



GUJARAT AMBUJA EXPORTS LIMITED

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

Independent assessment by



Citation: BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

Customer: Gujarat Ambuja Exports Limited
AHMEDABAD

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Annexure I

Business Responsibility & Sustainability Reporting Format

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L15140GJ1991PLC016151
2	Name of the Listed Entity	Gujarat Ambuja Exports Limited
3	Year of incorporation	1991
4	Registered office address	"Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road, PO - Thaltej, Bodakdev, AHMEDABAD.
5	Corporate address	"Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road, PO - Thaltej, Bodakdev, AHMEDABAD.
6	E-mail	info@ambujagroup.com
7	Telephone	079-61556677
8	Website	www.ambujagroup.com
9	Financial year for which reporting is being done	2021-22
10	Name of the Stock Exchange(s) where shares are listed	NSE & BSE
11	Paid-up Capital	229335330 INR
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Sandeep Agrawal Whole-Time Director email Id sandeep@ambujagroup.com Contact No. 9099011219
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	This is a consolidated report.

II. Products/services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
	Trading		13.0%
	Manufacturing		86.8%

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

Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Starch Powder	10629	21.82
2	Soya Ref. Oil	10402	12.74
3	Maize Germ	10623	6.96
4	LG	10621	6.73
5	DOC	1118	6.40
7	Gluten	10629	5.25
8	Maize Fibre	10623	5.05
9	Sorbitol	10623	4.63
10	Others		5.38

III. Operations

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

Location	Number of plants	Number of offices	Total
National	8	3 (including HO)	11
International	--	--	--

17. Markets served by the entity:

a. Number of locations:

Locations	Number
National (No. of States)	07
International (No. of Countries)	00

b. What is the contribution of exports as a percentage of the total turnover of the entity?
Exports contribute to 88% of the total turnover.

c. A brief on types of customers: GAEL supplies its products to MNCs, large corporations and MSMEs alike.

IV. Employees

18. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	1111	1088	97.93	23	2.07
2.	Other than Permanent (E)					
3.	Total employees (D + E)	1111	1088	97.93	23	2.07
WORKERS						
4.	Permanent (F)	1510	1295	85.76	215	14.24
5.	Other than Permanent (G)					
6.	Total workers (F + G)	1510	1295	85.76	215	14.24

b. Differently abled Employees and workers:

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

The company does not have any differently-abled employees (including workers) at present.

19. Participation/Inclusion/Representation of women

	Total	No. and percentage of Females	
	(A)	No. (B)	% (B / A)
Board of Directors	6	2	33%
Key Management Personnel	4	1	25%

20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 21-22 (Turnover rate in current FY)			FY 20-21 (Turnover rate in previous FY)			FY19-20 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	19.96%	28.57%	20.12%	17.69%	36%	18.08%	15.06%	21.43%	15.20%
Permanent Workers	24.87%	47.96%	28.22%	38.65%	51.34%	40.61%	27.15%	46.30%	30.16%

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

21. (a) Names of holding / subsidiary / associate companies / joint ventures

Sl. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Mohit Agro Commodities Processing Private Limited	Subsidiary	100	No

VI. CSR Details

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **(Yes)**
(ii) Turnover (in Rs.)--- 46703068523/-
(iii) Net worth (in Rs.)—21272219409/-

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 21-22 Current Financial Year			FY 20-21 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	NO	NIL	NIL	NIL	NIL	NIL	
Investors (other than shareholders)	NO	NIL	NIL	NIL	NIL	NIL	
Shareholders	NO	7	0		3	0	
Employees and workers	NO	NIL	NIL	NIL	NIL	NIL	
Customers	YES	12	00	NA	11	00	NA
Value Chain Partners	NO	NIL	NIL	NIL	NIL	NIL	
Other (please specify)	NO	NIL	NIL	NIL	NIL	NIL	

24. 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

Sl. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Climate Change- Unpredictable weather.	Risk	Input material is basically agricultural produce	Mitigate	-ve
2	Water scarcity – Shortage of fresh water.	Risk	Input material is basically agricultural produce	Mitigate	-ve
3	Non-availability of quality seeds of improved varieties of soybean.	Risk	Affects the quality of the product	Mitigate	-ve
4	Management of insects & pests and disease	Risk	Lowers productivity of produce	Mitigate	-ve
	Imbalanced fertilization and timely unavailability of needed fertilizers	Risk	Lowers productivity of produce	Mitigate	-ve

