

ANNEXURE VII

STATEMENT OF PARTICULARS OF EMPLOYEES PURSUANT TO THE PROVISIONS OF RULE 5(2)(I) OF THE COMPANIES (APPOINTMENT AND REMUNERATION) RULES, 2014 AND FORMING PART OF THE DIRECTORS' REPORT FOR THE YEAR ENDED 31ST MARCH, 2024

Sr. No.	Name and Age (in years)	Designation	Nature of Employment	Total Remuneration (in ₹)	Qualification and Experience (in years)	Date of Commencement of Service	Last Employment held before joining the Company
1.	Mr. R. B. Rathi (55)	Managing Director	Permanent Employee	137,559,510	B.E. Mech. Engg. - MIT, Pune, B. S. Chem. Engg. - Ohio University, USA. M.B.A.- Pittsburgh University - USA (29 years)	1 st October, 1992	-
2.	Mr. A. Vij (54)	Wholetime Director	Permanent Employee	19,444,320	B. E. Chem. (28 years)	8 th December, 2005	Jubilant Organosys Limited, Gajraula (UP)

1. The gross remuneration includes Salary, PLVA, Company's contribution to Provident Fund and Superannuation Scheme, Leave Travel Allowance, Medical, House Rent Allowance, Pension and value of perquisites in respect of car facility, which is calculated in accordance with the provisions of the Income Tax Act, 1961, and the Rules made thereunder.
2. The conditions of employment are contractual.
3. Other terms and conditions are as per the rules of the Company.
4. In terms of Rule 5(2)(iii) of the Companies (Appointment and Remuneration) Rules, 2014, it is clarified that during the Financial Year under review, no employee of the Company was in receipt of remuneration in that year, which in the aggregate or as the case may be at a rate which in the aggregate is in excess of that drawn by the Working Directors and holds himself / herself along with their spouse and dependent children not less than 2% of the equity shares of the Company.
5. Mr. R. B. Rathi, Managing Director, forms part of the Promoter Group and holds in his individual name 4,050,359 (5.85%) Equity Shares of the Company. Mr. R. B. Rathi is not related to any Director of the Company in terms of the provisions of The Companies Act, 2013 and Rules made thereunder and SEBI Listing Regulations, 2015.
6. Mr. A. Vij, Wholetime Director is not related to any Director of the Company and holds 4,001 Equity Shares of the Company.
7. Details of remuneration of top 10 employees other than Directors which form part of the Directors' Report, will be made available to any member on request, in terms of provision of Section 136(1) of the Companies Act, 2013.

Business Responsibility & Sustainability Reporting

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

Sr. No.	Particulars	Disclosure
1	Corporate Identity Number (CIN) of the Listed Entity	L24119PN1951PLC008409
2	Name of the Listed Entity	Sudarshan Chemical Industries Limited ("Sudarshan/the Company")
3	Year of incorporation	19 th February, 1951
4	Registered Office address	7 th Floor, Eleven West Panchshil, Survey No. 25, Near PAN Card Club Road, Baner, Pune – 411 069, Maharashtra, India
5	Corporate address	7 th Floor, Eleven West Panchshil, Survey No. 25, Near PAN Card Club Road, Baner, Pune – 411 069, Maharashtra, India
6	E-mail	shares@sudarshan.com
7	Telephone	+91 20 682 81 200
8	Website	www.sudarshan.com
9	Financial year for which reporting is being done	1 st April 2023 - 31 st March, 2024
10	Name of the Stock Exchange(s) where securities are listed	- National Stock Exchange of India Limited (Equity) - BSE Limited (Equity and Debt)
11	Paid-up Capital	₹1,384.54 Lakhs
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Mandar Meenanath Velankar Contact: 020-68281200 Email: mmvelankar@sudarshan.com
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone-Basis Reporting
14	Name of assurance provider	TUV India Private Limited (CIN - U74140MH1989PTC052930)
15	Type of assurance obtained	Limited Assurance (ISAE 3000)

II. Products/services

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

Sr. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1.	Manufacturing	Chemical and Chemical Products, Pharmaceuticals, Medicinal Chemical and Botanical Products	100%

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

Sr. No.	Product/Service	NIC Code	% of total Turnover contributed
1.	Manufacture of dyes and pigments from any source in basic form or as concentrate	20114	98%
2.	Manufacture of prepared pigments and other coloring matter of a kind used in the manufacture of paints or by artists or other painters	20224	2%

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*	2	4	6
International	0	0	0

*Note – Two (2) manufacturing plants at Roha and Mahad, Dist. Raigad, Maharashtra, India; Four (4) offices at Delhi, Mumbai, Kolkata, Chennai

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

Locations	Number
National (No. of States)	28 States, 8 Union Territories
International (No. of Countries)	85+ countries

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

During FY2023-24, the contribution of exports is 45.6% of the total turnover of the Company.

c. A brief on types of customers

Sudarshan is a global pigment manufacturer with a diverse range of products ranging from organic, inorganic, and effect pigments to performance colorants, pearlescent pigments, and specialty chemicals. It primarily serves customers in the paints & coatings, plastics, printing, cosmetics, and special application industries, who require high-quality color pigments for manufacturing of end products.

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

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1,036	819	79.05%	217	20.95%
2.	Other than Permanent (E)	28	23	82.14%	5	17.86%
3.	Total employees (D+E)	1,064	842	79.14%	222	20.86%
WORKERS						
4.	Permanent (F)	212	212	100%	0	NA
5.	Other than Permanent (G)	2,544	2,429	95.4%	115	4.52%
6.	Total workers (F+G)	2,756	2,641	95.8%	115	4.17%

b. Differently abled Employees and workers:

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
DIFFERENTLY ABLED EMPLOYEES						
1.	Permanent (D)	0	0	NA	0	NA
2.	Other than Permanent (E)	0	0	NA	0	NA
3.	Total differently abled employees (D+E)	0	0	NA	0	NA
DIFFERENTLY ABLED WORKERS						
4.	Permanent (F)	0	0	NA	0	NA
5.	Other than permanent (G)	4	4	100%	0	NA
6.	Total differently abled workers (F+G)	4	4	100%	0	NA

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors*	10	2	20%
Key Management Personnel**	4	0	0%

*As on 31st March, 2024, the Company's Board consists of ten members. Dr. Deepak Parikh, Non-Executive and Independent Director (DIN: 06504537) resigned effective close of business hours on 2nd February, 2024.

**Key Management Personnel include Mr. Rajesh B. Rath, Managing Director (DIN: 00018628), Mr. Ashish Vij, Wholtime Director (DIN: 08140194), Mr. Nilkanth Natu, Chief Financial Officer and Mr. Mandar Velankar, General Counsel and Company Secretary.

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12.9%	2.7%	15.6%	12.57%	2.72%	15.30%	10.84%	1.72%	12.57%
Permanent Workers	0	0	0	8.07%	NA	8.07%	5.39%	0	5.39%

V. Holding, Subsidiary and Associate Companies (including joint ventures)**23. (a) Names of holding / subsidiary / associate companies / joint ventures**

Sr. 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.	RIECO Industries Limited	Wholly Owned Subsidiary	100%	No
2.	Sudarshan CSR Foundation	Wholly Owned Subsidiary	100%	No
3.	Sudarshan Europe B.V.	Wholly Owned Subsidiary	100%	No
4.	Sudarshan (Shanghai) Trading Company Limited*	Step Down Subsidiary	100%	No
5.	Sudarshan Japan Limited	Wholly Owned Subsidiary	100%	No
6.	Sudarshan North America Inc., USA	Step Down Subsidiary	100%	No
7.	Sudarshan Mexico S de R. L. de CV	Step Down Subsidiary	100%	No

* During the year under review, the Company entered into the agreement for sale of its entire investment held by the Company (in the form of Equity Shares) in Sudarshan (Shanghai) Trading Company Limited, Wholly Owned Subsidiary of the Company to Sudarshan Europe B.V., another Wholly Owned Subsidiary of the Company on 22nd March, 2024. As a result of this transaction, Sudarshan (Shanghai) Trading Company Limited has ceased to be a Wholly Owned Subsidiary and has become a Step - Down Subsidiary of the Company.

