

📍 **Thermax Limited,**
Thermax House, 14 Mumbai - Pune Road,
Wakdevadi, Pune - 411 003, India

📍 **Regd. Office:**
D-13, MIDC Industrial Area, R D Aga Road,
Chinchwad, Pune 411019, India

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🌐 www.thermaxglobal.com

PAN AA ACT 3910D

CIN L29299PN1980PLC022787

📄 27AAACT3910D1ZS

✉ enquiry@thermaxglobal.com



July 8, 2024

To
The Secretary
BSE Limited
PJ Towers, Dalal Street
Mumbai: 400 001
Company Scrip Code: 500411

National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E)
Mumbai – 400 051
Company Scrip Code: THERMAX EQ

Sub: Business Responsibility and Sustainability Report for FY 2023-24

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Company's Business Responsibility and Sustainability Report (BRSR) along with limited assurance report on Core BRSR indicators for Financial Year 2023-24, which also forms part of the Integrated Annual Report of the Company for FY 2023-24, submitted to the Exchanges vide our intimation dated July 8, 2024.

This is for your information and records.

Thanking you,

Yours faithfully,
For **THERMAX LIMITED,**

Janhavi Khele
Company Secretary
Membership No: A20601
Encl: as above

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

Section A: General Disclosures

I. Details of the Listed Entity

1	Corporate Identity Number (CIN) of the listed entity	L29299PN1980PLC022787
2	Name of the listed entity	Thermax Limited
3	Year of incorporation	June 30, 1980
4	Registered office address	D-13, MIDC, Industrial Area, R. D. Aga Road, Chinchwad, Pune 411019
5	Corporate office address	Thermax House 14, Mumbai-Pune Road, Wakdevadi, Pune 411003, Maharashtra, India
6	E-mail	cservice@thermaxglobal.com
7	Telephone	020-66051200
8	Website	www.thermaxglobal.com
9	Financial year for which reporting is being done	2023-2024
10	Name of the stock exchange(s) where shares are listed	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)
11	Paid-up capital	Rs. 23,83,12,600
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Ms. Janhavi Khele cservice@thermaxglobal.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 that form a part of its consolidated financial statements, taken together)?	Standalone – Thermax Limited
14	Name of the assurance provider	Price Waterhouse Chartered Accountants LLP
15	Type of assurance obtained	Limited

The reporting boundary for the current year ended March 31, 2024 is on a standalone basis for Thermax Limited only. Information and disclosures for the previous year ended March 31, 2023 are on a consolidated basis (unless otherwise stated), which includes the following entities: (i) Thermax Limited, (ii) Thermax Babcock & Wilcox Energy Solutions Private Limited (TBWES), (iii) Thermax Instrumentation Limited and (iv) Thermax Onsite Energy Solutions Limited (TOESL).

Accordingly, current year's information and disclosures are not comparable with those of the previous year.

II. Products/Services

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the Entity
1	Industrial Products segment	Boilers & heating equipment (small capacity), absorption chillers/heat pumps, air pollution control equipment/systems, water & waste recycle including associated services and engineering, procurement and construction (EPC)	57
2	Industrial Infra segment	EPC of power plants, boiler & heater (high capacity) plants, infra projects, flue gas desulphurisation projects (including associated services)	32
3	Chemical segment	Ion exchange resins, performance chemicals, construction chemicals, water treatment chemicals, oil field chemicals, paper and construction chemicals and related services	11

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

S. No.	Products/Services	NIC Code	% of Total Turnover Contributed
1	Industrial Products segment: boilers & heating equipment (small capacity), absorption chillers/heat pumps, air pollution control equipment/systems, water & waste recycle including associated services and engineering, procurement and construction (EPC)	37003, 25131, 20119	57
2	Industrial Infra segment: EPC of power plants, boiler & heater (high capacity) plants, infra projects, flue gas desulphurisation projects (including associated services)	37003, 25131, 20119	32
3	Chemical segment: ion exchange resins, performance chemicals, construction chemicals, water treatment chemicals, oil field chemicals, paper chemicals and construction chemicals and related services	37003, 25131, 20119	11

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	8	17	25
International	0	0	0

19. Markets served (refers to all the geographic regions where the Company sells its products) by the entity**a. Number of Locations**

Locations	Number
National (No. of States)	31
International (No. of Countries)	92

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

18%

c. A brief on types of customers

The Company has a presence in both national and international markets, offering its products and services to customers predominantly engaged in manufacturing. Many customers emphasise on providing sustainable products that are both environmentally conscious and economically feasible. By providing sustainable products to these manufacturing customers, the Company is enabling them to make a positive impact on the environment while still maintaining their bottom line.

IV. Employees**20. Details as at the end of the financial year****a. Employees and workers (including differently-abled)**

S. No.	Particulars	Total	Male	Female		
		(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1	Permanent (D)	2,830	2,572	91	258	9
2	Other than permanent (E)	2,723	2,631	97	92	3
3	Total employees (D + E)	5,553	5,203	94	350	6
Workers						
4	Permanent (F)	542	540	100	2	-
5	Other than permanent (G)	2,340	2,269	97	71	3
6	Total workers (F + G)	2,882	2,809	97	73	3

b. Differently-abled employees and workers

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

21. Participation/inclusion/representation of women

	Total	No. and Percentage of Females	
	(A)	No. (B)	% (B/A)
Board of Directors	10	2	20
Key management personnel	3	1	33

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

	FY 2023-2024 (Turnover Rate in Current FY)			FY 2022-2023 (Turnover Rate in Previous FY)			FY 2021-2022 (Turnover Rate in the Year Prior to the Previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	15	17	15	18	27	18	13	8	14
Permanent workers	13	-	13	1	60*	1	0#	-	0#

* During FY 2022-23, out of five, three female workers left.

Permanent workers turnover rate for FY 21-22 is 0.32

V. Holdings, Subsidiaries, and Associate Companies (including Joint Ventures)

23. (a) Names of holdings/subsidiaries/associate companies/joint ventures

S. No.	Name of the Holdings/Subsidiaries/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	RDA Holdings Private Limited	Holding	-	No
2	Thermax Onsite Energy Solutions Ltd.	Subsidiary	100	Yes
3	Thermax Instrumentation Limited	Subsidiary	100	Yes
4	Thermax Engineering Construction Company Ltd.	Subsidiary	100	No
5	Thermax International Ltd. (Mauritius)	Subsidiary	100	No
6	Thermax Europe Ltd. (U.K.)	Subsidiary	100	No
7	Thermax Inc. (U.S.A.)	Subsidiary	100	No
8	Thermax do Brasil Energia e Equipamentos Ltda. (Brazil)	Subsidiary	100	No
9	Thermax Netherlands BV	Subsidiary	100	No
10	Thermax Denmark ApS	Subsidiary	100	No
11	Danstoker A/S	Subsidiary	100	No
12	Ejendomsanpartsselskabet Industrivej Nord 13	Subsidiary	100	No
13	Boilerworks A/S	Subsidiary	100	No



S. No.	Name of the Holdings/Subsidiaries/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)
14	Danstoker Poland Spółka Z Ograniczona Odpowiedzialnoscia	Subsidiary	100	No
15	Rifox-Hans Richter GmbH Spezialarmaturen	Subsidiary	100	No
16	Thermax Sdn.Bhd, Malaysia	Subsidiary	100	No
17	Thermax Engineering Singapore Pte. Ltd.	Subsidiary	100	No
18	PT Thermax International Indonesia	Subsidiary	100	No
19	Thermax Energy & Environment Philippines Corporation	Subsidiary	100	No
20	Thermax Energy & Environment Lanka (Private) Limited	Subsidiary	100	No
21	Thermax Nigeria Limited	Subsidiary	100	No
22	Thermax Babcock & Wilcox Energy Solutions Ltd.	Subsidiary	100	Yes
23	Thermax Cooling Solutions Limited	Subsidiary	100	No
24	Thermax Engineering Construction FZE	Subsidiary	100	No
25	Thermax International Tanzania Limited	Subsidiary	100	No
26	Thermax (Thailand) Limited	Subsidiary	100	No
27	Enerxnt Private Limited	Subsidiary	100	No
28	Thermax Bioenergy Solutions Private Limited	Subsidiary	65	Yes
29	First Energy Private Limited	Subsidiary	100	Yes
30	First Energy TN 1 Private Limited	Subsidiary	73.82	Yes
31	First Energy 2 Private Limited	Subsidiary	73.99	Yes
32	First Energy 3 Private Limited	Subsidiary	73.99	Yes
33	First Energy 4 Private Limited	Subsidiary	73.99	Yes
34	First Energy 5 Private Limited	Subsidiary	73.81	Yes
35	First Energy 6 Private Limited	Subsidiary	73.96	Yes
36	First Energy 7 Private Limited	Subsidiary	71.17	Yes
37	First Energy 8 Private Limited	Subsidiary	100	Yes
38	First Energy Nine Private Limited	Subsidiary	100	Yes
39	First Energy 10 Private Limited	Subsidiary	100	No
40	Jalansar Wind Energy Private Limited	Subsidiary	74	Yes
41	Kanakal Wind Energy Private Limited	Subsidiary	74	Yes
42	Exactspace Technologies Private Limited	Associate Company	15.17	No
43	Covascis Technologies Private Limited	Associate Company	16.67	No

VI. CSR Details

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

(ii) Turnover (in Rs. in crore): 5,821.93

(iii) Net worth (in Rs. in crore): 3,536.70

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 (NGRBC)

Stakeholder Group from Whom Complaint is Received	Grievance Redressal Mechanism in Place	If Yes, Then Provide Web-link for Grievance Redressal Policy)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
			No. of Complaints Filed during the Year	No. of Complaints Pending Resolution at Close of the Year	Remarks	No. of Complaints Filed during the Year	No. of Complaints Pending Resolution at Close of the Year	Remarks
Communities	No	No	-	-	NA	-	-	NA
Investors (other than shareholders)	Yes	Yes*	-	-	NA	-	-	NA
Shareholders	Yes	Yes*	-	-	NA	2	-	NA
Employees and Workers	Yes	Yes**	13	5	NA	7	1	NA
Customers	Yes	Yes***	8,257	30	NA	7,335	143	NA
Value chain partners	Yes	Yes****	-	-	NA	2	-	NA

Note: The Company has a mechanism (complaint box at locations)/platforms (town hall meetings) to track complaints and the numbers are mentioned under respective heads in the report. Other routine/miscellaneous complaints/concerns addressed at respective forums like town hall etc. are not added here.

