

Annexure - I

Business Responsibility Report – 2021-22

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1	Corporate Identity Number (CIN) of the Company	L15421UP1932PLC022174												
2	Name of the Company	Triveni Engineering & Industries Limited												
3	Registered Address	A-44, Hosiery Complex, Phase-II Extension, Noida-201 305, Uttar Pradesh												
4	Website	www.trivenigroup.com												
5	E-mail ID	shares@trivenigroup.com												
6	Financial Year reported	2021-22												
7	Sector(s) that the Company engaged in (industrial activity code-wise)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">NIC Code</th> <th style="text-align: left;">Product Description</th> </tr> </thead> <tbody> <tr> <td>1072</td> <td>Sugar</td> </tr> <tr> <td>35106</td> <td>Cogeneration (Power)</td> </tr> <tr> <td>1101</td> <td>Industrial Alcohol including Ethanol, Potable Alcohol and Potable Liquor</td> </tr> <tr> <td>281</td> <td>Industrial Gears</td> </tr> <tr> <td>360</td> <td>Water & Waste Water Treatment</td> </tr> </tbody> </table>	NIC Code	Product Description	1072	Sugar	35106	Cogeneration (Power)	1101	Industrial Alcohol including Ethanol, Potable Alcohol and Potable Liquor	281	Industrial Gears	360	Water & Waste Water Treatment
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1101	Industrial Alcohol including Ethanol, Potable Alcohol and Potable Liquor													
281	Industrial Gears													
360	Water & Waste Water Treatment													
8	List three key products/services that the Company manufactures/ provides	<p>Sugar and Ethanol Industrial Gears (High speed Gears) Solutions relating to Waste Water, Sewage and Effluents</p>												
9	Total number of location where business activity is undertaken by the Company	<p>(a) Number of International Locations (Provide details of major 5) The Company is majorly operating in domestic market. However, Water segment of the company has been executing an Overseas job in country of Maldives.</p> <p>(b) Number of National Locations: Uttar Pradesh (UP) - 03 Sugar manufacturing plants in West UP, 03 in Central UP and 01 in East UP; - 04 cogeneration plants in 3 sugar units in West UP, 02 in Central UP; - 02 Distilleries situated in West U.P. and 01 in Central UP (commenced operations in current FY23); - Water Business at Noida, with projects being executed all over India - IMIL manufacturing plants at Muzaffarnagar (UP) - Corporate and Registered Offices at Noida</p> <p>(c) Karnataka - Manufacturing facilities of High Speed & Niche Low speed Gears and other equipment at Mysuru.</p>												
10	Markets served by the Company: Local/State /National/ International	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Local</th> <th style="text-align: left;">Yes</th> </tr> </thead> <tbody> <tr> <td>State</td> <td>Yes</td> </tr> <tr> <td>National</td> <td>Yes</td> </tr> <tr> <td>International</td> <td>Yes*</td> </tr> </tbody> </table>	Local	Yes	State	Yes	National	Yes	International	Yes*				
Local	Yes													
State	Yes													
National	Yes													
International	Yes*													

* mainly through exports by Water Business Group, Power Transmission Business and exports by Sugar Business either directly or through merchant exporters

SECTION B: FINANCIAL DETAILS OF THE COMPANY.
Triveni Engineering & Industries Limited

	FY-22 Stand alone ₹ Crores	FY-22 Consolidated ₹ Crores
1 Paid-up Capital	24.18	24.18
2 Total Income	4716.87	4716.23
(a) Revenue from operations	4677.44	4694.04
(b) Other income	39.43	22.18
3 Profit for the year (after taxes and minority interest)	382.17	424.06
4 Total Comprehensive Income	383.39	429.59
5. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit before tax	1.39% of Profit before tax of FY 2021-22 and 2% of average profit of last three years.	
List of activities in which expenditure in 5 above has been incurred	1. Education 2. Healthcare, Disaster Management 3. Environmental sustainability, and maintaining quality of soil 4. Training to promote nationally recognized sports 5. Safe drinking water	

SECTION C: OTHER DETAILS
1. Does the Company have any Subsidiary Company/ Companies?

Yes, the Company has eleven subsidiaries as on March 31, 2022.

2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s).

