are mindful that strong governance is key to maintaining trust and credibility across all stakeholders.</p> <p>Through a combination of innovation, technology, and principled leadership, we remain committed to delivering outcomes that align with our ESG goals while contributing to a better and more sustainable future for all.</p> <p>- Shri Hemul Shah, Executive Director and CEO (DIN: 00058558)</p>	
<p>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</p>	<p>Shri Hemul Shah, Executive Director and CEO DIN: 00058558 cosec@ashapura.com</p>
<p>9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.</p>	<p>The Company has Risk Management Committee, responsible for making decision relating to issues on Sustainability.</p>

10. Details of Review of NGRBCs by the Company:																		
Subject for Review	Indicate whether review was under taken 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	Board of Directors									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	As a regulated entity, the Company ensures adherence to all key statutory requirements aligned with the relevant principles. No major instances of non-compliance were observed during the year, and periodic compliance updates are submitted to the Board of Directors.									Quarterly								
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
										Dhir & Dhir Associates, a eminent Law Firm, has assessed the effectiveness & operationalisation of the Policies. The evaluation was conducted based on the functionality of the policies and SOPs followed. Additionally, department heads and business heads periodically review and revise the policies, which are then approved by the management or board.								

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)	NA								
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)									

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	4	During the year, the Board and KMPs engaged in updates on business operations, risk management, legal and regulatory frameworks, ESG, and CSR. KMPs also attended external programmes on corporate law, Union Budget, RPTs, anti-money laundering, SEBI regulations, and GST.	100.00
Key Managerial Personnel	14		100.00



Employees other than BoD and KMPs	34	During the year, various training programs were conducted across departments, covering critical areas such as Behaviour-Based Safety, Work Permit and LOTO Systems, Machine Guarding Practices, and Preventive Maintenance. Sessions also included leadership development, emotional intelligence, communication, and time management. Technical trainings focused on SAP, production planning, instrument calibration (both internal and external), and awareness of API (Q1 & 13A) standards. Additionally, workshops on management insights drawn from mythology and supply chain awareness were organized to foster holistic professional growth.	100.00
Workers	18	The Company conducted training on workplace safety, fire safety, bag packing and weighing, environmental aspects and impacts, and HIRA (Hazard Identification and Risk Assessment).	100.00

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 (basis the materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website)**

Monetary					
	NGRBC 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	P1	BSE Ltd.	138060	SOP Fine paid under Regulations 17(1), 18(1) and 19(1)/(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 for the temporary non-composition of the Board, Audit Committee, and Nomination & Remuneration Committee	No
	P1	National Stock Exchange of India Ltd.	138060	SOP Fine paid under Regulations 17(1), 18(1) and 19(1)/(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 for the temporary non-composition of the Board, Audit Committee, and Nomination & Remuneration Committee	No
Settlement	NIL				
Compounding Fee					
Non-Monetary					
Imprisonment	P1	Court of LXXXI Additional City & Civil Judge at Bengaluru ("the Special CBI Court")	₹ 9.06 Crores (jointly & severally) + ₹ 20,000 each and imprisonment up to 7 years as per order	The Company and its Chairman, along with others, have been included in an order passed in a matter relating to Iron Ore Exports. While the court has issued its verdict under IPC sections 120-B, 420, and 379, the Company firmly believes in its non-involvement and has initiated an appeal.	Yes
Punishment	NIL				

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Sentence suspended by Hon'ble Karnataka High Court; bail granted on deposit of 25% fine and bond execution	Hon'ble High Court of Karnataka, Bengaluru

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

The Company is unwavering in its commitment to ethical business conduct and operational integrity. In line with this ethos, the Company has instituted a comprehensive Anti-Corruption and Anti-Bribery Policy, embedded within its Code of Conduct and Vigil Mechanism. This policy applies uniformly to all directors, officers, and employees, and is designed to prevent, detect, and address any form of corrupt practice or undue influence.

The policy safeguards confidentiality, discourages misuse of reporting frameworks, and ensures that bona fide concerns are treated with the seriousness and sensitivity they deserve. It reflects the Company's proactive stance in fostering a transparent work culture, free from coercion or compromise.

For further information, the web link to the Company's Vigil Mechanism is available at: <https://www.ashapura.com/downloads/investor-corner/Policies/Vigil%20Mechanism%20-%20Whistle%20Blower%20Policy.pdf>

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

	FY 2024-25	FY 2023-24
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the Directors	Nil	NA	Nil	NA
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.

The Company has in place strong governance policies and monitoring mechanisms to ensure adherence to applicable laws and ethical standards. These systems are routinely reviewed and aligned with best practices. As no instances of non-compliance or regulatory action were reported during the year, no corrective measures were required.

8. Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format⁴:

	FY 2024-25	FY 2023-24
Number of days of accounts payables	101.83	115.32

9. Open-ness of Business

Provide details of concentration of purchases and sales with trading houses, dealers and related parties along-with loans and advances & investments, with related parties, in the following format⁵:

Parameter	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from Trading houses as % of total purchases	0.00	0.00
	b. Number of trading houses where purchases and made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0.00	0.00
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	0.00	0.00
	b. Number of dealers/distributors to whom sales are made	0	0
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	0.00	0.00
Share of RPTs in	a. Purchases (Purchases with related parties/ Total Purchases)	9.97	12.87
	b. Sales (Sales to related parties/Total Sales)	16.36	17.79
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	70.83	69.50
	d. Investments (Investments in related parties/ Total Investments made)	71.65	58.99

⁴ The above calculations are in accordance with Part B, Attribute 9 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

⁵ The above calculations are in accordance with Part B, Attribute 9 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.



Leadership Indicators

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

Total number of awareness programmes held	Topic/ principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
While the Company regularly communicates its policies and code of conduct to value chain partners, no formal awareness or training programmes were conducted during the reporting period. The Company is actively exploring structured mechanisms to conduct such assessments and training sessions in the forthcoming years.		

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 established clear processes to manage and avoid conflicts of interest involving members of the Board. These are articulated within its Code of Conduct and Ethics Policy, which incorporates a dedicated Conflict of Interest framework. The policy allows for personal financial dealings, provided they do not interfere with the individual's responsibilities or influence decision-making in a manner adverse to the Company's interests.

It mandates timely disclosure of any actual or potential conflicts and outlines procedures to address and mitigate such instances effectively. This reflects the Company's strong commitment to ethical governance and transparency in all aspects of its operations.

The Code of Conduct and Ethics Policy is accessible via - <https://www.ashapura.com/downloads/coc/Code%20of%20Conduct%20for%20Board.pdf>

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.

	2024-25	2023-24	Details of Improvements in environmental and social impacts
R&D	2.05	2.24	The Company's investment in research and development is driving innovation, improving processes, and creating products that support sustainability and deliver positive social impact. Considerable efforts have been undertaken to meet energy goals, including the adoption of solar power generation and the installation of power-saving systems. These initiatives combine efficient lighting solutions such as LED lights and motion sensors with optimized air-cooling systems, natural ventilation fans, and measures to improve power factors through the use of static capacitors and synchronous condensers.
Capex	0.65	0.55	In water management, the Company follows an integrated and sustainable approach. This includes drip irrigation for plantations, wastewater treatment for reuse and recycling, and gravity-based water filtration systems for pre-treating bore or well water before RO filtration. The treated water is then distributed within the premises, significantly contributing to plant and tree growth. Ethical business practices are reinforced through a multi-pronged strategy that emphasizes rigorous testing, adherence to established standards, and an unwavering commitment to safety and quality. This approach includes the implementation of standard work practices, achievement of NABL accreditation, adherence to robust safety protocols, and the application of the 5S methodology to ensure operational excellence.

The data in the above are for Ashapura Minechem only.

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

Yes, the Company has procedures in place for sustainable sourcing. Operating across mining, mineral processing, and logistics, the Company prioritizes the procurement of raw materials from local suppliers and vendors, thereby significantly reducing the carbon footprint associated with transportation. All sourcing activities are conducted in adherence to applicable environmental and regulatory standards, and the Company remains committed to responsible and sustainable mining practices, both in policy and on the ground.

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

The Company is committed to efficient procurement and requires suppliers to adhere to industry standards. While the specific percentage of sustainably sourced inputs is yet to be determined, the Company intends to gather this data in the coming years to enhance transparency and accountability.

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

The Company has instituted structured processes to ensure the safe reclamation, reuse, recycling, and disposal of its products and waste streams. Standard Operating Procedures (SOPs) are in place, assigning responsibility to respective departments for proper disposal through authorized vendors. Oversized, undersized, or rejected materials are crushed and reintroduced into the production cycle. The Company also undertakes research initiatives to explore the reuse of mineral waste in the manufacture of ceramic products. At the plant level, certain waste materials are converted into fertilizers for beneficial reuse. Segregation of waste at the source into wet and dry categories is enforced across facilities, with clearly marked bins placed at strategic locations for efficient collection and management.

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.

No, Extended Producer Responsibility (EPR) is not applicable to the Company, considering the nature and scope of its operations.

LEADERSHIP INDICATORS

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product/ Service	% of total Turnover Contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
Currently, the Company has not undertaken any Life Cycle Assessment (LCA); however, it is actively considering incorporating LCA as part of its sustainability and environmental management initiatives in future, if required.					

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

Name of Product/ Service	Description of the risk/ concern	Action Taken
No significant social or environmental risks were identified, as no Life Cycle Assessments (LCA) or equivalent evaluations were conducted during the reporting period.		

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 2024-25	FY 2023-24
	Nil	Nil

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

	FY 2024-25			FY 2023-24		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	Nil	Nil	Nil	Nil	Nil	Nil
E-waste	Nil	Nil	Nil	Nil	Nil	Nil
Hazardous Waste	Nil	Nil	Nil	Nil	Nil	Nil
Other waste	Nil	Nil	Nil	Nil	Nil	Nil



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 percentage of products sold) for each product category
Nil	Nil

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:

% of employees covered by											
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	1320	1320	100.00	1320	100.00	0	0.00	1320	100.00	0	0.00
Female	101	101	100.00	101	100.00	101	100.00	0	0.00	0	0.00
Total*	1421	1421	100.00	1421	100.00	101	100.00	1320	100.00	0	0.00
Other than Permanent Employees											
Male	20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Female	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

Percentage of (D) & (E) - Maternity & Paternity benefit is calculated as 100% as per FAQ's on BRSR issued by NSE dt May 10, 2024.