* <https://www.thermaxglobal.com/investor-services-contact/>

** <https://www.thermaxglobal.com/about-us/policies/>

*** <https://www.thermaxglobal.com/thermaxedge/>

**** https://www.thermaxglobal.com/wp-content/uploads/2023/09/Code_of_Conduct_for_ThermaxGroupsSupplyChainPartners.pdf

**** <https://www.thermaxglobal.com/wp-content/uploads/2021/05/Thermax-Ltd.-Whistleblower-Policy-.pdf>

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:

S. No.	Material Issue Identified	Indicate whether Risk or Opportunity (R/O)	Rationale for Identifying the Risk/ Opportunity	In Case of Risk, Approach to Adapt or Mitigate	Financial Implications of the Risk or Opportunity (Indicate Positive or Negative Implications)
1	Energy management	O	Effective energy efficiency management resulted in several advantages to the Company, such as cost reduction, increased efficiency, enhanced reputation, regulatory compliance, and innovation.		Positive
2	Design upgradation & improvements	O	Opportunity to develop and deliver state-of-the-art technology products and implement sustainability aspects in both products and services. The Company's strong internal engineering and R&D are developing new products and services to meet customer needs.		Positive
3	Waste management	R	Waste management is a material issue due to growing regulatory pressure, as companies that fail to comply with regulations may face legal and financial consequences.	Improper disposal of waste can have detrimental effects on our ecosystems and public health. Waste management is one of the most pressing environmental issues of our time. The Company ensures adherence to the regulatory framework defined under applicable laws.	Negative



S. No.	Material Issue Identified	Indicate whether Risk or Opportunity (R/O)	Rationale for Identifying the Risk/ Opportunity	In Case of Risk, Approach to Adapt or Mitigate	Financial Implications of the Risk or Opportunity (Indicate Positive or Negative Implications)
		O	The Company has taken proactive measures to incorporate sustainable waste management approaches such as recycling and waste reduction. By doing so, we seize the chance to minimise our environmental footprint, reduce expenses, explore fresh avenues for business growth and ensure compliance with regulations.		Positive
4	Climate change-related risks	R	Climate change is a significant risk for companies due to the growing awareness of the negative impact of human activities on the environment. To mitigate this risk, companies must adopt more sustainable practices and offer environment-friendly products to meet the changing demands of their customers and stakeholders.	The Company recognises the importance of being proactive in responding to the challenges and opportunities presented by climate change. By charting out strategy, the Company is well-positioned to respond to climate change-related risks.	Negative
		O	The increasing awareness of the negative impact of human activities on the environment, particularly climate change, presents a significant opportunity for companies. Responding to this concern, the Company is putting concentrated efforts to develop sustainable products and environment-friendly solutions.		Positive
5	Water management	R	The increasing scarcity of freshwater sources can disrupt the Company's operations, supply chain, and reputation, leading to potential economic losses. Additionally, companies that rely heavily on water for their operations, such as chemical manufacturing, are particularly vulnerable to water-related risks	The Company has developed in-house expertise and solutions for optimising water usage in industrial plants.	Negative
		O	The Company's effective water management practices are helping to mitigate risks associated with water scarcity, such as disruptions to its operations, supply chain, and reputation. Furthermore, the Company considers water management as an opportunity to reduce customer's water consumption, save costs, and increase efficiency. Adopting sustainable water practices can mitigate risks associated with water scarcity, preserve vital ecosystems, and ensure access to safe and clean drinking water for communities.		Positive
6	Emission management	O	The Company's utmost priority is emission management through various activities that contribute to mitigating climate change while also reaping the benefits of a more sustainable and profitable business model.		Positive

S. No.	Material Issue Identified	Indicate whether Risk or Opportunity (R/O)	Rationale for Identifying the Risk/ Opportunity	In Case of Risk, Approach to Adapt or Mitigate	Financial Implications of the Risk or Opportunity (Indicate Positive or Negative Implications)
7	Local employment	R	Lack of employment opportunities in the local area can impede economic development in the community, resulting in insufficient support from local stakeholders. Furthermore, businesses that fail to prioritise local employment may encounter challenges in accessing the skills and expertise of the local workforce, resulting in escalated costs and decreased efficiency.	The Company's emphasis on local hiring minimises the risks and establishes favourable relationships with the local community as a responsible corporate.	Negative
8	Occupational health & safety	R	Workplace accidents and illnesses can impact productivity and increase costs. It may damage the reputation of the Company and may adversely impact the morale of employees and its culture.	The Company has implemented the OHSE policy and enforces strict adherence to it. Several initiatives and programmes have also been initiated to manage health and safety, which are continually monitored for improvement. One of the initiatives is the Behaviour Based Safety programme, which aims to bring about a cultural shift towards safety improvement. Furthermore, the Company has put in place several insurances and medical policies to safeguard its employees	Negative
9	Talent acquisition and retention	R	The inability to attract and retain top talent can result in a shortage of skilled employees, leading to reduced productivity, increased costs, and potential quality issues. Additionally, the turnover of key employees can lead to a loss of institutional knowledge and expertise, which can negatively impact the Company's competitiveness and ability to innovate.	The Company has implemented various measures to attract and retain talent through initiatives such as job rotation, up-skilling, reskilling, training, fast-track promotion, leadership development programmes, etc. Moreover, the Company has taken steps to ensure the well-being of its employees.	Negative
10	Responsible supply chain management	R	Consumers are becoming increasingly aware of the ethical and environmental impacts of the products they purchase, and they are more likely to avoid brands that do not meet their expectations. This can lead to a loss of market share and reputational damage for companies. By prioritising responsible supply chain management practices, companies can mitigate these risks, improve their reputation, and gain a competitive advantage in the market. Failure to ensure that suppliers meet environmental and social standards can lead to legal and regulatory challenges, resulting in fines, legal action, and negative publicity.	The Company enforces a vendor code of conduct and actively collaborates with vendors to improve its operations. The vendor code of conduct lays down guidelines outlining expectations and standards for vendors who provide goods or services to the Company. It covers various areas such as labour practices, human rights, environmental sustainability, and business ethics. By having a vendor code of conduct, the Company sets clear expectations for its suppliers, ensuring they meet the necessary standards.	Negative
11	Labour management relations	R	Not adhering to labour laws not only violates human rights but can also lead to legal and reputational risks for the Company. Negative publicity resulting from labour disputes, strikes, or other labour-related issues can lead to a loss of customer confidence and reduced sales.	The Company ensures ongoing monitoring and audits which reveal compliance at all locations. This helps the Company to progressively move to the next level as envisioned through the Social Compact initiative.	Negative



S. No.	Material Issue Identified	Indicate whether Risk or Opportunity (R/O)	Rationale for Identifying the Risk/ Opportunity	In Case of Risk, Approach to Adapt or Mitigate	Financial Implications of the Risk or Opportunity (Indicate Positive or Negative Implications)
12	Diversity & equal opportunity	O	A diverse workforce can bring new perspectives and ideas, which can lead to increased creativity and innovation. Different viewpoints and experiences can improve decision-making and lead to more thoughtful decisions. A diverse workforce can also help companies better understand and serve a diverse customer base, which can lead to improved customer satisfaction and financial performance.		Positive
13	Ethics & integrity	O	Prioritising ethics and integrity can lead to enhanced reputation, increased customer loyalty, improved employee morale, and better risk management. Companies that operate with ethics and integrity create a culture of trust and transparency, which can attract customers, investors, and top talent. Employees are more likely to feel engaged and committed to a company that operates with integrity, leading to increased productivity and retention.		Positive

Section B: Management and Process Disclosures

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and Management Processes									
1a	Whether your entity's policy/policies cover each principle and core elements of the NGRBCs? (Yes/No)		Yes						
1b	Has the policy been approved by the Board? (Yes/No)		Yes. The Board has approved the Thermax Code of Conduct, CSR, terms of reference of Stakeholder Relationship Committee and Whistleblower policy which covers each principle and elements of NGRBC.						
1c	Web link of the policies, if available		https://www.thermaxglobal.com/about-us/policies/ https://www.thermaxglobal.com/corporate-governance-policies-and-disclosures/						
2	Whether the entity has translated the policy into procedures? (Yes/No)		Yes						
3	Do the enlisted policies extend to your value chain partners? (Yes/No)		Yes, all applicable policies are extended to value chain partners.						
4	Name of the national and international codes/certifications/ labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle		ISO 9001, ISO 14001, ISO 45001						
5	Specific commitments, goals and targets set by the entity with defined timelines, if any		By 2025, we aim to achieve a 25% reduction in our absolute carbon emissions compared to the base year of 2019. The Company has aimed to obtain Water Positive Certificate for one more manufacturing unit in FY 2024-25.						
6	Performance of the entity against the specific commitments, goals, and targets along with reasons in case the same are not met		In order to attain this objective, we have identified four crucial areas: operational efficiency, implementation of renewable energy generation, procurement of renewable energy, and fuel switching. As a result at the Group level, 30.61% target achieved in FY 23-24 and 16% reduction achieved at Thermax Limited on a standalone basis.						

Governance, Leadership and Oversight

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

Thermax has been committed to environmental well-being since its inception, prioritising ESG long before it became a mainstream concept. The Company aims to reduce 25% of absolute carbon emissions from the base year 2019 by 2025 as part of its decarbonisation journey. To achieve this, multiple initiatives with respect to improving operational efficiency, addition to renewable energy generation and its procurement, and fuel switch, are being implemented across its facilities. On the business side, the Company offers a range of energy-efficient and environment-friendly products and solutions. This enables industries to optimise their energy consumption, reduce greenhouse gas emissions and minimise their freshwater intake through the reuse and recycling of water. Cognisant of the change in the energy mix in recent times, and its ability to contribute to this transition, Thermax has concentrated its efforts towards green energy. It has proactively aligned its strategies with climate change mitigation and sustainability goals. Along with investing in R&D and digital capabilities, it has inked partnerships with global technology majors to strengthen its clean energy offerings and to solidify its presence as a trusted partner in energy transition and water management to its customers.