VI. Corporate Social Responsibility ("CSR") details

24.

Whether CSR is applicable as per section 135 of Companies Act 2013: (Yes/No)	Turnover (₹ in Lakhs)	Net Worth (₹ in Lakhs)
Yes	2,11,696.6	1,10,648.8

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
		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
Communities	Yes. Sudarshan has strategically placed complaint boxes throughout our localities to encourage anonymous feedback. In addition, Sudarshan encourage the local communities to raise their grievances electronically at the email ID below- grievance. redressal@sudarshan.com	0	0	NA	0	0	NA
Investors (other than shareholders)	Yes. Investors can register their grievances at the below email ID - grievance. redressal@sudarshan.com	0	0	NA	0	0	NA
Shareholders	Yes https://www.sudarshan.com/investor-communication-policy.pdf Shareholders can register their grievances at the below email ID – grievance. redressal@sudarshan.com	3	1	Complaint remaining unresolved as on 31 st March 2024 was treated as resolved after conclusion of the Financial Year based on the Company's response.	8	0	All 8 complaints were resolved during FY 2022-23

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
		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	Yes Employees: https://www.sudarshan.com/connecting-people/	262	15	Employees closure rate: 94%	351	24	Employees closure rate: 93%
Workers	Yes Workers: https://www.sudarshan.com/connecting-people/ Additionally, both employees and workers can register their grievances at the below email ID- grievance. redressal@sudarshan.com	447	96	Workers closure rate: 78.5%	697	96	Workers closure rate: 86%
Customers	Yes https://www.sudarshan.com/contact-us/ Customers can register their grievances at the below email ID – grievance. redressal@sudarshan.com	236	4	Customers closure rate: 98.3%	257	2	Product-related technical complaints
Value chain partners	Sudarshan has dedicated buyers allotted for supplier categories who are in touch with the suppliers regularly.	0	0	No complaints were received from the suppliers.	0	0	No complaints were received from the suppliers.

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

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

Sr. No.	Material issue identified	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.	Climate Change and Energy Source Diversification	Risk	IPCC's Sixth Assessment Report warns of rapid global temperature rise, leading to more extreme weather events. Unchecked warming poses physical risks to operations, and climate related transitional risks can impact markets.	We are proactively managing climate change risks through energy conservation and source diversification to reduce our carbon footprint. Initiatives to enhance physical infrastructure and diversify the energy mix, aim to mitigate acute risks.	Negative, due to higher capex on mitigation measures.
2.	Human Capital Management	Opportunity	India is emerging as a knowledge-based economy. Due to a strong demographic dividend, a competent workforce is available. This workforce provides an opportunity for us to expand and grow.	We prioritize equal opportunities for all employees, irrespective of gender, race, or religion. Our policies, procedures, and ongoing online training programs underscore our commitment to employee protection and well-being. Training initiatives are integral to our Human Resource strategy.	Positive, due to higher productivity of people.
3.	Labor Relationship	Risk	We have a complex global value chain in chemical manufacturing. Non-adherence to global standards on Human Rights has the potential to affect our operations, reputation, and business relationships.	We are committed to the protection and promotion of fundamental human rights. We have adopted a comprehensive Human Rights Policy and all employees are trained on this Policy. We engage with our value-chain partners on the management of human rights.	Negative due to expenditure on training and due diligence.
4.	Occupational Health & Safety	Risk	Due to the nature of our business operations, occupational safety is one of the risks posed to us	Our safety strategy includes behavior-based safety, process automation, and asset integrity. More details are available in the 'Strengthening Social Inclusiveness' section of the report.	Negative, due to expenditure on automation, training, and asset management.
5.	Water Management	Risk	Climate change-related water disruptions pose a growing risk. In addition, Inefficient water usage, pollution, can lead to regulatory compliance issues, reputational damage, and operational disruptions.	We fulfil our daily water requirements by obtaining water from Maharashtra Industrial Development Corporation (MIDC). We have implemented various water conservation measures, controlling filtration parameters, R&D sites recognized as Zero Liquid Discharge (ZLD), and the recovery of condensate.	Negative, since water scarcity or contamination can disrupt production processes, impacting supply chains and revenue.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6.	Product Innovation	Opportunity	Innovative products drive market expansion, boost sales and profits, conferring a competitive advantage. Environmentally friendly innovations align with sustainability trends, appealing to eco-conscious consumers.	We are implementing innovative solutions to reduce environmental impacts, including minimizing HCB in products, adopting Diethyl Sulfate (DES) for ethylation, and exploring alternative raw materials for solvent and catalyst recovery	Positive, as successful product innovation can drive revenue growth and profitability
7.	Waste Management	Risk	Dynamic regulations and increased stakeholder activism concerning waste handling and disposal poses risks on waste management.	We have implemented well-defined and efficient processes for managing waste. This includes the use of recyclable packaging materials, recycling programs, recovery & reuse of solvents, and optimizing production processes and strict adherence to regulations for the proper disposal of waste, in accordance with the guidelines set forth by the Pollution Control Board.	Negative due to expenditure incurred on waste reduction measures and safe handling.
8.	Product Stewardship	Opportunity	Technological advancements and scientific progress have made it feasible to identify and manage the environmental and social impacts of products with reasonable certainty	We have implemented measures to minimize POPs in our products, ensuring low VOC content. Our adherence to strict standards includes compliance with EU REACH, USFDA, Turkey REACH, UK REACH, US Toxic Substance Control Act, TPCH.	Positive, due to enhanced stakeholder trust.
9.	Supplier Sustainability	Risk	Complex and diverse supply chains pose several risks affecting the cost and quality of raw material.	We have adopted the Supplier-51 program to engage with suppliers on several financial and non-financial aspects to risk the supply chain.	Negative, due to expenditure on supplier due diligence.
10.	Product Quality & Excellence	Opportunity	Top-tier product quality boosts market share, brand recognition, and competitiveness for chemical companies, fostering lasting customer relationships, securing contracts, and driving revenue growth	We prioritize customer health and safety, delivering high-quality, environmentally sustainable products through advanced R&D facilities. Our transparent approach invites customers to tour our plants and R&D labs, ensuring confidence in product quality.	Positive due to higher profit margins, increased sales, reduced operational costs, and improved overall financial performance, positioning the company as an industry leader
11.	Air Pollution	Risk	Emissions regulations can incur costly compliance and fines, impacting reputation and sales. Environmental damage may harm our image, while employee health issues can raise healthcare costs and lower productivity	We adhere to strict air quality standards, using low-sulfur coal and implementing Electro-Static Precipitators (ESP) and Scrubbers in all exhaust stacks to keep emissions well below legal limits.	Negative due to increased operational costs

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
12.	Corruption and Bribery	Risk	Corruption and bribery pose significant risks to a company as they can lead to unethical practices, compromising the integrity of operations and the reputation of the Company.	We oppose corruption and bribery. Our zero-tolerance policy extends beyond our operations, supported by our Code of Conduct (COC) and Whistle Blower Policy to prevent fraud at all levels.	Negative, due to potential legal fines, penalties, and reputational damage impacting customer trust and investor confidence. Corrupt practices may distort fair competition, eroding market share and profitability.
13.	Competitive Practices	Risk	Engaging in anti-competitive practices, like price-fixing or monopolistic behavior, can trigger legal issues, hefty fines, and damage a company's reputation.	We provide training on Sudarshan's Code of Conduct to all employees. This reinforces adherence and commitment to the anti-competitive, anti-corruption and bribery laws.	Negative, due to potential legal costs, fines, and the erosion of profits.