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure	P	P	P	P	P	P	P	P	P
Questions	1	2	3	4	5	6	7	8	9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	No	Yes	No	No	No	No	No	No
b. Has the policy been approved by the Board? (Yes/No)	Yes	NA	Yes	NA	NA	NA	NA	NA	NA
c. Web Link of the Policies, if available	https://www.ambujagroup.com/downloads/								
2. Whether the entity has translated the policy into procedures.	In the process	No	No	No	No	No	No	No	No
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	No	No	No	No	No	No	No	No	No
4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	NA	NA	NA	NA	NA	NA	NA	NA	NA
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	In the process	NA	NA	NA	NA	NA	NA	NA	NA
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	Cannot be commented upon at this juncture	NA	NA	NA	NA	NA	NA	NA	NA
Governance, leadership and oversight									
<p>7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (<i>listed entity has flexibility regarding the placement of this disclosure</i>)</p> <p><i>GAEL's key motivation is to be an end-to-end ingredient provider in the entire food chain. The company aspires to be the leader in its business. We believe that as a leader, it is not enough to just comply with the ESG parameters but to take a step beyond and set an example. We understand that mitigating the environmental, social, and governance risks is crucial for the sustainability of a business. We consider the UN SDG's a critical barometer to achieve a better tomorrow and work tirelessly to be in parallel with the set sustainable goals.</i></p> <p><i>This is an opportunity to introspect and align our policies and business processes to be in sync with international practices. We are committed to reducing our carbon footprint and consumption of fresh water. We demonstrate our care towards our employees by ensuring their health and well-being along with empowering them to be global leaders. We will continue to support the weaker sections of our society through our CSR and Social activities.</i></p> <p><i>The Corporation has been built on the founding principles of kindness, fairness, effectiveness and efficiency. The Corporation believes that sound principles of governance are a necessary tool for creating long-term value for all its stakeholders and promoting sustainability. GAEL regards respect for human rights as one of its fundamental and core values. We will not leave any stone unturned to make sure that whatever we do is in favour of the environment, society, nation and all our stakeholders. Our basic values are always deeply rooted in our system</i></p>									
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).					Mr. Sandeep Agrawal, Whole Time Director				
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.					Managing Director and the Whole-Time Director				

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action	Yes	NA	Yes	NA	NA	NA	NA	NA	NA	Annually	NA	Annually	NA	NA	NA	NA	NA	NA
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes	NA	Yes	NA	NA	NA	NA	NA	NA	Annually	NA	Annually	NA	NA	NA	NA	NA	NA
11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.										P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
										No	No	No	No	No	No	No	No	No

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	Yes, the Company is guided by a Board-approved Policy that covers the underlying core elements of the NGRBC principles. The Company is on its way to formulate policies and procedures to formalize this aspect, as far as the same is deemed relevant and practicable.								
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	Yes, but the resources are to be oriented towards the requirements. The process will be completed in one year.								
It is planned to be done in the next financial year (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Any other reason (please specify)									

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 their impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	2		11.6
Key Managerial Personnel	8	Safety Meetings did periodically with all members (First - Aid / Health, Safety & Environment)	64
Employees other than BoD and KMPs	41	First - Aid /Health, Safety & Environment GMP, FSSC/ISO, Code of Conduct/ETI Fire & Safety, Allergens	48
Workers	45	First - Aid /Health, Safety & Environment, GMP, FSSC/ISO, Code of Conduct/ETI Fire & Safety, Allergens	58

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):

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	7	Adjudicating Authority Food Safety	25000	Edible oil packaging was declared misbranded as "BEST BEFORE 9 MONTHS" and was written in small letters.	No
Settlement			0	0	NA
Compounding fee			0	NA	NA
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions		Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment		0		NA	NA
Punishment		0		NA	NA

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

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
None	

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

The Anti-Bribery and Anti-Corruption Policy defines the Company's policy on the avoidance of bribery and corruption and ensures that it reflects any changes in applicable laws and developments in acceptable standards for the conduct of business. Gujarat Ambuja Exports Limited is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates throughout the world. The Company will not engage in bribery or corruption. Adherence to the clear guidelines set out in this Policy will ensure that the Company and its employees comply with anti-bribery and anti-corruption laws.