On the social front, Thermax is actively engaged in initiatives, striving to create equal opportunities through education and empowering the informal workforce through its SoCo initiative.

Although the Company is making persistent efforts to meet its ESG imperatives, there are many challenges on its journey. These include dealing with the complexity of the infrastructure of existing industries and transitioning them into cleaner and more sustainable alternatives, cost implications for implementing the technological innovations, assessing and managing the sustainability practices of its suppliers and mitigating any environmental or associated social risks, and data collection and reporting on ESG performance metrics across the organisation. Despite these challenges, Thermax remains dedicated to addressing them through ongoing innovation, strategic partnerships, stakeholder engagement, and continuous improvement of its ESG practices. Over the past year, concrete progress has been achieved through targeted projects, including the successful procurement of renewable electricity for major manufacturing plants, the installation of solar rooftop systems at critical locations like Solapur and Bhosari plants, and the strategic switch from natural gas to biomass fuel in the boiler at the Dahej plant. We know we have come a long way, but there is still much to be done.

8 Details of the highest authority responsible for implementation and oversight of the Business Responsibility and Sustainability Policy Managing Director and Chief Executive Officer Ashish Bhandari | DIN – 05291138

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, Managing Director and Chief Executive Officer Ashish Bhandari | DIN – 05291138

10. Details of review of NGRBCs by the Company:

Subject for Review	Indicate whether Review was Undertaken by Director/Committee of the Board/ Any other Committee									Frequency (Annually/Half yearly/Quarterly/Any other – Please Specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against the above policies and follow-up action	The policies of Thermax, i.e., Code of Conduct, CSR and Whistleblower, which cover the elements of the NGRBC Principles, are reviewed periodically and approved by the Board. During the review, the effectiveness of the policies is evaluated, and necessary amendments to policies and procedures are implemented. The Company complies with the extant regulations and principles as applicable.																	
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances																		



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

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

No assessment conducted

Not Applicable

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

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

Not Applicable

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	% of Persons in Respective Category Covered by the Awareness Programmes
Board of Directors	1	Board governance focussing on sustainability and ESG	76
Key Managerial Personnel (KMP)	1	Board governance focussing on sustainability and ESG	100
Employees other than BoD and KMP	246	Health-related and human rights related compliance	55
Workers	465	Health & safety-related and skill upgradation & prevention of sexual harassment at the workplace	100

Health-related training has significantly impacted workers and their work environment. It has contributed to the creation of a safer workplace by reducing the number of accidents, injuries, and illnesses. The Company can demonstrate this impact by providing statistics on the percentage of falls in the number of fatalities and injuries in the past year. In addition, a healthier workforce has improved the Company's productivity and efficiency.

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

NGRBC Principle	Name of the Regulatory/ Enforcement Agencies/ Judicial Institutions	Amount (in Rs.)	Brief of the Case	Has an Appeal been Preferred? (Yes/No)
Monetary				
Penalty/fine	Refer to the Company's website for all disclosures made under Regulation 30 of SEBI			
Settlement	(Listing Obligations and Disclosure Obligations) Regulations, 2015 at https://www.thermaxglobal.com/stock-exchange-notifications/			
Compounding fee				
Non-Monetary				
Imprisonment				
Punishment	Nil			

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

Case Details	Name of the Regulatory/Enforcement Agencies/Judicial Institutions
Not Applicable	

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

Yes, we have implemented a Code of Conduct for all our employees, and it distinctly elucidates the expected standards of governance practices within our organisation. A particular emphasis is placed on the Company's unequivocal stance of zero-tolerance towards any forms of bribery and corruption. The intention of this Code is to ensure that all business operations and transactions are carried out in a professional, fair, and principled manner, thereby affirming our commitment towards upholding human rights.

Web-link - https://www.thermaxglobal.com/wp-content/uploads/2023/09/Code_of_Conduct_for_Thermax_Employees-.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 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NIL	NIL

6. **Details of complaints regarding conflict of interest:**

	FY 2023-24 (Current Financial Year)		FY 2022-23 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the directors	NIL	Not Applicable	NIL	Not Applicable
Number of complaints received in relation to issues of conflict of interest of the KMPs	NIL	Not Applicable	NIL	Not Applicable



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

Not Applicable

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

	FY 2023-24 Consolidated (Current Financial Year)	FY 2022-23 23# (Previous Financial Year)
No. of days of accounts payables*	86	92

Note: An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

* Average trade payables have been considered in the computation of the numerator. For the purpose of calculating the Cost of goods/ services procured, all procurements in the nature of capital expenditures have been excluded.

The details pertaining to FY 22-23 are on a standalone basis.

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

Parameter	Metrics	FY 2023-24 (Current Financial Year)	FY 2022-23# (Previous Financial Year)
Concentration of purchases	A. Purchases from trading houses as % of total purchases	6%	5%
	B. Number of trading houses where purchases are made from	527	321
	C. Purchases from top 10 trading houses as % of total purchases from trading houses	47%	53%
Concentration of sales	A. Sales to dealers/distributors as % of total sales	7%	7%
	B. Number of dealers/distributors to whom sales are made	147	147
	C. Sales to top 10 dealers/distributors as % of total sales to dealers/ distributors	36%	32%
Share of RPTs in	A. Purchases (purchases with related parties/total purchases)	4%	6%
	B. Sales (sales to related parties/total sales)	6%	7%
	C. Loans & advances (loans & advances given to related parties/total loans & advances)*	53%	62%
	D. Investments (investments in related parties/total investments made)^	47%	35%

Note: An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

The details pertaining to the previous year are reported on a standalone basis.

* For loans and advances and Investments, closing balances disclosed in the audited standalone financial statements for the year ended March 31, 2024 have been considered.

^ Including investment in subsidiaries and associates.

Leadership Indicators

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

Total Number of Awareness Programmes held	Topics/Principles Covered under the Training	% of Value Chain Partners Covered (by Value of Business Done with Such Partners) under the Awareness Programmes
14	BRSR 9 Principles	16

2. (a) Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No)

Yes

(b) If yes, provide details of the same.

The Company has a Code of Conduct. This Code of Conduct, aimed towards the Board of Directors and senior management, is made publicly accessible on the Company's website (<https://www.thermaxglobal.com/corporate-governancepolicies-and-disclosures/>)

Under the guidelines outlined in the Code, directors, key managerial personnel, and senior management are expected to avoid scenarios in which their personal interests may directly conflict with the Company's welfare. This involves an annual mandatory disclosure of any potential conflicts of interest to the Board of Directors by the aforesaid categories of personnel.

Another significant measure involves the proper management of related party transactions. Necessary approvals are obtained from both the Audit Committee and the Board prior to entering such transactions, particularly if the directors involved have vested interests in the process. The Company's policy strictly reiterates that any directors or key managerial personnel should abstain from participation in instances where they may have a personal conflict of interest, thereby minimising the opportunity for improper influence or unwanted complications within the workplace.

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 products and processes to total R&D and capex investments made by the entity, respectively.

	Current Financial Year (FY 2023-24)	Previous Financial Year (FY 2022-23)	Details of Improvements in Environmental and Social Impacts
R&D	11%	13%	<ul style="list-style-type: none"> (1) Fuel cell development - Environmental: This reduces the CO₂ emissions from the gen set and it produces clean power. (2) Mobile air conditioning system (HVAC) - Environmental: This helps in saving diesel consumption and in turn it will also reduce the CO₂ emissions. (3) CL2001-TAC demonstration at bus world Brussel Expo Oct'21 (HVAC) - Environmental- This helps in saving diesel consumption and, in turn, reduces CO₂ emissions. (4) Green hydrogen - Environmental : This helps in reducing the carbon emission in other hydrogen producing technology (grey/blue/etc.). (5) Bio hydrogen - Environmental: This helps in reducing carbon emissions in other hydrogen producing technology (grey/blue/etc.). (6) Industrial wastewater treatment systems - Environmental: Reuse & recycling of wastewater, thereby reducing the requirement for freshwater
Capex	13%	14%	<ul style="list-style-type: none"> (1) JC-DMP1-059 ESP for biomass boiler (Dahej) - Air pollution control equipment installed on the biomass-fired boiler as per GPCB norms. (2) JC-PMP1-038 ETP Triton Aerators - By using these aerators, impacts projected are: <ul style="list-style-type: none"> A) 73,000 KWH units per annum are going to be saved. B) Carbon emissions will be reduced by 58 tonnes per annum. C) Effluent parameters maintenance will be constant. (3) Scrap yard for hazardous waste (4) Sewage treatment plant of capacity of 200 KLD

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

Yes

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

50



3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for:

Waste Type	Process Description
Plastics (including packaging)	Not Applicable
E-waste	Not Applicable
Hazardous waste	Not Applicable
Other waste	Not Applicable

The Company does not reclaim any specific product at the end of its life. However, at the project and operation sites, there are systems in place to recycle, reuse, and dispose of in line with the regulatory requirement for the above waste being generated during the course of construction and operation.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No)? (b) 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, the Company has obtained the Extended Producer Responsibility (EPR) registration for specific products. The environmental responsibility encompasses recycling waste through a Central Pollution Control Board (CPCB) approved agency. The organisation is actively fulfilling its liabilities under EPR by taking effective measures such as progressing toward brand owner registration status.

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

Essential Indicator

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	2,572	2,572	100	2,572	100	-	-	2,572	100	2,572	100
Female	258	258	100	258	100	258	100	-	-	258	100
Total	2,830	2,830	100	2,830	100	258	100	2,572	100	2,830	100
Other than Permanent Employees											
Male	2,631	2,631	100	2,631	100	-	-	2,631	100	2,631	100
Female	92	92	100	92	100	92	100	-	-	92	100
Total	2,723	2,723	100	2,723	100	92	100	2,631	100	2,723	100

(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	540	540	100	540	100	-	-	540	100	-	-
Female	2	2	100	2	100	2	100	-	-	-	-
Total	542	542	100	542	100	2	100	540	100	-	-
Other than Permanent Workers											
Male											
Female											
Total											

The day-care facility is not provided to the permanent workers. The well-being of the workers other than permanent is the responsibility of the respective contractors engaged at respective locations.

