

GFCL: BRD: 2026

27th August, 2026

The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai 400 001

The Secretary
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex
Bandra (E), Mumbai 400 051

Scrip Code: 542812

Symbol: FLUOROCHEM

Dear Sir/Madam,

Sub: Business Responsibility and Sustainability Report for the Financial Year 2025-26

Ref.: Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), please find enclosed herewith the Business Responsibility and Sustainability Report of the Company for the Financial Year 2025-26.

The Business Responsibility and Sustainability Report is an integral part of the Integrated Annual Report 2025-26 which can also be accessed at the Company's website www.gfl.co.in.

We request you to kindly take the same on record.

Thanking you.

Yours faithfully,
For Gujarat Fluorochemicals Limited

Bhavin Desai
Company Secretary
FCS 7952

Encl.: As above

BUSINESS RESPONSIBILITY & 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	E-mail	bvdesai@gfl.co.in
7	Telephone	0265 6198 111
8	Website	www.gfl.co.in
9	Financial year for which reporting is being done	1 st April 2025 to 31 st March 2026
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: Compliance Officer and Company Secretary Email: bvdesai@gfl.co.in 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 assurance provider	Intertek India Private Limited
15	Type of 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	Polymer	20111	61.42%
2	Fluorochemicals	20111	24.14%
3	Bulk Chemicals	20111	14.44%

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)	50

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

56.90%

c. A brief on types of customers

Gujarat Fluorochemicals Limited ("GFL" or "the Company") serves diversified global customer base comprising automotive and EV manufacturers, semiconductor and electronics manufacturers, refrigeration OEMs, pharmaceutical and agrochemical companies, chemical processors, and renewable energy businesses across Asia, Europe and the Americas.

IV. Employees

20. Details as at the end of financial year:

a. Employees and Workers (including differently abled):

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	1,788	1,679	94%	109	6%
2.	Other than permanent (E)	47	36	77%	11	23%
3.	Total employees (D + E)	1,835	1,715	93%	120	7%
Workers						
4.	Permanent (F)	1,354	1,353	99.93%	1	0.07%
5.	Other than permanent (G)	3,123	3,059	97.95%	64	2.05%
6.	Total workers (F + G)	4,477	4,412	98.55%	65	1.45%

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)	1	1	100%	0	0%
2.	Other than permanent (E)	0	0	0%	0	0%
3.	Total differently abled employees (D + E)	1	1	100%	0	0%
Differently abled workers						
4.	Permanent (F)	1	1	100%	0	0%
5.	Other than permanent (G)	0	0	0%	0	0%
6.	Total differently abled workers (F + G)	1	1	100%	0	0%

21. Participation/Inclusion/Representation of women

	Total (A)	No. and percentage of females	
		No. (B)	% (B/A)
Board of Directors	9	1	11%
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 2025-26 (Turnover rate in current financial year)			FY 2024-25 (Turnover rate in previous financial year)			FY 2023-24 (Turnover rate in the year prior to the previous financial year)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	26%	26%	26%	31%	41%	31%	17%	20%	17%
Permanent workers	18%	0%	18%	12%	0%	12%	12%	20%	12%

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

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

S r. 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	96.89%	No
9	GFCL Solar and Green Hydrogen Products Limited	Wholly owned subsidiary	100%	No
10	Flurry Wind Energy Private Limited	Associate	26%	No
11	IGREL Mahidad Limited	Associate	26.25%	No
12	GFCL EV Products Americas LLC	Step-down wholly owned subsidiary	100%	No
13	GFCL EV (SFZ) LLC	Step-down subsidiary	76%	No
14	GFCL EV Products GmbH	Step-down wholly owned subsidiary	100%	No
15	GFCL EV Products Pte. Ltd.	Step-down wholly owned subsidiary	100%	No
16	GFCL EV Advanced Materials (SFZ) LLC	Step-down subsidiary	99.70%	No

*As per the Joint Venture Agreement, the Company is required to hold 25% of the total equity share capital of Swarnim Gujarat Fluorspar Private Limited ("SGFPL"). However, Gujarat Mineral Development Corporation Limited is yet to contribute its equity participation through the transfer of assets, the valuation of which is currently under review. Consequently, the Company's equity holding has increased on account of its subscription to additional equity shares in SGFPL.

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VI. CSR Details

24.

- Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes
- Turnover (in ₹): ₹4,541.59 Crores
- Net worth (in ₹): ₹ 6,984.39 Crores

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)	FY 2025-26 (Current financial year)			FY 2024-25 (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	Yes, https://gfl.co.in/Our_People.php	0	0	None	0	0	None
Investors (other than shareholders)	Yes, https://gfl.co.in/Our_People.php	0	0	None	0	0	None
Shareholders	Yes, https://scores.sebi.gov.in/ https://smartodr.in/intermediary/login	11	0	It comprises the grievances of shareholders received through the Stock Exchanges and directly received by the Company.	9	0	It comprises the grievances of shareholders received through the Stock Exchanges and directly received by the Company.
Employees and workers	Yes, https://gfl.co.in/Our_People.php	40	5	None	2	0	None
Customers	Yes, https://gfl.co.in/Our_People.php	35	3	None	46	36	None
Value chain partners	Yes, https://gfl.co.in/Global_Presence.php	0	0	None	0	0	None
Other (please specify)	-	-	-	None	-	-	None

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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, and approach to adapt or mitigate the risk along with its financial implications, as per the following format

Sr. No.	Material issue identified	Risk / Opportunity	Rationale for identifying the risk / opportunity	Approach to manage / mitigate	Financial implications of the risk / opportunity
1	Climate Change (GHG Emissions)	Risk	Climate change presents risks through evolving regulations, carbon-related costs, changing customer expectations and the need to decarbonise energy-intensive operations. These risks extend across GFL's operations and value chain.	GFL is addressing these risks through renewable energy adoption, energy efficiency, process optimisation, waste heat recovery and lower-carbon technologies. Measures include captive wind, solar and hybrid renewable energy, Green Open Access procurement, VFDs, turbine optimisation and use of by-product hydrogen.	Negative: Potential increase in operating, compliance and transition costs arising from climate regulations, carbon-related costs, decarbonisation requirements and investments in lower-carbon technologies.
2	Water Consumption & Effluent Discharge	Risk & Opportunity	Risk: Water availability and wastewater management present risks relating to regulatory compliance, resource availability and operational continuity. Opportunity: Water recycling, reuse and improved treatment systems provide opportunities to improve water efficiency and reduce freshwater dependence.	Zero Liquid Discharge at Ranjit Nagar; expansion of water recycling and reuse at Dahej and Jolva; recovery and reuse of boiler blowdown water and condensate; RO water recycling and wastewater reuse; and strengthening of wastewater treatment and resource recovery systems. A 45 KLD MEE has also been commissioned.	Negative: Potential increase in water procurement, treatment, compliance and operational costs arising from water availability constraints and wastewater management requirements. Positive: Improved water efficiency, recycling and reuse can reduce freshwater dependence and associated operating costs.
3	Occupational Health & Safety	Risk	The nature of GFL's chemical manufacturing operations creates occupational health and safety risks for employees and workers. Effective safety management is critical to protecting people, maintaining regulatory compliance and avoiding operational disruption.	Occupational Health & Safety Management System covering hazard identification, risk assessment and regulatory compliance; HIRA, HAZOP, JSA and QRA; Permit-to-Work; Management of Change; Pre-Startup Safety Reviews; safety training; emergency drills; incident and near-miss investigation; and corrective and preventive actions.	Negative: Potential costs arising from workplace incidents, medical and compensation obligations, regulatory action, business interruption and productivity losses.

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Sr. No.	Material issue identified	Risk / Opportunity	Rationale for identifying the risk / opportunity	Approach to manage / mitigate	Financial implications of the risk / opportunity
4	Resource Use, Hazardous Waste & Circularity	Risk & Opportunity	Risk: Resource consumption and hazardous waste generation can increase environmental exposure, disposal costs and regulatory risks. Opportunity: Circularity and resource recovery can improve material efficiency, reduce waste and recover value from waste streams.	Source segregation and regulated waste handling; recycling through authorised recyclers; co-processing and resource recovery; spent resin regeneration; IPA solvent recovery; conversion of HCl waste streams into saleable by-products; wastewater treatment and process optimisation; and evaluation of material substitution and inventory management.	Negative: Potential increase in resource consumption, waste treatment, disposal and regulatory compliance costs. Positive: Recycling, reuse, resource recovery, solvent recovery and by-product utilisation can improve material efficiency, reduce disposal costs and enable value recovery.
5	Corporate Governance & Business Ethics	Risk & Opportunity	Risk: Weak governance, unethical conduct, conflicts of interest or regulatory non-compliance can expose GFL to financial, legal and reputational risks. Opportunity: Strong governance and ethical business practices support transparency, accountability and stakeholder confidence.	Anti-Corruption and Anti-Bribery Policy and Code of Conduct; Whistle-blower and confidential reporting mechanisms; Ethics Committee and periodic risk assessments; ethical conduct training; conflict-of-interest processes; periodic policy reviews; and independent third-party assessments and certification audits.	Negative: Potential financial, legal, regulatory and reputational costs arising from misconduct, conflicts of interest or non-compliance. Positive: Strong governance and ethical practices can strengthen stakeholder confidence, accountability and business continuity.
6	Process & Chemical Safety	Risk	Chemical processing and handling involve inherent risks of accidental releases, fires, explosions and exposure to hazardous substances. Such incidents can affect employees, surrounding communities, the environment and business continuity.	HIRA, HAZOP, JSA and QRA for process hazard identification; Management of Change; Pre-Startup Safety Reviews; Permit-to-Work controls; reporting and investigation of unsafe acts, conditions, near misses and incidents; corrective and preventive actions; internal and external safety audits; and emergency preparedness supported by drills and training.	Negative: Potential costs arising from process safety incidents, remediation, asset damage, regulatory action, business interruption and operational disruption.