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 21-22 (current FY)	FY 20-21 Previous Financial Year
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

No charges of bribery/ corruption have been reported against any Directors/KMPs/employees/workers and no disciplinary action taken by any law enforcement agency for the charges.

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

	FY 21-22 (Current Financial Year)	FY 20-21 (Previous Financial Year)
	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	None reported
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	None reported

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.

No fine/penalty/action has been taken by any regulator/ law enforcement agency/ judicial institution, on cases of corruption and conflicts of interest. And therefore, no action was needed to be taken.

PRINCIPLE 2

Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

- 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.

	FY 21-22 (Turnover rate in current FY)	FY 20-21 Previous Financial Year	Details of improvements in environmental and social impacts
R&D	50 lakhs (20%)	40 lakhs (25%)	1) CSL (Effluent) Re-using Mechanism
Capex	2000 lakhs (10%)	1500 lakhs (10%)	2) New usages of Effluent Discharged from Plant 3) Improving the water balance and moving towards a Zero-Liquid Di

- Does the entity have procedures in place for sustainable sourcing? (Yes)
 - If yes, what percentage of inputs were sourced sustainably?
The organization tries to source directly from the farmers with a viewpoint of empowering them. The Pan-India network of procurement of raw materials gives the company a sustainable edge in the long run.
- Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste, and (d) other waste.
The organization does not have any plastic waste, E-waste or other hazardous waste at the end of life. All its products are used as raw material for the subsequent process by its customers are used as Presently there is no process to safely reclaim products for reusing, recycling, and disposal at the end of life. However, the organization is continuously monitoring its end-of-life products and any opportunity to reclaim them will be evaluated and implemented. The E-Waste generated across the company is handled meticulously every quarter.
- Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.
Presently Extended Producer Responsibility does not apply to the organization.

PRINCIPLE 3

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

Essential Indicators

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

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	1154	0	0	1154	100%	0	0	0	0	0	0
Female	24	0	0	24	100%	0	0	0	0	0	0
Total	1178	0	0	1178	100%	0	0	0	0	0	0
Other than permanent employees											
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Total	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

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	1031	0	0	1031	100%	0	0	0	0	0	0
Female	136	0	0	136	100%	0	0	0	0	0	0
Total	1167	0	0	1167	100%	0	0	0	0	0	0
Other than permanent workers											
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Total	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

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

Benefits	FY 2021-22 Current Financial Year			FY 2020-21 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	34.04%	31.71%	Y	35.86%	31.15%	Y
Others – please specify	NA	NA	NA	NA	NA	NA

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.

Yes. The premises/offices are accessible to differently-abled employees and workers, although there is no such worker at present under GAEL's employment.

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

The Company is committed to being an equal-opportunity employer and ensures an inclusive workplace for all. An Equal Opportunity Policy is being formulated.

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	NIL	NA	NIL	NA
Female	NIL	NA	NIL	NA
Total	NIL	NA	NIL	NA

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	A grievance-handling procedure is in place. Permanent workers can raise their grievances with the HR Department.
Other than Permanent Workers	Contract Workmen can raise their grievances through their respective line managers or Plant Heads, if not resolved, they can escalate the same to the HR Department through their respective contractors.
Permanent Employees	As a part of our open and transparent culture, we follow an open-door policy. So, every employee can share their concerns with their functional heads at any point in time.
Other than Permanent Employees	They can directly approach the respective HODs/ Functional Heads and the same is addressed by the respective HODs/ Functional Heads.

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

Category	FY 21-22 (Current Financial Year)			FY 20-21 (Previous Financial Year)		
	Total employees / workers in respective category	No. of employees / workers in respective category, who are part of association(s) or Union	% (B/A)	Total employees/ workers in respective category	No. of employees / workers in respective category, who are part of association(s) or Union	% (D/C)
	(A)	(B)		(C)	(D)	
Total Permanent Employees	NIL	NIL	NA	NIL	NIL	NA
– Male	NIL	NIL	NA	NIL	NIL	NA
– Female	NIL	NIL	NA	NIL	NIL	NA
Total Permanent Workers	NIL	NIL	NA	NIL	NIL	NA
– Male	NIL	NIL	NA	NIL	NIL	NA
– Female	NIL	NIL	NA	NIL	NIL	NA