(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	0.17	0.11

Note: An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

The details pertaining to FY 22-23 are on a standalone basis.

2. Details of retirement benefits, for the current and previous financial year

Benefits	FY 2023-2024 Current Financial Year			FY 2022-2023 Previous Financial Year		
	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	4	-	Y	8	-	Y
Others – please specify	NIL	NIL	NIL	NIL	NIL	NIL

3. Accessibility of workplaces

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

The Company is working towards improving infrastructure for eliminating barriers to accessibility for differently-abled people.

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, <https://www.thermaxglobal.com/about-us/policies/>

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	NA*	NA
Female	100	100	NA	NA
Total	100	100	NA	NA

*No permanent workers have availed parental leave during FY 2023-24.



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

Permanent workers	Yes, the mechanism to receive and redress grievances is in place. The Whistleblower Policy facilitates the reporting of protected disclosures to top-level management, including the chairperson, managing director, or the chair of the Audit Committee. This process is managed through distinct communication avenues, channelling grievances from different sources and addressing them to senior officials. Two specific email addresses have been assigned for this purpose to ensure written complaints can be directly submitted. The confidentiality of the whistleblower is strived for, and any retaliatory actions are not permitted. The organisation has put into place a Prevention of Sexual Harassment Policy, consistent with the directives of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. This policy is applicable to all individuals irrespective of their employment status and is supported by regular virtual training sessions to create awareness within the organisation. Moreover, a Code of Conduct equally applies to both employees and business partners. Ensuring adherence to this code, diverse training initiatives have been undertaken, encompassing all employees from varied business sectors and geographies. The Whistleblower Policy, however, does not include daily workers' grievances. For addressing these concerns, the Company organises town hall meetings, which provide a platform for employees to freely voice their troubles. Furthermore, several other platforms, including induction sessions and more town hall meetings, are available for employees to articulate their grievances.
Other than Permanent workers	
Permanent employees	
Other than permanent employees	

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

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	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						
Male	-	-	-	-	-	-
Female	-	-	-	-	-	-
Total Permanent Workers						
Male	540	462	86	913	843	92
Female	2	-	-	2	-	-

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

Category	FY 2023-24 Current Financial Year					FY 2022-23 Previous Financial Year				
	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 (Permanent + Other than Permanent)										
Male	6,667	4,021	60	4,004	60	6,280	4,621	74	1,007	16
Female	422	173	41	310	73	398	173	43	98	25
Total	7,089	4,194	59	4,314	60	6,678	4,794	72	1105	17
Workers										
Male	18,757	17,332	92	340	2	16,790	14,952	89	NA*	-
Female	73	73	100	2	3	102	100	98	NA*	-
Total	18,830	17,405	92	342	2	16,892	15,052	89	NA*	-

*The data is not available but the workmen are covered under the wage settlement agreement where skill up gradation requirements are agreed.

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

Category	FY 2023-24 Current Financial Year			FY 2022-23 Current Financial Year		
	Total (A)	No. (B)	% (B/A)	Total (D)	No.(E)	% (E/D)
Employees						
Male	5,203	5,203	100	6,280	6,280	100
Female	350	350	100	398	398	100
Total	5,533	5,533	100	6,678	6,678	100
Workers						
Male	540	390	72	913	47	5
Female	2	2	100	2	-	-
Total	542	392	72	915	47	5

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 of such a system?

Yes, the Company has taken a systematic approach to safeguard the health and safety of its employees by implementing the ISO 45001:2018 Occupational Health and Safety Management System across its manufacturing, EPC (Engineering, Procurement, and Construction) and O&M (Operations & Maintenance) sites. This application aims at promoting a positive occupational health and safety (OHS) culture within the organisation.

By establishing standard operating procedures for every task, the organisation ensures that activities are carried out consistently and safely. In addition, contingency management protocols have been instituted, including conducting frequent mock drills, to increase preparedness and response to potential emergencies.

The organisation conducts regular training sessions about occupational health and safety procedures and preferred practices.

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

The Company has adopted multiple methods for identifying potential and work-related risks to ensure a healthy and safe workplace. These methods include risk assessment, job safety analysis, health, safety, and environment (HSE) audits, site severity index rating, and daily site inspections, which are conducted regularly. Furthermore, an IT-enabled platform called 'Thermax OHSE' has been implemented. This platform is utilised by Thermax employees and workers for reporting any identified hazards. The platform also facilitates the monitoring and tracking of reported hazard resolution. Overall, these measures contribute to creating a safe and healthy environment for all personnel.

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

The organisation has instated safety protocols and health measures to ensure a safe and productive work environment. Recognising employees' active participation in safety, the Company has facilitated the provision for workers to report occupational hazards and provided stop work authority to every workman in case of imminent risk.

To enhance safety norms, the Company utilises a health, safety and environment (HSE) application for observing and reporting HSE conditions. This digital tool has improved the safety measures at our operational sites by substantially mitigating the associated risks.

Furthermore, the organisation has adopted new initiatives aimed at promoting a safety culture. One such measure is the introduction of a behaviour-based safety programme. Through this programme, the organisation encourages safe behaviour among employee activities, rectifies any inappropriate behaviour, and flags it for future reference. In addition to this, the organisation is progressively digitising HSE



management. This move aims at fostering a sense of accountability among employees and improving the transparency of our operations. To motivate and reward compliance with safety standards, the organisation has instituted a recognition system for individuals who demonstrate exemplary commitment to safety protocols. Simultaneously, a consequence management system has been structured to address any violations of the established safety protocols.

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

Yes. Medical centres and first aid facilities are available for both employees and workers. The entity has implemented several measures diligently to ensure a secure and healthy environment for the workforce. The on-site medical facilities are easily accessible to all staff members. Additionally, first aid facilities are available across the organisation, prepared for immediate assistance in case of any emergencies or unforeseen medical conditions. This comprehensive healthcare infrastructure upholds the health and well-being of not just permanent employees but also temporary and contractual labour.

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

Safety Incident/Number	Category	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Lost time injury frequency rate (LTIFR) (per one million-person hours worked)#	Employees	-	0.12
	Workers (Including the contract workforce)	0.55	0.17
Total recordable work-related Injuries#	Employees	3	5
	Workers (Including the contract workforce)	20	45
No. of fatalities	Employees	-	-
	Workers (Including the contract workforce)	-	2
High consequence work-related injury or ill-health (excluding fatalities)*	Employees	-	-
	Workers (Including the contract workforce)	-	-

Note: An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

The incidents that occurred at project sites i.e. Customer's premises are not included.

* The BRSR Core requires disclosure of "Number of Permanent Disabilities", however, it does not include the definition of 'Permanent Disabilities'. We, in the absence of any other guidance, have considered high consequence work-related injury or ill health, which results in an injury from which the employee/worker cannot or is not expected to recover fully to the previous health status, this does not include fatalities. There are no incidents resulting in permanent disabilities.

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

The Company has incorporated protective measures to create a safe and healthy working environment. Ensuring well-being, safety, and security for all regular and contractual employees has been deemed to be a fundamental priority by the organisation.

The Organisation's Occupational Health, Safety, and Environmental (OHSE) Policy, authorised by the Managing Director and CEO, serves as a compulsory guideline for every individual employed by or representing Thermax Limited. The Company engages in the identification of hazards and the evaluation of risks and opportunities (HIARO) associated with every operation, implementing appropriate mitigating strategies in response. Standard operating procedures (SOPs) have been made uniformly accessible for all functional activities.

The Company is committed to providing regular Health, Safety, and Environment (HSE) training to all employees through developing e-learning modules covering diverse safety subjects. In compliance with statutory requirements, safety committees have been established and safety council meetings are organised regularly at respective work locations and business units.

Pre-employment medical fitness evaluations are a condition of hiring, ensuring that all employees and workers meet the health standards. Compliance with the health, safety and environment guidelines is affirmed by department heads and undergoes regular scrutiny. To monitor attentively, periodic safety audits and inspections focussed on high-risk sectors such as work at height, material handling, confined spaces, and electrical and fire

safety parameters are performed by cross-functional teams. If necessary, corrective actions are taken promptly to rectify any issues identified.

Safety is highlighted as the utmost priority during all Board meetings, creating a ripple effect that extends to every employee. Equal emphasis is placed on the safety of permanent, contractual, and temporary workers. The Company pledges to maintain these initiatives and explore further opportunities to solidify the safety measures for our workforce.

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

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Filed during the Year	Pending Resolution at the End of Year	Remarks	Filed during the Year	Pending Resolution at the End of Year	Remarks
Working conditions	-	-	NA	-	-	NA
Health and safety	-	-	NA	-	-	NA

Note: The Company has a mechanism to track complaints and the numbers are mentioned under respective heads in the report. There are no other complaints received during the year.

14. Assessments for the year

	% of Your Plants and Offices that Were Assessed (by Entity or Statutory Authorities or Third Parties)
Health and safety practices	No assessment was conducted by the statutory authority
Working conditions	No assessment was conducted by the statutory authority

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.

Not Applicable

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)?

Employees (Y/N)	Yes
Workers (Y/N)	Yes*

*Only permanent workers are considered. The Company has started extending the life insurance coverage to workers from January 2023 and other workers will be covered gradually. Currently, workers engaged at two manufacturing units are covered under the Death Benevolent Fund as a part of the wage settlement agreement.

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

To ensure a safe and healthy work environment, the entity lays significant emphasis on strict adherence to relevant statutory provisions. This incorporates payment and deduction of mandatory dues, which are duly integrated within the contract agreement with all value chain partners. The Company ensures all clauses associated with legal compliance are meticulously validated and abided by all parties involved. Moreover, contractors are obligated to furnish supporting documentation for the payment of statutory dues, such as Provident Fund (PF) and Employee's State Insurance (ESIC) alongside their invoices. Additionally, the entity supervises vendors' Goods and Services Tax (GST) payments during the payment release process, further reinforcing its commitment to legal and regulatory compliance.



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 (Current Financial Year)	FY 2022-23 (Previous Financial Year)	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Employees	-	-	-	-
Workers	-	-	-	-

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

No

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

Essential Indicator

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

The Company recognises the importance of identifying and engaging with various stakeholders to gain insight into their expectations and develop effective strategies. Key stakeholders, both internal and external, are identified based on their impact on the Company's operations and functioning. These include employees, shareholders, customers, investors, communities, suppliers, and vendors. Channels of communication have been established to facilitate open dialogue and understanding of issues that are critical to their respective interests. This enables us to create shared value and make a positive contribution to building a sustainable society.