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Sr. No.	Material issue identified	Risk / Opportunity	Rationale for identifying the risk / opportunity	Approach to manage / mitigate	Financial implications of the risk / opportunity
7	Working Conditions & Equal Opportunity	Risk & Opportunity	Risk: Discrimination, harassment, inadequate working conditions or ineffective grievance resolution may adversely affect employees and create workplace and compliance risks. Opportunity: Fair working conditions, equal opportunity and an inclusive workplace can support employee engagement, talent retention and productivity.	Equal opportunity and non-discrimination practices; POSH framework and Internal Committee; multiple employee grievance mechanisms including HR Buddy, HR Mitra, Ethics Line and Suggestion Box; Women Employees Development Committee; human rights awareness and training; periodic assessment of working conditions; and confidentiality and non-retaliation protections.	Negative: Potential costs arising from workplace grievances, discrimination, harassment, employee attrition and related compliance matters. Positive: Improved employee engagement, retention and productivity can support workforce effectiveness and reduce turnover-related costs.
8	Consumers and End-Users – Product Safety	Risk	Product safety risks can affect customer health, regulatory compliance, product acceptance and GFL's reputation. Strong product stewardship and quality controls support customer confidence and reduce the risk of product-related incidents.	Product Stewardship and Responsible Care framework; product testing and process controls; Root Cause Analysis and Corrective and Preventive Actions; provision of MSDS/ SDS and safe handling, storage, transportation and emergency-response information; customer feedback and satisfaction surveys; and monitoring of regulatory developments and product requirements.	Negative: Potential costs arising from product incidents, recalls, product liability, regulatory action and reputational damage.
9	Workers in the Value Chain – Upstream Hazards	Risk & Opportunity	Risk: Upstream workers may face occupational health and safety, working-condition and human-rights risks associated with raw material extraction, chemical supply and other activities across GFL's value chain. Opportunity: Responsible supplier practices can strengthen supply-chain resilience and support responsible sourcing.	Sustainable Procurement Policy and Supplier Code of Conduct; supplier onboarding requirements; supplier engagement and awareness programmes; contractual requirements relating to statutory compliance; periodic supplier assessments and corrective actions; and integration of human-rights requirements into supplier relationships and contracts.	Negative: Potential supply-chain disruption, compliance costs and reputational exposure arising from adverse supplier practices. Positive: Responsible sourcing and stronger supplier practices can strengthen supply-chain resilience and continuity.

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Sr. No.	Material issue identified	Risk / Opportunity	Rationale for identifying the risk / opportunity	Approach to manage / mitigate	Financial implications of the risk / opportunity
10	Affected Communities	Risk & Opportunity	Risk: GFL's manufacturing operations can affect surrounding communities through resource use, environmental exposure, employment and local economic activity. Opportunity: Community engagement and targeted development programmes can strengthen local well-being and create shared value.	Regular community consultations and CSR needs assessments; community grievance mechanism; field visits and investigation of concerns; programmes covering healthcare, education, women's empowerment, livelihoods, skill development and infrastructure; focus on vulnerable and marginalised groups; and ongoing stakeholder feedback and programme review.	Negative: Potential costs arising from community grievances, adverse impacts, regulatory intervention or operational disruption. Positive: Strong community relationships and development programmes can strengthen stakeholder trust, social licence to operate and local economic development.
11	Pollution of Air – VOCs & Particulate Matter	Risk	Air emissions can create environmental, health and regulatory risks. GFL manages these risks through emission-control systems, process optimisation and environmental monitoring.	Advanced emission-control technologies; process optimisation and energy-efficiency initiatives; waste heat recovery; regular environmental monitoring; and regulatory compliance and corrective action where required.	Negative: Potential costs associated with emission-control requirements, regulatory compliance, remediation and operational restrictions arising from adverse air-quality impacts.
12	Pollution of Soil – Contamination	Risk	Soil contamination can arise from accidental spills, improper handling or disposal of hazardous materials and may result in environmental remediation, regulatory and reputational risks.	Source segregation and controlled handling of hazardous waste; disposal through authorised facilities; co-processing and resource recovery where feasible; environmental monitoring and compliance; green-belt development and biodiversity assessments; process optimisation and waste reduction; and emergency preparedness and incident-response procedures.	Negative: Potential remediation, regulatory, legal and reputational costs arising from soil contamination, accidental releases or improper hazardous-material management.

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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
Policy and management processes										
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	Y	Y	Y	Y	N	Y	Y
	c. Weblink of the policies, if available	https://www.gfl.co.in/Company_Policies.php https://gfl.co.in/Our_People.php Principle 1 - Code of Conduct - Policy on Materiality of Related Party Transactions - Policy for Determination of Materiality of any Event/Information Principle 2 - Environmental Policy Principle 3 - Nomination and Remuneration Policy - Whistle Blower Policy - Health & Safety (H&S) Policy - Board Diversity Policy Principle 4 - Whistle Blower Policy - Stakeholder Engagement Policy Principle 5 - Whistle Blower Policy Principle 6 - Environmental Policy - Energy Management Policy - Biodiversity Policy - Water Policy - Code of Conduct Principle 8 - Policy on Corporate Social Responsibility Principle 9 - Cyber Security Policy								
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

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Sr. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
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.	P1 - ISO 37001:2016 (Anti-Bribery Management System), UN Global Compact P2 - ISO 9001:2015 (Quality Management System), IATF 16949:2016 (Automotive Quality Management) P3 - ISO 45001:2018 (Occupational Health & Safety Management System) P4 - ISO 26000:2010 (Social Responsibility), UN Global Compact P5 - UN Global Compact P6 - ISO 14001:2015 (Environmental Management System), CDP Climate Disclosure P7 - UN Global Compact P8 - ISO 26000:2010 (Social Responsibility) P9 - ISO 9001:2015 (Quality Management System), IATF 16949:2016 (Automotive Quality Management)								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	GFL has established principle-wise commitments aligned with the NGRBC framework. Key priorities include strengthening ethical business conduct, enhancing employee safety and well-being, advancing human rights due diligence, implementing its decarbonisation roadmap and SBTi-aligned climate targets, increasing renewable energy use, promoting sustainable products, and creating long-term value for customers, communities and other stakeholders. These commitments are reviewed periodically by senior management and the Board-level sustainability governance mechanisms. As part of its climate strategy, GFL has developed a Net Zero Roadmap with defined commitments, targets and timelines. The Company is targeting Net Zero emissions across its value chain by 2050, with an accelerated ambition to achieve Net Zero Scope 1 and Scope 2 emissions by 2040 through energy efficiency improvements, renewable energy adoption, process optimisation, low-carbon technologies and supply chain decarbonisation initiatives.								
6	Performance of the entity against the specific commitments, goals and targets along with reasons in case the same are not met.	The Performance of the Company against its principle-wise commitments, goals and targets is reviewed periodically by various committees chaired by senior management and the Board of Directors. During the reporting year, we continued to progress on our key priorities relating to ethical business conduct, employee safety, human rights, sustainable procurement, climate action, resource efficiency and stakeholder engagement. The Company remains committed to achieving its Net Zero ambition, including Net Zero Scope 1 and Scope 2 emissions by 2040 and Net Zero across the value chain by 2050. Where required, corrective actions and improvement plans are developed and monitored through the established governance framework.								

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Sr. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Policy and management processes									
	Governance, leadership and oversight									
7	Statement by the Director responsible for the business responsibility report, highlighting ESG-related challenges, targets and achievements At Gujarat Fluorochemicals Limited (GFL), sustainability is deeply embedded in our business strategy and operational ethos. As a global leader in the fluorochemicals industry, we firmly believe that long-term value creation can only be achieved through a balanced approach that integrates environmental stewardship, social responsibility, and strong governance. During the year, we continued to strengthen our ESG framework amidst an evolving business landscape shaped by climate imperatives, regulatory developments, and rising stakeholder expectations. These dynamic shifts have presented both challenges and opportunities, reinforcing the importance of resilience, agility, and forward-looking sustainability practices. The Company continues to focus on the decarbonisation of its energy-intensive operations whilst maintaining competitiveness. At the same time, we are working to improve supply chain transparency, strengthen ESG data systems and align our disclosures with globally recognised reporting and assurance standards. We are also expanding the scope and precision of our Life Cycle Assessments (LCA) and Product Carbon Footprint (PCF) assessments to aid in decision making and address customer needs. In response, GFL has taken significant steps in advancing its sustainability agenda. Also, we have strengthened our decarbonisation roadmap with specific initiatives to improve energy efficiency, boost the integration of renewable energy and reduce greenhouse gas emissions across our operations. The ESG governance structure, with strong leadership oversight and cross-functional collaboration, continues to generate accountability, performance and continuous improvement. We have also achieved notable progress in enhancing ESG performance and disclosures. Our continued engagement with globally recognised sustainability assessment platforms, including S&P Global, EcoVadis, CDP, and the Dow Jones Sustainability Indices (DJSI), reflects our commitment to transparency and benchmarking against international best practices. This progress is evidenced by our inclusion in the S&P Global Sustainability Yearbook and our recognition as an Industry Mover, our continued ratings for Climate Change and Water Security by CDP, and our Bronze rating from EcoVadis. During the year, we also completed our TCFD-aligned assessment and initiated key projects related to internal carbon pricing, water valuation frameworks, and biodiversity risk assessment. Responsible sourcing remains a key priority for GFL and we have strengthened our engagement with suppliers and progressively integrated ESG risk assessments across our value chain. On the social side, we remain committed to safe, inclusive and growth-oriented workplaces and to make meaningful contributions to the development of communities through our CSR initiatives. Our commitment to occupational health and safety, employee development and stakeholder engagement underpins the creation of long-term value. Sustainability remains a fundamental pillar of GFL's strategic direction. Our approach is aligned with globally recognised frameworks, including the UN Global Compact, Responsible Care®, and the United Nations Sustainable Development Goals (SDGs). We also support India's long-term vision of achieving carbon neutrality by 2070 and are actively contributing through investments in green and emerging businesses such as battery chemicals, solar energy, green hydrogen, and fuel cells, alongside our existing renewable energy portfolio within the INOXGFL Group. Our ESG strategy is anchored on three core pillars: environmental stewardship, social responsibility, and strong governance. We are committed to addressing climate change, conserving natural resources, and managing waste responsibly. Our social commitment focuses on ethical business conduct, safe working conditions, and inclusive growth. Robust governance practices, guided by our Code of Conduct and anti-bribery framework, ensure integrity, transparency, and accountability across the value chain. Looking ahead, we remain committed to setting ambitious yet achievable ESG targets, strengthening data quality and transparency, and progressively advancing towards third-party assurance of key sustainability metrics. Through continued investments in innovation, digitalisation, and strategic partnerships, we aim to accelerate our sustainability future, and create resilient value for all our stakeholders.									