IPCC: Intergovernmental Panel on Climate Change
MIDC: Maharashtra Industrial Development Corporation
ZLD: Zero Liquid Discharge
HCB: Hexachlorobenzene
DES: Diethyl Sulfate
POP: Persistent Organic Pollutants
VOC: Volatile Organic Content
EU REACH: European Union Registration, Evaluation, Authorisation and Restriction of Chemicals
USFDA: United States Food and Drug Administration
Turkey REACH: Turkey Registration, Evaluation, Authorisation and Restriction of Chemicals
UK REACH: United Kingdom Registration, Evaluation, Authorisation and Restriction of Chemicals
US Toxic Substance Control Act: US Registration, Evaluation, Authorisation and Restriction of Chemicals
TPCH: Transaction Processing and Database Benchmark specific to decision support (TPCH)
R&D: Research & Development
ESP: Electro-Static Precipitators
COC: Code of Conduct

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	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
c. Web Link of the Policies, if available	Sudarshan has updated all of its corporate policies on its website, which are Board-approved. For easy access, please refer to the link to view the updated policies. https://www.sudarshan.com/company-policies/								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/ certifications/labels/ standards (e.g., Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g., SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	Sudarshan has adopted various national and international standards aligning to respective NGRBC Principles: - ISO 14001:2015 - Principle 6 - ISO 9001:2015 - Principle 2 - Responsible Care (RC 14001) - Principle 2, 3, 6 - ISO 45000:2018, Occupational Health and Safety Assessment Series (OSHAS 18001) - Principle 3 The Company has developed policies that adhere to industry standards and legal requirements. It is committed to ensuring that its policies align with the best practices in the industry and contribute to the safety and well-being of its stakeholders.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Sudarshan has adopted various ambitious ESG goals mentioned below: Environmental: - To reduce specific energy consumption by 6% year-on year till 2030 - To reduce absolute GHG emissions by 42.4% by FY 2029-30 from baseline of FY 2021-22 - To reduce specific water withdrawal by 20% by FY 2025-26 from baseline of FY 2020-21 - To achieved zero waste to landfill by FY 2030-31 Social 60% overall inclusion by FY 2024-25 30% women participation in the overall workforce by 2025 - Great place to work- gold standards by 2025. - Safety culture maturity score of a minimum of 80% by 2025 - Zero process safety events (Tier 1 and 2 as per API 754) by 2025 - Screening of all new vendors on ESG criteria w.e.f., FY 2024-25 Manufacturing Excellence - Life Cycle Impact Assessment (LCIA) of products with over 35% of projected FY 2024-25 revenue. - Elimination of hazardous operations by year 2026 Governance 30% women directors on Board by 2026 - Enhance and improve Business Continuity Plan (BCP) by FY 2024-25 - Ensure 100% compliance with all applicable regulations. - Average 2-person hours training on cyber security w.e.f FY 2023-24 Detailed Goals & Targets adopted by the Company can be accessed in its Sustainability report for FY 2023-24								



Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
6. Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met.	Sudarshan's performance against the ESG targets can be accessed in its Sustainability report FY 2023-24								
Governance, leadership, and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets, and achievements (listed entity has flexibility regarding the placement of this disclosure)	Sudarshan is devoted to integrating environmentally sustainable practices across all functions and making responsible choices to safeguard the future. By incorporating environmental considerations into its business planning, the Company aims to be transparent and open in its operations. In addition to its environmental commitments, Sudarshan is dedicated to fostering a nurturing workplace that promotes gender diversity, inclusion, non-discrimination policies, and work-life balance. The Company prioritizes the health and safety of its employees, maintaining a constant focus on delivering the highest quality products and services to its customers while minimizing its impact on the environment and society. Furthermore, Sudarshan is committed to integrating Environmental, Social, and Governance (ESG) principles across our value chain.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Rajesh B. Rathi, Managing Director and the Board of Directors of the Company								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision-making on sustainability-related issues? (Yes / No). If yes, provide details.	Yes Steering Committee, led by the Managing Director, is a cross-functional group that meets monthly to review progress against set targets. It includes the Executive Director, Head of People Practice and Chief Sustainability Officer, Company Secretary, and Head of R&D. The Committee is supported by a Working Group, which implements ESG initiatives across the Company. This group includes representatives from various business functions and reports to the Steering Committee through the Chief Sustainability Officer.								

10. Details of Review of NGRBCs by the Company

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Steering Committee									Monthly								
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Steering Committee									Monthly								

	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	No		NA						

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the principles material to its business (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
The entity is not at a stage where it is able to formulate and implement the policies on specified principles (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
It is planned to be done in the next financial year (Yes/No)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Any other reason (please specify)	NA	NA	NA	NA	NA	NA	NA	NA	NA

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	6	PRINCIPLE 1: - Operation Plans and Strategy Discussions - Internal Audit and Compliance Process - SEBI Regulations, Secretarial Standards and other regulatory updates - Business Updates on Subsidiaries - Risk Management and Internal Control, Whistleblower Policy PRINCIPLE 8: - CSR Framework related updates	100%
Key Managerial Personnel	6	PRINCIPLE 1: - Operation Plans and Strategy Discussions - Internal Audit and Compliance Process - SEBI Regulations, Secretarial Standards and other regulatory updates - Business Updates on Subsidiaries - Risk Management and Internal Control, Whistleblower Policy PRINCIPLE 8: - CSR Framework related updates	100%
Employees other than BoD and KMPs	20	Principle 3: - Health & safety related awareness program. PRINCIPLE 5: - ESG & Human Rights Policy training coverage PRINCIPLE 6: - ESG Train-the-Trainer (TTT), ESG awareness - Executive Development Programme ("EDP") batch, Manager Development Programme ("MDP") batch - ETP Operations - ETP and Environmental Awareness - Waste Management – Circularity and Recycle	87%
Workers	2	Principle 3: All workers are actively engaged in a health and safety-related toolbox talk and learning session to ensure their well-being and awareness of safety protocols.	100%

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

(Note: the entity shall make disclosures based on materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website).

Monetary					
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In ₹)	Brief of the Case	Has an appeal been preferred? (Y/N)
Penalty/ Fine	No penalties amount was paid in FY 2023-24	NA	NA	NA	NA
Settlement	No settlement amount was paid in FY 2023-24	NA	NA	NA	NA
Compounding fee	No compounding fees amount was paid in FY 2023-24	NA	NA	NA	NA

Non-Monetary				
Type	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Y/N)
Imprisonment	No imprisonments observed in FY 2023-24	NA	NA	NA
Punishment	No punishments observed in FY 2023-24	NA	NA	NA

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

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

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

Yes.

Sudarshan maintains a steadfast commitment to eliminating corruption and bribery from its business operations, refraining from any involvement or endorsement of unethical practices or illegal activities. With a zero-tolerance approach to corruption, its Code of Conduct and Whistleblower Policy serve as robust safeguards against fraudulent behavior at every level of the company. Through comprehensive risk assessments, Sudarshan diligently identifies and addresses potential corruption, bribery, and anti-competitive risks across its operations.

Link to the policies:

- 1) <https://www.sudarshan.com/corporate-code-of-conduct-policy.pdf>
- 2) <https://www.sudarshan.com/whistle-blower-vigil-mechanism-policy.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 2023-24	FY 2022-23
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

6. Details of complaints regarding conflict of interest:

Category	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	NA	0	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NA	0	NA

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

During FY2023-24, no such instances have occurred across the Company.

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

	FY 2023-24	FY 2022-23
Number of days of accounts payables	130.07	128.40

9. Open-ness of business

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

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	7%	10%
	b. Number of trading houses where purchases are made from	364	386
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	75%	77%
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	54.75%	53.91%
	b. Number of dealers / distributors to whom sales are made	88	91
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	65.07%	63.80%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.089%	0.65%
	b. Sales (Sales to related parties / Total Sales)	18.45%	18.50%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	11.71%	2.92%
	d. Investments (Investments in related parties / Total Investments made)	NA	NA

Leadership Indicators

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

Total no. of awareness programmes held	Topics/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Nil	NA	Nil

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 Board members and Senior Executives adhere to 'Code of Conduct for Directors and Senior Management Personnel' mandating them to disclose any personal or business interests that could conflict with the Company. Additionally, they annually declare their dedication to prioritize the organization's best interests and avoid conflicts stemming from external affiliations or transactions.