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 & Marginalised Group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of Engagement (Annually/ Half Yearly/Quarterly/ Others – Please Specify)	Purpose and Scope of Engagement including Key Topics and Concerns Raised during Such Engagement
Owners & shareholders	No	(1) Annual Report (2) Company website (3) Quarterly calls (4) Investor relationship meetings and AGM (5) Various publications (6) Stock exchange notifications (7) Newspapers (8) Emails (9) Stakeholders Relationship Committee (10) Investor Relations (11) Registrar & Transfer Agent	Quarterly/Half yearly	Purpose: (1) Continuously elevating corporate value (2) Delivering better returns on investments Concerns Raised: (1) Company's financial health (2) Effective risk controls (3) Fair business practices - Improved return on investment
Employees and workers	No	(1) Awards (2) Department meetings (3) Surveys (4) Town halls (5) Trainings (6) Workshops (7) Nomination & Remuneration Committee (8) Human Resource function	Continuous	Purpose: (1) Employee well-being (2) Functional and soft skill development (3) Structured learning (4) Talent attraction and retention Concerns Raised: (1) Career growth (2) Employee benefits (3) Performance management

Stakeholder Group	Whether Identified as Vulnerable & Marginalised Group (Yes/No)	Channels of Communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of Engagement (Annually/ Half Yearly/Quarterly/ Others – Please Specify)	Purpose and Scope of Engagement including Key Topics and Concerns Raised during Such Engagement
Customers	No	(1) Advertisement campaigns (2) Brochures (3) Company website (4) Customer care (5) Customer meets (6) Customer satisfaction survey (7) Feedback forms - Fireside (in-house magazine) (8) Events and exhibitions (9) Emailers (10) Social media webinars	Continuous	Purpose: (1) Providing a comprehensive portfolio of products and solutions aligned with their evolving requirements Concerns Raised: (1) Quality (2) Responsiveness (3) Timely project completion (4) Engineering technique
Vendors and business partners	No	(1) Enquiries via telephone and e-mail (2) Periodic partner meets (3) Publications (4) Supplier surveys (5) Tendering and procurement	Continuous	Purpose: (1) Assessment and audit of suppliers (2) Aligning suppliers with environmental and supplier code of conduct (3) Conforming to quality and HSE (Health, Safety and Environment) Concerns Raised: (1) Purchase processes (2) Repeat orders (3) Timely payments
Government authorities	No	(1) Activities through business and industry groups (2) Industry associations (3) Participation in policy councils (4) Inspection (5) Report & return submission to the authorities	Continuous	Purpose: (1) Building businesses contributing to the development (2) Making mandatory and non-mandatory disclosures Concerns Raised: (1) Compliance with regulations (2) CSR reporting (3) ESG performance
Communities and academic groups	No	(1) CSR initiatives (2) Community development (3) Engaging with local authorities (4) Engaging with research institutes and premier universities	Continuous	Purpose: (1) Contributing to the well-being of local communities through social activities (2) Educational initiatives (3) Health and skill development (4) Research and development initiatives Concerns Raised: (1) Creating livelihoods (2) Developing community infrastructure (3) Improving living standards (4) Developing commercially viable solutions



Leadership Indicator

- 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?**

The Company's management frequently engages with its key stakeholders, including investors, customers, suppliers, and employees. Progress updates are provided to the Board, and their inputs are sought periodically. The Board of Directors are periodically updated on various topics, including industry overviews, customer service updates, digital initiatives, corporate social responsibility projects, financial performance, and strategy. Additionally, the directors are briefed on the regulatory environment, including significant regulatory developments, circulars, and amendments by bodies such as the Securities & Exchange Board of India and the Ministry of Corporate Affairs. Feedback from the Board is also collected to ensure alignment and collaboration.

- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics. If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, the Company utilises materiality assessments to engage with stakeholders and priority issues related to economic, environmental, and social topics. In addition, the Company interacts with investors and analysts to gain an understanding of their expectations and incorporate them into the sustainability framework. This has led to the development of several initiatives focussed on responsible investing, equal opportunity, diversity and inclusion policies, privacy policies, human capital, environmental impact, and sustainability risk assessments.

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

The Company places a strong emphasis on education for economically underprivileged children, with Thermax Foundation supporting two Akanksha Foundation schools in Pune through a public-private partnership. Additionally, Thermax Foundation provides support to Akanksha Foundation alumni through mentorship and guidance to pursue higher education and careers. In addition to education, the Company is also involved in addressing social discrimination through affirmative action, skill development, and employability initiatives. The Company's social arm, Thermax Foundation, also addresses complex health, safety, and environmental issues faced by disadvantaged, vulnerable, and marginalised stakeholders.

Principle 5: Businesses should respect and promote human rights

Essential Indicator

- 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 Current Financial Year			FY 2022-23 Previous Financial Year		
	Total (A)	No. of Employees/Workers Covered (B)	% (B/A)	Total (C)	No. of Employees/Workers Covered (D)	% (D/C)
Employees						
Permanent	3,255	3,255	100	3,497	707	20
Other than permanent	3,834	3,834	100	3,181	1,399	44
Total Employees	7,089	7,089	100	6,678	2,106	32
Workers						
Permanent	542	542	100	915	915	100
Other than permanent	3,159	Not Applicable*		15,977	Not Applicable*	
Total Workers	4,827	963	20	16,892	915	5

* For non-permanent workers or contractually employed personnel, the responsibility to provide training on the same aspects of human rights lies with their respective contractors. This unified approach ensures consistent understanding and adherence to the principles that underline a safe and respectful workplace.

As part of an ongoing commitment to uphold human rights, the entity has incorporated several measures into its operational activities to ensure a safe and healthy work environment. These include the ongoing implementation of the Human Rights Policy, the inclusion of human rights components into the entity's Code of Conduct, adherence to child labour laws, and the foundation of preventive policies against sexual harassment at the workplace.

To facilitate comprehension and awareness of these principles among the workforce, the entity has established a structured induction process for newly appointed employees and permanent workers. This introductory plan includes training and orientation sessions focussed on the aforementioned aspects of human rights in the workplace.

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

Category	FY 2023-24 Current Financial Year				FY 2022-23 Previous Financial Year					
	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										
Male	2,572	-	-	2,572	100	3,230	-	-	3,230	100
Female	258	-	-	258	100	267	-	-	267	100
Other than Permanent										
Male	2,631	-	-	2,631	100	3,050	-	-	3,050	100
Female	92	-	-	92	100	131	-	-	131	100
Workers										
Permanent										
Male	540	-	-	540	100	913	-	-	913	100
Female	2	-	-	2	100	2	-	-	2	100
Other than Permanent										
Male	2,269	-	-	2,269	100	15,977	-	-	15,977	100
Female	71	-	-	71	100	-	-	-	-	-

3. (a) Details of remuneration/salary/wages, median remuneration/wages:

	Male		Female	
	Number	Median Remuneration/Salary/Wages of the Respective Category	Number	Median Remuneration/Salary/Wages of the Respective Category
Board of Directors (BoD)	10	30,05,000	2	42,50,000
Key managerial personnel	2	4,02,13,926	1	42,74,832
Employees other than BoD and KMP	2,501	10,12,320	271	8,10,107
Permanent workers	540	1,52,324	2	2,99,440
Contractual workers	3,086	2,61,332	123	43,479

(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	6	6

Note : An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

The details pertaining to FY 22-23 are on a standalone basis.

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



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

Operating under COBEC (Code of Business Ethics & Conduct), POSH (Prevention of Sexual Harassment) and the Whistleblower Policy, the Company has established relevant committees to respond to a variety of work-related incidents.

Employees and stakeholders who have concerns or grievances have protected channels through which to report them, inclusive of but not limited to directly reaching out to the chairperson, the managing director, or the chairperson of the Audit Committee. The Company has established a clear procedure for receiving and directing grievances from different platforms towards the relevant parties. Furthermore, they adhere to strict confidentiality to protect whistleblowers from any form of retaliatory actions.

Thermax has also implemented the Prevention of Sexual Harassment Policy in accordance with the requisites put forth by the Sexual Harassment of Women at Workplace Act of 2013. This measure is all-inclusive, covering all employees, irrespective of their employment status being permanent, contractual, temporary or trainees. The Company conducts periodic awareness sessions.

Lastly, with the Company-wide adoption of COBEC, Thermax mandates the adherence to a specific set of business ethics and conduct, applicable across all its employees and business associates. This has been complemented by a slew of training programmes, aimed at reaching all business divisions and regions that have taken place since the instatement of COBEC.

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

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Filed during the Year	Pending Resolution at the End of Year	Remarks	Filed during the Year	Pending Resolution at the End of Year	Remarks
Sexual harassment	1	-	Compliant is resolved	-	-	No compliant received
Discrimination at workplace	-	-	No compliant received	-	-	No compliant received
Child labour	-	-	No compliant received	-	-	No compliant received
Forced labour/Involuntary labour	-	-	No compliant received	-	-	No compliant received
Wages	-	-	No compliant received	-	-	No compliant received
Other human rights related issues	-	-	No compliant received	-	-	No compliant received

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 Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (POSH)	1	NIL
Complaints on POSH as a % of female employees/workers	0.24	NIL
Complaints on POSH upheld	1	NIL

Note: An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

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

The Company believes in upholding fairness and meritocracy through a policy framework that strictly adheres to non-discriminatory practices and provides equal opportunities to all individuals regardless of their gender, religion, caste, race, age, community, physical ability or sexual orientation. To achieve this, the Company has implemented various policies such as the Code of Conduct, Prevention of Sexual Harassment, Rights of Persons

with Disabilities, etc. These policies ensure a robust grievance redressal process and establish clear employee responsibilities and acceptable conduct. By upholding these policies, the Company promotes a diverse and inclusive culture in the workplace.

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

Yes

10. Assessments for the year:

	% of Your Plants and Offices that Were Assessed (by Entity or Statutory Authorities or Third Parties)
Child labour	100
Forced/involuntary labour	100
Sexual harassment	100
Discrimination at workplace	100
Wages	100

Internal Assessment carried out by Thermax Limited at its Plants & offices.