The Subsidiary Companies are in the nascent stages of setting up their respective businesses and hence, these do not have any active participation in the BR initiatives. However, one subsidiary company, Mathura Waste Water Management (P) Limited (MWWMP), has carried out substantial business activities and endeavors to follow the BR initiative of the parent company.

3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company?

While the suppliers or distributors are not directly involved in the BR initiatives pursued by the Company, the Company arranges with third parties to provide their expertise, products and services for the benefit of the farmers who are the supply chain partners to the Company. Further, the Company also engages with the farmers directly to provide expert knowledge on latest farming techniques and prevention of disease to the crop

If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%].

Not Applicable

SECTION D: BR INFORMATION
1. Details of Director/Directors responsible of BR

a) Details of the Director/Director responsible for implementation of the BR policy/policies

DIN No: 00382878

Name: Mr. Tarun Sawhney

Designation: Vice Chairman and Managing Director

b) Details of the BR head*

Sl. No.	Particulars	Details
1.	DIN Number (if applicable)	Not applicable
2.	Name & Designation	Mr. Sameer Sinha, CEO-Sugar Business Group Mr. Rajiv Rajpal, CEO-Power Transmission Business Mr. Kamal Verma, CEO-Water Business
3.	Telephone number	0120-4308000 0821-4280501 0120-4748000
4.	e-mail id	ssinha@ho.trivenigroup.com rajivrajpal@ptb.trivenigroup.com kamal.verma@projects.trivenigroup.com

2. Principle-wise (as per NVGs) BR Policy/policies:

The National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs) released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These briefly are as follows:

-
- P1 Business should conduct and govern themselves with ethics, Transparency and Accountability.
- P2 Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
- P3 Businesses should promote the well-being of all employees.
- P4 Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
- P5 Businesses should respect and promote human rights.
- P6 Business should respect, protect, and make efforts to restore the environment.
- P7 Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.
- P8 Businesses should support inclusive growth and equitable development.
- P9 Businesses should engage with and provide value to their customers and consumers in a responsible manner.
-

a. Details of compliance:

Sl. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have policy/policies for BR?					Yes				
2	Has the policy being formulated in consultation with the relevant stakeholder?	The Company has formulated the policies, SOPs and adopted best practices by considering inputs, feedback and sensitivities of the stake holders, wherever practicable.								
3	Does the policy conform to any national/international standards? If yes, specify? (50 words)	Yes, the policies/practices broadly conform to the National Voluntary Guidelines (NVGs) issued by the Ministry of Corporate Affairs, Government of India, and the policies are compliant with applicable laws as mapped against the principles mentioned in NVGs.								
4	Has the policy being approved by the Board? If yes, has it been signed by MD/owner/CEO/appropriate Board Director?	Yes, the Board of Directors of the Company has approved the BR Policy and the same has been signed by the VCMD, pursuant to the authorization by the Board.								
5	Does the company have a specified committee of the Board/Director/Official to oversee the implementation of the policy?					Yes				
6	Indicate the link for the policy to be viewed online?	The link for the Policies: www.trivenigroup.com								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	The internal stakeholders have been made aware of the policies through appropriate means of communication. For the external stakeholders, the policy has been posted on the Company's website and they have also being made aware of details of such policy and about its availability on the website of the Company								
8	Does the company have in-house structure to implement the policy/policies					Yes				
9	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?					Yes				
10	Has the company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	There is an adequate system in force to ensure effective implementation. The audit by an external agency will be arranged in the due course.								

b. If answer to the question at Sl.No. 1 against any principle, is “No” please explain why: (Tick up to 2 options):

Sl. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The company has not understood the Principles									
2	The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles.									
3	The Company does not have financial or manpower resources available for the task.									
4	It is planned to be done within next 6 months									
5	It is planned to be done within next 1 year									
6	Any other reason (please specify)									

NOT APPLICABLE

3. Governance related to BR

- Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to access the BR performance of the Company. Within 3 months. 3-6 months, Annually, More than 1 year.

The Board of Directors have adopted BR Policy in Feb 2018 and BR Performance of the Company is reviewed by VCMD/BR heads annually.

- Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

The Company publish, as part of its Annual Report, the Business Responsibility Report on yearly basis, which is hosted on the website of the Company at www.trivenigroup.com.

unethical and/or improper practice(s) suspected to be taking place in the Company for appropriate action and reporting. Further, no employee is denied access to the Audit Committee and all disclosures are reported to the Chairman of the Audit Committee. The Code of Conduct and Whistle Blower Policy are uploaded on the Company’s website- www.trivenigroup.com.