Link to access the Code of Conduct for Directors and Senior Management: <https://www.sudarshan.com/code-of-conduct-for-directors-and-senior-management-personnel.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.

	FY 2023-24	FY 2022-23	Details of improvements in environmental and social impacts
R&D	83.03%	70%	- Reducing POPs in products - Waste reduction - Solvent Recovery - Yield Improvement
Capex	16.96%	1.58%	- Solar installation - ETP modification

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

Yes, Sudarshan has established procedures in place for sustainable sourcing.

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

During the reporting period, 42% of the inputs were sourced sustainably.

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

Sr. No.	Product	Process to safely reclaim the product
a.	Plastics (including packaging)	Reclaiming and reusing is not a viable option due to contamination in the packaging material. Also, reclaiming the pigments from the end-use products are technologically infeasible. Therefore, Sudarshan does not reclaim and reuse its products at the end-of-life stage.
b.	E-Waste	Sudarshan's products do not contribute to generation of electronic waste at end-of-life stage.
c.	Hazardous Waste	Sudarshan's products form a part of final product by its customers, therefore, its reclaiming at end of life is not feasible.

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.

Yes, our business operations adhere to the Extended Producer Responsibility (EPR) regulations, and we are registered as an importer. We are committed to not producing any plastic material, and we use recycled plastic packaging as our raw material. Moreover, we ensure that all our plastic waste is sent for recycling in accordance with the consent from the Pollution Control Board.

Leadership Indicators

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

- During the reporting year, Sudarshan has conducted detailed Life Cycle Assessment of select products. The details are tabulated below:

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.
20114	Quinacridone, Quinophthalone, Dioxazine Pigment, Effect Pigments and Complex Inorganic Color Pigment (CICP)	25%	Cradle-to-gate	Yes	No

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

The LCA study did not provide evidence of any significant environmental and social concerns. The study showed that gate-to-gate environmental footprint caused by use of steam and power which is currently generated from fossil fuels. The Company has developed a plan to diversify energy mix by use of biofuels, which will mitigate gate-to-gate environmental impact substantially.

Name of the Product/Service	Description of the Risk/Concern	Action Taken
Quinacridone	Nil	NA
Quinophthalone	Nil	NA
Dioxazine Pigment	Nil	NA
Effect Pigments	Nil	NA
Complex Inorganic Color Pigment (CICP)	Nil	NA

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 2023-24	FY 2022-23
Methanol	82.7%	79%

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 2023-24			FY 2022-23		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	NA	NA	NA	NA	NA	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
NA	NA

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

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

Category	% of employees covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Employees											
Male	819	819	100%	819	100%	0	0	819	100%	0	0
Female	217	217	100%	217	100%	217	100%	NA	NA	0	0
Total	1,036	1,036	100%	1,036	100%	217	21%	819	79%	0	0
Other than Permanent Employees											
Male	23	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA
Female	5	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA
Total	28	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA

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

Category	% of workers covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent Workers											
Male	212	212	100%	212	100%	Nil	NA	Nil	NA	Nil	NA
Female	Nil	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA
Total	212	212	100%	212	100%	Nil	NA	Nil	NA	Nil	NA
Other than Permanent Workers											
Male	2,429	2,429	100%	Nil	NA	NA	NA	Nil	NA	Nil	NA
Female	115	115	100%	Nil	NA	115	100%	Nil	NA	Nil	NA
Total	2,544	2,544	100%	Nil	NA	115	4.5%	Nil	NA	Nil	NA

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

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company	0.045%	0.037%

2. Details of retirement benefits, for current FY and previous FY:

Benefits	FY 2023-24			FY 2022-23		
	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	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	33%	100%	Y	38%	100%	Y

3. Accessibility of workplaces

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

Sudarshan champion an inclusive workplace environment, by valuing and supporting individuals with disabilities. In compliance with the Rights of Persons with Disabilities Act, 2016, inclusive infrastructure facilities have been seamlessly integrated into the premises of the Company to accommodate the needs of differently abled individuals. These facilities include, but are not limited to walkway ramps, wheelchair ramps, and differently abled washrooms. By providing accessible facilities and accommodations, Sudarshan ensures all employees have equal opportunities to thrive and contribute their unique talents. Aligned with the Company's ESG, Diversity & Inclusion and Human Rights Policy, it prioritize promoting the rights of individuals with disabilities, fostering a culture where every employee is treated with dignity and respect regardless of their ability.

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

Yes, Sudarshan has an Equal Employment Policy in place in accordance with Rights of Persons with Disabilities Act, 2016.

Web-link to access the policy: <https://www.sudarshan.com/diversity-and-inclusion-policy.pdf> ;
<https://www.sudarshan.com/equal-employment-policy.pdf>

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

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

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

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	Yes IR Ninja and Works Committee as per The Industrial Dispute Act, 1947 have been established.
Other than Permanent Workers	Yes IR Ninja
Permanent Employees	Yes The Company has appointed internal committee to address employee grievances. Our Grievance redressal process is as below: 1) HR Ninja & Suda Interconnect (for further details, please refer to Page No. 67 of Sudarshan ESG Report FY 2022-23) 2) Suda Connect (for further details, please refer to Page No. 67 of Sudarshan ESG Report FY 2022-23) 3) Lean Daily Management meetings 4) Department level meetings
Other than Permanent Employees	Yes Monthly meetings HR Ninja

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

Category	FY 2023-24			FY 2022-23		
	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	1,036	0	0%	1,026	0	0%
Male	819	0	0%	843	0	0%
Female	217	0	0%	183	0	0%
Total permanent workers	212	212	100%	223	223	100%
Male	212	212	100%	223	223	100%
Female	0	0	NA	0	0	NA

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23				
	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	842	702	83.37%	695	82.54%	843	754	89.44%	689	81.73%
Female	222	197	88.73%	180	81.08%	183	178	97.27%	160	87.43%
Total	1,064	899	84.49%	875	82.23%	1,026	932	90.84%	849	82.75%
Workers										
Male	2,641	2,641	100%	2,641	100%	2,548	2,548	100%	2,548	100%
Female	115	115	100%	115	100%	29	29	100%	29	100%
Total	2,756	2,756	100%	2,756	100%	2,577	2,577	100%	2,577	100%

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

Category	FY 2023-24			FY 2022-23		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category who had a career review (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category who had a career review (D)	% (D/C)
Employees						
Male	842	717	85.15%	843	635	75.33%
Female	222	147	66.21%	183	122	66.67%
Total	1,064	864	81.20%	1,026	757	73.78%
Workers						
Male	2,641	0	0%	2,548	Nil	NA
Female	115	0	NA	29	0	NA
Total*	2,756	0	0%	2,577	Nil	NA

*Permanent workers undergo settlement activity every three years

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, Sudarshan has an Occupational Health & Safety Management System in place. 100% of its sites are SO 45001:2018 certified.

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

Sudarshan's Risk Management System systematically identifies, assesses, and manages health and safety hazards and credible risk scenarios associated with its operations. Additionally, the Company ensure that all employees entering its industrial sites are fit for work and free from fatigue or substances that could compromise their ability to work safely.

The Company is actively working to reduce process safety incidents and raise awareness of potential risks among its workforces. To minimize such incidents, the Company have introduced technical measures and is promoting a leadership culture that prioritizes process safety. Collaborating with Partner Risk Management Services, Sudarshan has established a structured Process Safety Management (PSM) approach within its organization.

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

Yes, all employees and workers actively engage in identifying hazards associated with their work through the "Hazard Identification and Risk Assessment" process. This allows for the reporting and implementation of control measures aimed at preventing and mitigating these risks.

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

Yes, the Company ensure that all employees/workers receive full medical care, addressing any medical needs that may arise, whether emergency or otherwise.