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Sr. No	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9								
Policy and management processes																		
8	Details of the highest authority responsible for implementing and overseeing 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, we have a formal governance structure for sustainability oversight through the Corporate Sustainability Committee (CSC), which functions under the direction of senior management and provides strategic oversight on sustainability and ESG-related matters. The Committee is responsible for overseeing and coordinating the Company's overall sustainability strategy, setting sustainability targets, reviewing performance, monitoring progress against ESG commitments, and guiding implementation of environmental, social, and governance initiatives across the organisation. In addition to the Corporate Sustainability Committee, the Company has several specialised committees, including the Sustainable Procurement Committee, Social Accountability & CSR Committee, Ethics Committee, Corporate Health & Safety Steering Committee, Corporate Women's Empowerment Committee, Corporate WASH Committee, and Risk Management Committee.																
10	Details of Review of NGRBCs by the Company:																	
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
Performance against the above policies and follow-up action		Yes, by the Senior Leadership Team, including the Chief Executive Officer, through the Corporate Sustainability Committee and other functional governance committees. The effectiveness of the policies is periodically reviewed and necessary amendments are made based on business requirements, regulatory developments and stakeholder expectations.								Annually and as required								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances		Yes, by the Senior Leadership Team and relevant governance committees. Compliance status is monitored on an ongoing basis, and corrective and preventive actions are implemented wherever required to address any instances of non-compliance.								Quarterly and as required								

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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. The entity periodically undergoes independent third-party assessments and certification audits to evaluate the effectiveness of its policies, management systems and governance practices. These assessments are conducted by external certification and assurance bodies, including DQS India Private Limited, Intertek Certifications Limited and Bureau Veritas, covering standards such as ISO 9001:2016, ISO 14001:2015, ISO 45001:2018, ISO 20400:2017, ISO 26000:2010 and ISO 37001:2016								
12 If the answer to question (1) above is ‘No’ i.e. not all Principles are covered by a policy, reasons to be stated										
Questions		P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9
The entity does not consider the Principles material to its business (Yes/No)		-	-	-	-	-	-	N	-	-
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)		-	-	-	-	-	-	N	-	-
The entity does not have the financial or/ human and technical resources available for the task (Yes/No)		-	-	-	-	-	-	N	-	-
It is planned to be done in the next financial year (Yes/No)		-	-	-	-	-	-	N	-	-
Any other reason (please specify)		As our business is not engaged in any advocacy activities, we do not find ourselves at a stage where we can devise and implement relevant policies.								

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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 categorized 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	% age of persons in respective category covered by the awareness programmes
Board of Directors	5	1. Technical, Manufacturing Excellence, Operations, Project, Quality 2. Corporate Policy Training 3. Corporate Sustainability 4. Legal, Secretarial, Compliance 5. Safety Health and Environment	1. Technical, Manufacturing Excellence, Operations/Project, Quality: 25% 2. Corporate Policy Training: 50% 3. Corporate Sustainability: 25% 4. Legal, Secretarial, Compliance: 25% 5. Safety Health and Environment: 25%
Key Managerial Personnel	3	1. Behaviour, Leadership, Soft-skills, Self-development 2. Corporate Policy Training 3. Information Technology	1. Behaviour, Leadership, Soft-skills, Self-development: 33% 2. Corporate Policy Training: 100% 3. Information Technology: 67%
Employees other than BOD and KMPs	1,788	1. Health & Safety Measures 2. Skill Upgradation 3. Human Rights	1. Health & Safety Measures: 81% 2. Skill Upgradation: 94% 3. Human Rights: 65%
Workers	4,477	1. Health & Safety Measures 2. Skill Upgradation 3. Human Rights	1. Health & Safety Measures: 77% 2. Skill Upgradation: 29% 3. Human Rights: 9%

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (in ₹)	Brief of the case	Has an appeal been preferred (Yes/No)
Penalty/Fine	P1	Office of the Deputy Commissioner of Income tax	1,49,325/-	Ineligible ITC pursuant to Section 16 (2), claimed from cancelled taxpayers, non-genuine and non-existent Taxpayers and return/tax defaulters.	No
	P1	Office of the Commercial Tax Officer, Tamil Nadu	20,000/-	Order pursuant to Section 73 of TNGST Act, 2017 for discrepancies in tax liability while filing the annual returns.	No
	P1	Assistant Commissioner of Customs, Mumbai	5,582/-	Incorrect declaration in Bill/s of Entry for wrong Customs Tariff heading for the goods contravened the provisions of Section 46 of the Customs Act, 1962.	No
	P1	Assistant Commissioner of Customs, Mumbai	11,649/-	Incorrect declaration in Bill/s of Entry for wrong Customs Tariff heading for the goods contravened the provisions of Section 46 of the Customs Act, 1962.	No
Settlement	Nil – No settlement or compounding cases were reported during FY 2025-26.				
Compounding Fee					

Non-Monetary				
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the case	Has an appeal been preferred (Yes/No)
Imprisonment Punishment	There were no cases of imprisonment, prosecution, or non-monetary penalties imposed on the Company, its Directors, or employees under any regulatory, enforcement, or judicial authority relating to the NGRBC Principles during the reporting period.			

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

Case Details	Name of the regulatory/enforcement agencies/judicial institutions
NA	No appeals or revisions were preferred during FY 2025-26 as no such cases were reported.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

Yes, we have an Anti-Corruption and Anti-Bribery Policy (ABAC Policy) and a Guideline on Prevention of Corruption and Bribery for Employees (HR/65), supported by its Code of Conduct and Whistle-blower Policy. We maintain the highest moral and ethical standards and enforce a strict zero-tolerance policy towards bribery, corruption, facilitation payments, fraud, and all forms of unethical business practices. It applies to all employees, Directors, contractors, consultants, suppliers, and business partners. We have instituted an Ethics Committee, confidential reporting mechanisms, periodic risk assessments, awareness programmes, and training to ensure compliance with applicable laws and ethical business standards. The policy is aligned with the Indian Prevention of Corruption Act, 1988, UN Global Compact principles, ISO 37001:2016 Anti-Bribery Management System, ISO 26000:2010, and the National Voluntary Guidelines on Social, Environmental, and Economic Responsibilities.

For details, please refer to our policy Anti-Corruption and Anti-Bribery Policy (ABAC Policy):

<https://gfl.co.in/upload/pages/bb169a8b6bb6d70b563dab0494d8a355.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 2025-26 (Current Financial Year)	FY 2024-25 (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 2025-26 (Current Financial Year)		FY 2024-25 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	None	Nil	None
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	None	Nil	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.

Not Applicable. There were no reported cases of corruption, bribery, or conflict of interest that resulted in fines, penalties, or actions by any regulator, law enforcement agency, or judicial institution during FY 2025-26. Accordingly, no corrective actions were required.

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

	FY 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
No. of days of accounts payable	61.56	66.82

*Restatement: FY 2024-25 accounts payable days has been restated to include previously excluded capex procurement.

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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 2025-26 (Current Financial Year)	FY 2024-25* (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	8%	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)	2.41%	2.75%
	b. Sales (Sales to related parties/Total Sales)	30.31%	27.20%
	c. Loans & advances (Loans & advances given to related parties/ Total loans & advances)	100%	100%
	d. Investments (Investments in related parties/Total Investments made)	100%	10%

*Restatement: FY 2024-25 purchases with related parties has been restated to include previously excluded capex procurement.

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/Principals covered under the training	% age of value chain programme partners covered (by value of business done with such partners) under the awareness programmes
126	Principle 3: Contract Labour at Chemical Plant Safety Awareness Training Module (Worker & Supervisor)	49%
6	Principle 3: Half Face Cartridge Mask Training Record GFL (Cont.)	32%
99	Principle 3: SA8000 Training	62%
15	Principle 3: WASH Awareness (Water, Sanitation, Hygiene)	12%

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 & 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.

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)	Details of improvements in environmental and social impacts
R&D	GFL is exploring mechanisms to systematically track R&D and capital investments related to environmental and social improvements, with the objective of enhancing disclosure and monitoring practices in the future.		
Capex			

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

Yes. We have established robust procedures for sustainable sourcing through our Sustainable Procurement Policy and Code of Conduct for Suppliers, Vendors, and Service Providers. These procedures integrate environmental, social, ethical, and governance considerations into supplier selection, evaluation, and engagement processes. Suppliers are required to comply with applicable laws and internationally recognised ESG standards, while sustainability criteria are incorporated into procurement decisions and supplier assessments. The Company's approach is aligned with ISO 20400:2017 Sustainable Procurement Guidelines, demonstrating its commitment to responsible and sustainable sourcing practices across the value chain.

Weblink: <https://gfl.co.in/upload/pages/ad7443ff14f8ca3d04a4c604be2cf580.pdf>

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

70%

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.

- a) **Plastics (including packaging):** We fulfil our Extended Producer Responsibility (EPR) obligations for plastic packaging waste through authorised recyclers and collection agencies in accordance with the Plastic Waste Management Rules, 2016, as amended.
- b) **E-waste:** As we manufacture specialty chemicals, our products do not generate e-waste at the end of their life cycle.
- c) **Hazardous Waste:** Our products are primarily used as intermediates by downstream industries for manufacturing finished products. Any hazardous waste arising from the use of such products is managed by customers in accordance with their applicable regulatory approvals and waste management requirements.
- d) **Other Waste:** Not applicable.