8. Details of training given to employees and workers

Category	FY 2021-22					FY 2020-21 (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										
Male	1154	325	28.16%	342	29.64%	1192	141	11.83%	270	22.65%
Female	24	2	8.33%	2	8.33%	21	0	0.00%	2	9.52%
Total	1178	327	27.76%	344	29.20%	1213	141	11.62%	272	22.42%
Workers										
Male	1031	303	29.39%	269	26.09%	1127	295	26.18%	221	19.61%
Female	136	0	0%	0	0%	170	0	0%	0	0%
Total	1167	303	25.96%	269	23.05%	1297	295	22.74%	221	17.04%

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

Category	FY 2021-22 Current Financial Year			FY 2020-21 Previous Financial Year		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	1154	0	0	1192	0	0
Female	24	0	0	21	0	0
Total	1178	0	0	1213	0	0
Workers						
Male	1031	0	0	1127	0	0
Female	136	0	0	170	0	0
Total	1167	0	0	1297	0	0

10. Health and safety management system:

- Whether an occupational health and safety management system has been implemented by the entity? **(Yes/ No)**. If yes, the coverage such system?
Yes. The entire organisation is ESLC compliant. There is also a system of regular monitoring in place to ensure the proper health and safety of all workers and employees.
- 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 a comprehensive hazard identification mechanism in its factories. The factory audits are also done quarterly to ensure that the hazards are minimized.
- Whether you have processes for workers to report work-related hazards and to remove themselves from such risks. (Y/N)
Yes. A system is in place across the Company's Plants for workers to spot and report work-related hazards and offer suggestions for improvements. Necessary training is given to all workers in recognising hazards and issues.
- Do the employees/workers of the entity have access to non-occupational medical and healthcare services? (Yes/ No)
Yes, permanent employees and their family members have the option to enrol under Company's Group Insurance Policy. Workers have access to medical benefits through Company provided group insurance policies. The Contractual workers also have statutory benefits under ESIC.

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

Safety Incident/Number	Category	FY 2021-22 Current Financial Year	FY 2020-21 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	123	15
Total recordable work-related injuries	Employees	0	0
	Workers	3	14
No. of fatalities	Employees	0	2
	Workers	2	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	1	0

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

We have a fully-functional occupational health centre at our Factory premises. There is a Factory medical officer and compounder. First aid boxes have been put in several areas of plants and are being regularly checked. Sanitization and thermal screening for every person has been organised at the gates. Masks have been widely distributed among employees to prevent Covid-19.

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

	FY 2021-22 (Current Financial Year)			FY 2020-21 (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	NIL	NIL		NIL	NIL	
Health & Safety	NIL	NIL		NIL	NIL	

14. Assessments for the year:

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

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions. We constantly monitor the safety and working conditions of all of our manufacturing units. There is a periodic check to ensure everything complies.

Leadership Indicators

- Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y) (B) Workers (Y).

Yes. In the unfortunate event of the death of an employee including workers, the Company extends financial support to the family members of the employee.

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

The Company ensures that statutory dues as payable by service providers for the third-party payroll employees are deposited on time and in full through a process of periodic audits and controls.

- 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 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)	FY 2021-22 (Current Financial Year)	FY 2020-21 (Previous Financial Year)
Employees	2	5	1	4
Workers	4	15	2	15

- Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? **(Yes)**

Yes, the entity offers assistance to its employees.

- Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	The Company raises the awareness of the supply chain members relating to the products and their properties through various meets regularly. However, no formal assessment is carried out.
Working Conditions	

- Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Periodic training is organised through the partners. Recommended procedures and preventive measures are specified during such training programmes.

