

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the listed entity	L24304HP2018PLC011898
2.	Name of the listed entity	Gujarat Fluorochemicals Limited
3.	Year of incorporation	2018
4.	Registered office address	Plot No. 1, Khasra Nos. 264 to 267, Industrial Area, Village: Basal, Una – 174 303, Himachal Pradesh
5.	Corporate address	Inox Towers, 17, Sector 16A, Noida – 201 301, Uttar Pradesh
6.	Email	<a href="mailto:bvdesai@gfl.co.in">bvdesai@gfl.co.in</a>
7.	Telephone	0265 6198 111
8.	Website	<a href="http://www.gfl.co.in">www.gfl.co.in</a>
9.	Financial year for which reporting is being done	1 <sup>st</sup> April 2024 to 31 <sup>st</sup> March 2025
10.	Name of the stock exchange(s) where shares are listed	BSE Limited National Stock Exchange of India Limited
11.	Paid-up capital	₹ 10,98,50,000
12.	Name and contact details (telephone, Email address) of the person who may be contacted in case of any queries on the BRSR report	Name of Responsible Person: Mr. Bhavin Desai Designation of Responsible Person: Company Secretary Email: <a href="mailto:bvdesai@gfl.co.in">bvdesai@gfl.co.in</a> Contact Number: 0265 6198 111
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)	The disclosures under this report are made on a Standalone basis.
14.	Name of assessment or assurance provider	Intertek India Private Limited
15.	Type of assessment or assurance obtained	BRSR Core Indicators: Reasonable Assurance

### 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	Manufacturing	Chemicals and chemical products, pharmaceuticals, medicinal chemicals, and botanical products	100%

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

S. no.	Product/Service	NIC code	% of total turnover contributed
1	Bulk Chemicals	20111	16.82%
2	Fluorochemicals	20111	26.86%
3	Polymers	20111	56.32%

### 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	3	2	5
International	0	0	0

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### 19. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (no. of states)	14
International (no. of countries)	13

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

58.35%

#### c. A brief on types of customers

At Gujarat Fluorochemicals Limited (also referred to as 'GFL' or 'the Company'), we serve as a strategic partner to leading sectors, encompassing Chemical Processing, Oil and Gas, and Automotive. We are also extending our influence into pioneering fields like 5G, Electric Vehicles (EVs), semiconductors, and the dynamic green hydrogen space.

## IV. Employees

### 20. Details as at the end of financial year

#### a. Employees and workers (including differently abled):

Sr. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	2,969	2,870	97	99	3
2.	Other than permanent (E)	82	67	82	15	18
3.	<b>Total employees (D + E)</b>	<b>3,051</b>	<b>2,937</b>	<b>96</b>	<b>114</b>	<b>4</b>
Workers						
4.	Permanent (F)	436	436	100	0	0
5.	Other than permanent (G)	3,521	3,452	98	69	2
6.	<b>Total workers (F + G)</b>	<b>3,957</b>	<b>3,888</b>	<b>98</b>	<b>69</b>	<b>2</b>

#### b. Differently abled employees and workers:

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

### 21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors	10	1	10
Key Management Personnel	2*	0	0

\*Key Management Personnel exclude Managing Director as he has been counted in Board of Directors.

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## 22. Turnover rate for permanent employees and workers

	FY 2024-25 (Turnover rate in current FY)			FY 2023-24 (Turnover rate in previous FY)			FY 2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	31%	41%	31%	17%	20%	17%	30%	40%	30%
Permanent workers	12%	0%	12%	12%	20%	12%	18%	0%	18%

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

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

Sr. no.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Inox Leasing and Finance Limited	Holding	52.61%	No
2	Gujarat Fluorochemicals Singapore Pte. Ltd.	Wholly owned subsidiary	100%	No
3	Gujarat Fluorochemicals Americas LLC	Wholly owned subsidiary	100%	No
4	Gujarat Fluorochemicals GmbH	Wholly owned subsidiary	100%	No
5	Swarnim Gujarat Fluorspar Private Limited*	Joint venture	49.47%	No
6	GFL GM Fluorspar SA	Step-down wholly owned subsidiary	100%	No
7	Gujarat Fluorochemicals FZE	Wholly owned subsidiary	100%	No
8	GFCL EV Products Limited	Subsidiary	96.87%	No
9	GFCL Solar and Green Hydrogen Products Limited	Wholly owned subsidiary	100%	No
10	IGREL Mahidad Limited	Associate	26.25%	No
11	GFCL EV Products Americas LLC	Step-down wholly owned subsidiary	100%	No
12	GFCL EV (SFZ) LLC (formerly GFCL EV (SFZ) SPC )	Step-down wholly owned subsidiary	100%	No
13	GFCL EV Products GmbH	Step-down wholly owned subsidiary	100%	No
14	GFCL EV Products Pte. Ltd.	Step-down wholly owned subsidiary	100%	No

\*As per the JV agreement, GFL will hold 25% of the total equity capital of Swarnim Gujarat Fluorspar Private Limited (SGFPL). In view of the fact that Gujarat Mineral Development Corporation Limited (GMDC) is yet to contribute its equity participation by way of its asset value, which is under review, the equity contribution by GFL has temporarily increased due to its subscription to additional equity in SGFPL.

## VI. CSR Details

## 24.

- Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)  
Yes, CSR is applicable as per section 135 of Companies Act, 2013.
- Turnover (in ₹): 4,564.55 Crores
- Net worth (in ₹): 6,463.87 Crores

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### VII. Transparency and disclosures compliances

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

Stakeholder group from whom complaint was received	Grievance redressal mechanism in place (Yes/No)  (If yes, then provide a weblink to the grievance redress policy)	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
		Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks	Number of complaints filed during the year	Number of complaints with pending resolution at the close of the year	Remarks
Communities	<a href="https://gfl.co.in/Our_People.php">https://gfl.co.in/Our_People.php</a>	0	0	None	0	0	None
Investors (other than shareholders)	<a href="https://gfl.co.in/Our_People.php">https://gfl.co.in/Our_People.php</a>	0	0	None	0	0	None
Shareholders	<a href="https://scores.sebi.gov.in/">https://scores.sebi.gov.in/</a> <a href="https://smartodr.in/intermediary/login">https://smartodr.in/intermediary/login</a>	9	0	It comprises the grievances of shareholders received through the Stock Exchanges and directly received by the Company.	10	0	It comprises the grievances of shareholders received through the Stock Exchanges and directly received by the Company.
Employees and workers	<a href="https://www.gfl.co.in/Our_People.php">https://www.gfl.co.in/Our_People.php</a>	2	0	None	10	0	None
Customers	<a href="https://gfl.co.in/Global_Presence.php">https://gfl.co.in/Global_Presence.php</a>	46	36	None	28	0	None
Value Chain Partners	<a href="https://gfl.co.in/Global_Presence.php">https://gfl.co.in/Global_Presence.php</a>	0	0	None	0	0	None
Other (please specify)	-	-	-	None	-	-	None

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

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

Sr. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
1	Climate risk	Risk	Climate risk affects operations, supply chain, and regulatory compliance. Mitigating risks aligns with regulations and enhances reputation.	We are expanding our renewable energy capacity and adopting circular economy practices to minimise operational disruptions and reduce costs.	Positive: Cost savings from reduced energy and water usage, and enhanced operational efficiency.



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Sr. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
2	Energy management	Risk	Dependence on energy supply and regulatory pressures impact operations.	We are investing in renewable energy sources like wind turbines and hybrid solutions to decrease reliance on fossil fuels and meet sustainability targets.	Positive: Long-term cost savings from reduced energy dependence, and potential revenue from renewable energy credits.
3	Occupational health and safety	Risk	Legal compliance, workforce morale, and productivity.	By integrating advanced technology and involving employees in safety initiatives, we aim to minimise the occurrence of workplace accidents and improve productivity.	Positive: Lower costs from reduced accidents, and enhanced workforce productivity.
4	Greenhouse gas emissions	Risk	Compliance with regulations, and environmental impact	Our installation of wind turbines and ongoing efforts in emission reduction technologies aim to mitigate issues related to our environmental footprint and ensure regulatory compliance.	Positive: Potential savings from carbon credits, and compliance with emissions regulations.
5	Air quality	Risk	Health impacts, and regulatory compliance.	We are implementing advanced emission control technologies to meet stringent air quality standards and enhance public health outcomes.	Positive: Reduced regulatory fines, and improved community health.
6	Water management	Risk	Regulatory compliance, and operational disruptions.	Through sustainable water sourcing and recycling initiatives, we are minimising risks associated with water scarcity and enhancing operational resilience.	Positive: Reduced water costs, and compliance with regulations.

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<b>Sr. no.</b>	<b>Material issue identified</b>	<b>Indicate whether risk or opportunity (R/O)</b>	<b>Rationale for identifying the risk/opportunity</b>	<b>In case of risk, approach to adapt or mitigate</b>	<b>Financial implications of the risk or opportunity (indicate positive or negative implications)</b>
7	Data privacy and security	Risk	Cybersecurity threats, and regulatory fines.	Investing in robust cybersecurity measures and compliance with data protection laws to safeguard sensitive information and maintain operational continuity.	Negative: Initial investment costs are incurred, but the Return on Investment (RoI) is positive due to risk reduction and improved regulatory compliance.
8	Materials management	Risk	Efficiency, waste reduction, and environmental impact.	Adopting circular economy practices to minimise waste and maximise resource recovery, and support our commitment to sustainable practices.	Positive: Lower waste disposal costs, and improved resource efficiency.
9	Sustainable supply chain	Risk	Ethical sourcing, resilience, and reputation.	Promoting sustainable procurement practices and transparency with suppliers to reduce risks and enhance our brand reputation.	Positive: Reduced supply chain disruptions, and improved stakeholder trust.
10	Product safety and quality	Risk	Compliance, and customer satisfaction.	Upholding stringent quality assurance standards to ensure product reliability and safety, thereby enhancing customer loyalty and satisfaction.	Positive: Reduced product recall risks, and enhanced customer trust.
11	Employment practices	Opportunity	Talent attraction, retention, and productivity.	Fostering an inclusive workplace with fair recruitment policies and continuous development programmes to attract and retain top talent.	Positive: Higher employee retention, and increased productivity.