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

Safety Incident/Number	Category*	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	0.581	0
Total recordable work-related Injuries	Employees	0	0
	Workers	82	60
No. of fatalities*	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	3	0

*Including in the contract workforce

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

Sudarshan is committed to employee safety, striving to become an industry leader in this aspect by aiming for a workplace free from fatalities and severe injuries. The Company's 'Zero Harm' goal entails enhancing operational safety, fostering a safe culture, developing employee skills, implementing a robust safety governance structure, and optimizing assets. Sudarshan's Risk Management System systematically identifies, assesses, and manages health and safety hazards and credible risk scenarios associated with our operations. Additionally, we ensure that all employees entering our industrial sites are fit for work and free from fatigue or substances that could compromise their ability to work safely.

We are actively working to decrease process safety incidents and raise awareness of potential risks among our workforces. To minimize such incidents, we have introduced technical measures and are promoting a leadership culture that prioritizes process safety. Collaborating with Partner Risk Management Services, we have established a structured Process Safety Management (PSM) approach within our organization.

Some of the initiatives are Energy Isolation Matrix, Personal Protective Equipment (PPEs) Matrix and Confined Space Emergency Rescue Kit.

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

	FY 2023-24			FY 2022-23		
	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	0	0	NA	0	0	NA
Health & Safety	0	0	NA	0	0	NA

14. Assessments for the year:

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



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

The Company has implemented various corrective actions to address safety-related incidents as mentioned below:

- 1) Implementation of Energy Isolation Matrix
 - Developing an energy isolation matrix for our facilities
 - Utilization of isolation types and LOTOTO devices during emergencies or vessel entry
 - Tagging each line with equipment tag numbers and descriptions of isolation devices
- 2) Confined Space Emergency Rescue Kit
 - Supplying appropriate PPE for specific job tasks to reduce injury risks.
 - Prioritizing PPE allocation based on risk assessments for different tasks.
 - Tracking PPE-related incidents for root cause analysis and corrective actions.
 - Assessing PPE consumption and supplier performance for quality, delivery, and cost-effectiveness.
- 3) Personal Protective Equipment (PPEs) Matrix
 - Identifying critical vessel locations.
 - Providing practical demonstrations to workers.
 - Ease/safe evacuation of people during confined space activity Increased productivity

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).

(A) Employees: Yes

(B) Workers: Yes

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 ensure that statutory dues are deducted by third-party contractors through the inclusion of appropriate payment terms in contract agreements.

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

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	0	0	0
Workers	3	0	3	0

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

Yes.

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	65%
Working Conditions	0.04%

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.

Sudarshan has initiated its journey to assess its value chain partners on health and safety practices and has adopted a Supplier Assessment Questionnaire (SAQ) based on ESG aspects. Sudarshan aims to initiate conducting audit of its suppliers on ESG parameters in a phased manner, in the subsequent years.

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.

Sudarshan prioritize both our internal and external stakeholders based on their significance to and influence on our business. Throughout the year, the Company actively engage with its key stakeholders through various channels to understand their needs and expectations and share information about the Company's performance and outlook.

For further details on the Company's stakeholder engagement and identification process, please refer to its ESG Report FY 2023-24.

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 (Y/N)	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees & contractual workforce	No	• Organization-level communication • Department-level communication • Individual-level communication • Social media	Annually, quarterly, monthly, daily	• Communicate on business goals, values, and principles • Facilitate learning and developing • Track key performance indicators • Grievance redressal
Board of Directors	No	• Understanding and addressing company concerns • Business operations and company performance • Economic value generated and distributed	Annually, quarterly, need based	• Understanding and addressing company concerns • Business operations and company performance • Economic value generated and distributed
Customers	No	• Customer portal, email, & phone communication • Customer visits • Conference & exhibitions • Social media	Annually, quarterly, monthly, daily	• Value addition • Quality and perfection • Customer-centric R&D • Transparency and trust • Customer Health & Safety
Industry forums & peers	No	• Industry forum meetings • Executive committees • Social media	Annually, need based	• Collaborative and mutual learning • Relationship building



Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Y/N)	Channels of communication	Frequency of engagement	Purpose and scope of engagement including key topics and concerns raised during such engagement
Communities	No	- Community meets - Employee volunteering - Need assessment survey - Social media	Annually, quarterly, need based	- Understanding and addressing their concerns - Local community upliftment - SUDHA (Sudarshan's Holistic Aspirations) initiatives
Regulatory bodies	No	- Annual report - Press releases	Annually, quarterly	- Regulatory compliances - Relationship building - Discussions on major investment plans - Understanding upcoming regulations and policies
Shareholders / providers of capital	No	- Annual report - Investor relation - Investor presentations - Press releases - Stock Exchange Disclosures - Social media	Annually, quarterly, monthly, event based	- Information to shareholders - Return on investment - Transparency and disclosures
Media	No	- Media forums - Press releases - Social media	Annually, need based	- Product promotion - Timely disclosure and dissemination of accurate and relevant information to society and community
Vendors / suppliers	No	- Vendor portal - Vendor visits - Email & phone communications - Conferences and exhibitions - Social media	Weekly for critical suppliers, monthly	- Building supplier relations - Supply chain sustainability - Competitive pricing

Leadership Indicators

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

Sudarshan use various communication channels to engage stakeholders, including one-on-one meetings, annual meetings, training, group discussions, surveys, and grievance mechanisms. The Company evaluate stakeholder concerns and integrate them into its core decisions. It continuously improves its engagement process to encourage greater participation. The company has established a Steering Committee to ensure robust governance practices and provide guidance on ESG initiatives. The Committee is responsible for assisting the Board of Directors (BOD/Board) in having effective oversight and providing guidance on ESG (Environmental, Social, and Governance) initiatives of the Company. It shapes sustainability strategy, sets goals, and prioritizes workplace safety, stakeholders, and the environment. The CSR Committee assesses initiatives against the annual plan and establishes a transparent monitoring system. The Committee formulates CSR policy, recommends budgets, oversees implementation, ensures compliance, and prevents any surplus from contributing to business profits.

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

Yes, Sudarshan conducted a comprehensive materiality assessment through active engagement with both its internal and external stakeholders. This enabled us to identify the key material topics and adopt appropriate actions for managing associated risks and opportunities.

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

During the reporting period, no related instances occurred.

PRINCIPLE 5: BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

Essential Indicators

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	1,036	998	96.33%	1,026	974	94.93%
Other than permanent	28	0	0%	33	0	0%
Total Employees	1,064	998	93.79%	1,059	974	91.97%
Workers						
Permanent	212	212	100%	223	0	0%
Other than permanent	2,544	1,328	52.20%	2,354	2,354	100%
Total Workers	2,756	1,540	55.88%	2,577	2,354	91.3%

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

Category	FY 2023-24					FY 2022-23				
	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	1,036	0	0%	1,036	100%	1,026	0	0%	1,026	100%
Male	819	0	0%	819	100%	843	0	0%	843	100%
Female	217	0	0%	217	100%	183	0	0%	183	100%
Other than Permanent	28	0	0%	28	100%	33	0	0%	33	100%
Male	23	0	0%	23	100%	21	0	0%	21	100%
Female	5	0	0%	5	100%	12	0	0%	12	100%
Workers										
Permanent	212	Nil	NA	212	100%	223	Nil	NA	223	100%
Male	212	Nil	NA	212	100%	223	Nil	NA	223	100%
Female	Nil	Nil	NA	Nil	NA	Nil	Nil	NA	Nil	NA
Other than Permanent	2,544	Nil	NA	2,544	100%	2,354	Nil	NA	2,354	100%
Male	2,429	Nil	NA	2,429	100%	2,325	Nil	NA	2,325	100%
Female	115	Nil	NA	115	100%	29	Nil	NA	29	100%

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

a. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)*	9	9,75,000	2	12,37,500
Key Managerial Personnel (KMP)**	4	1,60,08,954	Nil	NA
Employees other than BoD and KMP	815	5,67,000	217	2,35,944
Workers	212	7,94,100	Nil	NA

*Note: Mr. Rajesh B. Rath, Managing Director (DIN: 00018628) and Mr. Ashish Vij, Wholetime Director (DIN: 08140194) are paid remuneration, and Mr. Pradeep R. Rath, Non-Executive and Non-Independent Director (DIN: 00018577) is paid pension which is considered as remuneration as per the provisions of The Companies Act, 2013, and Rules made thereunder. All other Directors were paid remuneration in the form of Commission (proposed for FY 2023-24). Sitting Fees paid to Directors is not treated as remuneration as per the statutory provisions and hence not considered in the table above. Remuneration to Dr. Deepak Parikh includes Commission proposed for FY 2023-24 who resigned as an Independent Director effective close of business hours on 2nd February 2024.