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

Not Applicable

Leadership Indicator

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

The organisation has implemented several robust policies and mechanisms to ascertain a secure and wholesome work environment. These include COBEC, POSH, Whistleblower, and Equal Opportunity Policy to meticulously manage and address human rights grievances. These frameworks are potent tools to handle any incidents that may impact employees. However, at this stage, no alteration or introduction of business processes has taken place. Through this comprehensive approach, the organisation strictly adheres to maintaining an office environment that respects human rights and promotes well-being.

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

The human rights aspects are covered under various laws like the prevention of sexual harassment at the workplace, child labour law, equal opportunity policy etc. The Company ensures that human rights aspects are strictly adhered to by following the applicable laws.

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

The Company is working towards improving infrastructure for eliminating barriers to accessibility for differently-abled people.

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

Essential Indicator

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
From Renewable Sources in Gigajoule		
Total electricity consumption (A)	21, 295	11,481
Total fuel consumption (B)	54,998	4,428
Energy consumption through other sources (C)	-	-
Total energy consumed from renewable sources (A+B+C)	76,293	15,909



Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
From Non-renewable Sources in Gigajoule		
Total electricity consumption (D)	66,938	1,09,223
Total fuel consumption (E)	1,18,836	1,78,367
Energy consumption through other sources (F)	-	15,187
Total energy consumed from non-renewable sources (D+E+F)	1,85,774	3,02,777
Total energy consumed (A+B+C+D+E+F)	2,62,067	3,18,686
Energy intensity per rupee of turnover (Total energy consumption/revenue from operations)	0.00000450	0.00000411
Energy Intensity per rupee of turnover adjusted for purchasing power parity (PPP)* (Total energy consumed/Revenue from operations adjusted for PPP)	0.00009435	0.00008613
Energy intensity in terms of physical output [#]		

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

Yes, An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

*The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by the World Bank for India which is 20.96.

[#] Due to the diverse nature of the business operations and products/services of the Company, it is not feasible to determine the physical output for the calculation of Energy Intensity.

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.

Not Applicable

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

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water Withdrawal by Source (in Kilolitres)		
(i) Surface water	1,25,352	1,46,432
(ii) Groundwater	-	-
(iii) Third party water	5,82,190	6,40,194
(iv) Seawater/desalinated water	-	-
(v) Others (Rain water & recycled water)*	32,362	23,178
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	7,39,304	8,09,804
Total volume of water consumption (in kilolitres)	3,88,849	5,31,167
Water intensity per rupee of turnover (Total water consumption/revenue from operations)	0.00000668	0.00000685
Water intensity per rupee of turnover adjusted for purchasing power parity (PPP) (Total water consumption/revenue from operations adjusted for PPP) [#]	0.00013999	0.00014355
Water intensity in terms of physical output [#]		

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

Yes, An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

* The rainwater consumption for Jhagadia, Sricity & Solapur units, are estimated based on the capacity of water pits for storage of rainwater.

[#]The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by the World Bank for India which is 20.96.

[#]Due to the diverse nature of the business operations and products/services of the Company, it is not feasible to determine the physical output for the calculation of Water Intensity.

4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
Water Discharged by Destination and Level of Treatment (in Kilolitres)		
(i) To surface water	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(ii) To groundwater	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
(iii) To seawater	3,49,342	2,74,771
No treatment	-	-
With treatment – Tertiary Treatment	3,49,342	2,74,771
(iv) Sent to third-parties	1,713	3,666
No treatment	1,713	3,666
With treatment – please specify level of treatment	-	-
(v) Others	-	-
No treatment	-	-
With treatment – please specify level of treatment	-	-
Total water discharged (in kilolitres)	3,51,055	2,78,437

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

Yes, An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

5. Has the entity implemented a mechanism for zero liquid discharge? If yes, provide details of its coverage and implementation.

5 plants (Chinchwad, Bhosari, Savli, Solapur, Paudh) have zero liquid discharge.

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

Parameter	Please Specify Unit Tonnes Per Annum	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
NOx	T/Y	248	351
SOx	T/Y	205	111
Particulate matter (PM)	T/Y	868	991
Persistent organic pollutants (POP)		Not Applicable	Not Applicable
Volatile organic compounds (VOC)	T/Y	94	161
Hazardous air pollutants (HAP)		Not Applicable	Not Applicable
Others – please specify			

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

No.



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

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO ₂ equivalent	14,998	12,180
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO ₂ equivalent	13,312	24,037
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/revenue from operations)		0.00000049	0.00000047
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted or purchasing power parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/revenue from operations adjusted for PPP)*		0.00001019	0.00000976
Total Scope 1 and Scope 2 emission intensity in terms of physical output#			

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

Yes, An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

*The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by the World Bank for India which is 20.96.

#Due to the diverse nature of the business operations and products/services of the Company, it is not feasible to determine the physical output for the calculation of Scope 1 and Scope 2 emission Intensity.

8. Does the entity have any project related to reducing greenhouse gas emissions? If yes, then provide details.

The Company has been proactively implementing operational efficiency initiatives and renewable energy projects to minimise its carbon footprint and promote a sustainable future. Throughout the year, the Company has undertaken several measures aimed at conserving energy and resources, including:

- Electricity:** Thermax has effectively executed multiple operational efficiency projects at its manufacturing plants. These include addressing compressor leakages, installing variable frequency drives (VFD) on various equipment, deploying motion sensors to prevent unnecessary usage, optimising operations of effluent treatment plant (ETP) blowers, substituting cooling water pumps with energy-efficient alternatives at process cooling towers, and implementing LED lighting in workshops. These initiatives have not only resulted in reduced energy consumption and greenhouse gas emissions for Thermax but have also enhanced operational efficiency and lowered costs.
- Fuel:** Thermax is actively enhancing operational efficiency and minimising its carbon footprint through strategic projects. For instance, at the Paudh plant, measures have been implemented to optimise boiler operations. These efforts have led to a significant reduction of 133.91 metric tonnes in furnace oil (LHS oil) consumption, while at the Dahej plant, Thermax has transitioned to biomass from natural gas, resulting into saving of natural gas. These projects have resulted in cost savings and substantial environmental benefits.

Thermax is actively implementing initiatives to increase the utilisation of renewable energy sources. The Company has procured 34.34 lakh units of renewable energy through an open access mechanism. The Company has installed a 297 kWp capacity solar PV project at Solapur and a 370 kWp solar rooftop capacity at the Bhosari Plant. The Bhosari plant will commence power generation from the next financial year.

Moreover, Thermax has generated 24.81 lakh units from a Solar Power, combined capacity of 2.83 MWp across its plants in Savli, Jhagadia, Sri City, Solapur, and Pune offices, showcasing a strong commitment to adopting renewable energy for its operations.

Overall, the Company has consumed a total of 59.15 lakh units of renewable power this year, demonstrating significant efforts to reduce its environmental impact through renewable energy adoption. The Company's overall commitment to sustainability and reducing its carbon footprint is evident through its various efforts.

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

*in metric tonnes

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total waste generated (in metric tonnes)		
Plastic waste (A)	148	86
E-waste (B)	7	7
Bio-medical waste (C)	0**	0**
Construction and demolition waste (D)	-	-
Battery waste (E)	-	4
Radioactive waste (F)	-	-
Other hazardous waste. Please specify, if any. (G)	12,780	9,606
Other non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	3,543	6,378
Total (A+B + C + D + E + F + G+ H)^	16,479	16,081
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations)	0.00000028	0.00000021
Waste intensity per rupee of turnover adjusted for purchasing power parity (PPP)*. (Total waste generated/revenue from operations adjusted for PPP)	0.00000593	0.00004744
Waste intensity in terms of physical output#		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	3,912	6,615
(ii) Re-used	-	-
(iii) Other recovery operations	-	-
Total	3,912	6,615
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration (Including Co-processing) [§]	11,380	8,526
(ii) Landfilling	1,186	940
(iii) Other disposal operations	-	-
Total	12,565	9,466

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

Yes, An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

* The revenue from operations has been adjusted for PPP based on the latest PPP conversion factor published for the year 2022 by the World Bank for India which is 20.96.

**Bio-medical Waste - 0.03 for FY 23-24 and 0.02 for FY 22-23

#Due to the diverse nature of the business operations and products/services of the Company, it is not feasible to determine the physical output for the calculation of waste Intensity.

^Waste is accounted for at the time of disposal and therefore waste disposed has been considered as waste generated.

§The previous year's Co-processing waste has been re-classified to Incineration.

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

The Company has eliminated single-use plastics (SUP) throughout our manufacturing operations, resulting in the elimination of 1,307 kg of SUP during the year. The Company has transformed every aspect of our plants, from offices to shop floors, canteens, and pantries, into SUP-free zones. This effort has earned us the SUP-free certification from CII, recognising the commitment of Company's manufacturing locations (Savli, Dahej, Sri City, Jhagadia, Paudh, and Chinchwad) to sustainable practices.



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

S. No.	Location of Operations/ Offices	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					

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

S. No.	Specify the Law/Regulation/ Guidelines which Was Not Complied with	Provide Details of the Non-compliance	Any Fines/Penalties/Action Taken by Regulatory Agencies such as Pollution Control Boards or by Courts	Corrective Action Taken, if Any
NIL				

Leadership Indicator

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:

- Name of the area – Ahmedabad, Bangalore, Bhubaneshwar, Chandigarh, Chennai, Kolkata, Lucknow and Delhi
- Nature of operations – Regional Offices
- Water withdrawal, consumption, and discharge in the following format:

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	-	Not Available
(ii) Groundwater	-	Not Available
(iii) Third party water	1,223	Not Available
(iv) Seawater/desalinated water	-	Not Available
(v) Others	-	Not Available
Total volume of water withdrawal (in kilolitres)	1,223	Not Available
Water intensity per rupee of turnover (water consumed/turnover)	0.00000002	Not Available
Water intensity (optional) – the relevant metric may be selected by the entity	-	Not Available
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into surface water	-	Not Available
- No treatment	-	Not Available
- With treatment – please specify the level of treatment	-	Not Available
(ii) Into groundwater	-	Not Available
- No treatment	-	Not Available
- With treatment – please specify the level of treatment	-	Not Available

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
(iii) Into seawater	-	Not Available
- No treatment	-	Not Available
- With treatment – please specify the level of treatment	-	Not Available
(iv) Sent to third-parties	-	Not Available
- No treatment	-	Not Available
- With treatment – please specify the level of treatment	-	Not Available
(v) Others	-	Not Available
- No treatment	-	Not Available
- With treatment – please specify the level of treatment	-	Not Available
Total water discharged (in kilolitres)	-	Not Available

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

No.