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

% 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	138	138	100.00	138	100.00	0	0.00	138	100.00	0	0.00
Female	1	1	100.00	1	100.00	1	100.00	0	0.00	0	0.00
Total*	139	139	100.00	139	100.00	1	100.00	138	100.00	0	0.00
Other than Permanent Workers											
Male	459	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Female	183	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	642	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

*Percentage of (D) & (E) – maternity and paternity benefit is calculated as 100% as per FAQs on BRSR issued by NSE dt. May 10, 2024

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format: ⁶

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the Company	0.15	0.22

⁶ The above calculations are in accordance with Part B, Attribute 5 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

Benefits	FY 2024-25			FY 2023-24		
	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.)
PF	99.84	100.00	Yes	97.94	24.21	Yes
Gratuity	100.00	100.00	NA	98.17	24.21	N/A
ESI	0.91	2.88	Yes	0.46	1.32	Yes

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 deeply committed to the principles of equality and inclusivity, and recognizes the value that a diverse workforce brings to the organization. While the current infrastructure is yet to be fully aligned with the accessibility standards under the Rights of Persons with Disabilities Act, 2016, the Company has initiated plans to upgrade its premises to ensure they are accessible to differently abled employees and workers in the near future.

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 upholds a robust policy framework that affirms its commitment to providing equal employment opportunities in alignment with the principles of the Rights of Persons with Disabilities Act, 2016. This policy forms an integral part of the Company's HR Manual and is readily accessible to all employees via the internal intranet. It reflects the Company's unwavering dedication to fostering a diverse, inclusive, and equitable work environment.

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

Gender	Permanent Employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100.00	100.00	100.00	100.00
Female	100.00	100.00	NA	NA
Total	100.00	100.00	50.00	50.00

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/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	The Company is committed to fostering a positive and inclusive work environment that promotes fairness in grievance resolution. To this end, a dedicated grievance redressal mechanism has been embedded within the Company's Vigilance Framework and Code of Conduct, ensuring accessibility to all employees and workers across the organization.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

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

Category	FY 2024-25			FY 2023-24		
	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	1421	0	0.00	1287	0	0.00
Male	1320	0	0.00	1184	0	0.00
Female	101	0	0.00	103	0	0.00
Total Permanent Worker	139	0	0.00	183	0	0.00
Male	138	0	0.00	182	0	0.00
Female	1	0	0.00	1	0	0.00

8. Details of training given to employees and workers:



	FY 2024-25					FY 2023-24				
	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	1340	432	32.24	542	40.45	1208	399	33.03	578	47.85
Female	101	23	22.77	41	40.59	103	22	21.36	20	19.42
Total	1441	455	31.58	583	40.46	1311	421	32.11	598	45.61
Workers										
Male	597	127	21.27	25	4.19	688	586	85.17	304	44.19
Female	184	51	27.72	4	2.17	68	50	73.53	12	17.65
Total	781	178	22.79	29	3.71	756	636	84.13	316	41.80

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1340	1340	100.00	1208	1208	100.00
Female	101	101	100.00	103	103	100.00
Total	1441	1441	100.00	1311	1311	100.00
Workers						
Male	597	597	100.00	688	688	100.00
Female	184	184	100.00	68	68	100.00
Total	781	781	100.00	756	756	100.00

10. Health and safety management system:

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

Yes, the Company has implemented a comprehensive Occupational Health and Safety Management System (OHSMS), reflecting its strong commitment to the welfare of its employees and workers. The system encompasses key components such as the Environment, Health & Safety (EHS) policy, a structured work permit system, and protocols for incident and accident reporting, all aimed at fostering a safe and compliant working environment.

Hazard Identification and Risk Assessment (HIRA) forms a core part of this system, enabling the Company to proactively identify, assess, and mitigate workplace risks. To ensure continuous improvement, regular internal safety audits are conducted at the plant level. The Company's adherence to the OHSAS 18001:2007 standard further underscores its commitment to maintaining best-in-class occupational health and safety practices.

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

Yes, the Company recognizes its responsibility to proactively identify and manage work-related hazards. To this end, hazard identification and risk assessment (HIRA) studies are routinely conducted at the plant level. The process is systematically structured as follows:

- (i) Identification of potential hazards in both routine and non-routine operations.
- (ii) Risk assessment to evaluate the likelihood and severity of harm or damage.
- (iii) Risk evaluation to determine the adequacy of existing controls and identify the need for additional measures.
- (iv) Implementation of appropriate control measures to mitigate identified risks.
- (v) Continuous monitoring and review of the effectiveness of these controls to ensure sustained workplace safety.

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

Yes, the Company has instituted clear protocols that empower workers to report work-related hazards directly to their respective supervisors. In alignment with the principles of the Hazard Identification and Risk Assessment (HIRA) framework, the Company emphasizes active participation, consultation, and open communication with both employees and contractors to ensure timely identification, assessment, and mitigation of workplace risks. Workers are also encouraged to remove themselves from hazardous situations until appropriate safety measures are in place.

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

Yes, the Company is committed to the well-being of its employees and extends access to non-occupational medical and healthcare services.

This includes annual health check-ups as well as medical consultation facilities, which are made available to both employees/workers and their spouses.

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

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	2.02	1.91
	Workers	6.40	2.20
Total recordable work-related injuries	Employees	7	6
	Workers	12	4
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 work place.

The Company adopts a proactive and structured approach to ensuring a safe and healthy workplace by embedding risk management into its core operational practices. Potential hazards are systematically identified, risks assessed, and suitable control measures implemented and regularly monitored. Safety protocols include the mandatory use of personal protective equipment (PPE), clearly marked emergency escape routes, and strategic placement of rescue equipment. To reinforce these efforts, internal audits are conducted periodically to evaluate the adequacy and effectiveness of health and safety measures across all operational sites.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	NIL, since during FY 2024-25, there were no complaints received.			NIL, since during FY 2023-24, there were no complaints received.		
Health & Safety						

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100.00
Working Conditions	100.00

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.

NIL, No safety-related incidents or significant risks or concerns pertaining to health and safety practices or working conditions were reported during the reporting period, and hence, no corrective actions were required.

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, the Company has a defined process for the settlement of dues in the unfortunate event of an employee/worker's demise, in accordance with the Company's internal policies. In addition, where circumstances warrant, the Company may extend financial assistance on a discretionary basis, taking into account the specific needs of the affected family. This reflects the Company's compassionate and responsible approach towards the welfare of its workforce.

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 expects all value chain partners to adhere strictly to applicable statutory obligations, including the deduction and deposit of statutory dues. While the Company monitors compliance through regular interactions and documentation checks where applicable, a formalised, centralised mechanism for verification is presently under development.

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:



	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

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

Yes, the Company has in place a considered transition assistance framework to support employees approaching retirement or exiting due to termination. As part of this initiative, individuals may be engaged as consultants for a defined period typically one to two years, thereby ensuring continuity of income, retention of institutional knowledge, and a dignified transition from active employment. This approach reflects the Company's commitment to responsible workforce management and long-term employability.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	NIL, No assessments of value chain partners with respect to health and safety practices were conducted during the reporting period.
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, as no assessments relating to health, safety practices, or working conditions of value chain partners were undertaken during the reporting period. Consequently, no corrective actions were required or initiated.

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 recognises the critical importance of engaging with stakeholders who influence or are impacted by its operations. Accordingly, the Company has systematically identified its key stakeholder groups, both internal and external, which include investors, customers, employees, clients, statutory authorities, and vendors. This identification is a continuous and evolving process, aligned with the dynamic nature of the Company's business environment and stakeholder expectations.

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
Customers	No	- Email, Telephonic communications, Personal meetings, - Virtual meetings	Regularly	Communication & engagement during the entire cycle of obtaining, execution and feedback of a contract/ order/ despatch
Shareholders	No	- Press release Website; - Publications, - Newspaper publications, - Annual reports, - Annual General Meetings	Annually, Quarterly & Need basis	Update on Financial Performance/ Business Performance, Company's new Initiatives.
Government/ Competent Authorities	No	Statutory Filings	From time to time	Submissions of compliances and receipt of approvals

Employees	No	Emails, Meetings	Regularly	Update on policies Achievement, Awards, Trainings, Employee engagement initiatives.
Suppliers	No	Email, Telephonic communication, Personal meetings, Virtual meetings	Regularly	Communication & engagement during the entire cycle of awarding, execution and feedback of a contract/ order/ despatch.
Communities	Yes	Community Meetings	From time to time	Requisite engagement under the mining regulations and for CSR objectives.

LEADERSHIP INDICATORS

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

The Company follows a structured process wherein designated departments engage regularly with key stakeholders. Feedback from these consultations is reviewed by the Stakeholder Relationship Committee and communicated to the Board to support informed decision-making on economic, environmental, and social matters.

- 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, the Company actively engages stakeholders through a combination of formal and informal consultation mechanisms to identify and manage key environmental and social matters. This consultative process is continuous and adaptive, evolving in response to stakeholder feedback and emerging priorities. Inputs received from stakeholders are thoughtfully evaluated and, where appropriate, deliberated at the Board level, thereby informing and influencing the development and refinement of the Company's internal policies and operational practices.

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

There were no such instances recorded during the reporting period. Ashapura's CSR initiatives are designed to support disadvantaged and marginalized communities. These initiatives are carefully aligned with the Company's CSR Policy, ensuring that projects address the needs of vulnerable groups.

PRINCIPLE 5: Businesses should respect and Promote Human rights.



ESSENTIALS INDICATORS

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	1421	974	64.54	1287	820	63.71
Other than permanent	20	20	100.00	24	24	100.00
Total Employees	1441	994	68.98	1311	844	64.38
Workers						
Permanent	139	139	100.00	183	171	93.44
Other than permanent	642	101	15.73	573	573	100.00
Total Workers	781	240	30.73	756	744	98.41



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

Category	FY 2024-25					2023-24				
	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	1421	30	2.11	1391	97.89	1287	0	0.00	1287	100.00
Male	1320	0	0.00	1320	100.00	1184	0	0.00	1184	100.00
Female	101	30	29.70	71	70.30	103	0	0.00	103	100.00
Other than Permanent	20	0	0.00	20	100.00	24	0	0.00	24	100.00
Male	20	0	0.00	20	100.00	24	0	0.00	24	100.00
Female	0	0	0.00	0	0.00	0	0	0.00	0	0.00
Workers										
Permanent	139	131	94.24	8	5.76	183	0	0.00	183	100.00
Male	138	130	94.20	8	5.80	182	0	0.00	182	100.00
Female	1	1	100.00	0	0.00	1	0	0.00	1	100.00
Other than Permanent	642	0	0.00	642	100.00	573	0	0.00	573	100.00
Male	459	0	0.00	459	100.00	506	0	0.00	506	100.00
Female	183	0	0.00	183	100.00	67	0	0.00	67	100.00

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

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ Salary/ Wages of respective category (in INR per year)	Number	Median remuneration/ Salary/ Wages of respective category (in INR per year)
Board of Directors (BoD)	5	84,88,771	0	0
Key Managerial Personnel	3	84,70,226	2	39,45,686
Employees other than BoD and KMP	1312	3,85,802	99	6,00,000
Workers	138	1,87,303	1	1,80,000

In the above table, the Remuneration paid to Executive Directors have been considered as the remaining Directors do not draw any salary or commission except for sitting fees

b. Gross wages paid to females as % of total wages paid by the entity, in the following format:⁷

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	8.68	11.12

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 Company has appointed the Head of Human Resources as the designated focal point responsible for addressing any human rights impacts or issues that may arise from, or be contributed to by, the Company's operations. This ensures accountability and facilitates a coordinated approach to safeguarding human rights across the organization.