** KMP include Mr. Rajesh B. Rath, Managing Director (DIN: 00018628), Mr. Ashish Vij, Wholetime Director (DIN: 08140194), Mr. Nilkanth Natu, Chief Financial Officer and Mr. Mandar Velankar, General Counsel and Company Secretary

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

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	7%	6%

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, Sudarshan has a Human Right Policy as per which the Head - Human Resource & Admin and Head - Pigment Division comprise of the approving authority for any changes to implemented in the policy.

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

Our Human Rights Policy ensures that we conduct business by upholding the rights and dignity of all individuals and providing a work environment that is free from harassment, ill-treatment, or discrimination of any kind. The policy ensures that all employees are aware of these principles through regular training and communication. It establishes a due diligence process that emphasizes identifying, assessing, mitigating, and managing potential risks and related impacts. The policy also includes monitoring, benchmarking, and reviewing objectives based on employee experience, and improving through timely interventions. Business leaders and line managers are responsible for fully implementing the policy and standards. They are also responsible for tracking and taking appropriate actions to address grievances through a proper channel and actively engaging in the grievance redressal mechanism.

The detailed approach for the grievance redressal mechanism is as follows:

- The employee is required to submit a written complaint or send an email to committee members.
- The committee appoints a lead investigator and creates a consensus and case resolution document.
- The committee forwards its findings and action recommendations to the leadership.
- Finally, the leadership makes the final decision on each case and ensures a fair resolution.

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

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0	NA	0	0	NA
Discrimination at workplace	0	0	NA	0	0	NA
Child Labour	0	0	NA	0	0	NA
Forced Labour/ Involuntary Labour	0	0	NA	0	0	NA
Wages	0	0	NA	0	0	NA
Other human rights relate issues	0	0	NA	0	0	NA

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

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	0
Complaints on POSH as a % of female employees / workers	0	0
Complaints on POSH upheld	0	0

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

At Sudarshan, we strive to create an environment of mutual trust and the absence of intimidation, oppression, exploitation, or harassment of any kind. We are committed to preventing, correcting, and disciplining behavior that violates this policy through the implementation of an Anti-harassment policy and by educating, mentoring, and guiding our employees. No cases of anti-harassment were reported during the reporting year. Below are the details of the mechanisms implemented by Sudarshan:

Prevention of Sexual Harassment: Known as POSH, this policy prohibits any form of retaliation against individuals involved in the investigation or reporting of sexual harassment allegations. Retaliation may lead to disciplinary action, including termination of employment and criminal action. All employees are required to complete a training module emphasizing the policy requirements.

Reporting to the Committee: The committee of investigators reports directly to the Managing Director. If necessary, they may seek assistance from any department other than the one from which the complaint has been received.

Grievance against any member of the Internal Committee: Any disciplinary or corrective action initiated against the subject due to any inquiry conducted pursuant to this policy will be considered final. The management shall provide required assistance to ensure a complete, speedy, and effective implementation of the policy.

Internal Complaints Committee (ICC): Formed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, the committee is responsible for receiving, addressing, and resolving any complaints related to POSH. They ensure a clear understanding of their role, responsibilities, sensitivity, and the importance of maintaining confidentiality in these matters.

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

(Yes/No)

- Yes. We expect our suppliers, contractors, and business partners to align with this commitment and implement policies and procedures that ensure and maintain respect for human rights.

10. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labor	100%
Forced/involuntary labor	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%

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

- Not Applicable

Leadership Indicators

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

- There were no modifications in the business process during the reporting year. However, Sudarshan has a well-established and robust business process for addressing the human rights grievances or complaints that are identified and registered. Thus, all the external stakeholders (including shareholders) can address their grievances or complaints on the email ID: grievance.redressal@sudarshan.com.

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

- Sudarshan is committed to conducting Human rights due diligence and has a Human Rights Policy which forms a part of their ESG policy. In the subsequent reporting years, Sudarshan will consider conducting the due diligence for all its operational sites. We have also adopted a Supplier Assessment Questionnaire (SAQ) which includes parameters related to human rights such as minimum wage, working hours, overtime, prevention of sexual harassment at workplace, etc.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

- Yes. In compliance with The Rights of Persons with Disabilities Act, 2016, inclusive infrastructure facilities have been seamlessly integrated into our premises to accommodate the needs of differently abled individuals. These facilities include, but are not limited to walkway ramps, wheelchair ramps, and differently abled washrooms.

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	65%
Discrimination at workplace	65%
Child Labour	65%
Forced Labour/Involuntary Labour	65%
Wages	65%

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

- No significant risks have been identified during assessments.

PRINCIPLE 6: BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

Essential Indicators

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

Parameter	FY 2023-24 (GJ)	FY 2022-23 (GJ)
From renewable sources		
Total electricity consumption (A)	1,37,147	1,08,951
Total fuel consumption (B)	Nil	Nil
Energy consumption through sources (C)	Nil	Nil
Total energy consumed from renewable sources (A+B+C)	1,37,147	1,08,951
From non-renewable sources		
Total electricity consumption (D)	65,006	75,133
Total fuel consumption (E)	23,65,319	19,66,001
Energy consumption through other sources (F)	Nil	Nil
Total energy consumed from non-renewable sources (D+E+F)	24,30,325	20,41,133
Total energy consumed (A+B+C+D+E+F)	25,67,472	21,50,084
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations in million INR)	118.90	108.60
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations in million INR adjusted for PPP)	118.90	108.60
Energy intensity in terms of physical Output (GJ/ton of production)	72.00	72.20
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

No

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

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Groundwater	Nil	Nil
(iii) Third party water	43,87,129	39,02,646
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	43,87,129	39,02,646
Total volume of water consumption (in kilolitres)	7,02,390	10,78,407
Water intensity per rupee of turnover (Total water consumption / Revenue from operations in million INR)	32.54	54.46
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations in million INR adjusted for PPP)	32.54	54.46
Water intensity in terms of physical output	19.69	36.22
Water intensity (optional) –the relevant metric may be selected by the entity	NA	NA

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	36,84,739	28,24,239
(ii) To Groundwater		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iii) To Seawater		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third parties		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Primary, Secondary and Tertiary	Primary, Secondary and Tertiary
(v) Others		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
Total water discharged (in kilolitres)	36,84,739	28,24,239

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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

Not Applicable.

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

Parameter	Please specify unit	FY 2023-24	FY 2022-23
NOx	MT	15.43	17.77
SOx	MT	176.02	141.83
Particulate matter (PM)	MT	62.40	89.67
Persistent organic pollutants (POP)	Nil	Nil	Nil
Volatile organic compounds (VOC)	Nil	Nil	Nil
Hazardous air pollutants (HAP)	Nil	Nil	Nil

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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

Parameter	Unit	FY 2023-24	FY 2022-23
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)	tCO ₂ e	2,23,675	1,85,765
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	15,770	14,992
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations in million INR)	tCO ₂ e	11.09	10.13
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations in million INR adjusted for PPP)	tCO ₂ e	11.09	10.13
Total Scope 1 and Scope 2 emission intensity in terms of physical output (tCO₂e/ton of production)	tCO ₂ e	6.71	6.74
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	tCO ₂ e	NA	NA

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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

Yes, Sudarshan is committed to reducing its emissions by 42.5% by 2030 in line with SBTi targets. To achieve this, we are implementing various initiatives to mitigate greenhouse gases, including energy conservation measures to reduce energy consumption, continuous monitoring to reduce flare emissions, and the installation of two boilers and a 15 MW cogeneration power plant at the Roha site. We have also implemented CT fan temperature interlocking, Brine pump, Jet mill air compressor, and motor modification across our facilities. Furthermore, we are investing in renewable energy, focusing mainly on solar and wind energy.