- Does the Policy relating to ethics, bribery and corruption cover only the Company? Does it extend to the Group / Joint Ventures / Suppliers/ Contractors / NGOs/ Others?

The policies, philosophy and thinking in respect of the above issues are practiced by the Company in the normal conduct of the business and it also encourages its suppliers and contractors to adopt such practices. While the subsidiary companies engaged in tangible business activities will follow such policies of the Company, the associate companies in India do practice their own well-structured policies on the same lines.

- How many stakeholders’ complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof.

Stakeholder	Complaints received During 2021-22	Complaints resolved during 2021-22	%age resolved
Investors’ Complaints	11	11	100%
Customers’ Complaints	113	105	92.92%
Total	124	116	93.54%

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1: Ethics, Transparency and Accountability

The Company’s commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, the senior management and all employees of the Company. The corporate governance philosophy of the Company is anchored on the values of integrity, transparency, building efficient and sustainable environment, system and practices to ensure accountability, transparency, fairness in all the transactions in the widest sense to meet stakeholders and societal expectations. The Code of Conduct and other policies adopted by the Company apply to the employees of the Company. In addition, the Company has a Whistle Blower Policy through which the Company seeks to provide a mechanism to the employees and directors to disclose any

Principle 2: Sustainability of Products & Services across Life –Cycle

- List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and / or opportunities

Most of the products manufactured or dealt with by the Company are environmental friendly:

- Through its cogeneration plants or incidental cogeneration facilities set up in the Sugar manufacturing units, the Company produces power mostly from captive generation of bagasse (a by-product produced during manufacture of sugar from sugarcane), which is a renewable source of energy.
- The distilleries of the Company use captive generated molasses (a by-product produced during manufacture of sugar from sugarcane) to manufacture environment friendly Ethanol (in substitution of fossil fuels) which is used by the Oil Marketing Companies to blend with petrol as per the mandate of the Government. The Company uses effective systems and equipment not only to reduce effluents but has installed & operates incineration boilers along with complete related systems to ensure Zero Liquid Discharge (ZLD) in all three distilleries.
- The Water business of the Company is engaged in offering solution to the industries and municipalities in the area of waste water, sewage and effluents treatment which has the impact of preserving much precious water and reduce pollution and contamination.
- High speed gears manufactured by the Company inter-alia are used to operate steam turbines based on various renewable energy sources, such as, biomass, agricultural waste, waste heat recovery etc. The Company also supplies gearboxes for hydel applications and also for wind gear components, both of which are used for renewable energy generation.

- For each such product provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (Optional).

- Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain? b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

- The Company is continually engaged in energy conservation (please refer to Annexure -F of the Director's Report) with a view to optimize the resource use.
- In respect of Sugar operations, each of the by-product produced during the manufacture of sugar is majorly captively used to generate power, produce Ethanol or used as organic manure for the benefit of farmers. The conversion of by-products into environmentally beneficial products is made through advanced energy efficient equipment.
- The Company has been focusing on enhancing raw material productivity in sugar operations by propagating appropriate sugarcane varieties which provide higher yield to the farmers and thus, augmenting their income and higher sugar recoveries which help the Company to lower its raw material costs per unit of output produced.
- During the crushing season 2021-22 the Sugar recovery of the Company is likely to be lower by 15 to 20 basis points from 11.86% achieved in the previous season and raw material cost per unit of sugar produced has increased by around 8%. There was a general trend of lower yields and recoveries this season as compared to the previous season in Uttar Pradesh but the Company has fared much better than the average decline in the State.

- Does the Company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably?

Yes. The Company deploys procurement practices and procedures for sustainable sourcing based on the requirements of different businesses pursued by the Company.

- The Sugarcane which is the raw material required for the manufacture of sugar is sourced from the farmers and the Company deals with over 3.18 lakh farmers

in respect of its seven sugar units. About 48%% of the total requirement of sugarcane is supplied by the farmers at the sugar mill's gate and the balance about 52%% is supplied at the cane centers which are up to 100 km from the sugar mills. There are about 556cane centers operated by our seven sugar mills. To avoid staling of cane, the Company employs an extensive and efficient arrangements as well as logistics services to transport cane from cane centers to the mill in a timely and cost effective manner.