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Sr. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (indicate positive or negative implications)
12	Chemical safety	Risk	Compliance, and workplace safety.	Strict adherence to safety protocols and regulations for chemical handling to minimise risks and ensure a safe working environment.	Positive: Decreased risks of accidents, and legal compliance.
13	Biodiversity and resource use	Opportunity	Conservation, and sustainability.	Investing in biodiversity conservation efforts and sustainable resource management practices to support environmental conservation goals.	Positive: Enhanced environmental sustainability, and community goodwill.
14	Customer health and safety	Risk	Compliance, and customer satisfaction.	Ensuring product safety and quality through rigorous testing, and compliance with safety standards to protect customer health and increase satisfaction.	Positive: Enhanced customer satisfaction, and reduced liability risks.
15	Human capital development	Opportunity	Workforce skills, innovation, and retention.	Investing in training and development initiatives to nurture talent, foster innovation, and enhance organisational resilience.	Positive: Improved workforce capabilities, and higher employee satisfaction.

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### 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.

Sr. no.	Disclosure questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	<b>Policy and management processes</b>									
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	Y	N	Y	Y	N	N	Y	N
	c. Weblink of the policies, if available	<a href="https://www.gfl.co.in/Company_Policies.php">https://www.gfl.co.in/Company_Policies.php</a>								
2	Whether the entity has translated the policy into procedures. (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y
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.	The organisation has received the following certificates:  1. ISO 9001, ISO 14001, ISO 45001, ISO 20400, ISO 26000, ISO 37001, and SA 8000  2. Authorised Economic Operator – T2 Certification  3. Certificate of compliance with Anti-Competitive and Anti-Trust principles based on the Competition Act, 2002, ISO 26000, and UNGC Principles								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	Our Net Zero Roadmap outlines clear commitments, goals, and timelines. We are targeting Net Zero emissions by 2050, with an accelerated aim to achieve Net Zero Scope 1 and 2 emissions by 2040.								
6	Performance of the entity against the specific commitments, goals and targets alongwith reasons in case the same are not met.	The performance of each principle undergoes periodic review by diverse committees chaired by the Company's management and Board of Directors.								
	<b>Governance, leadership and oversight</b>									
7	Statement by the director responsible for the business responsibility report, highlighting ESG-related challenges, targets and achievements.  We know that our success is closely tied to a sustainable future. Sustainability is not an option; it plays a pivotal role in the way we conduct our business. While shaping our strategy, we align with global sustainability frameworks and adopt principles such as the UN Global Compact and Responsible Care®.  We are committed to transparency and improvement and are involved with the leading global ESG disclosure organisations such as EcoVadis, CDP, and DJSI. Additionally, we are also members of the British Safety Council. We support India's big target for carbon neutrality by 2070. To contribute to achieving this goal, we are introducing new 'green' businesses such as battery chemicals, solar energy, green hydrogen, and fuel cells. These initiatives complement our existing Wind business under the INOXGFL Group and aim to drive a cleaner energy future.  Sustainability is embedded in the Company's values and principles and aligns well with the United Nations Sustainable Development Goals (UN SDGs). We are undertaking meaningful and decisive actions to create long-term value for our customers, employees, and communities through growth that includes everyone, and innovation that is intelligent and responsible.									



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	<p>Our ESG strategy rests on three vital pillars. We combat climate change and protect nature through smart resource and waste management. Our social commitment means fair business, safe workplaces, and community benefits. Furthermore, our strong governance, upheld by our Code of Conduct and Anti-Bribery System, ensures ethical decisions and full product life cycle responsibilities.</p> <p>Sustainability reflects a strategic choice that creates long-term value. We engage our stakeholders through awareness programs and actions that reduce our social and environmental footprint while promoting sustainable business practices. We also measure our impact across People, Planet, and Profit. Our ESG framework remains active and is continuously monitored for improvement.</p>																		
8	Details of the highest authority responsible for implementing and oversight the Business Responsibility policy(ies).	Dr. Bir Kapoor, Deputy Managing Director, in consultation with the Board of Directors and its Committees, bears responsibility for implementing and overseeing our Business Responsibility policies.																	
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, our Corporate Sustainability Steering Committee and Social Accountability, Regulatory, and Sustainability (SARS) Committee, spearheads all sustainability and climate initiatives. Chaired by the Deputy Managing Director and comprising members from diverse functions, its core mission is to align business objectives with our sustainability goals. The committee strategically manages key areas, including climate challenges, carbon emissions, circular water and waste management, biodiversity, health and safety, sustainable procurement, customer centricity, and employee and labour relations, integrating the triple bottom line into our corporate strategy to ensure ongoing success and a secure workplace.																	
10	<b>Details of Review of NGRBCs by the Company:</b>																		
	Subject for Review	Indicate whether the review was undertaken by Director/committee of the Board/any other committee									Frequency (annually/half-yearly/quarterly/any other – please specify)								
		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9
	Performance against the above policies and follow-up action	Yes									As a practice, the above policies of the Company are reviewed periodically or on a need basis by Senior Leadership Team, including the Managing Director and Chief Executive Officer. During this assessment, the efficacy of the policies is reviewed and necessary changes to policies and procedures are implemented.								
	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Yes									We are compliant with the relevant regulations as applicable.								

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11	Has the entity carried out an independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9
		Yes, we have carried out numerous independent assessments such as ISO 9001, ISO 14001, ISO 45001, ISO 20400, ISO 26000, ISO 37001, and SA 8000. The above-mentioned assessments were conducted by DQS India Private Limited, Intertek Certifications Limited and Bureau Veritas.								

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

[illegible]

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## SECTION C: PRINCIPLE-WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorised as 'Essential' and 'Leadership'. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

**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 programme
Board of Directors	4	1. Behavior, Leadership, Soft-Skills, Self-Development 2. Corporate Policy Training 3. Corporate Sustainability 4. HR Knowledge 5. Information Technology 6. Legal, Secretarial, Compliance 7. Safety, Health and Environment	1. Behavior, Leadership, Soft-Skills, Self-Development: 33% 2. Corporate Policy Training: 67% 3. Corporate Sustainability: 33% 4. HR Knowledge: 33% 5. Information Technology: 33% 6. Legal, Secretarial, Compliance: 33% 7. Safety, Health and Environment: 33%
Key Managerial Personnel	3	1. Behavior, Leadership, Soft-Skills, Self-Development 2. Corporate Policy Training 3. Information Technology 4. Legal, Secretarial, Compliance	1. Behavior, Leadership, Soft-Skills, Self-Development: 67% 2. Corporate Policy Training: 100% 3. Information Technology: 67% 4. Legal, Secretarial, Compliance: 67%
Employees other than BoD & KMPs	3,045	1. Health and Safety Measures 2. Skill Upgradation 3. Human Rights	1. Health and Safety Measures: 89% 2. Skill Upgradation: 99% 3. Human Rights: 38%
Workers	3,957	1. Health and Safety Measures 2. Skill Upgradation 3. Human Rights	1. Health and Safety Measures: 97% 2. Skill Upgradation: 14% 3. Human Rights: 12%

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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 Requirements) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (In ₹)	Brief of the case	Has an appeal been preferred (Yes/No)
Penalty /Fine	NA	BSE Limited and National Stock Exchange of India Limited	₹ 2,89,100 each	A notice was received for non-compliance of Regulation 17(1) of Listing Regulations for the quarter ended 31 <sup>st</sup> December 2024 for Composition of Board of Directors on 18 <sup>th</sup> March 2025.	No
		Assistant Commissioner, CGST & Central Excise Division - VII, Bharuch, Vadodara – II	₹ 14,868	Penalty for wrongly availed and utilised CENVAT Credit on outdoor catering service u/s 11A(4) of Central Excise Act, 1944.	No
		BSE Limited and National Stock Exchange of India Limited	₹ 5,31,000 each	Notice received for non-compliance of Regulation 17(1) of Listing Regulations for the quarter ended 31 <sup>st</sup> March 2025 for Composition of Board of Directors on 29 <sup>th</sup> May 2025.	No
		Commissioner of Customs Import Air Cargo Complex Sahar, Andheri	₹ 2,309	Penalty for misclassification and availment of customs duty, SWS and IGST for goods imported under wrong classification of HSN code.	No
		Assistant Commissioner, Central GST and Central Excise, Vadodara	₹ 1,13,08,480	The Company paid GST on Royalty at 12% while filing GST-3B returns, based on Notification No. 10/2017 dated 28 <sup>th</sup> June 2017, believing this was the correct rate until August 2022. Later, during an internal review, the Company found that Notification No. 06/2021 dated 30 <sup>th</sup> September 2021 had increased the GST rate to 18% for these transactions, effective immediately. The Company then made a provision for the extra 6% tax from 1 <sup>st</sup> September 2022 and paid the difference along with interest on 15 <sup>th</sup> October 2022. However, despite this self-correction, the tax department issued an order on 13 <sup>th</sup> May 2025, imposing a penalty for the short payment of GST.	Yes
		Commissioner of Customs (Adjudication), Mumbai	₹19,50,00,000	An appealable order is passed by the office of the Commissioner of Customs, Mumbai demanding duty of ₹ 30,46,87,136/- with applicable interest and penalty equivalent to the duty amount and fine of ₹ 19,50,00,000 under the Customs Act, 1962. As per the judgement of the honorable Supreme Court dated 28 <sup>th</sup> April 2023 on the said issue, the assessee is entitled to take Input Tax Credit for duty paid. Further, on the basis of our assessment, we believe that the consequential demand for penalty and fine is not sustainable. The Company is in the process of preferring an appeal against the said demand before the appellate authority.	Yes
Settlement	-	-	-	-	-
Compounding Fee	-	-	-	-	-

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	Non-monetary			
	NGRBC Principle	Name of the regulatory/ reinforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred (Yes/No)
Imprisonment	Nil			
Punishment				

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
Nil	Nil

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 maintain a strict policy to prevent corruption and bribery among employees and third parties. We remain committed to conducting business with integrity and complying with applicable laws and regulations, including the Indian Prevention of Corruption Act, 1988, and other anti-bribery and anti-corruption laws. Our approach aligns with the UN Global Compact principles, ISO 26000, and the National Voluntary Guidelines on Social, Environmental, and Economic Responsibilities. We continue to focus on improving these practices. For more details, please visit our website: <https://gfl.co.in/upload/pages/7653e03350050ff9e3b2d5f057207d86.pdf>.