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

The Company has instituted a structured grievance redressal mechanism within its Code of Conduct and vigilance framework, specifically designed to address concerns related to human rights. This internal mechanism enables employees to report grievances in a secure and transparent manner, ensuring that all issues are addressed promptly, fairly, and in alignment with the Company's commitment to upholding the highest standards of ethical conduct and human dignity.

⁷ The above calculations are in accordance with Part B, Attribute 6 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual harassment	Nil	Nil	NA	Nil	Nil	NA
Discrimination at workplace	Nil	Nil	NA	Nil	Nil	NA
Child Labour	Nil	Nil	NA	Nil	Nil	NA
Forced Labour/ Involuntary Labour	Nil	Nil	NA	Nil	Nil	NA
Wages	Nil	Nil	NA	Nil	Nil	NA
Other Human Rights related issues	Nil	Nil	NA	Nil	Nil	NA

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

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	NIL	NIL
Complaints on POSH as a % of female employees / workers	0.00	0.00
Complaints on POSH upheld	NIL	NIL

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

The Company maintains a firm zero-tolerance policy towards sexual harassment in the workplace, supported by a comprehensive Prevention of Sexual Harassment (PoSH) policy. This policy is crafted to cultivate a work environment grounded in safety, mutual respect, and dignity for all employees. Preventive measures include clearly defined procedures and protocols, alongside the establishment of an Internal Complaints Committee (ICC) mandated to handle grievances swiftly and sensitively. In addition, the Company has adopted a robust whistle-blower mechanism to safeguard the interests of complainants and uphold the integrity of the grievance redressal process.

9. Do human rights requirements form part of your business agreements and contracts?

Yes, the Company accords high priority to the protection and promotion of human rights and, accordingly, incorporates specific clauses relating to the observance of human rights within all its business agreements and contractual arrangements. This reflects the Company's unwavering commitment to ethical and responsible business conduct.

10. Assessments for the year:

	% of your plants and Offices that were assessed (by entity or statutory authorities or third parties)
Child Labour	100.00
Forced/involuntary labour	100.00
Sexual Harassment	100.00
Discrimination at workplace	100.00
Wages	100.00

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

No significant risks or concerns were identified during the reporting period that warranted corrective action.

⁸ The above calculations are in accordance with Part B, Attribute 6 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.



LEADERSHIP INDICATORS

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

The Company remains committed to upholding the highest standards of human rights across all facets of its operations. In alignment with this commitment, a grievance redressal mechanism has been embedded within the broader Code of Conduct framework to ensure that any potential concerns are addressed in a structured and transparent manner. During the reporting period, no grievances or complaints pertaining to human rights were reported. Nevertheless, the Company continues to reinforce its core values by maintaining a workplace culture rooted in dignity, respect, and ethical conduct.

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

Not applicable, as no human rights due-diligence exercise was undertaken by the Company during the reporting period.

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?

The Company is deeply committed to the principles of equality, inclusivity, and the promotion of a diverse and accommodating environment. While the Company's premises are not yet fully compliant with the accessibility standards prescribed under the Rights of Persons with Disabilities Act, 2016, concrete steps are being planned to ensure that appropriate facilities are put in place to accommodate differently abled visitors in the near future.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	Nil
Discrimination at workplace	Nil
Child Labour	Nil
Forced Labour / Involuntary Labour	Nil
Wages	Nil

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, as no such assessments have been conducted in respect of the Company's value chain partners, and accordingly, no significant risks or concerns have been identified warranting corrective action.

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



ESSENTIAL INDICATORS

1. Details of total energy consumption (in GJ) and energy intensity, in the following format: ⁹

Parameter	FY 2024-25 (In Gigajoules)	FY 2023-24 (In Gigajoules)
From renewable sources		
Total electricity consumption (A)	0.00	0.00
Total fuel consumption (B)	43,477.87	33,895.90
Energy consumption through other sources (C)	0.00	0.00
Total Energy consumption from renewable sources (A+B+C)	43,477.87	33,895.90
From non-renewable sources		
Total electricity consumption (D)	2,01,069.53	1,72,875.94
Total fuel consumption (E)	4,46,913.09	6,85,092.02
Energy consumption through other sources (F)	0.00	0.00
Total Energy consumption from non-renewable sources (D+E+F)	6,47,982.62	8,57,967.96
Total energy consumed (A+B+C+D+E+F)	6,91,460.50	8,91,863.86
Energy intensity per rupee of turnover (Total energy consumption/ Revenue from Operations) – GJ/Rupee	0.000025	0.000068
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) - GJ/USD	0.00052	0.00153
Energy intensity in terms of physical output – GJ/MT ¹⁰	0.53	1.14
Energy intensity per Employee – MJ/Employee ¹¹	479.85	680.29

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

Ashapura Minechem Limited does not have any facilities recognized as Designated Consumers under the Government of India's Perform, Achieve, and Trade (PAT) Scheme. The entity was therefore not subject to any specific obligations or targets under the PAT framework during the reporting year.

⁹ The above calculations are in accordance with Part B, Attribute 3 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹⁰ The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹¹ The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.



3. Provide details of the following disclosures related to water, in the following format ¹²:

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	1,75,563.00	2,33,498.00
(ii) Groundwater	18,205.60	18,143.10
(iii) Third party water	15,290.58	12,740.61
(iv) Seawater / desalinated water	0.00	0.00
(v) Others	0.00	0.00
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	2,09,059.18	2,64,381.71
Total volume of water consumption (in kilolitres) *	2,08,073.65	2,64,020.64
Water intensity per rupee of turnover (Water consumed / Revenue from operations) – KL/Rupee	0.000008	0.000020
Water Intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) – KL/USD ¹³	0.00016	0.00045
Water intensity in terms of physical output – KL/MT ¹⁴	0.16	0.34
Water intensity per Employee – KL/Employee	144.40	201.39

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

4. Provide the following details related to water discharged

Parameter	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
(ii) To Groundwater	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater	0.00	0.00
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third parties		
- No treatment	0.00	0.00
- With treatment – please specify level of treatment		
(v) Others – Gardening		
- No treatment	564.00	0.00
- With treatment – please specify level of treatment	360.00	360.00
Total water discharged (in kilolitres)	924.00	360.00

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

¹²The above calculations are in accordance with Part B, Attribute 2 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹³The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹⁴The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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

Yes, a Zero Liquid Discharge (ZLD) system has been implemented at the Ashapura Perfoclay Limited's Bleaching Clay Unit (APL - Bleaching Clay). The facility operates a comprehensive wastewater treatment and recycling process designed to eliminate any liquid effluent discharge. The system includes neutralization of acidic wastewater, followed by lime-soda softening, coagulation, flocculation, and clarification to remove suspended solids and hardness. Post-clarification, the water undergoes sand filtration and ultrafiltration to eliminate finer particles and microorganisms. A two-stage Reverse Osmosis (RO) system is then used to extract clean water from the effluent. The RO permeate is reused within the plant for operations such as industrial processing and gardening, while the RO reject is processed through a Multiple Effect Evaporator (MEE) to recover additional water and reduce waste volume. This setup ensures that nearly all wastewater is treated and reused within the unit, enabling full compliance with ZLD principles and significantly reducing reliance on freshwater sources.

At Ashapura Minechem Limited's Kaolin Unit (AML - Kaolin), operations follow a Zero Liquid Discharge (ZLD) approach. No chemicals are used during any stage of the process, ensuring that the water remains uncontaminated. After passing through a filter press, the water is fully recovered and reused within the system. This approach supports sustainable water management and helps minimize environmental impact.

At the Ashapura Minechem Limited's Dapoli Unit (AML - Dapoli), no water is discharged from mine pits or production activities. The mining operations do not intersect with the groundwater table, as bauxite is available at shallow depths. Water is sourced from nearby villages through tankers and is used solely for dust suppression within the mine area and on haulage roads. Since all the water is utilized in these activities and there is no water used in the production process, the operations result in negligible discharge.

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

Parameter	Unit	FY 2024-25	FY 2023-24
NOx	mg/Nm3	177.52	139.33
SOx	mg/Nm3	373.09	202.65
Particulate matter (PM)	mg/Nm3	1,061.32	242.64
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-

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.

The independent assessment has been carried out by:

Royal Environment Auditing and Consultancy in Ashapura Minechem Limited's Kaolin Unit (AML - Kaolin)

Bharti Enviro Services Pvt. Ltd. in Ashapura Perfoclay Limited's Bleaching Clay Unit (APL - Bleaching Clay)

ENPRO Enviro Tech and Engineers Pvt. Limited in Ashapura International Limited's Hamala Unit (AIL - Hamala)

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format ¹⁵:

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	38,961.39	60,513.87
Total Scope 2 emissions ¹⁶ (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	40,604.88	34,383.10
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent/Rupees	0.0000029	0.0000073
Total Scope 1 and Scope 2 emissions per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent/USD	0.000060	0.000163
Total Scope 1 and Scope 2 emissions intensity in terms of physical output ¹⁸	Metric tonnes of CO ₂ equivalent/Rupees	0.06	0.13
Total Scope 1 and Scope 2 emission intensity per Employee	Metric tonnes of CO ₂ equivalent/Employee	55.22	72.39

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

¹⁵ The above calculations are in accordance with Part B, Attribute 1 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹⁶ The above calculations as per the updated emission factors provided in the CO₂ Baseline Database for the Indian Power Sector – User Guide, Version 20.0, December 2024, published by the Central Electricity Authority, Ministry of Power, Government of India.

¹⁷ The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

¹⁸ The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.



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

Yes, at Ashapura Minechem Limited's Kaolin Unit (AML - Kaolin), a project has been implemented to reduce fuel consumption as part of efforts to lower greenhouse gas (GHG) emissions. The conventional methods used for drying and conveying materials have been replaced with a more sustainable, energy-efficient process. This transition has led to a notable decrease in fuel usage, contributing to the reduction of GHG emissions from operations.