- Cogeneration plants are set up at the sugar mills and they seamlessly get supply of bagasse mainly from the own sugar units, which is produced during manufacture of sugar, mostly through the conveyer belts.
- In respect of Distilleries, the main raw material (molasses) is sourced from our own sugar mills located adjacent (to the distillery) through pipelines or transported through tankers for those which are located at a separate distant location. The reliability of transport arrangement is ensured for uninterrupted operation of the distilleries.
- Water Business is engaged in project execution at the customer's site. Most of the supplies are engineered-to-order and are outsourced to approved vendors who are entrusted to transport the material directly to the project site after appropriate factory inspection. There is a structured mechanism to develop vendors and to maintain a list of approved vendors for various machineries / components required in project execution. In some cases, recommended list of vendors is provided by customers.
- The Power Transmission Business has an active domestic and global supply chain for various raw material / components. Based on the criticality and vendor ratings, orders are placed on reliable vendors. The selection of vendor is based on their past performance, reliability, adherence to delivery timelines, cost competitiveness, compliance to laws, including the standards set up by the Company towards EHS, quality of products / services and

willingness to reduce costs / wastages and increase productivity as a supply chain partner.

4. Has the Company taken any steps to procure goods and services from local and small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

The Company procures sugarcane from over 3.18 lakh farmers for its seven sugar mills in the state of Uttar Pradesh who are generally located in an area adjoining / in proximity of the sugar mill. As a part of the cane development program, the Company partners with these farmers on an ongoing basis to improve sowing, cultivation, crop protection and harvesting techniques in a mutually beneficial manner. The sugar business of the Company has been able to substantially change the sugarcane varietal balance in partnership with farmers which has resulted in increase in recoveries and yields and has immensely helped both the farmers and the Company.

The Company also encourages SMEs, especially in the vicinity of the manufacturing plants, to supply their products and services to the Company and imparts training to them to improve their technical skills.

5. Does the Company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

In respect of the Sugar Business, the Company has a policy to enhance recycling and reduce effluent quantum and has installed / operates an effective system to treat the industrial effluents and it regularly monitors the efficacy of ETP. Further, it has installed well engineered Bag Filters/ ESPs/Wet Scrubbers in its boilers to limit air pollution. All the by-products generated during manufacture of sugar are used to produce environment friendly products of commercial value. The Company has effective systems for the treatment & recycle of the water to conserve its utilization.

Additionally, other waste products include used lubricants, machinery oil and manufacturing scrap which are disposed of to be recycled for further use.

Principle 3: Employee Well-being

Sl. No.	Category	Response
1.	Total number of employees	7385 as on 31st March 2022 (includes Permanent, Temporary, trainee and contractual employees)
2.	Total numbers of employees hired on temporary / contractual / casual basis	3205 as on 31st March 2022
3.	Total number of permanent women employees	48 as on 31st March 2022
4.	Total number of permanent employees with disabilities	NIL
5.	Do you have employee association that is recognized by management?	Yes
6.	What percentages of your permanent employees are members of this recognized employee association?	Around 28%
7.	Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year:	NIL
8.	What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?	
	Category	Safety (%) Skill Up-gradation (%)
a.	Permanent employees	90% 65%
b.	Permanent Women Employees	75% 75%
c.	Casual / Temporary / Contractual employees	85% 38%
d.	Employees with disabilities	Nil Nil

Principle 4: Stake Holder Engagement**1. Has the Company mapped its internal and external stakeholders?**

Yes, the key stakeholders of the Company are employees, farmers, customers, government authorities, suppliers and shareholders.

2. (a) Out of the above has the Company identified the disadvantaged, vulnerable & marginalized stakeholders?

(b) Are there any special initiative taken by the Company to engage with the disadvantage, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

The Company treats all the stakeholders important and endeavors to remedy hardships, if any, being suffered by them. Further, the Company realizes that its sugar mills are situated in rural areas and it has responsibility to generate employment and entrepreneurship amongst the locals residing in the vicinity and has encouraged and supported the farmers in upgrading farming techniques to augment their income. It operates and manages schools for the betterment of the local people.