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).

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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?

NIC Code	Name of Product/Service	% of total turnover contributed	Boundary for which the Life Cycle Perspective/Assessment was conducted	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No) If yes, provide the weblink
20111	PTFE	27	Cradle to Gate	Yes	No
20111	FKM	15	Cradle to Gate	Yes	No
20111	PFA	8	Cradle to Gate	Yes	No
20111	2-bromo-5-fluorobenzotrifluoride	2	Cradle to Gate	Yes	No
20111	PVDF	1	Cradle to Gate	Yes	No
20111	4-(Trifluoromethyl) benzyl alcohol	0	Cradle to Gate	Yes	No

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

Name of the Product/Service	Description of the risk/concern	Action taken
PTFE, FKM, PVDF, PFA and other assessed products	No significant social or environmental concerns and/or risks arising from production or disposal were identified through the Life Cycle Assessment (LCA) or other assessment.	Not Applicable. We continue to monitor environmental and social impacts through its sustainability management systems and compliance processes.

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 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Nil	Nil	Nil

We did not utilise any recycled or reused input material in its production processes during FY 2025-26 and FY 2024-25. However, it follows a responsible waste management approach aligned with applicable environmental regulations. We remains committed to minimising environmental impacts through effective waste management, recycling, resource recovery and circular economy initiatives wherever feasible.

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 2025-26 (Current Financial Year)			FY 2024-25* (Previous Financial Year)		
	Reused	Recycle	Safely Disposed	Reused	Recycle	Safely Disposed
Plastics (including packaging)	890	1,263	NA	944.4	939.6	NA
E-waste	NA					
Others - Bio-medical waste	NA					
Others - Construction and demolition waste	NA					

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

	FY 2025-26 (Current Financial Year)			FY 2024-25* (Previous Financial Year)		
	Reused	Recycle	Safely Disposed	Reused	Recycle	Safely Disposed
Others - Battery waste				NA		
Others - Radioactive waste				NA		
Hazardous waste				NA		
Other Non-hazardous waste				NA		
Total				NA		

*Restatement: Plastic packaging reclaimed at the end-of-life of products has been included in FY 2024-25 data.

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
Nil	Nil

Note: The Plastic packaging reclaimed through the EPR mechanism is processed for recycling and reuse in compliance with applicable EPR requirements and targets.

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	1,679	1,679	100%	1,679	100%	0	0%	1,679	100%	0	0%
Female	109	109	100%	109	100%	109	100%	0	0%	0	0%
Total	1,788	1,788	100%	1,788	100%	109	6.10%	1,679	93.90%	0	0%
Other than permanent employees											
Male	36	36	100%	36	100%	0	0%	0	0%	0	0%
Female	11	11	100%	11	100%	0	0%	0	0%	0	0%
Total	47	47	100%	47	100%	0	0%	0	0%	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	1,353	1,353	100%	1,353	100%	0	0%	1,353	100%	0	0%
Female	1	1	100%	1	100%	1	100%	0	0	0	0%
Total	1,354	1,354	100%	1,354	100%	1	0.07%	1,353	99.93%	0	0%
Other than permanent workers											
Male	3,059	0	0	3,059	100%	0	0	0	0	0	0
Female	64	0	0	64	100%	0	0	0	0	0	0
Total	3,123	0	0	3,123	100%	0	0	0	0	0	0

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the Company	0.18%	0.18%

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

Benefits	FY 2025-26 (Current Financial Year)			FY 2024-25 (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/N.A.)	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/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI	0.00%	0%	Y	0.08%	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 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 committed to the concept of Equal Employment Opportunity. This commitment is reflected in all HR policies and procedures that adhere to non-discriminatory practices and provide equal opportunity for all employees. This is also reflected in the fact that we expect all our employees to treat each other fairly, with mutual respect and without any harassment, regardless of the 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	100%	100%	Nil	Nil
Female	100%	100%	Nil	Nil
Total	100%	100%	Nil	Nil

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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: 1. HR Buddy 2. Ethics Line 3. Suggestion Box 4. HR Mitra 5. Guideline HR/42 – Grievance Procedure for Employees/Contractors 6. Red Flag 7. POSH Line
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 5. Red Flag 6. POSH Line
Permanent Employees	Grievance Handling Platform: 1. HR Buddy 2. Ethics Line 3. Suggestion Box 4. HR Mitra 5. Guideline HR/42 – Grievance Procedure for Employees/Contractors 6. Red Flag 7. POSH Line
Other than Permanent Employees	Grievance Handling Platform: 1. Suggestion Box 2. Works Committee 3. SPT Committee 4. Guideline HR/42 – Grievance Procedure for Employees and Contractors 5. Red Flag 6. POSH Line

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

Category	FY 2025-26 (Current Financial Year)			FY 2024-25 (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)
Total Permanent Employees	1,788	0	0%	2,969	0	0%
Male	1,679	0	0%	2,870	0	0%
Female	109	0	0%	99	0	0%
Total Permanent Workers	1,354	47	3.47%	436	0	0%
Male	1,353	47	3.47%	436	0	0%
Female	1	0	0%	0	0	0%

None of our permanent employees are part of an union.

8. Details of training given to employees and workers:

Category	FY 2025-26 (Current Financial Year)					FY 2024-25 (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	1,679	1,382	82%	1,578	94%	2,870	2,577	90%	2,846	99%
Female	109	70	64%	106	97%	99	59	60%	99	100%
Total	1,788	1,452	81%	1,684	94%	2,969	2,636	89%	2,945	99%
Workers										
Male	4,412	3,411	77%	1,285	29%	3,888	3,769	97%	554	14%
Female	65	45	69%	5	8%	69	54	78%	0	0%
Total	4,477	3,456	77%	1,290	29%	3,957	3,823	97%	554	14%

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

Category	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1,679	1,373	82%	2,870	2,610	91%
Female	109	74	68%	99	91	92%
Total	1,788	1,447	81%	2,969	2,701	91%
Workers						
Male	4,412	1,249	28%	3,888	436	11%
Female	65	0	0%	69	0	0%
Total	4,477	1,249	28%	3,957	436	11%

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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 implemented a comprehensive Occupational Health and Safety (OH&S) Management System across our manufacturing operations, underpinned by strong leadership commitment and active employee participation. Our approach extends beyond regulatory compliance and focuses on fostering a proactive safety culture where every employee and contract worker is empowered to identify risks, adopt safe work practices, and contribute to a safe and healthy workplace. Dedicated Health and Safety Committees oversee safety performance, regulatory compliance, risk mitigation initiatives, and continuous improvement across our operations.

Our OH&S framework includes:

- Comprehensive health and safety policies, standards, procedures and safe work practices.
- Systematic identification, assessment and mitigation of workplace hazards and risks.
- Regular safety training, awareness programmes and emergency preparedness drills.
- Incident reporting, investigation and corrective action mechanisms.
- Employee consultation and participation through safety committees and engagement forums.
- Continuous monitoring of safety performance and compliance with applicable health and safety regulations.

- 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 established a structured risk management framework to identify workplace hazards and assess risks associated with both routine and non-routine activities. The framework combines preventive risk assessment, employee participation and continuous monitoring to minimise workplace risks.

Our processes include:

- Regular workplace inspections and safety audits to identify potential hazards.
- Hazard Identification and Risk Assessment (HIRA) for routine activities.
- Process Hazard Analysis (PHA), including HAZOP studies.
- Job Safety Analysis (JSA) and Qualitative Risk Assessment (QRA).
- Permit-to-Work (PTW) system for all non-routine activities, supported by a pre-job JSA before permit issuance.
- Management of Change (MoC) process for all non-like-for-like modifications, followed by a Pre-Startup Safety Review (PSSR).
- Reporting and investigation of unsafe acts, unsafe conditions, near misses and incidents to identify root causes and implement corrective and preventive actions.
- Periodic internal and external safety audits, together with monitoring of leading and lagging safety indicators to proactively address emerging risks.

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.

- 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.

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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 prioritize 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 organize gynecological, 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 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Lost Time Injury Frequency Rate (LTIFR) (per one million person-hours worked)	Employees	1.22	0.73
	Workers	0.63	0.78
Total recordable work-related injuries	Employees	27	18
	Workers	27	25
No. of fatalities	Employees	2	1
	Workers	1	4
High-consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

*Including in the contractual workforce

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

To ensure a safe and healthy workplace, we have implemented a comprehensive Occupational Health and Safety (OH&S) Management System built on proactive risk management, employee participation, and continuous improvement. Our key initiatives include:

- **Occupational Health & Safety Management System:** A robust framework of policies, standards, and procedures to identify, assess, and mitigate workplace hazards while ensuring regulatory compliance.
- **Hazard Identification & Risk Assessment:** Regular workplace inspections and the use of HIRA, HAZOP, JSA, QRA, and safety audits to identify risks and implement appropriate control measures.
- **Permit-to-Work & Management of Change:** A Permit-to-Work (PTW) system for non-routine activities, supported by Job Safety Analysis (JSA), Management of Change (MoC), and Pre-Startup Safety Reviews (PSSR).

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- **Training & Safety Awareness:** Regular training, toolbox talks, emergency drills, and awareness programmes to strengthen safety competencies and preparedness.
- **Incident Reporting & Investigation:** Structured processes to report, investigate, and address incidents, near misses, and unsafe conditions through corrective and preventive actions.
- **Health & Well-being:** Periodic health check-ups, wellness initiatives, first-aid training, and health awareness programmes to promote employee well-being.
- **Employee Participation:** Active involvement of employees and contract workers through Health and Safety Committees, safety observations, audits, and consultation forums.
- **Performance Monitoring:** Continuous monitoring of safety performance through audits, safety indicators, and periodic reviews to drive continual improvement.