In addition, Ashapura Perfoclay Limited's Bleaching Clay Unit (APL - Bleaching Clay) has implemented multiple initiatives to further its climate action efforts. A major initiative is the development of a green belt across an area of 57,166.09 m², which includes the plantation of 12,476 trees within the premises and several thousand more in nearby areas such as Mangal Mandir, Vankal Mata Mandir, Gir Gaudham, and Lakhond Village. This contributes to increased carbon sequestration, reduced ambient temperatures, and enhancement of local biodiversity.

Furthermore, APL's Bleaching Clay Unit (APL - Bleaching Clay) has also transitioned to the use of De-Oiled Cake (DOC), a carbon-neutral biofuel, in its boilers, replacing a portion of coal usage. This shift has helped in reducing carbon dioxide and sulphur dioxide emissions, while also supporting a circular economy through the reuse of agro-industry by-products.

AIL's Hamala Unit (AIL - Hamala) has undertaken a plantation initiative involving the planting of over 500 trees, including 300 near the entrance gate and 200 around the office area. This effort contributes to enhancing green cover, supporting carbon sequestration, and promoting environmental sustainability, thereby helping to reduce Greenhouse Gas emissions.

9. Provide details related to waste management by the entity, in the following format ¹⁹:

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tonnes)		
Plastic waste (A)	50.10	50.40
E-waste (B)	0.001	0.10
Bio-medical waste (C)	0.00	0.00
Construction and demolition waste (D)	0.00	0.00
Battery waste (E)	0.00	0.00
Radioactive waste (F)	0.00	0.00
Other Hazardous waste.		
Lubricating oil	1.22	0.46
Spent Sulphuric Acid	7,616.12	9,836.44
Other Non-hazardous waste generated (H).		
Overburden generated during mining, canteen waste	36,536.00	32,955.00
Food Waste	0.80	0.90
Gypsum	44,270.00	44,829.00
Total (A+B + C + D + E + F + G + H)	88,474.24	87,672.30
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations) ²⁰ - MT/Rupees	0.0000032	0.00000671
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) - MT/USD	0.000067	0.000150
Waste intensity in terms of physical output ²¹ - MT/MT	0.07	0.04
Waste intensity per Employee - MT/Employee	61.40	66.87
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste - E-waste, Hazardous and Non-Hazardous waste		
(i) Recycled - Plastic Waste, E-Waste, Lubrication Oil and Spent Sulphuric Acid	7,658.05	9,876.54
(ii) Re-used - Lubrication Oil, Plastic Waste, Food Waste, Backfilling of Gypsum and Concurrent Backfilling method of Overburden generated during mining	55,640.16	49,815.56
(iii) Other recovery operations - Co-processing of Gypsum	22,672.00	28,393.00
Total	85,970.21	88,085.10
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.00	0.00
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	0.00	0.00
Total	0.00	0.00

¹⁹ The above calculations are in accordance with Part B, Attribute 4 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

²⁰ The above calculations are in accordance with Part A, Section 1(I) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

²¹ The above calculations are in accordance with Part A, Section 1(II) of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

In FY 2023–24, e-waste and used oil were retained in storage, while gypsum was disposed of. Consequently, the figures for waste reclaimed and disposed did not correspond with the total waste generated during the year.

In FY 2024–25, the previously stored e-waste and used oil were disposed of, whereas gypsum was retained in storage.

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

Waste management at Ashapura Minechem Limited (Ashapura Group) involves a comprehensive process that includes the identification, collection, transport, processing, recycling, and monitoring of waste materials. Primarily focused on Ashapura follows a structured and comprehensive approach to waste management, encompassing the identification, collection, transportation, processing, recycling, and monitoring of waste materials. The process primarily addresses waste generated from operational activities, with a strong emphasis on minimizing adverse environmental and health impacts. Waste is classified into categories such as hazardous, non-hazardous, food, and biomedical waste—each requiring specific protocols for handling and disposal. Hazardous waste, in particular, is managed with stringent controls, including reference to Material Safety Data Sheets (MSDS) to ensure safety and compliance.

Waste segregation begins at the source, facilitated through the use of clearly color-coded bins: blue for non-biodegradable waste, green for biodegradable waste, and yellow for hazardous waste. These bins are strategically placed across facilities to optimize collection. Post-collection, waste is further segregated into streams such as general waste, metal, wood, paper, and others to enable efficient and responsible disposal. Designated storage areas—including secure, covered zones for hazardous waste—help prevent contamination and ensure regulatory compliance.

The company actively promotes the principles of reuse and recycling. Materials like plastic, metal, wood, and paper are either reused internally or handed over to authorized recyclers. Detailed records of waste generation and disposal are maintained to enhance traceability and governance. Disposal practices are tailored to the nature of the waste—biodegradable waste is collected by municipal bodies, while hazardous and electronic waste is managed through certified external agencies. This integrated waste management framework is aimed at reducing environmental impact and reinforcing Ashapura's commitment to sustainability.

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

S. No.	Location of operations/offices	Types of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
The Company does not operate in ecologically sensitive areas			

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

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
No Environmental Impact Assessment (EIA) was conducted by the Company during the current financial year.					

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, and Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Serial Number	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 taken, if any action
There were no material non-compliances reported in the financial year.				



LEADERSHIP INDICATORS

1. **Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):**
For each facility / plant located in areas of water stress, provide the following information:
 (i) **Name of the area**
 (ii) **Nature of operations**
 (iii) **Water withdrawal, consumption and discharge in the following format:**

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	Our plants are not located in water stressed areas	
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
Total volume of water withdrawal (in kilolitres)		
Total volume of water consumption (in kilolitres)		
Water intensity per rupee of turnover (Water consumed / turnover)		
Water intensity (optional) – the relevant metric may be selected by the entity		
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	Our plants are not located in water stressed areas	
- 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		
- 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)		

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

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

Scope 3 emissions are calculated based on the waste generation and disposal method used by the Company.

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) (Limited)	Metric tonnes of CO ₂ equivalent	307.77	391.92
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO ₂ Equivalent/Rupees	0.000000011	0.00000003000
Total Scope 3 emission intensity per Employee	Metric tonnes of CO ₂ equivalent/Employee	0.21	0.30

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 external review or independent analysis has been undertaken to evaluate our operational practices, performance metrics, or adherence to relevant standards and regulatory frameworks.

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable as the Company does not operate in ecologically sensitive areas.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, 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	Rainwater Harvesting Facility (AML-Dapoli)	Abandoned mined-out pits have been repurposed for rainwater harvesting to enhance water conservation efforts	Enhanced groundwater recharge observed in both core and buffer zones
2	Transition from FO to LDO (AML-Kaolin)	Furnace Oil (FO) has been replaced with Light Diesel Oil (LDO) in operations to promote cleaner combustion	Reduction in emissions of harmful gases
3	Expansion of drying yard (AML-Kaolin)	The drying yard area has been extended to minimize dependency on mechanical dryers for material drying	Decreased fuel consumption and associated emissions due to reduced usage of drying equipment
4	Tree Plantation Drive (AIL - Hamala)	The Company has carried out a plantation activity involving the planting of over 500 trees, including 300 trees near the entrance gate and 200 trees around the office area, to enhance green cover and contribute to environmental sustainability.	Contributed to the reduction of greenhouse gas emissions and improved local air quality.
5	Green Belt Development (APL - Bleaching Clay)	A total green belt area of 57,166.09 square meters has been developed. Of this, 21,325.12 square meters is within the plant premises and 35,840.97 square meters is in nearby areas. A total of 12,476 trees have been planted within the premises. Additional plantations have been undertaken at identified external locations.	The initiative has enhanced green cover and biodiversity in and around the operational areas. It has also contributed to improved dust control and helped stabilize the local microclimate.
6	Use of De-Oiled Cake (DOC) as Bio-Fuel (APL - Bleaching Clay)	De-Oiled Cake, a carbon-neutral bio-fuel derived from agro-industry by-products, has been adopted as a partial substitute for coal in boilers. The use of DOC contributes to renewable energy use and reduces sulphur emissions.	The initiative has resulted in a reduction in greenhouse gas and sulphur dioxide emissions. It has also reduced dependence on fossil fuels and supported the company's transition towards a circular economy.
7	Installation of Bag Filters (APL - Bleaching Clay)	Five bag filters have been installed in the dryer sections to capture particulate matter emissions. The collected dust is recycled back into the production process.	The installation of bag filters has led to a significant reduction in particulate emissions. It has also improved air quality and promoted resource recovery through internal recycling of captured dust.
8	Gypsum Waste Co-Processing (APL - Bleaching Clay)	A total of 22,672 metric tonnes of gypsum waste has been co-processed by cement industries as a substitute for natural gypsum in clinker production.	The initiative has reduced the volume of waste disposed to landfills and has helped in the conservation of natural gypsum resources. It has also strengthened industrial symbiosis practices.
9	Spent Acid Recycling (APL - Bleaching Clay)	A total of 7,616 metric tonnes of spent acid has been sent to Indian Farmers Fertilizer Cooperative Limited (IFFCO) for reuse as a raw material in fertilizer manufacturing.	The initiative has eliminated the need for hazardous waste disposal and supported the conservation of virgin raw materials. It has also contributed to circular economy principles in the fertilizer sector.
10	Installation of Wet Scrubbers and CEMS (APL - Bleaching Clay)	Wet scrubbers have been installed in both boilers to reduce sulphur dioxide emissions. Continuous Emission Monitoring Systems (CEMS) have also been installed to enable real-time monitoring of air pollutants.	This has improved compliance with regulatory air emission standards. It has also enabled effective environmental monitoring and control of sulphur dioxide emissions.
11	Rainwater Harvesting System (APL - Bleaching Clay)	A rainwater harvesting system has been installed to capture and treat rainwater for reuse in process operations, thereby reducing dependence on freshwater sources.	Total Scope 3 emission intensity per employee



12	Monsoon Water Recharge Structures (APL - Bleaching Clay)	Four monsoon water recharge structures have been constructed near the plant to collect and channel rainwater into the ground during monsoon season.	These structures have improved groundwater recharge in the region. They have also contributed to long-term sustainable water resource management.
13	Groundwater Level Monitoring (APL - Bleaching Clay)	Two piezometers have been installed near the plant to continuously monitor groundwater levels. Monitoring is carried out in accordance with Central Ground Water Authority (CGWA) guidelines.	This has enabled the company to make informed decisions regarding water resource planning. It also ensures compliance with groundwater monitoring regulations.

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

Yes, Ashapura Minechem Limited (Ashapura Group) has implemented a Business Continuity Plan (BCP) that is integrated into its overarching Risk Management Policy. This plan is structured to address a wide range of possible disruptions, both internal and external. These include operational issues, financial uncertainties, sustainability challenges, cybersecurity threats, and other material risks identified by the Risk Management Committee. The company has developed appropriate risk mitigation and response procedures to reduce potential disruptions and support swift recovery. To ensure the plan remains effective and current, it is reviewed and updated on an annual basis, reflecting changes in the risk landscape, regulatory environment, and business operations.