2. 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:

S. No.	Initiative Undertaken	Details of the Initiative (Web-link, if Any, May Be Provided Along with Summary)	Outcome of the Initiative
1	At Dahej, the co-processing of waste for energy purposes	Diverting effluent treatment plant (ETP) waste towards co-processing in the cement industry. This not only reduces landfill waste but also eliminates any potentially harmful substances from polluting the environment, offering a safer working space for its employees. The entity has been successful in its efforts, as reflected in the total recycling of 2,010 metric tonnes of landfill waste through co-processing.	Diversion of waste from landfill Resource conservation
2	At Dahej, reduction in freshwater consumption in the ETP process	Reduction of freshwater consumption in the ETP process by using treated water for the preparation of ETP chemicals	Resource conservation Reduction in pollution
3	Recycling of paint sludge at Chinchwad	Diversion of hazardous paint waste going for incineration to recycling for making powder from paint sludge.	Resource recovery by eliminating incineration
4	At Paudh, Chinchwad, Savli, Sri City, Dahej, Jhagadia, eliminated single-use plastic from plant	Elimination of single-use plastic from the plants	Reduced plastic pollution and received certification from CII and reduced SUP 1.307 MT collectively from the plants mentioned.
5	Solapur plant achieves water positive certification:	In a resounding victory for sustainability, the Solapur plant has achieved Water Positive Certification, attaining a remarkable water positive index of 6.59. This achievement stands as a testament to the plant's unwavering commitment to environmental stewardship and responsible resource management	Solapur plant has achieved Water Positive Certification, attaining a remarkable water positive index of 6.59

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

The Company has a focussed policy framework on Business Continuity & Disaster Recovery Management wherein Thermax's management, business heads, and other senior executives, commit to implementing and managing Business Continuity Plan (BCP) and Disaster Recovery (DR) processes for their respective key applications and infrastructure. Detailed recovery procedures are documented and maintained for implemented recovery strategies. Periodic tests/disaster recovery drills are planned to ensure that business continuity is viable, effective, and meets the recovery objective as appropriate.



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?

No such adverse impact related to the environment found during assessment.

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

50% sustainable sourced/value chain assessed via Thermax standard Sustainable Supply Chain Management (SSCM) check sheet on environment.

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

Essential Indicator

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

4

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

S. No.	Name of the Trade and Industry Chambers/Associations	Reach of Trade and Industry Chambers/Associations (State/National)
1	CI's National Committee for Capital Goods & Engineering	National
2	Mahratta Chamber of Commerce, Industries and Agriculture	State
3	Boilers and Pressure Vessels Sectional Committee, MED01, BIS	National
4	National Safety Council	National

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 Authority	Brief of the Case	Corrective Action Taken
Not Applicable	Not Applicable	Not Applicable

Nil. There is no litigation filed/pending or completed against Thermax Limited regarding any anti-competitive behaviour and violations of anti-trust provisions under the Competition Act 2002.

Principle 8: Businesses should promote inclusive growth and equitable development

Essential Indicator

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 Project	SIA Notification No.	Date of Notification	Whether Conducted by Independent External Agency (Yes/No)	Result Communicated in Public Domain (Yes/No)	Relevant Web Link
No such project was initiated which requires social impact assessment					

Note: The Company has undertaken various projects across the states. The site premise belongs to the customer where SIA was conducted. Those details are not covered.

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

Name of Project which R&R is Ongoing	State	District	No of Project Affected Families (PAFs)	% of PAFs Covered by R&R	Amount Paid to PAFs in the FY (In Rs.)
No rehabilitation and resettlement were undertaken by the entity during this reporting period					

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

Any community member can raise a complaint on Company’s toll-free number and email address provided on the Company’s website which is monitored, addressed, and a proper record is maintained under the Whistleblower Policy.

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	59	47
Directly from within India	95	94

Note : An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

The details pertaining to FY 2022-23 are on a standalone basis.

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. (Place to be categorised as per RBI classification system - rural/semi-urban/urban/metropolitan)

Location	FY 2023-24	FY 2022-23#
Rural	10	26
Semi-urban	2	3
Urban	1	1
Metropolitan	87	70

Note An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180

The details pertaining to FY 2022-23 are on a standalone basis.

For the purpose of categorisation of people employed at locations into rural/semi-urban/urban/metropolitan, the following mechanism has been adopted along with RBI classification system:

- (a) Metropolitan cities considered are Pune, Chennai, Bangalore, Mumbai, Hyderabad, Ahmedabad, Chandigarh, Kolkata, Solapur, Bharuch, Chinchwad, Bhubaneshwar, Lucknow.
- (b) All manufacturing locations (plants) are mapped basis their respective actual addresses.

Leadership Indicator

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:

S. No.	State	Aspirational District	Amount Spent (in Rs.)
1	Rajasthan	Sirohi	3,50,000



3. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No of Persons Benefitted from CSR Project	% of Beneficiaries from Vulnerable and Marginalised Group
1	School Project - Thermax Foundation (TF) funds two Pune Municipal Corporation (PMC) Schools run by NGO Akanksha Foundation through public-private partnership (PPP). Through this project, students from underprivileged economic families receive access to quality education.	1,812	100%
2	Alumni Project - TF supports the alumni from Akanksha Foundation as well as another NGO iTeach to continue higher education after school. Since most of the students are first-generation learners, through alumni projects they receive career guidance, academic mentoring and support for junior college enrolment.	3,987	100%
3	Skill Building - TF supports (based on identified need) the community youth from villages near Thermax factories, who have dropped out from education after class 10 th to develop skills, and take on roles like electrician, data entry operator. The NGO partner provides training and placement to a minimum of 75% among them in nearby companies.	810	100%

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

Essential Indicator

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

The organisation has initiated several measures to guarantee a secure and healthy working environment. These measures include the establishment of a system to receive customer complaints and feedback, which is managed via diverse modes such as email, transmittal letters and verbal conversations. Complaints that come through Thermax Channel Associates (TCAs) are diligently registered on Salesforce.com (SFDC), where they are reviewed by our dedicated service team. The team also records the corresponding resolutions in SFDC. In scenarios where the complaints are directly received from customers by our Customer Relationship Centre (CRC), they are immediately sent to the respective teams for relevant action. Monitoring customer complaints through Salesforce.com allows us to enhance our efficiency and responsiveness, while effectively identifying and addressing recurring issues. Hence, this strategy contributes significantly to ensuring a safe and healthy work environment as it effectively manages potential sources of stress and dissatisfaction.

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	
Safe and responsible usage	All the products of the Company contain relevant information as required under applicable laws
Recycling and/or safe disposal	

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

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Received during the Year	Pending Resolution at the End of the Year	Remarks	Received during the Year	Pending Resolution at the End of the Year	Remarks
Data privacy	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24
Advertising	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Received during the Year	Pending Resolution at the End of the Year	Remarks	Received during the Year	Pending Resolution at the End of the Year	Remarks
Cyber security	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24
Delivery of essential services	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24
Restrictive trade practices	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24
Unfair trade practices	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24
Other	-	-	No complaint received in FY 2023-24	-	-	No complaint received in FY 2023-24

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

	Number	Reasons for Recall
Voluntary recalls	-	NA
Forced recalls	-	NA

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

The Company regularly provides training on security awareness to its employees. Unused information is archived and purged according to the Company's Data Retention Policy. Role-specific access to IT equipment is created and controlled. Implementation of identity and access management through single sign-on and multi-factor authentication is underway. Servers and databases for all hosted applications are currently being upgraded for high availability. The Company regularly tests its disaster recovery plan for critical applications. The cyber security and risk-related policy is published on the intranet.

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

Not Applicable

7. Provide the following information relating to data breaches:

- (a) Percentage of data breaches involving personally identifiable information of customers: Nil
- (b) Impact, if any, of the data breaches: Nil
- (c) Impact, if any, of the data breaches: Nil

Note: An independent assurance has been carried out by Price Waterhouse Chartered Accountants LLP on the FY 2023-24 indicators in the table above. Please find the assurance report on page no. 180



Leadership Indicators

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

The details of the product and services are available on <https://www.thermaxglobal.com/>

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

The Company's tech-enabled assets/products drive operational efficiency and sustainable growth for its customers. Additionally, the Company places a strong emphasis on educating the customers through product manual/e-manual about the responsible usage of its products and services.

Independent Practitioner’s Limited Assurance Report on Identified Sustainability Information in Thermax Limited’s Business Responsibility and Sustainability Report pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

To the Board of Directors of Thermax Limited

We have undertaken to perform a limited assurance engagement for Thermax Limited (the “Company”) vide our Engagement Letter dated May 6, 2024 in respect of the agreed Sustainability Information referred in “Identified Sustainability Information” paragraph below (the “Identified Sustainability Information”) in accordance with the Criteria stated in the “Criteria” paragraph below. The Identified Sustainability Information is included in the Business Responsibility and Sustainability Report (“BRSR”) Section of the Integrated Report of the Company for the financial year ended March 31, 2024, pursuant to the requirement of Regulation 34(2)(f) of the Securities and Exchange Board of India (“SEBI”) (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) (the “LODR Regulations”). The Reporting Boundary for BRSR is on a standalone basis as disclosed under Question No. 13 of Section A of the BRSR. This engagement was conducted by a team comprising assurance practitioners and environment experts.

Identified Sustainability Information

The Identified Sustainability Information for the financial year ended March 31, 2024, is summarised in Appendix 1 to this report.

Our limited assurance engagement was with respect to the financial year ended March 31, 2024 information only and we have not performed any procedures with respect to earlier periods or any other elements included in the BRSR (other than those listed as BRSR Core Key Performance Indicators (‘KPIs’) in Appendix 1) and, therefore, do not express any conclusion thereon.