PRINCIPLE 4

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

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.
The organization has an informal process for identifying stakeholders. The key stakeholders include customers (downstream value chain), employees, and suppliers (upstream value chain). Other stakeholders include the society near and surrounding the plants. The organization is in the process of setting up formal processes for identifying key stakeholders.
2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Groups	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of Communication (Emails, SMS, Newspaper, pamphlets, advertisements, community, meetings, notices boards, websites, other	Frequency of engagement (annually, Half-yearly/Quarterly/ others -please specify	Purpose and scope of engagement including key topics and concerns raised during such engagements
Customers	No	Emails, Websites, meetings,	As and when required	Quality issues, customer feedback etc.
Employees	No	Emails, meetings, websites, notice boards	Annual and as and when required.	On performance, appraisal, and consultation in matters related to health and safety
Suppliers	No	Emails, meetings, websites,	Annual and as and when required.	On performance, related to health and safety
Society (neighbouring public)	No	Emails, meetings, websites,	As and when required	In the event of any complaints
Beneficiaries of CSR programmes	No	Meetings,	As and when required	In the event of any CSR events

PRINCIPLE 5

Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 21-22 Current Financial Year			FY 20-21 Previous Financial Year		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total ©	No. of employees / workers covered (D)	% (D/C)
Employees						
Permanent	1163	0	0	1188	0	0
Other than permanent	76	0	0	50	0	0
Total Employees	1239	0	0	1238	0	0
Workers						
Permanent	1381	0	0	1856	0	0
Other than permanent	1513	0	0	985	0	0
Total Workers	2894	0	0	2841	0	0

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

Category	FY 2021-22 Current Financial Year					FY 2020-21 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		Morethan Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	181	13	7	170	94	199	16	8	183	92
Male	2	0	0	2	100	4	0	0	4	100
Female										
Other than Permanent										
Male										
Female										
Workers										
Permanent										
Male	268	65	24	203	76	280	63	23	217	78
Female	0	0	0	0	0	0	0	0	0	0
Other Permanent										
Male										
Female										

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

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)				
Key Managerial Personnel	12	17903842	0	0
Employees other than BoD and KMP	169	47373241	2	417071
Workers	268	29514176	0	0

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)**

Yes, the human resource team at each respective region manages the grievance at the front end. Also, the Company follows an open-door policy and has internal mechanisms in place through which an employee can raise grievances with the senior management.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues. The HR Dept is very well versed with the plan of action on any such issues. As stated earlier, the human resource team at each region, Regional Heads and Plant Heads at each respective region are, inter alia, responsible for the review of material issues relating to human rights and redressal of grievances emanating in such areas.

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

	FY 2021-22 Current Financial Year			FY 2020-21 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	NIL	NIL	NIL	NIL	NIL	NIL
Discrimination at workplace	NIL	NIL	NIL	NIL	NIL	NIL
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL
Forced Labour/ Involuntary Labour	NIL	NIL	NIL	NIL	NIL	NIL
Wages	NIL	NIL	NIL	NIL	NIL	NIL
Other human rights related issues	NIL	NIL	NIL	NIL	NIL	NIL

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

The Company is committed to a workplace free of harassment, including sexual harassment at the workplace, and has zero tolerance for such unacceptable conduct. The company management encourages reporting any harassment concerns and is responsive to complaints about harassment or other unwelcome or offensive conduct.

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

Yes

9. The Company in course of its business enters into various agreements and contracts and has provisions relating to human rights aspects embedded as a part of their standard agreements and contracts. Steps are being taken to include such aspects as a part of all other minor business agreements and contracts also. **Also, all outsourcing of raw materials from vendors has a background check for this issue.** Assessments for the year: All plants have been assessed (SG).

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	Nil
Forced/Involuntary labour	Nil
Sexual harassment	Nil
Discrimination at workplace	Nil
Wages	Nil
Others - please specify	Nil

10. 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 Indicators

- Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.
The company is working towards framing a code of conduct to capture matters relating to human rights and steps are being taken to include reference to such Code as a part of all upcoming business agreements and contracts with value chain partners.
- Details of the scope and coverage of any human rights due diligence conducted.
Not applicable.
- 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?
Our establishments are accessible to the differently abled, and we are continuously working towards improving infrastructure for eliminating barriers to accessibility.
- Details on assessment of value chain partners
No formal assessment of the value chain partners for Human Rights has been conducted.
- Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above

Not applicable.

PRINCIPLE 6

Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

- Details of total energy consumption (in Giga Joules) and energy intensity, in the following format:

Parameter	FY 21-22 (Current Financial Year)	FY 20-21 (Previous Financial Year)
Total electricity consumption (A)	252394	183002
Total fuel consumption (B)	272545	121565
Energy consumption through other sources (C)	158450	81431
Total energy consumption (A+B+C)	683388	385998
Energy intensity per rupee of turnover (Total energy consumption/turnover in Crores rupees)	146.34	101.13
Energy intensity (optional) – the relevant metric may be selected by the entity		

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

No independent assessment/evaluation/ assurance has been carried out.