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

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

	FY 2024-25 (Current Financial Year)		FY 2023-24 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0	None	0	None
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	None	0	None

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.

NA.

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Number of days of accounts payable	67.40	70.59

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### 9. Open-ness of business

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

Parameter	Metrics	FY 2024-25 (Current Financial Year)	FY 2023-24* (Previous Financial Year)
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	7%	7%
	b. Number of dealers/distributors to whom sales are made	5	5
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	100%	100%
Share of RPTs in	a. Purchases (Purchases with related parties/Total purchases)	6.04%	9.97%
	b. Sales (Sales to related parties/Total sales)	27.20%	24.00%
	c. Loans & advances (Loans & advances given to related parties/Total loans and advances)	100%	100%
	d. Investments (Investments in related parties/Total investments made)	10%	100%

**\*Restatement:** We have re-stated the values of Sales to top 10 dealers/distributors as % of total sales to dealers/distributors based on the BRSR guidance.

### Leadership Indicators

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

Total no of awareness campaign held	Topics/Principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
1	Principle 3: Contract Labor at Chemical Plant Safety Awareness Training Module (Worker & Supervisor)	67%

#### 2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/ No) If Yes, provide details of the same.

Yes, at the end of every financial year, all Directors and Senior Management Personnel affirm compliance with our Code of Conduct. We present this affirmation to the Board at its first meeting of the new financial year and disclose it in the Annual Report to meet regulatory requirements and inform investors. Additionally, all new employees must also affirm their compliance with the Code upon joining.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

**PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe****Essential Indicators**

- 1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

	<b>FY 2024-25 (Current Financial Year)</b>	<b>FY 2023-24 (Previous Financial Year)</b>	<b>Details of improvements in environmental and social impacts</b>
R&D	During the previous year, we were in the process of monitoring R&D expenses and capital investments aimed at enhancing the environmental and social impacts of our products and processes.		
Capex			

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

Yes, we have robust procedures in place for sustainable sourcing. These are guided by our Sustainable Procurement Policy and Code of Conduct, which dictate how we conduct business with suppliers, vendors, and third parties. Furthermore, we are certified with ISO 20400:2017 Sustainable Procurement Guidelines, underscoring our commitment to integrity in all partnerships.

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

17%.

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

As a manufacturing company involved in B2B operations, we have established comprehensive processes to safely reclaim our products for reusing, recycling, and disposing them of at the end of their lives. For plastic packaging, we comply with the Plastic Waste Management Rules set by the Ministry of Environment, Forest, and Climate Change (MoEFCC), Government of India. Similarly, we adhere to the e-waste Management Rules and other hazardous waste regulations.

For hazardous waste, we ensure disposal through authorised recyclers and reprocessors only. We follow a strict regulatory procedure, generating manifests on the regulatory authorities' online hazardous waste disposal system and transporting the waste exclusively through authorised transporters. Although we did not reclaim any products in the last fiscal year, our commitment to environmental compliance and safety remains firm.

- 4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

Yes, the Company is in compliance with the requirements of Extended Producer Responsibility (EPR)\* under the Plastic Waste Management Rules, 2016 (as amended).

**Leadership Indicators**

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

<b>NIC Code</b>	<b>Name of Product/Service</b>	<b>% of total turnover contributed</b>	<b>Boundary for which the Life Cycle Perspective/Assessment was conducted</b>	<b>Whether conducted by an independent external agency (Yes/No)</b>	<b>Results communicated in the public domain (Yes/No) If yes, provide the weblink</b>
20111	PTFE	26	Cradel to gate	Yes	No
20111	FKM	12	Cradel to gate	Yes	No
20111	PVDF	1	Cradel to gate	Yes	No
20111	PFA	11	Cradel to gate	Yes	No
20111	4-(Trifluoromethyl)benzyl alcohol	0	Cradel to gate	Yes	No
20111	2-bromo-5-fluorobenzotrifluoride	2	Cradel to gate	Yes	No

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

Name of the product/service	Description of the risk/concern	Action taken
Nil	Nil	Nil

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or reused input material to total material	
	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
	Nil	

We follow a responsible waste management approach that aligns with the directives of the Gujarat Pollution Control Board (GPCB) and applicable laws. Our dedication to sustainable waste management transcends internal operations, seeking to mitigate environmental impact by promoting mindful recycling and repurposing initiatives to close the waste loop.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Reused	Recycle	Safely Disposed	Reused	Recycle	Safely Disposed
Plastics (including packaging)				NA		
E-waste				NA		
Hazardous waste				NA		
Others - Bio-medical waste				NA		
Others - Construction and demolition waste				NA		
Others - Battery waste				NA		
Others - Radioactive waste				NA		
Other Non-hazardous waste				NA		
<b>Total</b>				<b>NA</b>		

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

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



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

**PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains****Essential Indicators****1. a. Details of measures for the well-being of employees:**

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	2,870	2,870	100	2,870	100	0	0	2,870	100	0	0
Female	99	99	100	99	100	99	100	0	0	0	0
Total	2,969	2,969	100	2,969	100	99	3	2,870	97	0	0
Other than permanent employees											
Male	67	67	100	67	100	0	0	67	100	0	0
Female	15	15	100	15	100	15	100	0	0	0	0
Total	82	82	100	82	100	15	18	67	82	0	0

**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	436	436	100	436	100	0	0	436	100	0	0
Female	0	0	0	0	0	0	0	0	0	0	0
Total	436	436	100	436	100	0	0	436	100	0	0
Other than permanent workers											
Male	3,452	0	0	3,452	100	0	0	0	0	0	0
Female	69	0	0	69	100	0	0	0	0	0	0
Total	3,521	0	0	3,521	100	0	0	0	0	0	0

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

	<b>FY 2024-25</b> <b>(Current Financial Year)</b>	<b>FY 2023-24</b> <b>(Previous Financial Year)</b>
Cost incurred on well- being measures as a % of total revenue of the Company	0.18%	0.17%*

**\*Restatement:** The financial figures for the period FY 2023-24 have been restated to improve accuracy and clarity in reporting following the guidelines set forth in SEBI's circular dated December 20, 2024, which outlines Industry Standards Forum guidance for BRSR Core. Spending on measures towards well-being of employees and workers disclosed in BRSR for the year FY 2023-24 was 0.51%.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

Benefits	FY 2024-25 (Current Financial Year)			FY 2023-24 (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 authority (Y/N/NA)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with authority (Y/N/NA)
PF	100	100	Y	100	100	Y
Gratuity	100	100	Y	100	100	Y
ESI	0.08	0	Y	0	0	Y
Others – please specify	-	-	-	-	-	-

### 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.

We recognise that our facility may not currently meet the specified requirements. Nevertheless, we have proactively initiated measures to rectify the situation. Presently, we are conducting a thorough and constructive evaluation of the requirements, actively seeking solutions to enhance our facility's readiness to meet elevated standards.

### 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, GFL is dedicated to the principle of Equal Employment Opportunity. This commitment is ingrained in the Company's mission to be an 'Employer of Choice,' reflected in all HR policies and procedures, which uphold non-discriminatory practices and ensure equal opportunities for all employees. In alignment with this commitment, all employees are encouraged to treat their colleagues with fairness, mutual respect, and without harassment, regardless of hierarchical levels.

Click here to access the policy: <https://gfl.co.in/upload/pages/bbd4be48d14dfaf570c78fe0450b96b0.pdf>.

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

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	98%	98%	0%	0%
Female	100%	100%	0%	0%
Total	98%	98%	0%	0%

There are no female permanent workers; hence, it is marked as not applicable.

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

	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent workers	Grievance Handling Platform: <ol style="list-style-type: none"> <li>HR Buddy</li> <li>Ethics Line</li> <li>Suggestion Box</li> <li>PHRRO</li> <li>Guideline HR/42 – Grievance Procedure for Employees and Contractors</li> </ol>

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

	Yes/No (If Yes, then give details of the mechanism in brief)
Other than permanent workers	Grievance Handling Platform: 1. Suggestion Box 2. Works Committee 3. SPT Committee 4. Guideline HR/42 – Grievance Procedure for Employees and Contractors
Permanent employees	Grievance Handling Platform: 1. HR Buddy 2. Ethics Line 3. Suggestion Box 4. PHRRO 5. Guideline HR/42 – Grievance Procedure for Employees and Contractors
Other than permanent employees	Grievance Handling Platform: 1. Suggestion Box 2. SPT Committee 3. Works Committee 4. Guideline HR/42 – Grievance Procedure for Employees and Contractors

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total employees/ workers in the respective category (A)	No. of employees/ workers in the respective category who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in the respective category (C)	No. of employees/ workers in the respective category who are part of association(s) or union (D)	% (D/ C)
<b>Total permanent employees</b>	<b>2,969</b>	<b>0</b>	<b>0</b>	<b>1,805</b>	<b>0</b>	<b>0</b>
Male	2,870	0	0	1,722	0	0
Female	99	0	0	83	0	0
<b>Total permanent workers</b>	<b>436</b>	<b>0</b>	<b>0</b>	<b>1,437</b>	<b>0</b>	<b>0</b>
Male	436	0	0	1,437	0	0
Female	0	0	0	0	0	0

None of our permanent employees or permanent workers are part of a union.