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

	FY 2025-26 (Current Financial Year)			FY 2024-25 (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 & 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

Note: Assessment was 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.

All safety-related incidents including high potential near misses are investigated by a cross-functional team to identify root causes. Based on the findings, appropriate corrective and preventive actions (CAPA) are implemented and monitored to prevent recurrence. These actions may include improvements in procedures, training, engineering controls, and workplace safety practices. The effectiveness of implemented actions is reviewed through periodic audits, inspections, and management reviews.

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

Yes. We provide financial protection to both employees and workers through a comprehensive Group Accident Insurance Policy. The policy offers financial assistance and compensation to the nominee or family members in the unfortunate event of death arising out of an accident, reinforcing our commitment to employee and worker welfare.

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

We have established processes to promote compliance with statutory obligations across our value chain. Key measures include:

- **Supplier Obligations:** Suppliers are required to comply with all applicable statutory requirements and discharge their statutory dues in accordance with the terms and conditions of our purchase orders.
- **Supplier Onboarding:** New suppliers are required to acknowledge and accept GFL's Terms & Conditions and applicable policies before onboarding.
- **Contractual Compliance:** Our Sustainable Procurement Policy requires suppliers, vendors, and service providers to comply with all applicable laws and regulations. Any non-compliance may result in contract termination and, where applicable, indemnification of GFL against any resulting legal or financial liabilities.

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 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Employees	2	1	0	0
Workers	1	4	0	0

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)**

Yes. Where appropriate, retiring employees are provided opportunities to continue their association with the Company through service extensions or engagement in contractual or special assignments, enabling knowledge retention while supporting a smooth transition.

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	NA

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.**

As part of our sustainable procurement framework, we periodically engage with suppliers to promote responsible business practices and compliance with applicable requirements. Where improvement opportunities are identified, we communicate the observations to the concerned suppliers and encourage timely corrective actions. During the reporting year, no significant risks or material concerns relating to health and safety practices or working conditions of value chain partners were identified, reflecting the effectiveness of our supplier governance processes.

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PRINCIPLE 4: Businesses should respect the interests of and be responsive to all their stakeholders.

Essential Indicators

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

Our Stakeholder Engagement Policy defines stakeholders as individuals, groups or organisations that affect the activities of the Company or may be affected by the activities, products, services and performance of the Company. The policy covers across GFL's own operations and value chain partners, internal and external.

The Identification of Stakeholders is initiated by a systematic assessment of all parties who have a material interest in, an influence on or are affected by the business activities of the Company. This assessment will enable GFL to identify and prioritise key stakeholder groups that are critical to its operations and long-term success. These stakeholder groups are:

1. Employees
2. Shareholders and Investors
3. Customers
4. Suppliers and Vendors
5. Local Communities
6. Government and Regulatory Bodies
7. Contractors and Value Chain Partners

GFL evaluates stakeholders based on their level of influence on the organisation, the extent to which they are affected by the Company's activities, and the significance of their concerns and expectations. Particular emphasis is placed on identifying affected communities, vulnerable groups, and other local stakeholders who may experience direct or indirect impacts from the Company's operations.

The stakeholder identification and engagement process is periodically reviewed by management to ensure its continued relevance, effectiveness, and alignment with the Company's sustainability objectives, regulatory requirements, and evolving stakeholder expectations.

For details, please refer to Stakeholder Engagement Policy:

<https://gfl.co.in/upload/pages/0cd6bea3d041ffdce667989805eecf57.pdf>

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

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/ Quarterly/others – please specify)	Purpose and Scope of Engagement (Key Topics & Concerns)
Shareholders/ Investors	No	1. Company's website 2. Quarterly publication of results followed by earnings call 3. Periodic analysts' briefing and individual discussions between fund managers and the management team 4. Annual General Meeting (AGM) 5. Press conferences 6. Stock exchange announcements	Continuous	• Financial performance and long-term value creation. • Business strategy, capital allocation and growth opportunities. • Corporate governance, ethics and risk management. • ESG performance, climate-related initiatives and sustainability disclosures. • Dividend policy and shareholder returns.

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Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/ Quarterly/others – please specify)	Purpose and Scope of Engagement (Key Topics & Concerns)
Employees	No	1. Senior leaders' communication/talks/forum 2. Training and performance management through HR forums 3. Performance appraisal meetings/reviews 4. Wellness initiatives 5. Engagement surveys 6. Group discussions 7. Employee engagement events 8. Email communication 9. Employee satisfaction surveys	Continuous	• Occupational health, safety and well-being. • Learning, skill development and career progression. • Fair remuneration, performance management and recognition. • Diversity, equity and inclusion. • Employee engagement, workplace culture and grievance redressal.
Customers	No	1. Website's periodic market research 2. Customer meets 3. Customer visits, audits and meetings 4. Conferences 5. Trade fair Customer satisfaction surveys	Continuous	• Product quality, safety and reliability. • On-time delivery and customer service excellence. • Product innovation and technical support. • Sustainable products and responsible manufacturing practices. • Customer satisfaction, feedback and data privacy.
Suppliers/ Vendors	No	1. Supplier development initiatives 2. Online and offline workshops 3. Annual suppliers' meet (online and offline) 4. Supplier feedback surveys 5. Onboarding process	Continuous	• Fair and transparent procurement practices. • Timely payments and commercial collaboration. • Responsible sourcing and supplier code of conduct. • Quality, delivery and operational performance. • ESG, environmental and statutory compliance across the supply chain.

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Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/ Quarterly/others – please specify)	Purpose and Scope of Engagement (Key Topics & Concerns)
Government /Regulators	No	1. Meetings 2. Presentations and networking at different forums 3. Regular checks 4. Annual and quarterly compliance reports 5. Press conferences and media events 6. Published articles and newsletters 7. Online meetings and interviews	Continuous	• Compliance with applicable laws and regulations. • Environmental, health and safety compliance. • Timely statutory filings, taxes and regulatory reporting. • Responsible corporate governance and business ethics. • Participation in industry forums and support for national priorities.
Communities/ NGO	No	1. Interactions during implementation of CSR projects 2. Interacting with local communities 3. Representatives' public hearings 4. Community development newsletter	Continuous	• Community development and local socio-economic upliftment. • Education, healthcare and livelihood enhancement. • Environmental conservation and natural resource management. • Infrastructure development and community well-being. • CSR programme implementation, stakeholder feedback and long-term social impact.

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 recognise stakeholder engagement as an integral part of our governance and sustainability framework. We engage with our stakeholders through structured mechanisms and ensure that relevant feedback is appropriately escalated to the Board and senior management.

Our stakeholder consultation process includes:

- Engaging with investors, customers, suppliers, employees, communities, regulators, and other key stakeholders through multiple communication channels.
- Conducting employee forums, customer interactions, supplier engagements, community outreach programmes, investor meetings, sustainability assessments, and grievance mechanisms.
- Gathering stakeholder feedback on key economic, environmental, social, governance, and human rights-related matters, including climate change, resource efficiency, occupational health and safety, ethics, and community development.

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- Delegating stakeholder consultations to relevant business functions, including Sustainability, Human Resources, Procurement, Investor Relations, Site Management, and other functional teams, where direct Board engagement is not practical.
- Consolidating and analysing stakeholder inputs and periodically presenting material issues, emerging risks, and recommendations to senior management and the Board through management reviews, risk management processes, sustainability reviews, and governance forums.

2. Whether stakeholder consultation is used to support identifying and managing 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. Stakeholder consultation plays a key role in identifying and managing our environmental, social, and human rights priorities.

Stakeholder feedback enables us to:

- **Identify** material ESG risks, opportunities, and emerging stakeholder expectations.
- **Strengthen** our sustainability strategies, policies, and operational practices.
- **Enhance** initiatives relating to climate action, resource efficiency, occupational health and safety, employee well-being, responsible sourcing, and human rights.
- **Inform** our materiality assessment process and enterprise risk management framework.
- **Drive** continuous improvement in our ESG performance through regular review and incorporation of stakeholder expectations.

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

We are committed to engaging with vulnerable and marginalised communities to understand their needs and create sustainable social impact.

Our approach includes:

- **Conducting** regular community consultations, CSR needs assessments, and stakeholder engagement programmes in communities around our operations.
- **Identifying** priority social issues through continuous dialogue with local communities and implementing agencies.
- **Designing** targeted CSR interventions based on identified community needs.
- **Implementing** programmes focused on healthcare, education, women's empowerment, livelihood enhancement, skill development, and community infrastructure.
- **Supporting** underserved and disadvantaged groups by improving access to essential services and creating sustainable livelihood opportunities.
- **Reviewing** stakeholder feedback periodically to assess programme effectiveness and refine our CSR initiatives for greater social impact.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

PRINCIPLE 5: Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	1,788	1,172	66%	2,969	1,147	39%
Other than permanent	47	17	36%	82	16	20%
Total employees	1,835	1,189	65%	3,051	1,163	38%
Workers						
Permanent	1,354	0	0%	436	53	12%
Other than permanent	3,123	381	12%	3,521	634	18%
Total workers	4,477	381	9%	3,957	687	17%

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

Category	FY 2025-26 (Current Financial Year)					FY 2024-25 (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	1,788	5	0.3%	1,783	99.7%	2,969	14	0.5%	2,955	99.5%
Male	1,679	5	0.3%	1,674	99.7%	2,870	14	0.5%	2,856	99.5%
Female	109	0	0%	109	100%	99	0	0%	99	100%
Other than permanent	47	0	0%	47	100%	82	1	1.2%	81	98.8%
Male	36	0	0%	36	100%	67	1	1.5%	66	98.5%
Female	11	0	0%	11	100%	15	0	0%	15	100%
Workers										
Permanent	1,354	1	0.1%	1,353	99.9%	436	0	0%	436	100%
Male	1,353	1	0.1%	1,352	99.9%	436	0	0%	436	100%
Female	1	0	0%	1	100%	0	0	0%	0	0%
Other than permanent	3,123	2,620	84%	503	16%	3,521	3,510	99.69%	11	0.31%
Male	3,059	2,558	84%	501	16%	3,452	3,447	99.86%	5	0.14%
Female	64	62	97%	2	3%	69	63	91.3%	6	8.7%

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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	4,15,39,928	-	-
Key Managerial Personnel	2	90,96,433	-	-
Employees other than BoD and KMP	1,709	8,46,636	120	8,23,602
Workers	1,353	6,29,802	1	3,00,000

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (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 established dedicated committees and governance mechanisms to oversee human rights-related matters across our operations. These include:

- Internal Complaints Committee (ICC) for matters related to the Prevention of Sexual Harassment (POSH).
- Ethics Committee to oversee ethical conduct, whistleblower complaints, and human rights-related concerns.
- Women Employees Development Committee (WEDC) to promote diversity, inclusion, and women's empowerment.
- Social Accountability Review & Compliance Committee (SARCC) to monitor social accountability and responsible business practices.