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

Assessments related to environmental impacts arising from the value chain were not carried out during the reporting year. However, the Company remains committed to improving its understanding and management of environmental aspects across its value chain.

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

The Company has not undertaken a formal assessment of environmental impacts across its value chain partners.

8. How many Green Credits have been generated or procured ²² :

- By the listed entity - NIL
- By the top ten (in terms of value of purchases and sales, respectively) value chain partners - NIL

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. e) Number of affiliations with trade and industry chambers/ associations.

The Company has 14 affiliations with trade and industry chambers/associations.

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

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Chemicals & Allied Products Export Promotion Council (CAPEXIL)	National
2	Federation of Indian Export Organizations (FIEO)	National
3	Export Credit Guarantee Corporation (ECGC)	National
4	Bombay Chamber Of Commerce & Industry (BCCI)	State
5	Federation of Indian Mineral Industries (FIMI)	National
6	Directorate General Of Foreign Trade (DGFT)	National
7	Export Inspection Agency (EIA)	National
8	Quality Council of India (QCI)	National
9	National Accreditation Board of Laboratories (NABL)	National
10	Confederation of Indian Industries (CII)	National

²² The above disclosure is made as per the SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2025/42 dt. 28th March 2025.

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

Name of authority	Brief of the case	Corrective active taken
There have been no adverse orders issued by any regulatory authority in relation to anti-competitive conduct involving the Company. Consequently, no corrective action has been required or initiated.		

Leadership Indicators

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

Sr. No	Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, If available
The Company did not engage in any public policy advocacy during the reporting period.					

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development



Essential Indicators

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

Name and Brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web Link
No projects requiring a Social Impact Assessment were undertaken by the Company during the financial year, as per applicable legal provisions.					

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

S. No	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	5 of PAFs covered by R&R	Amounts paid to PAFs in the FY (in INR)
No projects requiring Rehabilitation and Resettlement were undertaken by the Company during the reporting period.						

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

The Company remains steadfast in its commitment to the inclusive and sustainable development of the communities in which it operates. Grievance redressal mechanisms are embedded within both formal and informal engagement frameworks, ensuring accessibility and responsiveness. Community members are afforded the opportunity to raise concerns through a dedicated online forum available on the Company's official website. In parallel, the Company, through its CSR initiatives at the group level, maintains an active and ongoing dialogue with local stakeholders, thereby reinforcing its obligation to social accountability and constructive community partnership.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers ²³:

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/ small producers	7.66	3.67
Sourced directly from within India	92.34	96.33

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 ²⁴

Location	FY 2024-25	FY 2023-24
Rural	79.49	58.99
Semi-Urban	3.33	0.36
Urban	1.03	0.00
Metropolitan	16.15	40.65

²³ The above calculations are in accordance with Part B, Attribute 7 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.



Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Not Applicable, since no SIA was undertaken.	

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

S. No	State	Aspirational District	Amount spent (In INR)
Not applicable, since for the current financial year CSR is not applicable.			

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

No, The Company does not procure from suppliers comprising from marginalized or vulnerable groups.

- (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:

S.No	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/ No)	Benefit shared (Yes / No)	Basis of calculating benefit share
Not Applicable				

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

Name of authority	Brief of the case	Corrective Action taken
Not Applicable		

6. Details of beneficiaries of CSR Projects:

CSR is not applicable to the Listed Entity i.e. Ashapura Minechem Ltd. However the CSR activities conducted by Ashapura Perfoclay Ltd. And Ashapura International Limited conducts its CSR activities through the Ashapura Foundation and Kutch Navnirman Trust. The various CSR projects of the Company are listed below

S. No	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Eradicating Hunger & Promotion of healthcare	17082	22.00
2	Promoting Education	10319	42.00
3	Women Empowerment	457	30.00
4	Environment Sustainability and Animal Welfare	Not Ascertainable	Not Ascertainable
5	Protection of national heritage, art & handicrafts	73028	Not Ascertainable
6	Disaster management, rehabilitation & reconstruction	7144	Not Ascertainable
7	Rural Development projects	5714	13.00

²⁴ The above calculations are in accordance with Part B, Attribute 7 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

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.

Operating primarily within the B2B domain, the Company has instituted a streamlined and highly responsive mechanism for addressing customer grievances, which, though rare, are treated with the utmost urgency. Any issue raised by a client is immediately escalated through designated marketing channels and directed to the appropriate internal teams—be it logistics, quality assurance, or production—depending on the specific nature of the concern. The grievance redressal process is both structured and proactive, often involving measures such as retrieval of product samples, detailed batch testing at the mine or factory level, and, where necessary, the deployment of technical experts to the client's site. These protocols reflect the Company's unwavering commitment to operational excellence and a service ethos centred on prompt, effective resolution.

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
Environmental and social parameters relevant to the product	100.00
Safe and responsible usage	100.00
Recycling and/or safe disposal	0.00

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

	FY 2024-25		Remarks	FY 2023-24		Remarks
	Received during the Year	Pending resolution at end of year		Received during the Year	Pending resolution at end of year	
Data Privacy	NIL	NIL	NA	NIL	NIL	NA
Advertising	NIL	NIL	NA	NIL	NIL	NA
Cyber-security	NIL	NIL	NA	NIL	NIL	NA
Delivery of essential services	NIL	NIL	NA	11	NIL	The Company promptly addressed and resolved the complaints in a time bound manner.
Restrictive Trade Practices	NIL	NIL	NA	NIL	NIL	NA
Unfair Trade Practices	NIL	NIL	NA	NIL	NIL	NA
Other Customer Complaints	NIL	NIL	NA	NIL	NIL	NA
Total	NIL	NIL	NA	11	NIL	The Company promptly addressed and resolved the complaints in a time bound manner.

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

	Number	Reasons for recall
Voluntary recalls	NIL	NA
Forced recalls	NIL	NA



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 implemented a comprehensive Cyber Security Policy that sets out clear protocols for identifying, addressing, and mitigating cyber security threats and data privacy risks. This policy is internally accessible to all employees through the Company's intranet platform.

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, as there have been no reported incidents warranting corrective action in relation to advertising practices, delivery of essential services, cyber security or customer data privacy breaches, product recalls, or any regulatory penalties concerning the safety of the Company's products or services.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches

NIL, there have been no such instances during FY 2024-25.

b. Percentage of data breaches involving personally identifiable information of customers ²⁵

NIL, there have been no such instances during FY 2024-25.

c. Impact, if any, of the data breaches

Not Applicable

Leadership Indicators

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

The Company disseminates comprehensive information regarding its products and services through multiple channels, including its official website and social media platforms such as LinkedIn and Facebook, thereby ensuring broad and accessible consumer outreach. Website: <https://www.ashapura.com/>

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

As a matter of standard practice, the Company provides a comprehensive Material Safety Data Sheet (MSDS) with every shipment, ensuring that consumers are well-informed about the safe handling and usage of its products. Additionally, during initial engagements, the Company offers tailored guidance on proper product usage and emphasises critical safety measures, thereby fostering responsible consumption.

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

The Company has established robust communication protocols to ensure that consumers are promptly informed of any potential risks relating to the disruption or discontinuation of essential services. Such information is conveyed through direct channels, including email and telephonic communication, to ensure timely and effective dissemination.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

The Company strictly adheres to all statutory labelling and disclosure requirements applicable to its products, in full compliance with prevailing local laws and industry-specific regulations. Beyond these mandated disclosures, the Company does not presently furnish any supplementary product information on a voluntary basis.

²⁵ The above calculations are in accordance with Part B, Attribute 8 of the Industry Standards Note (December 2024) on the Business Responsibility and Sustainability Report (BRSR) Core, jointly issued by ASSOCHAM, CII, and FICCI, pursuant to Regulation 34(2) of the SEBI (LODR) Regulations, 2015, and as per SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122.

Ashapura Minechem Limited

The initiatives taken by Ashapura confer with many UNSDGs. The alignment of these initiatives with the NGRBC principles & UNSDGs is as follows:²⁶



SDG 2: ZERO HUNGER (BRSR P2, BRSR P6, AND BRSR P8)

- The company distributed 4,194 kg of certified improved seeds to 2,705 farmers across 98 villages, enhancing agricultural productivity over 11,112 acres of land.
- The company introduced Kitchen Gardens by distributing vegetable and fruit seeds to families, enabling them to grow their own produce using drip irrigation for daily consumption.
- The Company, through the Ashapura Foundation, donated ₹ 20,00,000 worth of fodder to 26 villages, supporting rural livelihoods by ensuring the well-being of livestock and providing vital assistance to local communities.



SDG 3: GOOD HEALTH AND WELL BEING (BRSR P3, BRSR P8)

- The Company runs interactive programs in schools, like drawing and essay contests, to help children understand the value of staying clean, building good habits, and taking care of their health and hygiene.
- The Company ensures well-rounded support for its employees by offering a range of benefits, including maternity leave, health and accident insurance, access to day-care facilities, and retirement schemes.
- The Company prioritizes employee well-being by organizing annual health check-ups and providing consultation services not only for employees but also for their spouses.
- The Company has deployed three medical vans in the Nakatrana, Dayapar, and Bhujodi regions. These vans, equipped with medical professionals, visit villages to deliver general healthcare services. Primarily focusing on mining areas, they reach over 70 villages, offering treatment for common health concerns such as fever, ENT issues, skin conditions, dental problems, and blood pressure management.
- The Company provides Katla laddoos to postpartum women as a nutritional supplement across multiple rural communities.
- The Company conducted comprehensive Women's Health Camps across six villages in Lakhpat Taluka, providing gynecological and general examinations to 269 women, followed by necessary medical treatment.



Medical Care facilities



Distribution of Katla Laddoos



Women Health Care Camp

²⁶ The ISSB™, IFRS™, SASB™ and International Financial Reporting Standards are registered trademarks of the IFRS Foundation. SDG Logo, the SDG Wheel and any of the 17 UNSDG™ icons are Intellectual Property of United Nations



- The Company successfully organized a medical camp in Sherdi village, delivering essential healthcare services to the local community. The initiative provided critical eye care to 192 individuals and general medical assistance to 78 others, ensuring access to necessary medical support for underserved populations.
- The Company was honoured by the Government Health Department for its significant contribution to the Tuberculosis (TB) program. This recognition highlights its commitment to public health and its continued efforts toward fostering a healthier society.
- The Company hosted a Women's Health, Hygiene & Safety Awareness Program on December 17th, 2024, at the Ashapura Minerals Complex, Baraya, with 60 participants. The session covered key topics like menstrual hygiene, reproductive health, nutrition, and pregnancy care, empowering women in the workplace. Dr. Dinal Bhatt led interactive workshops, offering valuable insights on women's well-being.
- The Company, through the Ashapura Foundation, organized a Free Medical Treatment Camp at Moti Vamoti on January 11, 2025, providing essential healthcare to the local community. Led by Dr. Jayshree Ben Sojitra, the camp ensured quality care, reinforcing the Foundation's commitment to healthier communities.
- The Company organized the Vande Mataram Memorial Heritage Marathon on Republic Day, with over 150 participants in a 9km run. The event saw diverse participation, including local doctors, Bhuj Runners, Bhujodi school students, and Ashapura Group employees. The marathon concluded with the National Anthem and a nutritious breakfast, promoting unity, health, and community spirit.