Principle 5: Human Rights**1. Does the policy of the Company on human rights cover only the Company or extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others?**

While the Company or its subsidiaries do not have a stated policy on human rights, it has been practicing a high respect for human rights as a responsible corporate citizen, without any gender discrimination and exploitation. It believes in providing equal opportunity and to remunerate them in a fair manner commensurate with their skills and competence. The Company ensures conformance to fundamental labour principles including prohibition of child labour, forced labour, freedom of association and protection from discrimination in all its operation.

2. How many stakeholders' complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

During FY 2021-22, the Company has not received any complaints from any stakeholder pertaining to the human rights.

Principle 6: Protection & Restoration of the Environment

1. Does the Policy related to Principle 6 cover only the Company or extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/Others.

The Company's Policy on Safety, Health & Environment extend to all its offices, manufacturing locations, its employees and its surrounding places and habitat which could be impacted by its operations. The Company encourages its vendors, suppliers, and contractors and subsidiary company having tangible business activity to follow the Principle envisaged in the Policy.

2. Does the Company have strategies / initiatives to address global environmental issues such as climate change, global warming etc.? (Y/N) If yes, please give hyperlink for webpage etc.

Yes, as a responsible corporate, the Company considers environment issues very seriously. In fact, most of the products manufactured by the Company are environment friendly (manufacture of ethanol for blending with petrol; waste water / sewage / effluent treatment business being pursued by Water Business of the Company) and promote generation of power from renewable energy resources (Cogeneration Plants use bagasse which is a renewable fuel as feedstock for producing power). The Company has associated with Confederation of Indian Industry (CII) and formed a center of excellence "CII Triveni Water Institute" which does extensive research and advise wide ranging interventions to improve the quality of water and restore adequate water tables.

3. Does the Company identify and assess potential environmental risks? (Y/N)

The Company is cognizant of the environment risks and continually evaluates the impact of its manufacturing operations on the environment and endeavors to improve its benchmarks for stringent compliance. Further, all decisions relating to development of new products duly incorporate implications, if any, to the environment. As an example, the Company has during the year 2019-20 year installed an incineration boiler at its existing distillery to achieve zero liquid discharge and likewise, replicated this scheme successfully in new distilleries set up subsequently.

(a) Does the Company have any Project related to Clean Development Mechanism? If yes, whether any environmental compliance report is filed.

Yes, two of the Cogeneration Plants of the Company at Deoband and Khatauli (Phase I) were registered with UNFCCC under Clean Development Mechanism.

(b) Has the Company undertaken any other initiatives on clean technology, energy efficiency, renewable energy, etc.

The Company generates green power from renewable energy sources and also manufactures green fuel (Ethanol) for blending with petrol. Additionally, the Company is also engaged in segments relating to waste water, sewage and effluent treatment. Apart from the environment friendly products manufactured by the Company, the Company is conscious of its responsibility to conduct its operations in a manner to conserve energy

(c) Are the Emissions/ Waste generated by the Company within the permissible limits given by CPCB/ SPCB for the financial year being reported?

Yes, the emissions / waste generated by the Company are within the permissible limits prescribed by Central Pollution Control Board ("CPCB") / UP State Pollution Control Board /Karnataka State Pollution Control Board ("SPCB").

(d) Number of show cause / legal notices received from CPCB/ SPCB which are pending (i.e. not resolved to satisfaction) as on end of financial year.

No such notice from CPCB/SPCB is pending at the end of the financial year.

Principle 7: Responsible Advocacy

1. Is your Company a member of any trade and chamber or association? If yes, name only the ones that your business deals with:

The Company is a member of various trade and chamber associations. The major ones are:

- a. Confederation of Indian Industry (CII)
- b. Federation of Indian Chambers of Commerce and Industry (FICCI)
- c. Indian Sugar Mills Association (ISMA)

2. Have you advocated / lobbied through above associations for the advancement or improvement of public good? Yes/ No; if yes specify the broad areas.

The Company is continuously in touch with various organization, namely, CII, FICCI, ISMA for improvement of various economic and social policies for sustainable growth in the Sugar and Water Industry. The company has also associated with Confederation of Indian Industry

(CII) and formed a center of excellence “CII Triveni Water Institute” which does extensive research and advise wide ranging interventions to improve the quality of water and restore adequate water tables.