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

We have established multiple grievance redressal mechanisms to ensure that human rights concerns are reported, investigated, and resolved in a fair, confidential, and timely manner. These include:

- Ethics Line, an online whistleblower platform that enables anonymous reporting of unethical conduct and human rights-related concerns.
- A dedicated Ethics Officer responsible for investigating complaints and overseeing the grievance resolution process.
- A dedicated email channel (ethicsline@gfl.co.in) for employees and other stakeholders to raise concerns.
- Suggestion boxes across our sites to facilitate confidential reporting by employees and workers.
- Defined investigation and escalation procedures that ensure confidentiality, impartiality, and timely resolution of grievances.

6. Number of Complaints on the following made by Employees and Workers:

	FY 2025-26 (Current Financial Year)			FY 2024-25 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	1	0	None	0	0	None
Discrimination at workplace	0	0	NA	0	0	None
Child Labour	0	0	NA	0	0	None
Forced Labour/Involuntary Labour	0	0	NA	0	0	None
Wages	0	0	NA	0	0	None
Other human rights-related issues	3	0	None	1	0	None

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

	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	1	Nil
Complaints on POSH as a % of female employees/workers	0.54	Nil
Complaints on POSH upheld	Nil	Nil

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

We maintain a zero-tolerance approach towards retaliation against individuals who report concerns in good faith. To safeguard complainants, we have implemented the following measures:

- Strict confidentiality throughout the grievance handling and investigation process.
- Protection of complainants under our Whistleblower Policy and POSH Policy.
- Prohibition of retaliation, victimisation, or discrimination against individuals reporting genuine concerns.
- Appropriate disciplinary action against any person found engaging in retaliatory behaviour.

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

Yes. Human rights principles are integrated into our business relationships through our policies, supplier onboarding requirements, and contractual obligations. We also conduct awareness programmes and engagements to promote compliance with our human rights expectations across our supplier and vendor ecosystem.

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/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.

Not Applicable. Based on the assessments conducted during the reporting year, no significant human rights risks or concerns were identified that required corrective action. We continue to strengthen our human rights governance through periodic assessments, policy implementation, employee awareness programmes, grievance redressal mechanisms, and ongoing monitoring to ensure compliance with our human rights commitments.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

Leadership Indicators

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

This Financial year we received 3 grievances or complaints regarding human rights issues; the cases were thoroughly reviewed and resolved by the ethics committee. No process was being modified/ introduced as a result of addressing human rights grievance/ complaints.

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

Our human rights due diligence framework is designed to identify, assess, and mitigate potential human rights risks across our operations and value chain. The assessment covers compliance with our Human Rights Policy through a combination of internal reviews, self-assessment questionnaires, employee and workplace well-being surveys, and announced as well as unannounced audits of suppliers, vendors, and service providers. The findings are used to monitor compliance, identify improvement opportunities, and strengthen responsible business practice.

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 prioritises 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 organisation.

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/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.

Not Applicable. During the reporting year, no significant human rights-related risks or concerns were identified through the assessment of value chain partners that warranted corrective action. We continue to promote responsible business conduct through our supplier engagement processes, contractual requirements, periodic assessments, and ongoing monitoring to encourage compliance with our human rights expectations across the value chain.

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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 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
From renewable sources (in GJ)		
Total electricity consumption (A)	13,51,083	4,73,861
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A + B + C)	13,51,083	4,73,861
From non-renewable sources (in GJ)		
Total electricity consumption (D)	5,18,343	11,35,502
Total fuel consumption (E)	67,17,678	81,32,443
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	72,36,020	92,67,945
Total energy consumed (A + B + C + D + E + F)	85,87,104	97,41,807
Energy intensity per rupee of turnover (Total energy consumption/Revenue from operations)	0.000189	0.000213
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP)	0.0038	0.0043
Energy intensity in terms of physical output	15.18	16.24
Energy intensity (optional) – the relevant metric may be selected by the entity	NA	NA

*Restatement: The previous year's energy consumption and energy intensity figures have been restated following a comprehensive review of source data and calculation methodology.

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.

Yes. Our Dahej Chlor-Alkali Unit has been identified as a Designated Consumer (DC) under the Bureau of Energy Efficiency's (BEE) Perform, Achieve and Trade (PAT) Scheme. We completed the PAT Cycle VII audit for FY 2024-25 and submitted the audit report and supporting documents to the BEE for review. From FY 2025-26 onwards, the PAT Scheme has transitioned to the Carbon Credit Trading Scheme (CCTS), under which our Chlor-Alkali Plant has been notified as an Obligated Entity. The required audit under the new framework is scheduled for completion during FY 2025-26.

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

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(i) Surface water	0	0
(ii) Groundwater	0	0
(iii) Third-party water	48,23,581	48,12,903
(iv) Seawater/desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	48,23,581	48,12,903
Total volume of water consumption (in kilolitres)	37,16,062	36,89,375
Water intensity per rupee of turnover (Water consumed/ Revenue from operations)	0.000082	0.000081
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	0.00166	0.00164
Water intensity in terms of physical output	6.57	6.15
Water intensity (optional) – the relevant metric may be selected by the entity	NA	NA

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N)
If yes, 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 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(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 – Primary, Secondary and tertiary	8,57,992	8,83,092
(iv) Sent to third-parties		
No treatment	0	0
With treatment - Primary and Secondary	2,49,527	2,40,436
(v) Others		
No treatment	0	0
With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	11,07,519	11,23,528

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.

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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 a Zero Liquid Discharge (ZLD) system comprising a Multi-Effect Evaporator (MEE) and Reverse Osmosis (RO) facility for tertiary wastewater treatment. Treated water is recovered, recycled, and reused for plantation and other approved applications within the premises, eliminating liquid effluent discharge outside the facility. We are also progressively strengthening ZLD infrastructure and expanding water recycling and reuse initiatives at our Dahej and Jolva units.

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

Parameter	Please specify unit	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
NOx	MT/Year	77	98
SOx	MT/Year	80	86
Particulate matter (PM)	MT/Year	81	74
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 assurance provided 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 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	6,10,908	7,42,968
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1,02,724	2,29,308
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations)	MTCO ₂ e/₹	0.000016	0.000021
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations adjusted for PPP)	MTCO ₂ e/₹ adjusted for PPP	0.00032	0.00043
Total Scope 1 and Scope 2 emission intensity in terms of physical output	MTCO ₂ e/MT of product	1.26	1.62
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	NA	NA	NA

* Restatement: The previous year's Scope 1 and Scope 2 GHG emissions and emissions intensity figures have been restated following a comprehensive review of activity data and calculation methodologies.

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.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

Yes. We have implemented several projects aimed at reducing greenhouse gas (GHG) emissions as part of its decarbonisation and energy efficiency strategy. These initiatives focus on renewable energy adoption, energy efficiency improvements, waste heat recovery, process optimisation, and low-carbon fuel substitution. Key projects include:

- Expansion of renewable energy through captive wind, solar, wind-solar hybrid projects, and procurement of renewable power through Green Open Access, reducing dependence on conventional grid electricity and supporting long-term decarbonisation objectives.
- Improvement in Back Pressure Turbine (STG-2) efficiency, resulting in annual energy savings of 3,766 MWh and a reduction of approximately 3,088 tonnes of CO₂ emissions per year.
- Installation of Variable Frequency Drives (VFDs) in critical pumping systems, delivering annual energy savings of 319,380 kWh and avoiding approximately 252 tonnes of CO₂ emissions annually.
- PTFE compressor optimisation and deployment of advanced process controls, automation, and real-time energy monitoring systems to reduce electricity consumption and associated indirect emissions.
- Waste heat recovery initiatives, including recovery and reuse of process heat and utilisation of reactor waste heat in steam furnaces to reduce fuel consumption and lower carbon intensity.
- Commissioning of a 45 KLD Multiple Effect Evaporator (MEE), which reduced RLNG consumption by 58%, lowered greenhouse gas emissions, and improved resource efficiency through condensate recovery and reuse.
- Replacement of natural gas with by-product hydrogen in the caustic flaker heating system, creating a closed-loop energy solution that reduces fossil fuel consumption and GHG emissions.
- In addition, the Company is developing a comprehensive decarbonisation roadmap, increasing renewable energy usage, and implementing low-carbon technologies to achieve its medium- and long-term climate goal.