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

Category	FY 2024-25 (Current Financial Year)					FY 2023-24 (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	2,870	2,577	90	2,846	99	1,805	1,698	94	1,577	87
Female	99	59	60	99	100	90	88	98	81	90
Total	2,969	2636	89	2,945	99	1,895	1,786	94	1,658	87

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Category	FY 2024-25 (Current Financial Year)					FY 2023-24 (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)
Workers										
Male	3,888	3,769	97	554	14	6,186	4,627	75	5,305	86
Female	69	54	78	0	0	107	102	95	106	99
Total	3,957	3,823	97	554	14	6,293	4,729	75	5,411	86

Workers include permanent and other than permanent category.

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24* (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	2,870	2,610	91	1,805	1,022	57
Female	99	91	92	90	38	42
<b>Total</b>	<b>2,969</b>	<b>2,701</b>	<b>91</b>	<b>1,895</b>	<b>1,060</b>	<b>56</b>
<b>Workers</b>						
Male	3,888	436	11	6,186	1,024	17
Female	69	0	0	107	0	0
<b>Total</b>	<b>3,957</b>	<b>436</b>	<b>11</b>	<b>6,293</b>	<b>1,024</b>	<b>16</b>

\*New joiners in the second half of the assessment year (after 30<sup>th</sup> September, 2024) are not eligible for performance and career development reviews.

### 10. Health and safety management system:

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

Yes, we have established a comprehensive Occupational Health and Safety Management System, driven by our top management's commitment to a foster safe and healthy workplace. Our approach is proactive and inclusive, involving every level of the organisation to build a robust safety culture.

Our system integrates meticulously crafted policies, standards, procedures, and practices aimed at identifying and addressing workplace hazards, promoting overall employee well-being, and ensuring stricter adherence to applicable health and safety regulations. We also involve representatives of our contract workmen at every stage, reinforcing our focus on a safe, supportive environment.

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

We have a systematic approach to identify work-related hazards and assess associated risks on both routine and non-routine activities. The processes we adopted include regular workplace inspections to identify potential hazards and conducting risk assessments to evaluate the likelihood and potential consequences of these hazards and defining control measures for mitigation. We use tools such as PHA (e.g., HAZOP), Job Safety Analysis (JSA), Hazard Identification and Risk Assessment (HIRA), Qualitative Risk Assessment (QRA) and Safety Audits of work areas. We have a Permit to Work (PTW) system established for all non-routine activities. We conduct a preliminary JSA along with the workmen involved in the activity prior to issuance of the permit.

We encourage employees to report any safety concerns or near misses, ensuring that all incidents are promptly investigated to identify root causes and implement corrective actions. Additionally, we conduct safety audits through trained GFL employees and external experts periodically to monitor compliance with safety protocols. We use incident data and trend analysis to address emerging risks proactively. Any non-like-for-like modification is routed through the Management of Change (MoC) process and implemented only after a successful Pre-Startup Safety Review.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

Yes, we have implemented robust processes that encourage and empower our employees and workers to report work-related hazards and take necessary actions to mitigate potential risks. Also, we have a Non-Retaliation Policy in place which empowers workmen to report any safety-related violation at the workplace fearlessly. Additionally, we foster a strong safety culture built on open communication and proactive risk identification. Monthly safety communication sessions and ongoing awareness initiatives help reinforce this commitment. Every individual is encouraged to take ownership of workplace safety.

Employees receive training and are urged to report unsafe acts, conditions, or near misses. They can do so through several channels, including a dedicated digital platform, workplace safety committees, and direct communication with supervisors. To maintain transparency and accountability, we monitor both leading indicators (such as unsafe acts and near misses) and lagging indicators (such as incidents, ill health, and injuries). All reported hazards are tracked and addressed systematically.

Hazard identification is carried out through a combination of structured approaches, including routine safety observations, Contractor Field Safety Audits, and Plant Monthly Safety Involvement activities. These initiatives allow us to systematically uncover risks and address them before they escalate into incidents.

We are also dedicated to creating a workplace where safety is a shared responsibility. Clear guidelines and support mechanisms are in place to ensure that employees feel empowered to escalate safety concerns and, when necessary, remove themselves from potentially dangerous situations without fear of reprisal. We believe that cultivating a proactive hazard-reporting culture is essential for safeguarding the health, safety, and well-being of all members of our workforce.

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

Yes, we go beyond occupational requirements to ensure comprehensive access to medical and health services for our employees and workers. We prioritise their well-being through regular pre-employment and periodic health check-ups (employees' family members were encouraged to participate) for both employees and contractual staff. Additionally, we organise gynaecological, dental, and general health camps, conduct blood donation drives, and provide first aid training programs, empowering our workforce with essential life-saving skills.

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

Safety Incident/Number	Category*	FY 2024-25 (Current Financial Year)	FY 2023-24** (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one Million person-hours worked)	Employees	0.73	0.90
	Workers	0.78	0.54
Total recordable work-related injuries	Employees	18	15
	Workers	25	37
No. of fatalities	Employees	1	0
	Workers	4	0
High-consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

\*Including in the contractual workforce

\*\* **Restatement:** We have re-stated the values of Total recordable work-related injuries based on the BRSR guidance.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

To guarantee a safe and healthy workplace, we have undertaken the following steps:

- **Occupational Health and Safety Management System:** We have a robust system in place to identify, assess, and mitigate workplace hazards. Our policies and procedures ensure a safe work environment and compliance with health and safety regulations.
- **Hazard Identification and Risk Assessment (HIRA):** We regularly inspect and assess risks to identify potential hazards. This helps us implement control measures to minimise or eliminate threats to employee safety.
- **Training and Education:** We provide comprehensive training on occupational health and safety practices, including safe work procedures, proper equipment usage, emergency response, and hazard recognition.
- **Incident Reporting and Investigation:** We encourage prompt reporting of incidents, near misses, and hazards. Our reporting system ensures timely investigations, root cause identification, and corrective actions to prevent recurrence.
- **Emergency Preparedness and Response:** We have emergency response plans and conduct regular drills to prepare for fires, medical emergencies, and natural disasters. These exercises ensure our team is ready to respond effectively.
- **Health and Wellness Programmes:** We promote health and wellness through screenings, wellness programmes, and ergonomic assessments. We support healthy lifestyles and provide resources for physical and mental well-being.
- **Safety Committees and Worker Involvement:** We engage employees in safety initiatives through committees, feedback mechanisms, and inspections. This involvement fosters a sense of ownership and accountability for workplace safety.
- **Regular Monitoring and Review:** We regularly monitor and review our safety performance to assess the effectiveness of our measures and identify areas for improvement. We proactively address emerging safety risks.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Working conditions	0	0	None	0	0	None
Health and safety	0	0	None	0	0	None

### 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

\*Assessment were done by a third party.

### 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.

NA

### Leadership Indicators

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

(A) Employees - Y

(B) Workers - Y

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Yes, the organisation has taken measures to safeguard the well-being and security of our esteemed employees and workers. We have enacted a comprehensive and resilient Group Accident Insurance Policy, meticulously crafted to provide financial protection and assistance in the event of any employee's or worker's unfortunate demise.

**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 adherence to statutory regulations, we have implemented a rigorous system where we ensure the following measures are in place:

**1. Supplier Payment Obligations**

All suppliers must settle their statutory dues as per the terms and conditions outlined in each purchase order.

**2. Supplier Onboarding Requirements**

New suppliers are required to submit signed and stamped copies of the 'GFL Terms & Conditions' and 'GFL Policy' before their registration can be completed.

**3. Sustainable Procurement Policy**

All employees, suppliers, vendors, and service providers must comply with all applicable laws. In case of any legal breaches by suppliers, vendors, or service providers, we reserve the right to terminate the contract with immediate effect without prior notice or a notice period. If a breach causes legal litigation or financial liability for the Company, the responsible parties must indemnify GFL against any such liability.

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

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25 (Current Financial Year)	FY 2023-24* (Previous Financial Year)	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Employees	1	0	0	0
Workers	4	0	0	0

**\*Restatement:** We have re-stated the total no. of affected employees / workers based on BRSR guidance.

**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)**

Retiring employees selected for transition are supported by extending their service or engaging them in special assignments on a contractual basis.

**5. Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	NA
Working conditions	

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

Through a thorough sustainable procurement audit, we identified potential risks and concerns in some suppliers' practices. Responsible suppliers took prompt corrective actions, in line with our sustainability objectives. We also promoted transparent communication by providing detailed feedback to the respective suppliers on the identified issues. Notably, no significant risks or major concerns have been identified to date, underscoring the effectiveness of our proactive procurement approach.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

### 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.

A diverse array of stakeholders, spanning individuals both within and beyond GFL have been recognised. These groups hold significant influence, directly shaping our operations and activities. These stakeholders include:

- Employees
- Shareholders
- Customers
- Communities
- Suppliers
- Strategic Partners
- Vendors
- Government or Regulatory Bodies

#### 2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice Board, website, Other)	Frequency of engagement (annually/half yearly/quarterly/others – please specify)	Purpose and scope of engagement, including key topics and concerns raised during such engagement
Shareholders and Investors	No	<ol style="list-style-type: none"> <li>Company's website</li> <li>Quarterly publication of results followed by earnings call</li> <li>Periodic analysts' briefing and individual discussions between fund managers and the management team</li> <li>Annual General Meeting (AGM)</li> <li>Press conferences</li> <li>Stock exchange announcements</li> </ol>	Ongoing	We engage with shareholders and investors to communicate financial performance, business risk management, foray into new markets, optimisation of operational costs, corporate governance, ethics and values, energy efficiency, renewable energy, stock performance, and dividends.
Employees	No	<ol style="list-style-type: none"> <li>Senior leaders' communication/talks/forum</li> <li>Training and performance management through HR forums</li> <li>Performance appraisal meetings/reviews</li> <li>Wellness initiatives</li> <li>Engagement surveys</li> <li>Group discussions</li> <li>Employee engagement events</li> <li>Email communication</li> <li>Employee satisfaction surveys</li> </ol>	Ongoing	We are dedicated to ensuring the safety and job security of our employees. Their well-being is our priority, and we are committed to fostering a positive, transparent, and inclusive work environment. Through ongoing capability development and skill enhancement programs, we offer abundant opportunities for career advancement within the organisation.