Principle 8: Supporting inclusive Growth & Equitable Development

1. Does the Company have specified programs / initiatives/ projects in pursuit of the Policy related to Principle 8? If yes, details thereof.

- The Company deals with over 3.18 lakh farmers across all its seven sugar mills relating to the procurement of sugarcane for the manufacture of sugar. The Company engages in meaningful cane development program which aims to develop improved sowing, cultivation, crop protection and harvesting techniques and to improve quality of crop and land productivity resulting in enhanced income in the hands of farmers. During the FY 2021-22, the Company has purchased cane worth approx. ₹ 2955.7 crore from its farmers.
- All the payments to the farmers are made through banking channels as a result of which they become entitled for crop related banking assistance.
- The Company encourages employment of local people and promotes entrepreneurship amongst them to supply goods or render services to the sugar mills. The technical training and skill upgradation are provided by the Company, if required.
- The Company operates and manages 03 schools in the vicinity of the sugar mills to provide education to the children residing in the vicinity.

2. Are the Programs/ Projects undertaken through in house team / own foundation/ external NGO/ Government structures / any other organisation?

Most of the programs are undertaken by the In-house team. The specialized services, wherever required, are procured from expert third parties, including through various tie-ups.

3. Have you done any impact assessment of your initiatives?

While it is difficult to quantify, the results are visible through higher income accruing in the hands of farmers due to enhanced yields & cane supply and improved operational performance of the Company in terms of better sugar recovery and increased supply of sugarcane. The mutual cooperation with its farmers will help the Company to meet its social and commercial objectives.

4. What is your Company’s direct contribution to community development projects – amount in INR and the details of the project undertaken?

In addition to CSR activities undertaken, the Company has incurred around ₹ 2.39 crore in the cane development activities and financial assistance, as required, is provided to the schools being maintained by the Sugar mills. The time spent in counselling, educating farmers, managing schools and providing other services are administrative and time extensive, and thus, are difficult to be quantified. In addition, the Company has undertaken activities related to installations of tube wells, maintenance of ponds, cleaning of drains, organizing health camps etc through its community development initiatives. The Company also undertook active participation in distribution of hand sanitizers to curb the spread of Covid -19.

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the Community?

The Company believes that if the activities are carried out in a structured manner as per well laid out plan with proper identification of the target segment of the community, it is bound to be received well and adopted by the community. The Company stringently follows this line of thinking and continually monitors community development initiatives through various parameters such as productivity of land, income accruing to farmers, health indicators, literacy levels, sustainable livelihood processes and state of infrastructure among others.

Principle 9: Providing value to Customers and Consumers

1. What percentage of customer complaints / consumer cases are pending as on the end of the financial year.

The Company considers customer satisfaction as an important objective and has a well-structured policy on customer complaints resolution. The Company endeavors to resolve all complaints in an expeditious manner. As on 31.03.2022 there were about 7% complaints pending for resolution.

2. Does the Company display product information on the product label, over and above what is mandated as per local laws?

The Company displays applicable product information as mandated by Bureau of Indian Standards/FSSAI. The Company complies with all the applicable regulations as provided in Legal Metrology Act, Bureau of Indian Standards Specifications, Food Safety and Standards Act and the relevant rules prescribed therein.

3. Is there any case filed by any stakeholders against the Company regarding unfair trade practices, irresponsible advertising/ or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

The Company has not indulged in any unfair trade practices, irresponsible advertising or anti-competitive behavior.

There is a pending case of appeal by the distilleries (including our Company) to NCLAT wherein a stay has been granted to the Company upon deposit of 10% of the penalty amount of ₹ 174.16 lakhs ordered to be paid by Competition Commission of India (CCI) vide its order dated 18.09.2018 on the charges of collusion in submitting bids by the distilleries against a tender for the procurement of Ethanol.

4. **Did your Company carry out any consumer survey/ consumer satisfaction trends?**

The Company considers customer satisfaction as one of its foremost objectives and endeavors to take feedback from customers through practical means. In the Engineering Businesses, wherein the number of customers are not very large, the Company takes feedback directly from the customers, including through electronic means. In the Sugar business, such feedback, essentially on quality, is received through sugar agents as it not possible to deal with innumerable final customers.

For and on behalf of the Board of Directors

Dhruv M. Sawhney

Chairman and Managing Director

DIN: 00102999

Noida

May 14, 2022