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

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	299	302
E-waste (B)	7.65	1.84
Bio-medical waste (C)	0.01	0.02
Construction and demolition waste (D)	-	0
Battery waste (E)	43.7	16.5
Radioactive waste (F)	-	0
Other Hazardous waste. Please specify, if any. (G)	56,064.91	86,887.94
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	50,116.92	39,840.98
Total (A + B + C + D + E + F + G + H)	1,06,532.27	1,27,049.30
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations)	0.0000023	0.0000028
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operations adjusted for PPP)	0.000048	0.000057
Waste intensity in terms of physical output	0.19	0.21
Waste intensity (optional) – the relevant metric may be selected by the entity	NA	NA

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	4,661.09	4,736.05
(ii) Re-used	82,419.88	1,06,863.25
(iii) Other recovery operations	7,388.90	4,233.78
Total	94,469.87	1,15,833.08
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	19.53	0.11
(ii) Landfilling	12,042.86	11,216.11
(iii) Other disposal operations	0.00	0.00
Total	12,062.39	11,216.22

*Restatement: The previous year's waste generation figures for Other Hazardous Waste and Other Non-Hazardous Waste have been restated to reflect improvements in waste classification and data consolidation processes

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 adopt an integrated waste management approach based on the principles of reduce, reuse, recycle, recover, and responsible disposal. Waste is segregated at source and managed in accordance with applicable regulations. Recyclable materials are sent to authorised recyclers, while hazardous waste is disposed of through authorised Treatment, Storage and Disposal Facilities (TSDFs) or utilised through co-processing and resource recovery wherever feasible.

We have implemented several circular economy projects, including regeneration and reuse of spent resin, recovery and reuse of IPA solvent, conversion of HCl waste streams into saleable by-products, and recycling of wastewater through advanced treatment systems, thereby reducing waste generation and enhancing resource efficiency.

To reduce the use of hazardous and toxic chemicals, we continuously focuses on process optimisation, green chemistry principles, material substitution wherever technically feasible, improved inventory management, preventive maintenance, and enhanced process controls. Technologies such as solvent recovery systems, spent resin regeneration, by-product recovery, waste heat recovery, and advanced wastewater treatment have been adopted to minimise hazardous waste generation at source. Hazardous wastes are tracked, stored, handled, transported, and disposed of through authorised agencies in compliance with statutory requirements, while opportunities for recycling, recovery, reuse, and co-processing are actively pursued to support circularity and reduce environmental impacts.

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	Dahej A	Manufacturing	Yes

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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 2025-26.					

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 Ranjithnagar Plant resulted in a fine from the GPCB, in line with regulatory enforcement within the large-scale industrial sector.	₹49 Lakhs as interim environment damage compensation to the GPCB.	Yes. Corrective action taken and a compliance report was submitted to the Directorate of Industrial Safety and the Gujarat Pollution Control Board (GPCB).

Leadership Indicators

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

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

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

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water withdrawal by source (in kilolitres)		
(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
Total volume of water withdrawal (in kilolitres)	NA	NA
Total volume of water consumption (in kilolitres)	NA	NA
Water intensity per rupee of turnover (Water consumed/turnover)	NA	NA
Water intensity (optional) – the entity may select the relevant metric	NA	NA

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

Parameter	FY 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
(ii) Into Groundwater		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
(iii) Into Seawater		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
(iv) Sent to third-parties		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
(v) Others		
No treatment	NA	NA
With treatment – please specify the level of treatment	NA	NA
Total water discharged (in kilolitres)	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.

No, 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 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	10,02,814.33	6,12,740.23
Category-1: Purchased Goods and Services	Metric tonnes of CO ₂ equivalent	3,09,570.47	96,065.00
Category-2: Capital Goods	Metric tonnes of CO ₂ equivalent	7,075.99	-
Category-3: Fuel and Energy-Related Activities	Metric tonnes of CO ₂ equivalent	1,79,084.30	2,17,548.00
Category-4: Upstream Transportation and Distribution	Metric tonnes of CO ₂ equivalent	4,51,066.81	2,50,300.97
Category-5: Waste Generated in Operations	Metric tonnes of CO ₂ equivalent	6,306.78	6,233.00
Category-6: Business Travel	Metric tonnes of CO ₂ equivalent	1,201.83	631.00
Category-7: Employee Commute	Metric tonnes of CO ₂ equivalent	102.62	13,816.00

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

Parameter	Unit	FY 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
Category-9: Downstream Transportation and Distribution	Metric tonnes of CO ₂ equivalent	48,405.53	28,146.26
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO ₂ equivalent/₹ turnover	0.000022	0.000013
Total Scope 3 emission intensity (optional) – the entity may select the relevant metric	Metric tonnes of CO ₂ equivalent/ MT of product	1.77	1.02

* Restatement: The previous year's Scope 3 GHG emissions and emissions intensity figures have been restated following a comprehensive review of activity data and calculation methodologies.

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.

No, We have not conducted any independent assessment, evaluation, or assurance by an external agency.

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 responsibility to protect biodiversity and operate responsibly in and around ecologically sensitive areas. During FY 2025-26, no significant direct or indirect adverse impacts on biodiversity arising from our operations were identified. We continue to undertake regular environmental monitoring, biodiversity assessments, green belt development, pollution control, and wastewater management to minimise potential ecological impacts. As no significant impacts were observed during the reporting period, no remediation measures 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	Renewable Energy Adoption	Increased use of captive wind, solar, wind-solar hybrid projects and renewable power procurement through Green Open Access.	Reduced dependence on conventional grid electricity and supported decarbonisation objectives.
2	Back Pressure Turbine Efficiency Improvement	Overhauling and optimisation of STG-2 turbine to improve steam-to-power conversion efficiency.	Energy savings of 3,766 MWh/year and reduction of approximately 3,088 tonnes of CO ₂ emissions annually.
3	Installation of VFDs in Utility Pumps	Variable Frequency Drives installed in DI Water Transfer Pump and Brine Secondary Pumps for demand-based operation.	Annual energy savings of 319,380 kWh and reduction of approximately 252 tCO ₂ /year.
4	Waste Heat Recovery and Process Optimisation	Recovery and reuse of waste heat from manufacturing processes and optimisation of utility systems.	Reduced fuel consumption, improved energy efficiency and lower GHG emissions.
5	45 KLD Multiple Effect Evaporator (MEE) Installation	Commissioning of MEE for effluent treatment, condensate recovery and strengthening of ZLD performance.	58% reduction in RLNG consumption, 80% reduction in effluent load and recovery of approximately 36 KLD condensate water.
6	Water Recycling and Reuse Projects	Recovery and reuse of boiler blowdown water, condensate recovery, RO water recycling and wastewater reuse initiatives.	Reduced freshwater withdrawal, enhanced water circularity and improved water-use efficiency.
7	Hazardous Waste Reduction through Resource Recovery	Regeneration of spent resin, IPA solvent recovery and conversion of HCl waste streams into saleable by-products.	Reduced hazardous waste generation, improved resource circularity and lowered environmental footprint.
8	Hydrogen as Alternative Fuel	Replacement of natural gas with by-product hydrogen in the caustic flaker heating system.	Reduced fossil fuel consumption, lowered GHG emissions and improved resource efficiency.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

Yes. We have established a comprehensive Business Continuity and On-site Emergency Management Plan to ensure preparedness for potential emergency situations. The plan outlines response procedures for various emergency scenarios, defines roles and responsibilities, and focuses on protecting employees, neighbouring communities, the environment, and business operations. Regular mock drills, training programmes, and periodic reviews are conducted to strengthen emergency preparedness and response capabilities.

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.

During FY 2025-26, no significant adverse environmental impacts arising from our value chain were identified. We continue to promote responsible environmental practices through supplier engagement, contractual requirements, periodic assessments, and ongoing monitoring to encourage compliance with our environmental expectations.

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

Formal assessment of value chain partners was not conducted during the reporting year. The Company is strengthening its ESG due diligence and data management processes to support systematic assessment and reporting in the coming years.

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

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.

33

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

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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 since there were no cases of anti-competitive conduct in FY 2025-26.		

Leadership Indicators

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

S. 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
1	No specific public policy position was advocated during the reporting year. However, GFL actively engaged in discussions on industry standards and regulatory developments within the chemical sector	Participation in industry forums, stakeholder consultations, trade associations, and constructive engagement with regulatory developments affecting the chemical industry.	No	As part of regular governance oversight, as and when required.	NA

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
Not Applicable. No project undertaken by the Company during FY 2025-26 was required to undergo a Social Impact Assessment under any applicable legal or regulatory requirement.					

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

Name of 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 ₹)
No projects were subject to the provisions of the Right to Fair Compensation and Transparency in Land Acquisition, rehabilitation and Resettlement 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 receives 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 organise 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. This robust mechanism ensures that all breaches are promptly addressed and rectified, reinforcing our commitment to ethical conduct and accountability.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

	FY 2025-26 (Current Financial Year)	FY 2024-25* (Previous Financial Year)
Directly sourced from MSMEs/small producers	27.60%	18.18%
Sourced directly from within India	53.40%	53.90%

* Restatement: FY 2024-25 input material data has been restated to include previously excluded capex procurement.

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 2025-26 (Current Financial Year)	FY 2024-25 (Previous Financial Year)
Rural	26.21%	28%
Semi-Urban	46.22%	48%
Urban	26.24%	22%
Metropolitan	1.33%	2%

Leadership Indicators

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

Details of negative social impact identified	Corrective action taken
Not Applicable. No Social Impact Assessment was required or conducted during the reporting period under any applicable law.	

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

S. No.	State	Aspirational district	Amount spent (In ₹)
During FY 2025-26, we did not undertake any CSR projects in districts designated as Aspirational Districts by the Government of India. Accordingly, no expenditure was incurred on CSR projects in such districts during the reporting period.			

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

No. Currently, we do not have a preferential procurement policy that provides preference to suppliers comprising marginalised or vulnerable groups. However, the Company is committed to promoting responsible and inclusive procurement practices and will evaluate the feasibility of incorporating supplier diversity considerations into its procurement framework in the future.

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

Currently, the Company does not have procurement arrangements with suppliers belonging to marginalised or vulnerable groups. Accordingly, no procurement was undertaken from such groups during FY 2025-26.

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

Not Applicable, as no procurement was made from suppliers comprising marginalised or vulnerable groups during the reporting period.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

S. No.	Intellectual Property based on traditional knowledge	Owned/Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
We did not own or acquire any intellectual property based on traditional knowledge. Accordingly, there were no benefits derived from or shared in relation to traditional knowledge-based intellectual property during FY 2025-26.				