Criteria

The criteria used by the Company to prepare the Identified Sustainability Information is the “BRSR Core” as detailed in Appendix 1 to this report (the “Criteria”), which is a subset of the BRSR, consisting of a set of KPIs / metrics under nine Environmental, Social and Governance (“ESG”) attributes, as specified by SEBI vide its circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023 (the “SEBI Circular”).

Management’s Responsibilities

The Company’s Management is responsible for determining the Reporting Boundary of the BRSR,

selecting or establishing suitable criteria for preparing the Identified Sustainability Information, taking into account applicable laws and regulations including the SEBI Circular, related to reporting on the Identified Sustainability Information, identification of key aspects, engagement with stakeholders, content, preparation and presentation of the Identified Sustainability Information in accordance with the Criteria. This responsibility includes design, implementation and maintenance of internal control relevant to the preparation of the BRSR and the measurement of Identified Sustainability Information, which is free from material misstatement, whether due to fraud or error. The Management and the Board of Directors of the Company are also responsible for overseeing the Company’s compliance with the requirements of LODR Regulations and the SEBI Circular in relation to the BRSR Core.

Inherent Limitations in Preparing the Identified Sustainability Information

The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, measures and measurement techniques and can affect comparability between entities. In addition, Greenhouse Gas (“GHG”) quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India (“ICAI”) and the International Code of Ethics for Professional Accountants (including International Independence Standards) (“IESBA Code”) issued by the International Ethics Standard Board for Accountants, which is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Price Waterhouse Chartered Accountants LLP (the “Firm”) applies Standard on Quality Control 1, “Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements”, the International Standard on Quality Management (“ISQM”) 1 “Quality Management for Firms that perform Audits or Reviews of Financials



Statements, or Other Assurance or Related Services Engagements” and ISQM 2 “Engagement Quality reviews”, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Practitioner’s Responsibilities

Our responsibility is to express a limited assurance conclusion on the Identified Sustainability Information based on the procedures we have performed and the evidence we have obtained.

We conducted our limited assurance engagement in accordance with the Standard on Sustainability Assurance Engagements (“SSAE”) 3000, “Assurance Engagements on Sustainability Information” and the Standard on Assurance Engagements (“SAE”) 3410, “Assurance Engagements on Greenhouse Gas Statements”, both issued by the Sustainability Reporting Standards Board of the ICAI and the International Standard on Assurance Engagement (“ISAE”) 3000 (Revised), “Assurance Engagements other than Audits or Reviews of Historical Financial Information” and the ISAE 3410 “Assurance Engagements on Greenhouse Gas Statements”, both issued by the International Auditing and Assurance Standards Board (collectively referred to as “the Standards”). These Standards require that we plan and perform our engagement to obtain limited assurance about whether the Identified Sustainability Information is free from material misstatement.

A limited assurance engagement involves assessing the suitability in the circumstances of the Company’s use of the Criteria as the basis for the preparation of the Identified Sustainability Information, assessing the risks of material misstatement of the Identified Sustainability Information whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Identified Sustainability Information.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgement and included inquiries, observation of processes performed, inspection of documents, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures referred above, we:

- Obtained an understanding of the assessment criteria and their suitability for the evaluation and /or measurements of the Identified Sustainability Information;
- Made enquiries of Company’s Management, including the various teams such as Sustainability team, Human Resource team, etc., and those with responsibility for managing standalone BRSR;
- Obtained an understanding and performed an evaluation of the key systems and processes for managing, recording and reporting on the Identified Sustainability Information as per Appendix 1 including at the sites and corporate office visited. This did not include testing of the design and operating effectiveness of management systems and controls;
- Checked the consolidation for various plants and corporate office under the reporting boundary (as mentioned in the BRSR) for ensuring the completeness of data being reported;
- Based on above understanding, the risks that the Identified Sustainability Information may be materially misstated, determined the nature, timing and extent of further procedures;
- Performed limited substantive testing on a sample basis of the Identified Sustainability Information at corporate office, and 2 plants located at Dahej and Pune to check that data had been appropriately measured with underlying documents recorded, collated and reported;
- Reviewed records and performed testing including recalculation of sample data to establish an assurance trail;
- Where applicable for the Identified Sustainability Information in the BRSR, we have relied on the information in the audited standalone financial statements of the Company for the year ended March 31, 2024, which were audited by another firm of chartered accountants under the Companies Act, 2013 who, vide their report dated May 10, 2024, expressed an unmodified opinion on those standalone financial statements;
- Assessed the level of adherence to the BRSR followed in preparing the Integrated Report, which includes the BRSR;
- Assessed the BRSR for detecting, on a test basis, any major anomalies between the information reported in the BRSR on performance with respect to the Identified

Sustainability Information and relevant source data/information;

- Evaluated the reasonableness and appropriateness of significant estimates and judgments made by the Management in the preparation of the Identified Sustainable Information; and
- Obtained representations from the Company's Management.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether the Identified Sustainability Information have been prepared, in all material respects, in accordance with the Criteria.

Exclusions

Our limited assurance scope excludes the following and therefore we do not express a conclusion on the same:

- Operations of the Company other than the Identified Sustainability Information listed in Appendix 1;
- Aspects of the BRSR and data/information (qualitative or quantitative) included in the BRSR, other than the Identified Sustainability Information;
- Data and information outside the defined reporting period i.e., the financial year ended March 31, 2024; and
- The statements that describe expression of opinion, belief, aspiration, expectation, aim or future intentions provided by the Company and testing or assessing any forward-looking assertions and/or data.

Limited Assurance Conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes

us to believe that the Company's Identified Sustainability Information summarised in Appendix 1 to this report and included in the BRSR, for the financial year ended March 31, 2024 is not prepared, in all material respects, in accordance with the Criteria.

Other Matter

The BRSR section of the Integrated Report of the Company includes certain information pertaining to the financial year ended March 31, 2023 prepared on a consolidated basis (unless otherwise stated), which is not comparable with current year information and is not audited or reviewed.

Restriction on Use

Our work was performed solely to assist you in meeting the reporting requirements. This deliverable has been issued solely at the request of the Board of Directors of the Company to whom it is addressed, solely for reporting the Company's sustainability performance and activities and for publishing the same as a part of the BRSR forming part of the Company's Integrated Report. Accordingly, we accept no liability to anyone, other than the Company. Our deliverable should not be used for any other purpose or by any person other than the addressees of our deliverable. We do not accept or assume any liability or duty of care for any other purpose or to any other person to whom this report is shown or into whose hands it may come without our prior consent in writing.

For **Price Waterhouse Chartered Accountants LLP**
Firm Registration Number: 012754N/N500016

Sumit Seth

Partner
Membership Number: 105869
UDIN: 24105869BKFWUO3134

Place: Mumbai
Date: July 5, 2024



Appendix 1

List of BRSR Core KPIs

Sr. No.	Principle and indicator reference*	Attribute	Parameters (KPIs)
1.	Principle 6 – E7	Green-house gas (GHG) footprint	<ol style="list-style-type: none"> Total Scope 1 emissions (Break-up of the GHG into CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, if available) Total Scope 2 emissions (Break-up of the GHG (CO₂e) into CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, if available) GHG Emission Intensity (Scope 1 +2) <ol style="list-style-type: none"> Total Scope 1 and Scope 2 emissions (MT) / Total Revenue from Operations adjusted for PPP
2.	Principle 6 – E3 and E4	Water footprint	<ol style="list-style-type: none"> Total water consumption Water consumption intensity <ol style="list-style-type: none"> Water Intensity per rupee of turnover adjusted for PPP Water Discharge by destination and levels of Treatment
3.	Principle 6 – E1	Energy Footprint	<ol style="list-style-type: none"> Total Energy Consumed % of energy consumed from renewable sources Energy intensity <ol style="list-style-type: none"> Energy Intensity per rupee of turnover adjusted for PPP
4.	Principle 6 – E9	Embracing circularity- details related to waste management by the entity	<ol style="list-style-type: none"> Plastic waste (A) E-waste (B) Bio-medical waste (C) Construction and demolition waste (D) Battery waste (E) Radioactive waste (F) Other Hazardous waste. Please specify, if any. (G) Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector) Total waste generated ((A+B + C + D + E + F + G + H) Waste intensity <ol style="list-style-type: none"> Waste Intensity per rupee of turnover adjusted for PPP Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations For each category of waste generated, total waste disposed by nature of disposal method
5.	Principle 3 – E1(C) Principle 3 – E11	Enhancing employee wellbeing and Safety	<ol style="list-style-type: none"> Spending on measures towards well-being of employees and workers- cost incurred as a % of total revenue of the company Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites) <ol style="list-style-type: none"> Number of Permanent Disabilities Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) No. of fatalities
6.	Principle 5 – E3(b) Principle 5 – E7	Enabling Gender Diversity in Business	<ol style="list-style-type: none"> Gross wages paid to females as a % of wages paid Complaints related to POSH <ol style="list-style-type: none"> Total Complaints on Sexual Harassment (POSH) reported. Complaints on POSH as a % of female employees / workers Complaints on POSH upheld
7.	Principle 8 – E4 Principle 8 – E5	Enabling Inclusive Development	<ol style="list-style-type: none"> Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India Job creation in smaller towns- wages paid to people employed in smaller towns (permanent or non-permanent/on contract) as % of total wage cost

Sr. No.	Principle and indicator reference*	Attribute	Parameters (KPIs)
8.	Principle 9 – E7 Principle 1 – E8	Fairness in Engaging with Customers and Suppliers	<ol style="list-style-type: none"> 1. Instances involving loss/ breach of data of customers as a percentage of total data breaches or cyber security events 2. Number of days of accounts payable
9.	Principle 1 – E9	Open-ness of business	<ol style="list-style-type: none"> 1. Concentration of purchases & sales done with trading houses, dealers, and related parties <ol style="list-style-type: none"> a) Purchases from trading houses as % of total purchases b) Number of trading houses where purchases are made from. c) Purchases from top 10 trading houses as % of total purchases from trading houses d) Sales to dealers / distributors as % of total sales e) Number of dealers / distributors to whom sales are made. f) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors. 2. Loans and advances & investments with related parties <ol style="list-style-type: none"> a) Purchases b) Sales c) Loans & advances d) Investments

*'E' indicates Essential Indicator