- 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.

The organization does not have any sites identified as designated consumers under the PAT scheme.

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

Parameter	FY 21-22 (Current Financial Year)	FY 20-21 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	599684	986841
(iii) Third party water	1127364	224903
(iv) Seawater / desalinated water	0	0
(v) Others	0	0

Parameter	FY 21-22 (Current Financial Year)	FY 20-21 (Previous Financial Year)
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	1727048	1211744
Total volume of water consumption (in kilolitres)	1618601	1161958
Water intensity per rupee of turnover (Water consumed KL/ turnover Crores Rupees)	347	304
Water intensity (optional) – the relevant metric may be selected by the entity		

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

No evaluation or assessment has been carried out.

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

The organization has a mechanism for zero discharge. However, The organization practices zero discharge in most of the units.

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

Parameter	Please specify unit	FY 21-22 (Current Financial Year)	FY20-21 (Previous Financial Year)
NOx	kg	6755	266
SOx	kg	8650	126
Particulate matter (PM)	kg	5509	583
Persistent organic pollutants (POP)	No emissions	No emissions	No emissions
Volatile organic compounds (VOC)	No emissions	No emissions	No emissions
Hazardous air pollutants (HAP)	No emissions	No emissions	No emissions
Others – please specify	No emissions	No emissions	No emissions

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

No independent assessment/ evaluation/assurance has been carried out by an external agency.

The values have been estimated from the available information presently. The increase in the current year is due to the better capturing of the emission data.

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

Parameter	Unit	FY21-22 (Current Financial Year)	FY20-21 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	<i>Metric tonnes of CO₂ equivalent</i>	482837	342070
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	<i>Metric tonnes of CO₂ equivalent</i>	31588	37954
Total Scope 1 and Scope 2 emissions per Crores rupee of turnover		110.15	80.77
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity			

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

No Independent assessment has been carried out.

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

GAEL is committed to reducing carbon footprints and therefore contributing to a Green Environment, this journey is a continuous one. The Company is taking every possible step to contribute to a green environment through renewable energy resources, power-saving equipment, increasing plantation and thus making humble attempts to contribute to the cause. Various initiatives have been undertaken to install Biogas Engines; Biomass based Boilers and other energy-saving equipment at different Units/Plants of the Company. The Company commenced this activity way back in 2005 by installing wind turbines in the State of Gujarat.

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

Parameter	FY21-22 (Current Financial Year)	FY 20-21 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	21.2	25.2
E-waste (B)	1.1	0.1
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0.020	0.025
Battery waste (E)	0.2	0.8
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	4.8	22.1
Other Non-hazardous waste generated (H). Please specify, if any.	2446	6588
(Break-up by composition i.e. by materials relevant to the sector)	0	0
Total (A+B + C + D + E + F + G + H)	2472	6635
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	6.2	13.5
(ii) Re-used	0	0.6
(iii) Other recovery operations	0	0
Total	6.2	14.1
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations	4.3	0
Total	4.3	0

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No.

9. 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 organization is having a generation of waste i.e. ETP sludge, spent earth, soya danthal, mitti from soya seed, and coal ash from the boiler. The ETP sludge generated from ETP is being sold to approved agencies. Mitti from soya seeds are used in landfills and the same is being used in our agricultural land as fertilizer. Spent earth and coal ash are being sold for brick manufacturing and now the spent earth is used for its consumption in the boiler as fuel. Soya danthal is being used for its consumption at the boiler.

10. 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:

Sl. 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

The organization does not have any operations in ecologically sensitive areas.

11. 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 an independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Weblink
Nil	Nil	Nil	Nil	Nil	Nil

The organization does not have any projects where EAI has been required. Therefore, no EAI has been conducted.

12. 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:

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

There has been no noncompliance reported with respect to the law/ regulation.