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Stakeholder Group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice Board, website, Other)	Frequency of engagement (annually/half yearly/quarterly/others – please specify)	Purpose and scope of engagement, including key topics and concerns raised during such engagement
Customers	No	<ol style="list-style-type: none"> <li>1. Website's periodic market research</li> <li>2. Customer meets</li> <li>3. Customer visits, audits and meetings</li> <li>4. Conferences</li> <li>5. Trade fair</li> <li>6. Customer satisfaction surveys</li> </ol>	Ongoing	We uphold the highest standards of safety and data privacy. We are deeply committed to ethical business practices, providing environmentally friendly products and solutions, and consistently delivering high-quality goods and services that meet and exceed our customers' expectations.
Suppliers and Vendors	No	<ol style="list-style-type: none"> <li>1. Supplier development initiatives</li> <li>2. Online and offline workshops</li> <li>3. Annual suppliers' meet (online and offline)</li> <li>4. Supplier feedback surveys</li> <li>5. Onboarding process</li> </ol>	Ongoing	We are focused on expanding our reach into new markets while maintaining fair margins and driving revenue growth. We place great value on long-term partnerships and prioritise resource efficiency in our relationships with suppliers and vendors.
Government and Regulators	No	<ol style="list-style-type: none"> <li>1. Meetings</li> <li>2. Presentations and networking at different forums</li> <li>3. Regular checks</li> <li>4. Annual and quarterly compliance reports</li> <li>5. Press conferences and media events</li> <li>6. Published articles and newsletters</li> <li>7. Online meetings and interviews</li> </ol>	Ongoing	We are dedicated to ensuring timely compliance with all laws and regulations while maintaining transparency and openness in our operations. We strictly follow environmental laws, make prompt payments of dues and taxes, and actively support government initiatives to contribute positively to regulatory bodies and programmes.
Communities and NGOs	No	<ol style="list-style-type: none"> <li>1. Interactions during implementation of CSR projects</li> <li>2. Interacting with local community</li> <li>3. Representatives public hearings</li> <li>4. Community development newsletter</li> </ol>	Ongoing	We collaborate with communities and NGOs to generate livelihoods and introduce innovative technologies and smart solutions. We also work to reduce our environmental footprint, support community development, and preserve culture and heritage for a sustainable future.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

### Leadership Indicators

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

We actively promote engagement with our stakeholders and the Board, seeking their valuable input on key economic, environmental, and social matters. We also maintain a strong Ethics Line policy that provides clear guidelines and channels for stakeholders to voice grievances or raise concerns, fostering a culture of transparency, accountability, and ethical conduct.

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

Yes. We are committed to working closely with all stakeholders, recognising their essential role in our business. We engage with them regularly to gather constructive input on key matters, including social impact, environmental concerns, and human rights. These interactions help us assess environmental and social issues, as reflected in our employee engagement activities and investor meetings.

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

We consider our communities vital stakeholders and engage with them closely to tailor our Corporate Social Responsibility (CSR) programmes to their needs. These targeted initiatives aim to create social impact, support disadvantaged groups, and ensure effective use of CSR funds. Our key focus areas include medical care, education, and women's empowerment, alongside several other community initiatives.



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

## PRINCIPLE 5: Businesses should provide goods and services in a manner that is sustainable and safe

## Essential Indicators

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

Category	FY 2024-25 (Current Financial Year)			FY 2023-24 (Previous Financial Year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	2,969	1,147	39	1,805	586	32
Other than permanent	82	16	20	90	3	3
<b>Total employees</b>	<b>3,051</b>	<b>1,163</b>	<b>38</b>	<b>1,895</b>	<b>589</b>	<b>31</b>
<b>Workers</b>						
Permanent	436	53	12	1,437	0	0
Other than permanent	3,521	634	18	4,856	2,993	62
<b>Total workers</b>	<b>3,957</b>	<b>687</b>	<b>17</b>	<b>6,293</b>	<b>2,993</b>	<b>48</b>

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

Category	2024-25 (Current Financial Year)					2023-24 (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	2,969	14	0.5	2,955	99.5	1,805	0	0	1,805	100
Male	2,870	14	0.5	2,856	99.5	1,722	0	0	1,722	100
Female	99	0	0.0	99	100	83	0	0	83	100
Other than permanent	82	1	1.2	81	98.8	90	0	0	90	100
Male	67	1	1.5	66	98.5	83	0	0	83	100
Female	15	0	0.0	15	100	7	0	0	7	100
Workers										
Permanent	436	0	0	436	100	1,437	17	1	1,420	99
Male	436	0	0	436	100	1,437	17	1	1,420	99
Female	0	0	0	0	0	0	0	0	0	0
Other than permanent	3,521	1	0	11	92	4,856	4,856	100	0	0
Male	3,452	1	0	5	0	4,749	4,749	100	0	0
Female	69	0	0	6	9	107	107	100	0	0

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

## a. 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)	4	2,67,03,250	0	0
Key Managerial Personnel	2	88,96,350	0	0
Employees other than BoD and KMP	3,045	6,40,000	114	6,74,450
Workers	436	5,92,902	6	3,00,000

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Gross wages paid to females as % of total wages	3%	3%

### 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. We have instituted pivotal committees within our organisation to oversee crucial facets of our operations. These encompass the ICC (related to POSH) and Ethics Committee for human rights, the WEDC for women's empowerment and development, and the SARCC for corporate social accountability.

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

We have put in place a robust system to uphold integrity and transparency across our organisation. Our 'Ethics Line' online portal empowers employees to report unethical behaviour anonymously, ensuring their voices are heard without fear. The Ethics Officer is committed to thoroughly investigating these reports and keeping whistleblowers informed of the progress.

For added convenience, stakeholders can also send grievances directly to our dedicated Email address, [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in), which is prominently featured on our website. To further support anonymous feedback, suggestion boxes are strategically placed at our sites, providing an additional channel for employees and workers to raise concerns confidentially.

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

	FY 2024-25 (Current Financial Year)			FY 2023-24 (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	0	0	None	0	0	None
Discrimination at workplace	0	0	None	0	0	None
Child labour	0	0	None	0	0	None
Forced labour or involuntary labour	0	0	None	0	0	None
Wages	0	0	None	0	0	None
Other human rights-related issues	1	0	None	0	0	None

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees and workers	Nil	Nil
Complaints on POSH upheld	Nil	Nil

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

Our organisation places a high priority on safeguarding the identity of the complainant, as outlined in our Whistleblower Policy and the Prevention of Sexual Harassment (POSH) Policy. All reported matters are treated with the utmost confidentiality. Furthermore, our Code of Conduct unequivocally prohibits any form of retaliation against individuals who report legitimate concerns. Any individuals found engaging in retaliatory actions will face disciplinary measures.

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

Yes, We prioritise human rights in all our business agreements and contracts. At GFL, we take proactive measures by conducting awareness sessions to ensure that our vendors and suppliers fully comprehend and adhere to human rights standards.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

## 10. Assessments for the year:

	% of your plants and offices that were assessed (by the entity or statutory authorities or third parties)
Child labour	100
Forced or involuntary labour	100
Sexual harassment	100
Discrimination at workplace	100
Wages	100
Others – please specify	100

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

NA

## Leadership Indicators

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

We did not receive any grievances or complaints regarding human rights issues. Therefore, no modifications or introductions to business processes were required.

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

It ensures adherence to the human rights policy through internal and external assessment methods, including self-assessment questionnaires, announced and unannounced on-site audits of independent suppliers, vendors, and service providers, as well as employee and workplace wellness surveys.

## 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?

We acknowledge that our facility continues to progress towards fully meeting all specified requirements; however, we have made significant advancements in addressing critical accessibility needs. In particular, we have established a dedicated, fixed parking facility at our Vadodara office exclusively for employees with disabilities. This initiative reflects our unwavering commitment to creating an inclusive and supportive work environment that prioritizes the comfort, convenience, and dignity of all our team members.

Our management team has conducted a thorough and ongoing review to identify additional opportunities for enhancing accessibility. This process includes careful evaluation, active stakeholder engagement, and the implementation of practical, innovative measures designed to meet and surpass applicable regulatory standards.

We remain firmly committed to continuous improvement, striving not only to comply with accessibility requirements but also to set a benchmark for excellence in employee welfare and inclusivity across our organization.