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

Parameter	FY 2023-24	FY 2022-23
Total Waste Generated (in metric tonnes)		
Plastic waste (A)	715.13	584.26
E-waste (B)	Nil	4.07
Bio-medical waste (C)	0.01	0.02
Construction and demolition waste (D)	Nil	Nil
Battery waste (E)	6.01	Nil
Radioactive waste (F)	Nil	Nil
Other Hazardous waste. Please specify, if any. (G)	5,565.68	6,587.57
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	19,523.80	16,195.23
Total (A+B + C + D + E + F + G + H)	25,810.62	23,371.15
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations in million INR)	1.20	1.18
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations in million INR adjusted for PPP)	1.20	1.18
Waste intensity in terms of physical output	0.72	0.78



Parameter	FY 2023-24	FY 2022-23
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste	Plastic	
(i) Recycled	715.13	584.26
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	715.13	584.26
Category of waste	e-waste	
(i) Recycled	Nil	4.1
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	Nil	4.1
Category of waste	Battery	
(i) Recycled	6.01	Nil
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	6.01	Nil
Category of waste	Other Hazardous	
(i) Recycled	211.34	581.18
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	211.34	581.18
Category of waste	Other Non-Hazardous	
(i) Recycled	18,288.52	14,772.55
(ii) Re-used	Nil	Nil
(iii) Other recovery operations	Nil	Nil
Total	18,288.52	14,772.55
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste	Plastic	
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	Nil	Nil
Total	Nil	Nil
Category of waste	e-waste	
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	Nil	Nil
Total	Nil	Nil
Category of waste	BMW	
(i) Incineration	0.01	0.02
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	Nil	Nil
Total	0.01	0.02

Parameter	FY 2023-24	FY 2022-23
Category of waste	Battery	
(i) Incineration	Nil	Nil
(ii) Landfilling	Nil	Nil
(iii) Other disposal operations	Nil	Nil
Total	Nil	Nil
Category of waste	Other Hazardous	
(i) Incineration	202.66	447.58
(ii) Landfilling	5,151.68	5,558.81
(iii) Other disposal operations	Nil	Nil
Total	5,354.34	6,006.39
Category of waste	Other Non-Hazardous	
(i) Incineration	Nil	Nil
(ii) Landfilling	1,235.28	1,422.68
(iii) Other disposal operations	Nil	Nil
Total	1,235.28	1,422.68

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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.

We have developed a waste management strategy that is aimed at minimizing waste generation and maximizing our resource utilization. To achieve this, we have implemented several key elements. Firstly, we focus on efficient storage and inventory management to minimize waste. Secondly, we strive to enhance performance and yield while reducing waste generation through strategic asset management. Thirdly, we prioritize employee training and awareness programs on waste material handling to ensure that everyone is on board with our waste management goals. Fourthly, we work hard to prevent spills and leakages. Fifthly, we practice responsible logistics and transportation management. Lastly, we adhere to regulatory norms for the responsible disposal of waste materials. Our company is dedicated to embracing the principles of the circular economy as fundamental to responsible waste management. Specifically, we place immense importance on the 4Rs - Reduce, Reuse, Recycle, and Responsible Disposal - as the cornerstone of our approach.

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:

Nil, our operating sites are in industrial areas as notified by MIDC.

Sr. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
Nil	Nil	Nil	Nil

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
Nil	Nil	Nil	Nil	Nil	Nil

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India, such as The Water (Prevention and Control of Pollution) Act, The Air (Prevention and Control of Pollution) Act, The Environment protection act and rules thereunder (Y/N).

Yes, Sudarshan complies with all applicable environmental laws.

If not, provide details of all such non-compliances, in the following format:

Sr. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken if any
Nil	Nil	Nil	Nil	Nil

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 2023-24	FY 2022-23
Water withdrawal by source (in kilolitres)		
(i) Surface water	Nil	Nil
(ii) Groundwater	Nil	Nil
(iii) Third party water	Nil	Nil
(iv) Seawater / desalinated water	Nil	Nil
(v) Others	Nil	Nil
Total volume of water withdrawal (in kilolitres)	Nil	Nil
Total volume of water consumption (in kilolitres)	Nil	Nil
Water intensity per rupee of turnover (Water consumed / turnover)	Nil	Nil
Water intensity (optional) – the relevant metric may be selected by the entity	Nil	Nil
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(ii) Into Groundwater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iii) Into Seawater	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(iv) Sent to third parties	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
(v) Others	Nil	Nil
- No treatment	Nil	Nil
- With treatment – please specify level of treatment	Nil	Nil
Total water discharged (in kilolitres)	Nil	Nil

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	Nil	Nil
Total Scope 3 emissions per rupee of turnover	MtCO2e/INR crore	Nil	Nil
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	MtCO2e/FTE	Nil	Nil

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

Yes, TUV India Private Limited has carried out an independent assurance of the selected non-financial disclosures.

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.

NA

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
---------	-----------------------	--	---------------------------

Initiatives are available at: <https://www.sudarshan.com/esg-overview/>

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

Yes, a Business Continuity Plan (BCP) is a strategy designed for use during a business continuity emergency. It includes all essential personnel, resources, services, and necessary actions required for effective management. The plan involves implementing various systems and processes to minimize the consequences of an incident, collaborate with authorities, manage the emergency, communicate effectively with stakeholders, rectify any damage incurred, resume business operations as close to normal as possible, and safeguard the organization's value and reputation.

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?

Sudarshan ensures that all its sites operate with valid Environmental Clearance approvals obtained after following the due process of Environmental Impact Assessment. Additionally, the sites have valid consents from the State Pollution Control Boards to operate. They are following all conditions prescribed as part of these approvals, as well as those set by various Central and State government authorities. As a result, the impact of the operations is well within the predicted and prescribed limits. This demonstrates Sudarshan's commitment to responsible and sustainable operations.

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

We have implemented a Supplier Assessment Questionnaire (SAQ) checklist to evaluate our value chain partners. This assessment helps us measure our partners' performance in important environmental areas. As of 31st March, 2024, we have successfully assessed 65% for environmental impacts.

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

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/associations.

Sudarshan has affiliations with nine (9) trade and industry chambers/associations.