PRINCIPLE 7

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

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.
 The organization maintains close associations with leading trade and industry chambers and associations. Presently there are 7 such associations with leading trade and industry chambers with whom the organization is associated.
- 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	Vidarbha Chambers of Commerce of Industry	State
2	Soybean processors association	National
3	Akola Industries Association	State
4	Kumaun Garwhal Chamber of Commerce and Industry	State
5	Sitarganj Sidcul Industries Welfare Association	State
6	All India Starch Manufacturer's Association	National
7	Soya Bean Processors Association	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
No issues were reported related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.		

PRINCIPLE 8

Businesses should promote inclusive growth and equitable development

Essential Indicators

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

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain(Yes / No)	Relevant Weblink
Nil	Nil	Nil	Nil	Nil	Nil

Presently there are no projects which require Social Impact Assessments. Therefore, no Social Impact Assessments have been undertaken by the organization.

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

Sl. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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Presently there are no projects which require Rehabilitation and resettlement. Therefore, no Rehabilitation and Resettlement (R&R) have being undertaken by the entity.

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

The organization receives grievances through written letters addressed to it, phone calls and also through emails. Contact details are displayed on the organization's websites, entrance gates and other communication channels through which the organization communicates to its stakeholders. . also. Depending upon the nature of the complaints and grievances, actions are taken by the department responsible for the complaint redressal.

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

	FY 21-22 Current Financial Year	FY 20-21 Previous Financial Year
Directly sourced from MSMEs/ small producers	75%	80%
Sourced directly from within the district and neighbouring districts	30%	40%

PRINCIPLE 9

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

Essential Indicators

- Describe the mechanisms in place to receive and respond to consumer complaints and feedback.
The organization are receiving complaints from distributor /customer via Marketing Person through WhatsApp messages or verbal communication. The complaints are verified by the QC personnel and verify the warehouse stock as per complaints. They carry out present stock analysis and submit reports to the Unit head as well as Department Head. Based on the report, the Unit head directs corrective action accordingly. The department concerned implements the corrective action and is allowed to despatch the next lot. The department concerned communicates with the distributor /customer and takes the feedback of it.
- Turnover of products and/ services as a percentage of turnover from all products/service that carry information about

	As a Percentage to the total Turnover
Environmental and social parameters relevant to the product,	Approximately 45% of total turnover
Safe and responsible usage	
recycling and/or safe disposal.	

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

	FY21-22 (Current Financial Year)		Remarks	FY20-21 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	ND	ND	ND	ND	ND	
Advertising	ND	ND	ND	ND	ND	
Cyber-security	ND	ND	ND	ND	ND	
Delivery of essential services	1	0	1	1	0	1
Restrictive Trade Practices	ND	ND	ND	ND	ND	
Unfair Trade Practices	ND	ND	ND	ND	ND	
Other	14	0	13	11	0	11

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

	No	Reasons for Recall
Voluntary recalls		
Forced recalls	4	Due to Poor Quality of Product & specification not match. (Chalisgaon)

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? If available, provide a web link to the policy. The organization does not have a cyber security policy or framework.

There is a policy available on cyber security. The organization maintains a policy on data privacy on its website. The organization takes adequate protection to maintain cyber security through firewalls, antiviruses and other technical and non-technical controls.

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 the safety of products/services.

The organization takes prompt action to correct the complaint. A detailed root cause analysis and corrective is undertaken to assess the situation and to ensure that it does not recur. Responsibilities are allocated to ensure its implementation

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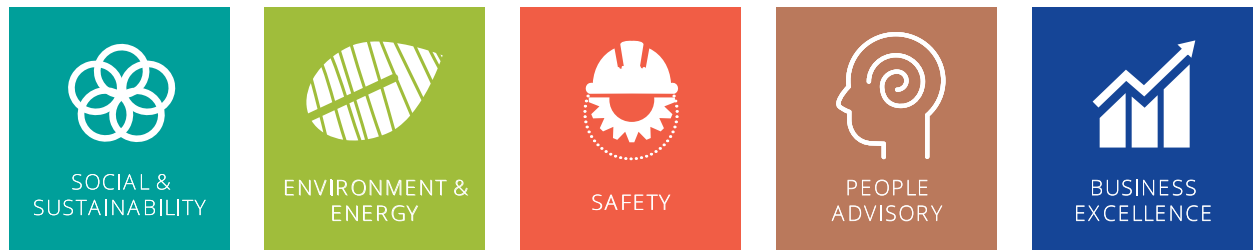
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