## 4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	Nil
Discrimination at workplace	Nil
Child labour	Nil
Forced labour or involuntary labour	Nil
Wages	Nil
Others – please specify	Nil

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

NA

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

#### Essential Indicators

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>From renewable sources (in GJ)</b>		
Total electricity consumption (A)	8,63,183	2,58,863
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
<b>Total energy consumed from renewable sources (A + B + C)</b>	<b>8,63,183</b>	<b>2,58,863</b>
<b>From non-renewable sources (in GJ)</b>		
Total electricity consumption (D)	19,95,044	29,18,103
Total fuel consumption (E)	75,41,725	63,70,680
Energy consumption through other sources (F)	0	0
<b>Total energy consumed from non-renewable sources (D + E + F)</b>	<b>95,36,769</b>	<b>92,88,783</b>
<b>Total energy consumed (A + B + C + D + E + F)</b>	<b>1,03,99,952</b>	<b>95,47,646</b>
<b>Energy intensity per ₹ of turnover</b> (Total energy consumption/Revenue from operations)	0.000227	0.000237
<b>Energy intensity per ₹ of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed/Revenue from operations adjusted for PPP)	0.0047	0.0049
<b>Energy intensity in terms of physical output</b>	17.34	13.55
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

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

Yes, Reasonably assured by Intertek India Private Limited.

#### 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.

We participate in the PAT Scheme under the 'Chlor Alkali Sector' of the Government of India, underscoring our firm dedication to energy efficiency. Our achievements include earning 437 E-Certificates in PAT Cycle 1 and 336 E-Certificates in PAT Cycle 2. Currently, we are actively engaged in PAT Cycle 3, which has been completed as on 31<sup>st</sup> March, 2025.

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third party water	48,12,903	47,54,388
(iv) Seawater/desalinated water	0	0
(v) Others	0	0
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>48,12,903</b>	<b>47,54,388</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>36,89,375</b>	<b>37,47,364*</b>
<b>Water intensity per ₹ of turnover</b> (Water consumed/Revenue from operations)	0.000081	0.000093



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water intensity per ₹ of turnover adjusted for Purchasing Power Parity (PPP)</b>	0.001670	0.00192
(Total water consumption/Revenue from operations adjusted for PPP)		
<b>Water intensity in terms of physical output</b>	6.15	5.32
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	NA	NA

**\*Restatement:** We have re-classified water withdrawal from Surface to Third-party based on guidance provided by GRI 303-3 and BRSR. We have re-stated quantity of water consumption based on guidance provided by GRI 303-5 and BRSR.

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

Yes, Reasonably assured by Intertek India Private Limited.

## 4. Provide the following details related to water discharged:

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 * (Previous Financial Year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
No treatment	0	0
With treatment – please specify level of treatment	0	0
(ii) To Groundwater		
No treatment	0	0
With treatment – please specify level of treatment	0	0
(iii) To Seawater		
No treatment	0	0
With treatment – please specify level of treatment – primary, secondary and tertiary	8,83,092	8,15,464
(iv) Sent to third-parties	0	0
No treatment	0	0
With treatment – please specify level of treatment – primary and tertiary	2,40,436	19,15,600
(v) Others		
No treatment	0	0
With treatment – please specify level of treatment	0	0
<b>Total water discharged (in kilolitres)</b>	<b>11,23,528</b>	<b>27,31,064</b>

**\*Restatement:** We have re-categorized the water discharge destination, previously discharge to Seawater was reported, and it has been re-categorized to Seawater and Third-party based on the guidance provided in GRI 303-4 and BRSR.

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

Yes, Reasonably assured by Intertek India Private Limited.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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

Yes, our Ranjitnagar unit has implemented the Zero Liquid Discharge (ZLD). The unit has installed a Multi Effect Evaporator (MEE) and Reverse Osmosis (RO) system as part of the tertiary treatment, and all the water is being recycled and used for plantation activity within the premises.

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

Parameter	Please specify unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
NOx	MT/Year	98	86
SOx	MT/Year	86	162
Particulate Matter (PM)	MT/Year	74	40
Persistent Organic Pollutants (POP)	NA	NA	NA
Volatile Organic Compounds (VOC)	NA	NA	NA
Hazardous Air Pollutants (HAP)	NA	NA	NA
Others – please specify	NA	NA	NA

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

Yes, Limited assured by Intertek India Private Limited.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	7,09,492	5,78,904
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	4,02,888	5,80,379
<b>Total Scope 1 and Scope 2 emission intensity per ₹ of turnover</b> (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	MTCO <sub>2</sub> e/₹	0.000024	0.0000288
<b>Total Scope 1 and Scope 2 emission intensity per ₹ of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)	MTCO <sub>2</sub> e/₹ adjusted for PPP	0.000503	0.000595
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	MTCO <sub>2</sub> e/MT of product	1.85	1.65
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	NA	NA	NA

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

Yes, Reasonably assured by Intertek India Private Limited.

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

Yes, We have launched several projects to reduce Greenhouse Gas (GHG) emissions, with a clear goal to achieve Net Zero by 2050. To support this ambition, strong measures have been taken to conserve energy and optimise resource use across our plants, thereby lowering emissions. Key actions include:



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

- At the S&A plant, two cooling water pumps were upgraded to energy-efficient models, saving 184.8 MW. Similarly, at the DPTFE utility, optimising chiller operations by installing a new 130 TR unit alongside an existing 170 TR chiller resulted in an annual power savings of 83.426 MW.
- The TFE 3 LP cooling tower was revamped with trickle flow fills, boosting its efficiency by 10%. The TFE 1 cooling tower's changeover to TFE augment cooling saves 1,641 kW daily, equating to 51 Lakhs annually. At the CA plant, cleaning the VAM chiller tubes increased its load capacity from 250 TR to 450 TR, improving performance. In the CPP, de-stagging boiler feed pump No. 3 saves 900 kWh daily, and boiler operation optimisation yields 0.22 MWh auxiliary power savings. The FI plant reduced power consumption by optimising fume extraction and stopping idle pump operation, saving 237.6 MW annually.
- To utilise alternate energy sources, we increased our share of imported power through renewables in FY 2024-25.
- A significant capital investment was made at the CA plant, where replacing the electrolyser's anode, cathode mesh, and membrane resulted in a substantial power saving of 7,280 MW per annum.
- At GFL Dahej-A, we successfully developed and commercialised two grades of fully fluorinated perfluoro elastomers (FFKM), FFR35PC and FFR75PC, improving equipment reliability and reducing energy losses. We are also developing a new FFKM formulation for extremely high-temperature applications (-10°C to 300°C), with improved compression set resistance. In parallel, we are working on specialised FFKM grades for stringent semiconductor applications to enhance yield and equipment efficiency.

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

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 * (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	302	330
E-waste (B)	1.84	12
Bio-medical waste (C)	0.02	0.013
Construction and demolition waste (D)	0	0
Battery waste (E)	16.5	10
Radioactive waste (F)	0	0
Other hazardous waste – please specify, if any (G)	85,822	68,679
Other Non-hazardous waste generated (H) – please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	3,305	29,115
<b>Total (A + B + C + D + E + F + G + H)</b>	<b>89,447</b>	<b>98,146</b>
<b>Waste intensity per ₹ of turnover</b> (Total waste generated/Revenue from operations)	0.0000019	0.00000244
<b>Waste intensity per ₹ of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated/Revenue from operations adjusted for PPP)	0.000040	0.000050
<b>Waste intensity in terms of physical output</b>	0.15	0.14
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity	NA	NA
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	4,949.6	2,017
(ii) Re-used	80,934.7	86,460
(iii) Other recovery operations	0	7,149
<b>Total</b>	<b>85,884.3</b>	<b>95,626</b>

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 * (Previous Financial Year)
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	0.11	7
(ii) Landfilling	3,562.87	2,527
(iii) Other disposal operations	0	0
<b>Total</b>	<b>3,563</b>	<b>2,534</b>

**\*Restatement:** We have re-stated the quantity of Biomedical waste (BMW) due to measurement error, wherein the quantity was recorded in Kilograms however, it was reported as Metric tonnes.

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

Yes, Reasonably assured by Intertek India Private Limited.

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

We specialise in producing chemicals, refrigerants, and fluorospeciality chemicals. We have implemented an integrated waste management system in accordance with the Hazardous Waste Management, Handling, and Transboundary Movement Rules. Embracing the principles of the circular economy, our efforts prioritise recycling, reusing, reprocessing, and recovering waste materials.

- 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.
1	Ranjitnagar	Manufacturing	No
2	Dahej - A	Manufacturing	Yes
3	Jolva	Manufacturing	No

- 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 an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
We did not undertake any environmental impact assessments of projects in FY 2024-25.					

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

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 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
1	Air (Prevention and Control of Pollution) Act, 1981	An accident at the Dahej Plant resulted in a fine from the GPCB, in line with regulatory enforcement within the large-scale industrial sector.	₹ 1 Crore as interim environment damage compensation to the GPCB.	Compliance Report submitted to the Directorate of Industrial Safety and GPCB. Both agencies have given permission for restarting the operation after review and submission of details.

## Leadership Indicators

1. **Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):**

For each facility/plant located in areas of water stress, provide the following information:

- Name of the area : All our facilities are located in safe zones as classified by the Central Ground Water Authority (CGWA)
- Nature of operations : NA
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third-party water	NA	NA
(iv) Seawater/Desalinated water	NA	NA
(v) Others	NA	NA
<b>Total volume of water withdrawal (in kilolitres)</b>	NA	NA
<b>Total volume of water consumption (in kilolitres)</b>	NA	NA
<b>Water intensity per ₹ of turnover</b> (Water consumed/turnover)	NA	NA
<b>Water intensity</b> (optional) – the entity may select the relevant metric	NA	NA
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
<b>(i) Into surface water</b>		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
<b>(ii) Into groundwater</b>		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
<b>(iii) Into seawater</b>		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
<b>(iv) Sent to third parties</b>		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Parameter	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
<b>(v) Others</b>		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
<b>Total water discharged (in kilolitres)</b>	NA	NA

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

We have not conducted any independent assessment, evaluation, or assurance by an external agency.