Scan for video of Women's Hygiene & Safety Awareness Program



Scan for video of Free Medical Treatment Camp at Moti Vamoti



SDG 4: QUALITY EDUCATION (BRSR P8)

- The company organized Training & Tour Programmes to educate farmers on modern, scientific agricultural practices, enhancing their knowledge through exposure to techniques used across regions.
- Under its CSR initiative, Ashapura Foundation, the Company has provided essential educational supplies - including textbooks, notebooks, slates, and pens - to primary school students across 42 villages in the Lakhpat, Nakhatrana, Abdasa, and Mandvi talukas.
- The Company further nurtures creativity and intellectual growth among primary school students by conducting engaging competitions, including essay writing, artistic drawing, and public speaking contests.



Karate Classes



ITI Classes



Summer Camps conducted for children



SDG 5: GENDER EQUALITY (BRSR P3, BRSR P4, BRSR P5)

- The Company maintains an unwavering commitment to providing equitable employment opportunities to individuals from all segments of society. This principle, embedded within our HR policies and openly available to every employee, underscores our dedication to cultivating a workplace founded on diversity, inclusion, and fairness. We recognize these values not merely as obligations, but as fundamental pillars that strengthen our organizational culture and drive sustainable growth.
- The Company conducts structured Garbhsanskar programs across rural communities, empowering expectant mothers with traditional wisdom and modern practices for safer pregnancies and holistic maternal health.
- The Company's foundation has empowered 871 women across 10 villages by establishing 81 Self-Help Groups that provide financial literacy, entrepreneurial training, and access to government schemes, enabling members to launch sustainable ventures in animal husbandry and household enterprises while achieving financial independence and stable monthly incomes.
- The company established the Ashapura Women's Academy to empower women by equipping them with skill-based training, enabling them to lead respectful and independent lives.
- The Company has pioneered a sustainable cooking solution by introducing smokeless cookstoves across 32 villages, directly addressing the health hazards posed by traditional wood-fired chulhas. To date, this initiative has successfully deployed over 800 units, significantly reducing firewood consumption while protecting women from harmful indoor air pollution.



Garbhsanskar sessions



Women Self Help Group





SDG 6: CLEAN WATER AND SANITATION (BRSR P6)

- Recognizing the critical importance of water conservation, the Company has implemented comprehensive rainwater harvesting systems across its operational zones. This strategic intervention has demonstrably enhanced groundwater recharge rates in both core and peripheral areas, creating sustainable water resources for local communities.
- The Company has implemented a comprehensive watershed management program through the construction of 801 strategically placed loose boulder structures, which effectively regulate water flow to prevent soil erosion, enhance groundwater recharge, and improve agricultural land fertility, while simultaneously creating natural sources of organic fodder - delivering multifaceted environmental and socioeconomic benefits to local communities.
- The company implemented Bori Bandh by placing sand-filled bags in stream paths to slow water flow and effectively prevent soil erosion in hilly terrains.
- The Company has created Nala Plugs to store rainwater and this stored water is later used for farming. Till date a total of 51 Nala Plugs have been created which has contributed to a Total Water Storage Capacity of 387.5 Million Litre
- The company promoted the construction of 44 Khet Talavdies (farm ponds), enabling storage of 86.3 million litres of rainwater for irrigation, ensuring water availability during dry spells and supporting sustainable farming.
- Seven overhead water tanks with a total storage capacity of 600,000 litres have been constructed, benefiting 18,087 villagers across seven villages.
- Thirty-three ground level water tanks with a total storage capacity of 1,010,000 litres have been constructed, benefiting 17,252 villagers across 28 villages.
- A total of 82,311 meters of water pipelines were laid across 46 villages, benefiting 44,290 villagers by ensuring a sufficient water supply to their homes.
- Seven underground sumps with a total storage capacity of 510,000 litres have been constructed, benefiting 18,532 villagers across seven villages, ensuring water availability during shortages.
- A Sewage Treatment Plant with a capacity of 1.5 million litres per day was established in Nakhatrana Taluka, benefiting 10 villages by filtering and reusing wastewater for agriculture and gardening.
- An RO Plant with a capacity of 1,000 litres/hour was installed in Jiyapar village, Nakhatrana Taluka, providing affordable safe drinking water to 950 villagers across 7 villages by reducing high TDS levels.
- The Company has installed a modern water purification system at Ler Primary School, ensuring reliable access to potable water for students and staff.
- The Company has implemented 89,442 staggered contour trenches designed to mitigate water flow velocity, effectively reducing topsoil erosion while maintaining agricultural land productivity.
- The Ashapura Foundation has enhanced educational infrastructure in Dayapar and Dolatpar (Lakhatpat Taluka) by providing critical amenities to primary schools, including potable water storage systems and sanitation facilities. These upgraded institutions cater to students from surrounding remote communities, supporting their access to quality education in a conducive learning environment.



Check Dams



Recharging Check dams, Storage Tanks



Construction of Nala Plugs



SDG 7: AFFORDABLE AND CLEAN ENERGY (BRSR P2, BRSR P6)

- The Company has set up solar energy in terms of light and power using Turbo Fans and Transparent sheets installation (Provides natural ventilation and power consumption)
- Installation of Regulators and Variable Frequency Drive (VFD) in equipment's such as Bead Mill, rotatory glass bead furnace and Roller Mill.
- Introduction of different types of process equipment such as vibro and screw feeder (This will replace manual feeding of material)
- Installation of smart sensors and related automation for optimum use of power components such as bulbs, tube light and fans in many critical and non-critical areas.
- Regular check-up of the working of electrical components and ensure the replacement of starter and switches by MCB saves cost and energy.
- Reduced energy consumption by Optimized the AC usage, which in all over the IKC premises.
- Introduction of equipment's such as hammer crusher and ultra-fine mill (Through this company achieved extra fineness of product and saved its time)
- Maintained Power Factor from 88 to 91, by introduction of capacitor and periodic maintenance of power sources such as transformer, generator, etc.
- For the disposal of waste, the Company has set SOP wherein different departments are given responsibility of safe disposal of waste.



SDG 8: DECENT WORK AND ECONOMIC GROWTH (BRSR P2, BRSR P3, BRSR P5, BRSR P8)

- The Company generated 2,30,350 mandays of local employment by engaging villagers in activities like Loose Boulder, Check Dam, Bori Bandh, and Storage Tank construction, disbursing ₹15 million in wages.
- The company organized three training workshops on Indonesian Batik craft, conducted by Indonesian artisans, to train Kutchh artisans at Vivekanand Gramudhyog Society in Mandvi and Mundra.
- The company's documentary "Kutchhiyat," showcasing Kutchhi folk music and culture, won the Best Documentary Award and was broadcast on multiple TV channels, encouraging events and providing artisans with opportunities for self-reliance.
- The Company believes in the inclusive and equitable development of the local community and, therefore, interacts through formal and informal mechanisms to work for their betterment. The Company also provides an open forum on its website where any member of the community can address their concerns or grievances. At a group level, the company proactively engages with the community as part of its CSR initiatives.
- The Company employs HIRA (Hazard Identification and Risk Assessment) to identify and evaluate work related hazards, implementing and monitoring appropriate measures for risk mitigation.
- The Company hosted the 2nd HR Symposium on April 22nd and 23rd, 2024, at the Vande Mataram Auditorium in Bhujodi, convening HR leaders and experts for a meaningful exchange of ideas. Centered around the theme "From Transactional to Transformational HR," the event featured keynote addresses, panel discussions, and interactive sessions focused on five core pillars of HR. The symposium served as a platform for sharing innovative strategies and best practices aimed at fostering long-term organizational growth and operational excellence, reaffirming the Company's dedication to progressive HR development.
- The Company organized an Internal Carrom Tournament at Ashapura PerfoClay Limited, encouraging cross-departmental participation in a lively and engaging competition. Judged by Mr. Dinesh Daki, the event promoted camaraderie, teamwork, and employee engagement, contributing to a positive and collaborative work environment.



Scan for video of HR Symposium



SDG 9: INDUSTRIES, INNOVATION AND INFRASTRUCTURE (BRSR P2, BRSR P6, BRSR P8)

- The Company has been honored with the prestigious 18th FGI Award, reflecting its steadfast commitment to excellence and innovation in the mining industry. This recognition highlights the dedication and expertise of its workforce, particularly the R&D departments, whose continuous efforts contribute to significant advancements and impactful outcomes.
- The Company has successfully launched the RISE with SAP project, marking a key achievement in its digital transformation journey. The migration to SAP S/4HANA on the cloud was completed with remarkable speed by the AeonX Digital team, significantly improving operational efficiency and positioning the organization for sustainable, long-term growth.
- The Company received the “Research in Science & Technology” Award 2024 from the Federation of Gujarat Industries. With DSIR and NABL accreditation, Ashapura continues to lead in technological advancements and scientific innovation.



Scan for video of launch of RISE with SAP Project



SDG 11: SUSTAINABLE CITIES AND COMMUNITIES (BRSR P3, BRSR P4, BRSR P7, BRSR P8)

- The company distributed earthquake relief kits to villages in Lakhpat Taluka, including Sayan, Junagiya, Ramaniya, Sambhla, Julrai, and Kotda.
- A total of 442 homes were constructed after the earthquake across various villages, including 15 temporary houses, 198 model houses, and 229 permanent houses.
- The Company believes in the inclusive and equitable development of the local community and interacts through formal and informal mechanisms to work for their betterment.
- The Company also provides an open forum on its website where any member of the community can address their concerns or grievances. At a group level, the company proactively engages with the community as part of its CSR initiatives.
- The Company organised “Sanskriti Darshanam” for preserving our classical dance and music heritage while promoting the talented trainees.
- The Company through the Kutch Navnirman Trust has been particularly active in the rural areas of Kutch which has nearly 900 villages, spread over 40,000 sq km. The Government of India and Gujarat have recognized Ashapura Foundation as its Project Implementing Agency (P.I.A) to carry out rural development projects of the Government.