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

Sr. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1.	Indian Chemical Council (ICC)	National
2.	National Safety Council (NSC)	National
3.	CHEMEXCIL- Basic Chemicals, Cosmetics & Dyes Export Promotion Council	National
4.	Mahratta Chamber of Commerce and Industry and Agriculture (MCCIA)	National
5.	ETAD- The Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturer	National
6.	Mahad Manufacturing Industrial Association	National
7.	Common Hazardous Waste Storage Treatment and Disposal Facility (CHWTSDf) - Mumbai Waste Management Ltd. (MWML) - Maharashtra Enviro Private Ltd. (MEPL)	National
8.	Pigment Manufacturers' Association of India (PMAI)	National
9.	United Nations Global Compact (UNGC)	International

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

Name of the authority	Brief of the case	Corrective action taken
No instances have occurred during the FY 2023-24	NIL	NA

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 (Y/N)?	Frequency of web review by link if Board available (Annually/half-yearly/ quarterly/others/please specify)
NIL	NIL	NIL	NIL	NIL

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 of the project	SIA Notification No.	Date of Notification	Whether conducted by independent in external agency (Y/N)	Results communicated in public domain (Y/N)	Relevant web link
Not Applicable					

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

Sr. No.	Name of the project for which R&R is ongoing	State	District	No. of project affected families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
Not Applicable						

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

Over the years, Sudarshan has devised and implemented several grievance redressal mechanisms to address the grievances of the communities as identified each time. Some of the mechanisms on effective redressal of the grievances are mentioned below:

- 1) Community outreach center
- 2) Community forums and meetings
- 3) Help Desk
- 4) Complaint boxes
- 5) Mediation and conflict resolution

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

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/small producers	13%	10%
Directly from within India	87%	90%

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

Location	FY 2023-24	FY 2022-23
Rural	Nil	Nil
Semi-urban	56.26%	60.52%
Urban	Nil	Nil
Metropolitan	43.74%	39.48%

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

- Not Applicable

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	

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

Sr. No.	State	Aspirational District	Amount Spent (In ₹)
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

(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:

Sr. No.	Intellectual Property based on traditional knowledge	Owned/Acquired (Y/N)	Benefit shared (Y/N)	Basis of calculating benefit share
The Company does not have any patents/IPR derived from traditional knowledge				

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.

- There has been no reported instance during the year.

6. Details of beneficiaries of CSR Projects

Sr. No.	CSR Project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Women empowerment and livelihood	2,999	100%
2	Health	8,374	100%
3	Education	6,547	100%
4	Environment and agriculture	21,765	100%
5	Community development	33,130	100%

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

Essential Indicators

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

Our Code of Conduct directs our staff on engaging with customers, promoting consistent feedback, and urging them to promptly tackle any issues. Following our "Customer-Centric Policy," employees are instructed to be attentive and responsive to customer requirements. We regularly conduct customer satisfaction surveys and relay the feedback to our sales teams to manage any concerns and inquiries effectively.

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	Currently Company's labelling practices are in accordance with Global Harmonized System ("GHS") and Safety Data Sheet ("SDS"). It contains limited ecological information.
Safe and responsible usage	100%
Recycling and/or safe disposal	100%

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

	FY 2023-24		Remarks	FY 2022-23		Remarks
	Received during the year	Pending resolution at the end of the year		Received during the year	Pending resolution at the end of the year	
Data privacy	0	0	NA	0	0	NA
Advertising	Company did not conduct any advertising	Company did not conduct any advertising	NA	Company did not conduct any advertising	Company did not conduct any advertising	NA
Cyber-security	0	0	NA	0	0	NA
Delivery of essential services	NA	NA	NA	0	0	NA
Restrictive Trade Practices	0	0	NA	0	0	NA
Unfair trade practices	0	0	NA	0	0	NA
Other	236	4	Product related queries	352	11	Including technical complaints and commercial queries

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

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

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, Sudarshan's IT & Cybersecurity Policy covers data privacy and cyber security.

Link to the Policy - <https://www.sudarshan.com/it-and-cyber-security-policy.pdf>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

- Sudarshan has a robust mechanism for corrective action on aspects such as advertising, delivery of essential services, cyber-security, data privacy, etc., in the form of MDR i.e., Manage, Detect & Response Process. Sudarshan also regularly conducts information security risk assessments. Any identified cyber risks are reported and updated to operational, managerial, and the Board of Directors level at least twice a year. Furthermore, Sudarshan is committed to achieving ISO 27001 certification to ensure the highest standards of information security.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches:	b. Percentage of data breaches involving personally identifiable information of customers	c. Impact, if any, of the data breaches
Nil	Nil	NIL

Leadership Indicators

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

Information on our products can be obtained from our company's website.

Link to the weblink is - <https://www.sudarshan.com/pigments-overview/>



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

We ensure that we deliver precise, transparent, and timely communication of pertinent product details to our customers and other stakeholders involved. We adhere to all relevant health and safety regulations, employing Material Safety Data Sheets (MSDS) and other required documents to convey product specifications, potential hazards, and methods for mitigating risks.

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

Sudarshan employs several methods to inform customers on any disruptions in critical services. This includes tailored communication regarding changes in leadership or product discontinuation from various departments like PTS or marketing, as well as unexpected events like raw material shortages or supply chain disruptions. Additionally, any scheduled or unforeseen interruptions in IT services are promptly communicated to all internal stakeholders.

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 conduct 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)

Yes. We display the following information on products:

- Sudarshan Trade name
- Color Index name
- Color Index number on the bags
- GHS (Global Harmonized System) Classification label on the bags
- In cases of Chromes export, we send materials in India Institute of Packaging ("IIP") approved, United Nations ("UN") packaging bags with UN numbers and affix Class 9 sticker on pallets as well as container.
- In case of Lead pearl, we send material in IIP approved packaging with UN details with Class 6 sticker.

Yes, we conducted customer satisfaction surveys related to products / services / significant locations of operations of the entity or the entity.

Report on Corporate Governance

A. CORPORATE GOVERNANCE

Corporate Governance is a set of principles, processes and systems which governs a Company. The elements of Corporate Governance are independence, transparency, accountability, responsibility, compliance, ethics, values and trust. Corporate Governance enables an organisation to perform efficiently and ethically generate long-term wealth and create value for all its stakeholders.

The Company believes that sound Corporate Governance is critical for enhancing and retaining investor trust and your Company always seeks to ensure that its performance goals are met accordingly. The Company has established systems and procedures to ensure that its Board of Directors is well informed and well equipped to fulfill its overall responsibilities and to provide management with the strategic direction needed to create long term shareholders value. The Company has adopted many ethical and transparent governance practices even before they were mandated by law. The Company has always worked towards building trust with shareholders, employees, customers, suppliers and other stakeholders based on the principles of good corporate governance.

B. COMPANY'S CORPORATE GOVERNANCE PHILOSOPHY

The Company's philosophy on Corporate Governance envisages attainment of transparency and accountability in all spheres including its dealings with Government and Regulatory Authorities, employees, shareholders, customers, vendors, lenders and others. Thus, Corporate Governance is a reflection of the Company's culture, policies, the Company's relationship with stakeholders and the Company's commitment to its values.

The Corporate Governance philosophy of the Company has been further strengthened with the adoption of the Code of Conduct of the Company and among others, the Code of Conduct to Regulate, Monitor and Report Trading by Insiders. The Company, through its Board and Committees, endeavors to maintain high standards of Corporate Governance for the benefit of its shareholders and stakeholders.

The Company has established systems and procedures to ensure that its Board of Directors is well informed and well equipped to discharge its overall responsibilities and provide the Management with the strategic direction catering to creation of long-term shareholder value.

The Company's initiatives towards adhering to high standards of Governance include self-governance, professionalisation of the Board, fair and transparent processes and reporting systems.

The Corporate Governance Principles implemented by the Company seek to protect, recognize and facilitate shareholders' rights and ensure timely and accurate disclosure to them. Good Governance practices have rewarded the Company in the sphere of improved share valuations, stakeholders' confidence, improved market capitalisation, and awards from appropriate authorities, among others, for its employee centric policies and environmental protection measures, etc. These have helped the Company to increase shareholder value.

The Company's Board comprises of individuals with considerable experience and expertise across a range of disciplines including business management, business strategy, direct taxation, finance, legal and accounting. The Board members are fully aware of their roles and responsibilities in discharge of their key functions. The Board members strive to meet the expectations of operational transparency without compromising on the need to maintain confidentiality of information.

The Company's vision is to be amongst the top three pigment players in the Global Pigment Industry. The Company's business strategy is to be a reliable partner and to provide value to its customers. This is achieved through a solution partnering approach, delivering products of world class standards and not the least, aiming at excellence in customer service each time, every time.

Sudarshan Values:

All employees are committed to living the Company's values:

- Seva (Service)
- Courage
- Commitment and Passion
- Respect
- Trust

Integrity of Financial Reporting:

The Company ensures that adequate controls are in place to provide accurate and timely disclosure on all material matters including financial situation, performance and