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

Name of authority	Brief of the case	Corrective action taken
No adverse orders were received during FY 2025-26 in relation to intellectual property disputes involving the use of traditional knowledge. Accordingly, no corrective actions were required or undertaken by the Company.		

6. Details of beneficiaries of CSR Projects

S. No.	CSR project	No. of persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalised groups
1	Education	28,150	88
2	Sustainable livelihood	644	100
3	Women empowerment	135	100
4	Sustainable agriculture	2,210	95
5	Animal husbandry	891	95
6	Human health	10,158	74
7	Water management	17,020	92
8	Public amenities and social infrastructure	21,649	86
9	Plantation and forestry	6,700	53
10	Community WASH	1,653	100

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

Essential Indicators

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

We have established a robust customer grievance redressal and feedback mechanism to ensure timely and effective resolution of customer concerns. Customers can raise complaints, queries, feedback, or escalations through multiple channels, including email, telephone, and designated sales managers. All complaints are promptly acknowledged, investigated based on priority, and tracked through to closure. Wherever feasible, we provide an initial response within 48 hours, conduct a Root Cause Analysis (RCA) within five working days, and implement appropriate Corrective and Preventive Actions (CAPA) within 30 days to prevent recurrence.

Customer complaints and feedback are systematically recorded, reviewed, and analysed to identify improvement opportunities and strengthen product quality, service excellence, and customer satisfaction. In addition, we conduct regular customer satisfaction surveys to evaluate product performance, service quality, and customer health and safety aspects. Insights from these surveys are incorporated into our continuous improvement initiatives, enabling us to enhance our products, services, and overall customer experience.

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%

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

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

	FY 2025-26 (Current Financial Year)		Remarks	FY 2024-25 (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
Cyber-security	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	35	3	None	46	36	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 cyber security and risks related to data privacy? (Yes/No) If available, provide a weblink to the policy.

Yes. We have a formal Cyber Security and Data Privacy Policy that governs information security, cyber risk management, and the protection of personal and sensitive data. The framework is aligned with applicable regulatory requirements and recognised standards and is periodically reviewed to address evolving cyber risks.

Cyber Security and Data Privacy Policy available at:

<https://gfl.co.in/upload/pages/e707616ddecf541979774ae7d1063ad6.pdf>

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

During the reporting period, we did not receive any material complaints, product recalls, or regulatory penalties relating to advertising practices, delivery of essential services, cyber security and data privacy, or product safety. Nevertheless, in line with its commitment to responsible business conduct, customer trust, and continuous improvement, we have undertaken the following preventive and corrective measures:

Advertising and Customer Communication:

We have strengthened its review and approval mechanisms for marketing and customer communication materials to ensure compliance with applicable regulatory requirements and industry standards. Periodic reviews are conducted to verify the accuracy, transparency, and consistency of information communicated to customers and other stakeholders.

Cyber Security and Data Privacy:

We maintains a robust information security and data privacy framework supported by documented policies, employee awareness programmes, controlled access management systems, and periodic security assessments. Regular audits and monitoring activities are undertaken to identify, mitigate, and proactively address potential cyber security and data privacy risks, thereby safeguarding customer and business information.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)

Product Quality, Safety and Recall Prevention:

No product recalls were reported during the year. However, we continue to strengthen its quality management systems through rigorous testing protocols, process controls, root cause analysis of customer complaints, and implementation of corrective and preventive actions (CAPA). Insights from customer feedback and complaint investigations are systematically incorporated into operational processes to prevent recurrence and enhance product reliability and safety.

Regulatory Compliance:

No material penalties, enforcement actions, or notices were received from regulatory authorities during the reporting period concerning product safety, advertising practices, customer data privacy, or delivery of products and services. We continue to monitor evolving regulatory requirements and strengthen compliance controls to ensure adherence to all applicable laws, regulations, and industry standards.

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches along with impact: 0
- b. Percentage of data breaches involving personally identifiable information of customers: NA
- c. 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).**

Information on products and services can be accessed through the following channels:

Channel/Platform	Details	Weblink
Corporate website	Comprehensive information on products, applications, sustainability initiatives, and company operations.	https://www.gfl.co.in
Product portfolio	Details of fluoropolymers, refrigerants, chemicals, battery materials, and allied products.	https://gfl.co.in/Businesses_Products.php
Customer support & sales team	Product-related enquiries, technical support, and customer assistance through designated sales managers and customer service channels.	https://gfl.co.in/Global_Presence.php
Sustainability & ESG disclosures	Information on sustainability practices, ESG performance, annual reports, and policies.	https://gfl.co.in/Sustainability.php
Investor relations	Annual reports, disclosures, presentations, and other corporate communications.	https://gfl.co.in/Investor_Relations.php

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

We promote the safe and responsible use of our products through a comprehensive Product Stewardship and Responsible Care framework. Product-specific information, including Material Safety Data Sheets (MSDS/SDS), safe handling instructions, storage requirements, transportation guidelines, emergency response measures, and regulatory information, is provided to customers to support safe use throughout the product lifecycle.

We maintain a documented process to keep safety information, labels, MSDS, and risk communication materials updated and accessible to customers. Technical support and guidance are provided through dedicated sales and customer service teams, who assist customers in understanding product characteristics, safe handling practices, and applicable safety precautions.

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As part of our Product Stewardship programme, we actively communicate product safety information, promote hazard awareness, and encourage responsible transportation, use, storage, and disposal of products. Clear warnings, usage instructions, and safety guidelines are shared through product documentation and customer interactions to help protect human health and the environment.

We also engage with customers through regular feedback mechanisms and technical discussions to address product-related concerns and continuously improve product safety, customer awareness, and responsible product management practices.

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

We have established communication mechanisms to ensure that customers are informed of any anticipated disruption, delay, supply constraint, or discontinuation of products and services. Customers are notified through direct communication by designated sales managers, key account managers, customer service teams, email communications, and other appropriate customer engagement channels.

In the event of production interruptions, raw material shortages, regulatory changes, logistics challenges, or product phase-outs that may impact product availability, the Company endeavours to provide timely notice to affected customers. Regular customer interactions and business reviews are used to communicate potential risks, expected timelines, and available alternatives, where applicable.

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, we provide product information beyond statutory requirements through product labels, packaging, technical literature, Safety Data Sheets (SDS), product stewardship information, and QR code-enabled traceability systems for select fluoropolymer products. Packaging includes detailed product identification, usage instructions, handling precautions, storage guidance, and safety warnings. During FY 2025-26, GFL introduced QR code-based traceability for select fluoropolymer products used in lining applications, enabling customers to verify product authenticity and trace material history, thereby enhancing transparency, product stewardship, and customer confidence.

Yes, we conducted a formal customer satisfaction survey for key customers during FY 2025-26. Customer engagement and feedback are continued to be obtained through factory visits, technical discussions, online and in-person meetings, customer-connect programmes under the 'Fluoro Connect' initiative, senior management interactions, customer audits, industry exhibitions, and ongoing engagement with EPC consultants and end users. These interactions provided valuable insights into customer requirements, product performance, and service expectations, supporting continuous improvement and strengthening long-term customer relationships.

BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT (CONTD.)



Independent Reasonable Assurance Statement to Gujarat Fluorochemicals Limited on their Business Responsibility & Sustainability Report (BRSR) FY2026 - 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 FY2026 as part of their Integrated Annual Report ("the Report"). The scope of the Report comprises the reporting periods of FY2026. 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 Engagement (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. HO/49/14/14(7)2025-CFDPOD2/ I/3762/2026 on 30th January 2026, 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 ₂ , CH ₄ , N ₂ O, HFCS, PFCs, SF ₆ , NF ₃ , if available) ii. Total Scope 2 emissions (Break-up of the GHG (CO ₂ e) into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , 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



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Principle 6	E9	Circularity - Waste management	i. Plastic waste (A) ii. E-waste (B) iii. Bio-medical waste (C) iv. Construction and demolition waste (D) v. Battery waste (E) vi. Radioactive waste (F) vii. Other Hazardous waste. Please specify, if any. (G) viii. Other Non-hazardous waste generated (H) ix. Total waste generated (A+B+C+D+E+F+G+H) x. Waste intensity per rupee of turnover adjusted for PPP xi. Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations xii. Each category of waste generated, total waste disposed by disposal method
Principle 3	E1(c) & E11	Employee well-being & safety	i. Spending on measures towards well-being of employees as % of total revenue ii. Details of safety-related incidents for employees and workers (including contract workers)
Principle 5	E3(b) & E7	Gender diversity in business	i. Gross wages paid to females as a % of wages paid ii. Total Complaints on Sexual Harassment (POSH) reported
Principle 8	E4 & E5	Inclusive development	i. Input material sourced from MSMEs or small producers and from within India as % of total purchases ii. Job creation in smaller towns iii. Wages paid to people employed in smaller towns (permanent/non-permanent/contract) as % of total wage cost
Principle 9	E7 & Principle 1-E8	Customer & supplier engagement	i. Instances involving customer data loss or breach as % of total cyber events ii. Number of days of accounts payable
Principle 1	E9	Business openness	i. Concentration of purchases & sales with trading houses, dealers, and related parties ii. Loans, advances, and investments with related parties

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 FY2026. Our assurance task was planned and carried out during July to Aug 2026. 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.



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- 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 2026.
- 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 2025 for 31 March 2026 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

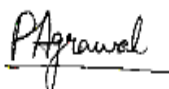
Intertek reviewed BRSR core disclosures provided by GFL in its consolidated Business Responsibility and Sustainability Report (BRSR). Based on the procedures performed as above, evidences obtained and the information and explanations given to us along with the representation provided by the management 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 2025 to 31 March 2026 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
Environmental KPIs Verifier
Intertek India
2026/08/20



Priyanka Agrawal
Social and Governance KPIs Verifier
Intertek India
2026/08/20



Shilpa Naryal
Head of Sustainability
Intertek South Asia & MENAP
2026/08/20

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.