SDG 13: CLIMATE ACTION (BRSR P2, BRSR P6, BRSR P7, BRSR P8)

- The Company planted 4,300 diverse trees, trained farmers in horticulture, and guided the planting of 3,645 mango trees to promote environmental sustainability and future income generation.
- The Company’s manufacturing facilities are ISO 14001:2015, ISO 45001:2018, ISO 9001:2015, ISO/IEC 17025: 2017 certified
- DSIR intermittent report submitted (The report carries out the activities relating to indigenous technology promotion, development).
- The Company created awareness on Safety and Waste management – Presentation and Field training given to the staff. Maintained all safety & Hazards norms for Fire, Electrical & Chemicals.
- Ashapura Group supplied GEOKLAY350 through their Delhi distributor’s network, ensuring the runway’s resilience and safety. (GEOKLAY350 is an effective geosynthetic clay product developed for capping and a less aggressive environment)
- Project initiated by company named “The Rajkot Solid Waste Management Project’ which paved the way for efficient waste management, ensuring a cleaner, greener tomorrow.
- The Company undertook “The Hyderabad Integrated Solid Waste Management Project” which Municipal Solid Waste (MSW) management project in India. The project’s landfill is located in Jawaharnagar. The city’s waste is transported to the landfill, where it is recycled, composted, or converted into fuel for cement factories. The waste is also dumped in landfills in large amounts.
- The Company’s Complex Baraya celebrated World Environment Day 2024 by planting 600 trees under the theme “Our Land. Our Future. We Are #GenerationRestoration,” reaffirming its commitment to environmental sustainability. The event, led by senior leadership, also recognized safety champions for their outstanding adherence to safety protocols.



SDG 15: LIFE ON LAND (BRSR 6)

- The Company undertook the responsibility of caring for cattle across 14 villages in the Lakhpat and Mandvi Taluka regions throughout a 5-year drought period, extending until the next monsoon season. During this time, we distributed a total of 3,045 metric tons of fodder to support 10,151 animals.
- The Ashapura Foundation has launched a Community Grass Development Programme as a pilot project, covering 100 acres of land across 2 villages. This initiative aims to provide fodder for 1,500 animals.
- To ensure a drinking water supply for animals, the Company has constructed 37 cattle troughs with a total water storage capacity of 195,000 liters. These troughs provide water to 18,940 animals.
- To safeguard the animals, the Company organized Animal Vaccination Camps in the Lakhiyarvira village of Nakhatrana and Lakhpat Taluka, vaccinating over 10,470 animals from 8 villages.



SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS (BRSR P1, BRSR P3, BRSR P5, BRSR P7, BRSR P8)

- Ashapura upholds ethical business practices through mandatory implementation of its:
 - Conflict of Interest Policy
 - Anti-corruption and Anti-Bribery Policy
- International Certifications made by company are:
 - ISO 14001:2015 - For Environment Management System;
 - ISO 45001:2018 - Occupational Health & Safety Management Systems;
 - ISO 9001:2015 - Quality Management System
 - ISO/IEC 1705: 2017 - General requirements for the competence of testing and calibration laboratories
- The company released audio CDs and cassettes of "Anandghan Na Pado," written by Avdhoot Anandhan, composed by Padmashree Kalyanji Anandji, and performed by renowned singers Sadhna Sargam, Sonali Bajpai, and S. Omkar.



SDG 17: PARTNERSHIPS FOR THE GOALS (BRSR P1, BRSR P7, BRSR P8)

- The Company is affiliated and member to 14 trade and industry chambers / associations. They are:
 - Chemicals & Allied Products Export Promotion Council (CAPEXIL)
 - Federation of Indian Export Organizations (FIEO)
 - Export Credit Guarantee Corporation (ECGC)
 - Generalized System Of Preferences (GSP)
 - Bombay Chamber Of Commerce & Industry (BCCI)
 - Federation of Indian Mineral Industries (FIMI)
 - Directorate General Of Foreign Trade (DGFT)
 - Indian Customs Electronic Gateway (ICEGATE)
 - Authorized Economic Operator (AEO) T1/T2/T3
 - Dindayal Port Authority, Kandla, Gujarat (DPA)
 - Export Inspection Agency (EIA)
 - Quality Council of India (QCI)
 - National Accreditation Board of Laboratories (NABL)
 - Confederation of Indian Industries (CII)
- The Company has partnered with China Railway to develop the Fako Bauxite Deposit in Guinea, aiming to produce 50 million tons of high-quality bauxite over the next decade. Leveraging both companies' expertise, the project will unlock 200 million tons of bauxite reserves, create over 300 local jobs, and support Guinea's economic growth, while ensuring sustainable and responsible mining practices.



Abbreviations used²⁷

Sr. No.	Particulars
1	ESG: Environmental, Social and Governance
2	SDG: Sustainable Development Goals
3	SASB: Sustainability Accounting Standards Board
4	GRI: Global Reporting Initiative
5	SEBI: Securities and Exchange Board of India
6	BRSR: Business Responsibility & Sustainability Reporting
7	ISSB : International Sustainability Standards Board

ANNEXURE I – Global Best Practices & ESG Journey of the Organization

Alignment of BRSR Sections A & B²⁸

Section A of BRSR : General Disclosures Alignment with GRI	
	No direct linkage
	GRI 2: General Disclosures 2021 GRI 2-1: Organizational details
	No direct linkage
	No direct linkage
	GRI 2: General Disclosures 2021 GRI 2-1: Organizational details
	GRI 2: General Disclosures 2021 GRI 2-3: Reporting period, frequency and contact point
	GRI 2: General Disclosures 2021 GRI 2-3: Reporting period, frequency and contact point
	No direct linkage
	GRI 2: General Disclosures 2021 GRI 2-3: Reporting period, frequency and contact point
	No direct linkage
	No direct linkage
	GRI 2: General Disclosures 2021 GRI 2-3: Reporting period, frequency and contact point
	GRI 2: General Disclosures 2021 GRI 2-2: Entities included in the organization's sustainability reporting
	GRI 2: General Disclosures 2021 GRI 2-6: Activities, value chain and other business relationships
	GRI 2: General Disclosures 2021 GRI 2-6: Activities, value chain and other business relationships
	GRI 2: General Disclosures 2021 GRI 2-6: Activities, value chain and other business relationships
	GRI 2: General Disclosures 2021 GRI 2-6: Activities, value chain and other business relationships
	GRI 2: General Disclosures 2021 GRI 2-7: Employees GRI 2-8 Workers who are not employees
	GRI 405: Diversity and Equal Opportunity 2016 GRI 405-1 Diversity of governance bodies and employees
	GRI 401: Employment 2016 GRI 401-1: New employee hires and employee turnover
	GRI 2: General Disclosures 2021 GRI 2-2: Entities included in the organization's sustainability reporting
	GRI 201: Economic Performance 2016 GRI 201-1: Direct economic value generated and distributed
	GRI 2: General Disclosures 2021 GRI 2-25: Processes to remediate negative impacts
	GRI 3: Material Topics 2021 GRI 3-1: Process to determine material topics GRI 3-2: List of material topics GRI 3-3: Management of material topics a. describe

²⁷ Global Reporting Initiative, GRITM and logo and GRI Sustainability Reporting Standards (GRI Standards) and logo are Intellectual Property of Stichting Global Reporting Initiative. The ISSBTM, IFRSTM, SASBTM and International Financial Reporting Standards are registered trademarks of the IFRS Foundation. SDG Logo, the SDG Wheel and any of the 17 UNSDGTM icons are Intellectual Property of United Nations

²⁸ https://www.globalreporting.org/media/10qnxmtmx/sebi_brsb_gri_linkage_doc.pdf

Section B: Management and Process disclosures	
	GRI 2: General Disclosures 2021 GRI 2-23: Policy commitments
	GRI 2: General Disclosures 2021 (e) 2-24: Embedding policy commitments
	GRI 2: General Disclosures 2021 (e) 2-24: Embedding policy commitments
	No direct linkage
	GRI 3: Material Topics 2021 GRI 3-3 Management of material topics
	GRI 3: Material Topics 2021 GRI 3-3 Management of material topics
	GRI 2: General Disclosures 2021 GRI 2-22: Statement on sustainable development strategy
	GRI 2: General Disclosures 2021 GRI 2-13: Delegation of responsibility for managing impacts
	GRI 2: General Disclosures GRI 2-9: Governance structure and composition
	No direct linkage
	GRI 2: General Disclosures 2021 GRI 2-5: External assurance
	No direct linkage

Alignment of BRSR Section C ²⁹

BRSR	GRI	SDG
PRINCIPLE 1 - Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent and accountable – ESSENTIAL INDICATORS	GRI 2: General Disclosures 2021 - GRI 2-17: Collective knowledge of the highest governance body GRI 2-23: Policy commitments GRI 2-25: Processes to remediate negative impacts GRI 2-27: Compliance with laws and regulations GRI 3: Disclosures on material topics GRI 3-3 - Management of material topics GRI 205 - Anti-corruption GRI 205-3: Confirmed incidents of corruption and actions taken	Goal 16 : Peace & Justice Strong Institutions Goal 17: Partnership for the goals
PRINCIPLE 1 - Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent and accountable – LEADERSHIP INDICATORS	GRI 2-10: Nomination and selection of the highest governance body GRI 2-15: Conflicts of interest GRI 2-24: Embedding policy commitments	
Principle 2 - Businesses should provide goods and services in a manner that is sustainable and safe – ESSENTIAL INDICATORS	GRI 301: Materials 2016 GRI 301-2: Recycled input materials used GRI 3: Management of Material Topics GRI 3-3: Management of material topics GRI 306-2 Management of significant waste-related impacts	Goal 6: Clean water and sanitation. Goal 7 : Affordable & Clean Energy Goal 10 : Reduced Inequality Goal 12 : Responsible Consumption & Production
Principle 2 - Businesses should provide goods and services in a manner that is sustainable and safe – LEADERSHIP INDICATORS	GRI 3: Disclosures on material topics GRI 3-3: Management of material topics GRI 301: Materials 2016 GRI 301-2: Recycled input materials used GRI 301-3: Reclaimed products and their packaging materials GRI 306-2: Management of significant waste-related impacts	Goal 13 : Climate Action