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

Parameter	Unit	FY 2024-25 (Current Financial Year)	FY 2023-24* (Previous Financial Year)
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	33,38,033	4,21,535
<b>Total Scope 3 emissions per ₹ of turnover</b>	Metric tonnes of CO <sub>2</sub> equivalent/₹ turnover	0.000073	0.000010
<b>Total Scope 3 emission intensity</b> (optional) – the entity may select the relevant metric	Metric tonnes of CO <sub>2</sub> equivalent/MT of product	5.57	0.60

**\*Restatement:** We have re-stated the values of Scope 3 emission intensity.

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

Yes, limited assured by Intertek India Private Limited.

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

We recognise our duty to operate responsibly in ecologically sensitive areas. During FY 2024-25, we did not observe any notable direct or indirect impact on biodiversity in these regions. As a result, no remedial or corrective actions were required.

### 4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions/effluent discharge/waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. no.	Initiative undertaken	Details of the initiative (weblink, if any, may be provided along with summary)	Outcome of the initiative
1	Waste Optimisation Initiatives at Dahej Site <ul style="list-style-type: none"> <li>Moisture Removal from Waste</li> <li>Hazardous Waste Packaging Optimisation</li> </ul>	<ul style="list-style-type: none"> <li>A dedicated drive was launched on the shop floor at Dahej Site to remove excess moisture from waste materials</li> <li>The packaging for numerous hazardous waste containers was converted from heavy PPCP drums to lighter-weight jumbo bags</li> </ul>	<ul style="list-style-type: none"> <li>It directly minimized the overall weight and volume of the waste, leading to more efficient handling and disposal</li> <li>This change resulted in a direct reduction in disposal weight, decreased plastic packaging material, and lowered transportation costs</li> </ul>

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

Sr. no.	Initiative undertaken	Details of the initiative (weblink, if any, may be provided along with summary)	Outcome of the initiative
2	Strategic Waste Segregation System Design	A new system was designed for strategic waste segregation, which involved categorising waste based on its Calorific Value and Chloride Content	This systematic categorisation enabled the redirection of specific waste streams to specialised pre-processors, facilitating their recycling and energy recovery
3	BALZ Process Optimization for Effluent Treatment	At the Ranjitnagar Plant, the BALZ process was optimized for treating 24 KLD (Kiloliters per Day) of effluent on-site	This upgrade resulted in the recovery of 16 KLD of water for reuse within the plant, eliminated incineration costs, and achieved a quick payback period of three months

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

Yes, we operate with a comprehensive Business Continuity and On-site Emergency Plan. This plan, shared with employees, the public, and government authorities, details our emergency action strategies for various accident scenarios, from minor internal incidents to major incidents requiring external assistance. Its core objectives are to safeguard lives within the facility and surrounding communities, contain hazards, minimise environmental impact, and reduce plant and production losses

**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.**

There were no significant adverse environmental impacts from the value chain in FY 2024-25.

**7. Percentage of Value Chain Partners (by value of business done with such partners) that were assessed for environmental impacts.**

We have assessed 66% of our value chain partners for environmental and social impacts.

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

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

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

**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.

21

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

Sr. no.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	Federation of Gujarat Industries	National
2	UNGC - United Nations Global Compact	International
3	British Safety Council	International
4	Indian Chemical Council and the IMC Chamber of Commerce and Industry	National
5	Corporate Membership of Asian Polymer Association (APA)	National
6	Life Membership of Asian Polymer Association (APA)	National
7	Asian Polymer Association Executive Committee Membership	National
8	Baroda Management Association	National
9	Federation of Indian Chamber of Commerce and Industry	National
10	Alkali Manufacturers Association of India	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		

### Leadership Indicators

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

Sr. no.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of review by board (annually/ half-yearly/ quarterly/others – please specify)	Weblink, if available
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We lead with foresight and actively engage in shaping industry standards, offering thought-provoking insights on regulatory advancements within the chemical sector. Our commitment is to balance diverse stakeholder interests and foster harmony among varying perspectives. Although we have not championed any public policy positions this financial year, our proactive stance ensures that we remain at the forefront of industry evolution.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

**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 the project	SIA notification no.	Date of notification	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No)	Relevant weblink
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No projects were mandated to undergo assessment for their social impact during the current financial year under any statutory obligation.

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

Sr. no.	Name of the project for which R&R is ongoing	State	District	No. of Project-Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (in ₹)
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Our core activities involve chemical manufacturing. As such, any projects we undertake are not subject to the provisions of the Rehabilitation and Resettlement (R&R) Act, 2013.

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

At GFL, we are committed to fostering strong community relationships through both proactive engagement and a dedicated grievance redressal process. Our CSR Department plays a crucial role in managing community concerns. Our team receive both written and verbal feedback, conducting thorough field visits and investigations to understand issues, and working diligently to achieve timely and appropriate resolutions. Every concern is meticulously recorded and tracked until it is officially closed, ensuring accountability and transparency.

Beyond addressing grievances, GFL actively invests in community development initiatives. Throughout the year, we organize numerous informal and formal sessions to encourage interaction and collaboration. We employ a targeted approach to engage with diverse community segments, including youth, women, and community leaders, ensuring a wide range of voices are heard.

To further empower our stakeholders, we have established several effective platforms for feedback and concern reporting. Any stakeholder, including community members, who encounters a potential violation of laws or company policies can directly report their concerns to our Ethics Line at [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in). This robust mechanism ensures that all breaches are promptly addressed and rectified, reinforcing our commitment to ethical conduct and accountability.

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

	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Directly sourced from MSMEs/small producers	4.44%	3.87%
Sourced directly from within India	21.52%	37.79%

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

Location	FY 2024-25 (Current Financial Year)	FY 2023-24 (Previous Financial Year)
Rural	28%	31%
Semi-Urban	48%	46%
Urban	22%	15%
Metropolitan	2%	5%

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

### Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
NA	

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

Sr. no.	State	Aspirational district	Amount spent (in ₹)
1.	Gujarat	Panchmahal	2.30 Crores

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

Currently, we do not have a preferential procurement policy that prioritises suppliers from marginalised or vulnerable groups. However, we plan to review this in the future and implement it after receiving management approval.

- (b) From which marginalized/vulnerable groups do you procure?

Currently, we do not procure from any marginalised or vulnerable groups.

- (c) What percentage of total procurement (by value) does it constitute?

NA

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Sr. no.	Intellectual property based on traditional knowledge	Owned/Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
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Throughout the financial year, we have not shared any intellectual properties, nor have we derived any benefits from intellectual properties based on traditional knowledge.

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

Name of authority	Brief of the Case	Corrective action taken
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We prioritise protecting intellectual rights and properties. Consequently, during the financial year, we did not receive any adverse orders from regulatory authorities regarding intellectual property disputes.

6. Details of beneficiaries of CSR Projects:

Sr. no.	CSR project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalised groups
1	Education	23,269	100
2	Sustainable Livelihood	531	100
3	Women's Empowerment	105	100
4	Sustainable Agriculture Development	2,339	95
5	Animal Husbandry	1,695	95
6	Human Health	8,664	98
7	Water Management	16,692	92
8	Public Amenities and Social Infrastructure	22,014	93
9	Plantation and Forestry	4,500	95
10	Community WASH	1,845	100
11	Sustainable Development Goal Day Celebration	530	100



## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

**PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner****Essential Indicators****1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

We have established a robust mechanism to address customer complaints efficiently. Customers may raise queries, grievances, or escalations through emails, phone calls, or direct messages to our sales managers. We prioritise prompt resolution, aiming to close complaints within 48 hours to avoid further loss. We also conduct a root cause analysis within 5 working days to identify underlying issues. Based on this, we implement corrective measures within 30 days of receiving the complaint, ensuring swift and effective resolution process.

**2. Turnover of products and/services as a percentage of turnover from all products/services that carry information about:**

	As a percentage of total turnover
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	100%

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

	FY 2024-25 (Current Financial Year)		Remarks	FY 2023-24 (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	0	0	None	0	0	None
Advertising	0	0	None	0	0	None
Cybersecurity	0	0	None	0	0	None
Delivery of essential services	0	0	None	0	0	None
Restrictive trade practices	0	0	None	0	0	None
Unfair trade practices	0	0	None	0	0	None
Other	46	36	None	18	0	None

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

	Number	Reasons for recall
Voluntary recalls	0	None
Forced recalls	0	None

**5. Does the entity have a framework/policy on cybersecurity and risks related to data privacy?**

**(Yes/No).** If available, provide a weblink to the policy.

Yes. We have established a framework/policy to address cybersecurity and data privacy risks.

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

In our persistent pursuit of excellence and accountability, we have instituted a series of proactive measures across critical operational domains:

**Advertising:** We have elevated our review processes to uphold the highest regulatory standards and foster transparency with our customers. Our enhanced protocols involve meticulous vetting and frequent audits, ensuring that our communications remain clear and accurate.

**Cybersecurity and Data Privacy:** We have strengthened our defences with robust Data Privacy policies, extensive employee training, and state-of-the-art security measures. Regular audits further bolster our efforts, allowing us to swiftly identify and address potential vulnerabilities, thereby ensuring the utmost protection for our data.

## BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (CONTD.)

**Product Recalls:** To prevent future issues, we implement rigorous corrective actions, including detailed root cause analyses and refined testing protocols. Our commitment to continuous improvement drives us to refine our processes, ensuring that every product meets the highest standards of quality and safety.

### 7. Provide the following information relating to data breaches:

- Number of instances of data breaches along with impact: 0
- Percentage of data breaches involving personally identifiable information of customers: NA
- Impact, if any, of the data breaches: NA

### Leadership Indicators

#### 1. Channels/Platforms where information on products and services of the entity can be accessed (provide weblink, if available).

The information about our products and services can be accessed at:

- [www.gfl.co.in](http://www.gfl.co.in)
- [www.inoflon.com](http://www.inoflon.com)
- [www.fluonox.co.in](http://www.fluonox.co.in)
- [www.gflamericas.com](http://www.gflamericas.com)

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

We are dedicated to keeping our customers well-informed about the health and safety aspects of our products. As a responsible manufacturer, we provide relevant safety and handling information through Technical Data Sheets (TDS) and Safety Data Sheets (SDS). We also conduct regular awareness sessions to educate consumers on the safe and responsible use of our products and services.