²⁹ https://www.globalreporting.org/media/ioqnxmtmx/sebi_brsb_gri_linkage_doc.pdf



<p>Principle 3 - Businesses should respect and promote the well-being of all employees, including those in their value chains – ESSENTIAL INDICATORS</p>	<p>GRI 201: Economic Performance 2016 GRI 201-1: Defined benefit plan obligations and other retirement plans GRI 2-25: Processes to remediate negative impacts</p> <p>GRI 2: General Disclosure 2021 GRI 2-30: Collective bargaining agreements</p> <p>GRI 3: Disclosures on material topics GRI 3-3: Management of material topics</p> <p>GRI 401: Employment 2016 GRI 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees GRI 401-3: Parental leave</p> <p>GRI 403: Occupational Health and Safety 2018 GRI 403-1: Occupational health and safety management system GRI 403-2: Hazard identification, risk assessment, and incident investigation GRI 403-5: Worker training on occupational health and safety GRI 403-6: Promotion of worker health GRI 403-9: Work-related injuries GRI 403-10: Work-related ill health</p> <p>GRI 404: Training and Education 2016 GRI 404-1: Average hours of training per year per employee GRI 404-2: Programs for upgrading employee skills and transition assistance programs GRI 404-3: Percentage of employees receiving regular performance and career development reviews</p>	<p>Goal 3 : Good Health & Well Being</p> <p>Goal 4 : Quality Education</p> <p>Goal 5 : Gender Equality</p> <p>Goal 8 : Decent Work And Economic Growth</p> <p>Goal 11 : Sustainable cities and communities.</p> <p>Goal 16 : Peace & Justice Strong Institutions</p>
<p>Principle 3 - Businesses should respect and promote the well-being of all employees, including those in their value chains – LEADERSHIP INDICATORS</p>	<p>GRI 404: Training and Education 2016 GRI 404-2: Programs for upgrading employee skills and transition assistance programs</p> <p>GRI 3: Disclosures on material topics GRI 3-3: Management of material topics</p> <p>GRI 414: Supplier Social Assessment 2016 GRI 414-2: Negative social impacts in the supply chain and actions taken</p>	
<p>Principle 4 - Businesses should respect the interests of and be responsive to all its stakeholders – ESSENTIAL INDICATORS</p>	<p>GRI 2: General Disclosures 2021 GRI 2-29: Approach to stakeholder engagement</p> <p>GRI 3: Disclosures on material topics GRI 3-1: Process to determine material topics</p>	<p>Goal 9 : Industry, Innovation and Infrastructure</p> <p>Goal 11 : Sustainable Cities & Communities</p>
<p>Principle 4 - Businesses should respect the interests of and be responsive to all its stakeholders – LEADERSHIP INDICATORS</p>	<p>GRI 2: General Disclosures 2021 GRI 2-12: Role of the highest governance body in overseeing the management of impacts GRI 2-13: Delegation of responsibility for managing impacts</p> <p>GRI 3: Disclosures on material topics GRI 3-1: Process to determine material topics</p> <p>GRI 2: General Disclosures 2021 GRI 2-29: Approach to stakeholder engagement</p>	<p>Goal 16 : Peace & Justice Strong Institutions</p>

<p>Principle 5 - Businesses should respect and promote human rights – ESSENTIAL INDICATORS</p>	<p>GRI 2: General Disclosures 2021 GRI 2-13: Delegation of responsibility for managing impacts</p> <p>GRI 2-19 Remuneration policies a. describe the remuneration policies for members of the highest governance body and senior executives</p> <p>GRI 2-21 Annual total compensation ratio</p> <p>GRI 2-23 Policy commitments</p> <p>GRI 2-24: Embedding policy commitments</p> <p>GRI 2-25: Processes to remediate negative impacts</p> <p>GRI 3: Disclosures on material topics GRI 3-3 Management of material topics</p> <p>GRI 202: Market Presence 2016 GRI 202-1 Ratios of standard entry level wage by gender compared to local minimum wage</p> <p>GRI 205: Anti-Corruption 2016 GRI 205-2 Communication and training about anti-corruption policies and procedures</p> <p>GRI 403: Occupational Health and Safety 2018 GRI 403-5 Worker training on occupational health and safety</p> <p>GRI 404: Training and Education 2016 GRI 404-1 Average hours of training per year per employee</p> <p>GRI 405: Diversity and Equal Opportunity 2016 GRI 405-2 Ratio of basic salary and remuneration of women to men</p> <p>GRI 406: Non-discrimination 2016 GRI 406-1 Incidents of discrimination and corrective actions taken</p> <p>GRI 410: Security Practices 2016 GRI 410-1 Security personnel trained in human rights policies or procedures</p>	<p>Goal 5 : Gender Equality</p> <p>Goal 8 : Decent Work And Economic Growth</p> <p>Goal 16 : Peace & Justice Strong Institutions</p>
<p>Principle 5 - Businesses should respect and promote human rights – LEADERSHIP INDICATORS</p>	<p>GRI 2: General Disclosures 2021 GRI 2-25 Processes to remediate negative impacts</p> <p>GRI 3: Material Topics 2021 GRI 3-1: Process to determine material topics</p> <p>GRI 3-3: Management of material topics</p> <p>GRI 414: Supplier Social Assessment 2016 GRI 414-1 New suppliers that were screened using social criteria</p> <p>GRI 414-2 Negative social impacts in the supply chain and actions taken</p>	



<p>Principle 6 - Businesses should respect and make efforts to protect and restore the environment – ESSENTIAL INDICATORS</p>	<p>GRI 302: Energy 2016 GRI 302-1 Energy consumption within the organization GRI 302-3: Energy intensity</p> <p>GRI 303: Water and Effluents 2018 GRI 303-1: Interactions with water as a shared resource GRI 303-3: Water withdrawal</p> <p>GRI 303-5: Water consumption</p> <p>GRI 304: Biodiversity 2016 GRI 304-1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas GRI 305: Emissions 2016 GRI 305-1 Direct (Scope 1) GHG emissions</p> <p>GRI 305-2: Energy indirect (Scope 2) GHG emissions.</p> <p>GRI 305-4: GHG emissions intensity</p> <p>GRI 305-5: Reduction of GHG emissions</p> <p>GRI 305-7: Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions</p> <p>GRI 306: Waste 2020 GRI 306-2 Management of significant waste related impacts</p> <p>GRI 306-3 Waste generated</p> <p>GRI 306-5 Waste directed to disposal</p> <p>GRI 2: General Disclosures 2021 GRI 2-27 Compliance with laws and regulations</p> <p>GRI 3: Material Topics 2021 GRI 3-3 Management of material topics</p> <p>GRI 413: Local Communities GRI 413-1 Operations with local community engagement, impact assessments, and development programs</p>	<p>Goal 3 : Good Health & Well Being</p> <p>Goal 6 : Clean Water & Sanitation</p> <p>Goal 7 : Affordable & Clean Energy</p> <p>Goal 12 : Responsible Consumption & Production</p> <p>Goal 13 : Climate Action</p> <p>Goal 14: Life below water</p> <p>Goal 15 : Life on land</p>
<p>Principle 6 - Businesses should respect and make efforts to protect and restore the environment – LEADERSHIP INDICATORS</p>	<p>GRI 302: Energy 2016 GRI 302-1: Energy consumption within the organization</p> <p>GRI 303: Water and Effluents 2018 GRI 303-3 Water withdrawal</p> <p>GRI 303-4 Water discharge GRI 304: Biodiversity 2016 GRI 304-2 Significant impacts of activities, products and services on biodiversity</p> <p>GRI 304-3 Habitats protected or restored</p> <p>GRI 305: Emissions 2016 GRI 305-3 Other indirect (Scope 3) GHG emissions</p> <p>GRI 305-4 GHG emissions intensity</p> <p>GRI 308: Supplier Environmental Assessment 2016 GRI 308-1 New suppliers that were screened using environmental criteria</p>	

Principle 7 - Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent – ESSENTIAL INDICATORS	<p>GRI 308: Supplier Environmental Assessment 2016 GRI 308-1 New suppliers that were screened using environmental criteria</p> <p>GRI 308-2 Negative environmental impacts in the supply chain and actions taken</p> <p>GRI 3: Material Topics 2021, GRI 3-3 Management of material topics The organization shall report how it manages anti-competitive behaviour</p>	<p>Goal 2 : Zero Hunger</p> <p>Goal 7 : Affordable and clean energy</p> <p>Goal 10 : Reduced Inequality</p> <p>Goal 11 : Sustainable cities and communities</p> <p>Goal 13 : Climate action</p>
Principle 7 - Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent – LEADERSHIP INDICATORS	<p>GRI 2: General Disclosures 2021 GRI 2-28 Membership associations</p> <p>GRI 3: Material Topics 2021 GRI 3-3 Management of material topics The organization shall report how it manages anti-competitive behaviour</p> <p>GRI 415: Public Policy 2016</p>	<p>Goal 14 : Life below water</p> <p>Goal 15 : Life on land</p> <p>Goal 16 : Peace & Justice Strong Institutions</p> <p>Goal 17: Partnership for the goals</p>
Principle 8 - Businesses should promote inclusive growth and equitable development – ESSENTIAL INDICATORS	<p>GRI 2: General Disclosures 2021 GRI 2-25 Processes to remediate negative impacts</p> <p>GRI 3: Material Topics 2021 GRI 3-3 Management of material topics The organization shall report how it manages local communities</p> <p>GRI 204: Procurement Practices 2016 GRI 204-1 Proportion of spending on local suppliers</p> <p>GRI 413: Local Communities 2016 GRI 413-1 Operations with local community engagement, impact assessments, and development programs</p>	<p>Goal 2 : Zero Hunger</p> <p>Goal 4 : Quality Education</p> <p>Goal 5 : Gender Equality</p> <p>Goal 6 : Clean Water & Sanitation</p> <p>Goal 8 : Decent Work And Economic Growth</p> <p>Goal 9: Industry, Innovation and Communities.</p>
Principle 8 - Businesses should promote inclusive growth and equitable development – LEADERSHIP INDICATORS	<p>GRI 3: Material Topics 2021 GRI 3-3 Management of material topics</p> <p>GRI 413: Local Communities 2016 GRI 413-1 Operations with local community engagement, impact assessments, and development programs</p>	<p>Goal 11: Sustainable cities and communities.</p> <p>Goal 13 : Climate action</p> <p>Goal 14 : Life below water</p> <p>Goal 15 : Life on land</p> <p>Goal 16 : Peace & Justice Strong Institutions</p> <p>Goal 17 : Partnership for the goals</p>



Principle 9 - Businesses should engage with and provide value to their consumers in a responsible manner – ESSENTIAL INDICATORS	GRI 417: Marketing and Labeling 2016 GRI 417-1 Requirements for product and service information and labelling GRI 418: Customer Privacy 2016 GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data GRI 3: Material Topics 2021 GRI 3-3 Management of material topics	Goal 12 : Responsible Consumption & Production
Principle 9 - Businesses should engage with and provide value to their consumers in a responsible manner – LEADERSHIP INDICATORS	GRI 417: Marketing and Labelling 2016 GRI 417-1 Requirements for product and service information and labelling GRI 418: Customer Privacy 2016 GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data GRI 3: Material Topics 2021 GRI 3-3 Management of material topics	