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

Currently, our ability to educate and inform end users about the risks of disruptions or discontinuation of essential services is somewhat limited. Consequently, we do not have a dedicated mechanism for this purpose. However, when critical communication, such as notifying users of any discontinuation of essential services or products, is necessary, we ensure it is effectively managed through direct mail or our established distribution network.

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

Yes, our packaging is meticulously designed to deliver a comprehensive array of crucial information, including product names, ingredients, nutritional facts, and usage instructions. We also highlight essential warnings and precautions to ensure our customers are fully informed and safe.

While we did not conduct customer satisfaction surveys for our primary products or services this financial year, our commitment to upholding the highest standards of quality and ensuring customer satisfaction remains firm. Through these efforts, we continually strive to excel in every facet of our business operations, reflecting our dedication to exceptional service and product excellence.



## Independent Reasonable Assurance Statement to Gujarat Fluorochemicals Limited on their Business Responsibility & Sustainability Report (BRSR) FY2025 - Core Disclosures

To the Management of  
Gujarat Fluorochemicals Limited

### Introduction

Intertek India Private Limited ("Intertek") was engaged by Gujarat Fluorochemicals Limited (hereinafter 'GFL') to provide an independent Reasonable Assurance on its consolidated BRSR (Business Responsibility & Sustainability Report) core disclosures for FY2025 as part of their Integrated Annual Report ("the Report"). The scope of the Report comprises the reporting periods of FY2025. The Report is prepared by GFL based on SEBI's (Securities and Exchange Board of India) BRSR guidelines. The assurance was performed in accordance with the requirements of International Federation of Accountants (IFAC) International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

### Objective

The objectives of this reasonable assurance exercise were, by review of objective evidence, to confirm whether the sustainability related disclosures in the report are in alignment with Business Responsibility and Sustainability Report (BRSR) requirements, laid down by SEBI and were accurate, complete, consistent, transparent and free of material errors or omission in accordance with the criteria outlined below.

### Intended Users

This Assurance Statement is intended to be a part of the Integrated Annual Report of GFL.

### Responsibilities

The management of GFL is solely responsible for the development of the Report and its presentation. Management is also responsible for the design, implementation and maintenance of internal controls relevant to the preparation of the Report so that it is free from material misstatement, whether due to fraud or error.

Intertek's responsibility, as agreed with the management of GFL, is to provide assurance and express an opinion on the data and assertions in the Report based on our verification following the assurance scope and criteria given below. Intertek does not accept or assume any responsibility for any other purpose or to any other person or organization. This document represents Intertek's independent and balanced opinion on the content and accuracy of the information and data held within.

### Assurance Scope

The assurance has been provided for selected sustainability performance disclosures as per BRSR core disclosures with reference to Business Responsibility and Sustainability Reporting by listed entities as per SEBI Master Circular no. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, presented by GFL in its Report. The assurance boundary included data and information of GFL. Our scope of assurance included verification of internal control systems, data and information on core disclosures reported as summarized in the table below:

#### BRSR-Core Disclosures

Principle	Indicator Reference	Attribute	Parameters
Principle 6	E7	Green-house gas (GHG) footprint	i. Total Scope 1 emissions (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCS, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) ii. Total Scope 2 emissions (Break-up of the GHG (CO <sub>2</sub> e) into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCS, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) iii. GHG Emission Intensity (Scope 1+2)
Principle 6	E3 & E4	Water footprint	i. Total water consumption ii. Water consumption intensity iii. Water Discharge by destination and levels of Treatment
Principle 6	E1	Energy footprint	i. Total Energy Consumed % of energy consumed from renewable sources ii. Energy intensity



Principle 6	E9	Circularity - Waste management	<ul style="list-style-type: none"> <li>i. Plastic waste (A)</li> <li>ii. E-waste (B)</li> <li>iii. Bio-medical waste (C)</li> <li>iv. Construction and demolition waste (D)</li> <li>v. Battery waste (E)</li> <li>vi. Radioactive waste (F)</li> <li>vii. Other Hazardous waste. Please specify, if any. (G)</li> <li>viii. Other Non-hazardous waste generated (H)</li> <li>ix. Total waste generated (A+B+C+D+E+F+G+H)</li> <li>x. Waste intensity per rupee of turnover adjusted for PPP</li> <li>xi. Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations</li> <li>xii. Each category of waste generated, total waste disposed by disposal method</li> </ul>
Principle 3	E1(c) & E11	Employee well-being & safety	<ul style="list-style-type: none"> <li>i. Spending on measures towards well-being of employees as % of total revenue</li> <li>ii. Details of safety-related incidents for employees and workers (including contract workers)</li> </ul>
Principle 5	E3(b) & E7	Gender diversity in business	<ul style="list-style-type: none"> <li>i. Gross wages paid to females as a % of wages paid</li> <li>ii. Total Complaints on Sexual Harassment (POSH) reported</li> </ul>
Principle 8	E4 & E5	Inclusive development	<ul style="list-style-type: none"> <li>i. Input material sourced from MSMEs or small producers and from within India as % of total purchases</li> <li>ii. Job creation in smaller towns</li> <li>iii. Wages paid to people employed in smaller towns (permanent/non-permanent/contract) as % of total wage cost</li> </ul>
Principle 9	E7 & Principle 1-E8	Customer & supplier engagement	<ul style="list-style-type: none"> <li>i. Instances involving customer data loss or breach as % of total cyber events</li> <li>ii. Number of days of accounts payable</li> </ul>
Principle 1	E9	Business openness	<ul style="list-style-type: none"> <li>i. Concentration of purchases &amp; sales with trading houses, dealers, and related parties</li> <li>ii. Loans, advances, and investments with related parties</li> </ul>

#### Assurance Criteria

Intertek conducted the assurance work in accordance with requirements of 'Reasonable Assurance' procedures as per the following standard:

- International Standard on Assurance Engagements (ISAE) 3000 (revised) for 'Assurance Engagements other than Audits or Reviews of Historical Financial Information'.
- International Standard on Assurance Engagements (ISAE) 3410 for 'Assurance Engagements on Greenhouse Gas Statement

A reasonable assurance engagement involved assessing the risks of material misstatement of the agreed indicators/parameters whether due to fraud or error, responding to the assessed risks as necessary in the circumstances. A materiality threshold level of 5% was applied.

#### Limitations

We have relied on the information, documents, records, data, and explanations provided to us by GFL for the purpose of our review.

The assurance scope excludes:

- Any disclosures beyond those specified in the Scope section above.
- Data and information falling outside the defined reporting period.
- Data pertaining to the Company's financial performance, strategy, and associated linkages articulated in the Report.
- Assertions made by the Company encompassing expressions of opinion, belief, aspiration, expectation, forward-looking statements, and claims related to Intellectual Property Rights and other competitive issues.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls.

The procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within software/IT systems.

#### Methodology

Intertek performed assurance work using risk-based approach to obtain the information, explanations and evidence that was considered necessary to provide a reasonable level of assurance. The assurance was conducted by desk reviews, visit to GFL sites and stakeholder interviews with regards to the reporting and supporting records for the FY2025. Our assurance task was planned and carried out during July to Aug 2025. The assessment included the following:

- Review of the Report that was prepared in accordance with the SEBI's BRSR guidelines.
- Review of processes and systems used to gather and consolidate data.





- Examined and reviewed documents, data and other information made available at a selected GFL's operational site and digitally.
- Conducted physical interviews with key personnel responsible for data management at a selected GFL's site in July to Aug 2025.
- Assessment of appropriateness of various assumptions, estimations and thresholds used by GFL for data analysis.
- Review of BRSR core disclosures for the duration from 1 April 2024 for 31 March 2025 was carried out onsite at a selected business location.
- Appropriate documentary evidence was obtained to support our conclusions on the information and data reviewed and details would be provided in a separate management report.

#### Conclusions

Intertek reviewed BRSR core disclosures provided by GFL in its consolidated Business Responsibility and Sustainability Report (BRSR). Based on the procedures performed as above, evidences obtained and the information and explanations given to us along with the representation provided by the management and subject to inherent limitations outlined elsewhere in this report, in our opinion, GFL's data and information on BRSR core disclosures for the period of 1 April 2024 for 31 March 2025 included in the Report, is, in all material respects, in accordance with the SEBI's BRSR guidelines.

#### Intertek's Competence and Independence

Intertek is a global provider of assurance services with a presence in more than 100 countries employing approximately 43,500 people. The Intertek assurance team included competent sustainability assurance professionals, who were not involved in the collection and collation of any data except for this assurance opinion. Intertek maintains complete impartiality towards any people interviewed.

For Intertek India Pvt. Ltd.

**Pulak Mishra**  
Intertek-Verifier  
2025/08/29

**Shilpa Naryal**  
Head of Sustainability Intertek  
South Asia & MENAP  
2025/08/29

**SANDEEP  
VIG**

Digitally signed by  
SANDEEP VIG  
Date: 2025.09.01  
17:28:01 +05'30'

**Sandeep Vig**  
Director-Business Assurance  
Intertek India & MENAP

*No member of the verification team (stated above) has a business relationship with GFL's stakeholders beyond that is required of this assignment. No form of bribe has been accepted before, throughout and after performing the verification. The verification team has not been intimidated to agree to do this work, change and/or alter the results of the verification. The verification team has not participated in any form of nepotism, self-dealing and/or tampering. If any concerns or conflicts were identified, appropriate mitigation measures were put in place, documented and presented with the final report. The process followed during the verification is based on the principles of impartiality, evidence, fair presentation and documentation. The documentation received and reviewed supports the conclusion reached and stated in this opinion.*

