



PRIVI SPECIALITY CHEMICALS LIMITED



SUSTAINABILITY REPORT 2022-23

ABOUT US

PRIVI SPECIALITY CHEMICALS LTD. IS A LEADING MANUFACTURER OF AROMA CHEMICALS BASED IN INDIA. THE COMPANY WAS FOUNDED IN 1992 AND HAS SINCE THEN GROWN TO BECOME A GLOBALLY RECOGNIZED PLAYER IN THE INDUSTRY.

Organization's product range includes over 50 different aroma and fragrance chemicals, having a capacity of over 40,000 tons per annum. The company has state-of-the-art manufacturing facilities located in Mahad, Maharashtra and Jhagadia, Gujarat.

Privi Speciality Chemicals Ltd. is committed to maintaining the highest quality standards in its products and has been awarded various certifications, including ISO 9001:2015, ISO 14001:2015 for Environmental Management System (EMS) and has a ISO 45001:2018 standard Certification Accredited by Bureau Veritas (Occupational Health & Safety Management System (OHSMS) for all Manufacturing Units in Mahad from Bureau Veritas & ISO 9001:2015 for its Jhagadia unit.

Our mission is to be the preferred supplier of aroma chemicals globally, and the company has a strong focus on research and development to continuously improve its product portfolio and stay ahead of the competition.

This report speaks about the organization's ESG approach which propels the business strategy to deliver, containing detailed Environmental, Social and Governance ("ESG") disclosures as per GRI standards.



In this report, the words – 'Privi', 'We', 'Company', 'Our', 'Organization' are used interchangeably to denote Privi Speciality Chemicals Ltd.



ESG AND PRIVI SPECIALITY CHEMICALS LTD.

Privi Speciality Chemicals Ltd. is a leading aroma chemicals manufacturer, supplier and exporter with a culture and belief of holistic sustainable development. The organization supports wide range of ESG programs through ratings and disclosures related to carbon and water emission and has also received various awards on its social front.

The organization also engages in various other initiatives aligned with that of various SDG's (Please refer to Annexure A to this report)



ENVIRONMENT:

The organization on the environment front makes various disclosures and has received ranking on the Global level which makes the organization stand out from its peers. A few of the accolades include:

The organization being an active contributor towards environment, labor and human rights has participated in survey conducted by EcoVadis and has secured on the parameter of Environment 70 out of 100 and has been awarded with silver medal in recognition of its sustainability achievement.



The organization is actively disclosing its Scope 1, 2 and 3 emissions to Carbon Disclosure Project (CDP) and scored 'C' rating which is same as Asia regional average score.



SOCIAL:

The organization on the social front actively works for the benefit of its employees and has also received various awards from "National Safety Council" for contribution towards safety of its employees at different Units.

The organization has received Certificate of Appreciation on 17th March, 2023, from 'National Safety Council of India' for its Unit-II in Mahad, Raigad, Maharashtra in recognition of their appreciable achievement in Occupational Safety & Health during 2019-2021.



The organization has received on 12th November, 2022 Certificate form 'National Safety Council- Maharashtra Chapter' Maharashtra safety Awards- 2021 for achieving Longest Accident Free Period in Chemicals and Fertilizers Industrial Group for the location Unit-I and Unit II in Mahad, Raigad, Maharashtra.



The organization has participated in survey conducted by EcoVadis and has secured 60 out of 100 on the parameter of Labour and Human Rights and has been awarded with silver medal in recognition of its sustainability achievement.





GOVERNANCE:

On the Governance front, the organization has made various disclosures in regards to their initiatives towards supplier engagement and sustainable procurement and has received ratings on Global level.

The organization has participated in survey conducted by EcoVadis and has secured 50 and 60 out of 100 on the parameter of Ethics and Sustainable Procurement and has been awarded with silver medal in recognition of its sustainability achievement.



The organization discloses its Supplier Engagement Rating (SER) 2022 and has scored 'B-' rating which is in the Management band. This is higher than the Asia regional average and Chemicals sector average of C.



B-



The TfS* on-site audit was conducted on the basis of best practices around Health & Safety, Governance, Ethics, Human Rights etc., on Nov 22, 2022 and the company has scored '100%' under Good Performance (Green classified) with 5 years validity.



* TfS is a joint initiative of chemical companies to ensure sustainability of supply chains.



The Sedex assessment consists of 4 key pillars - Labour Standards, Health & Safety, Environment and Business Ethics and the company has conducted on-site verification for these social compliances and successfully closed all audit findings.



HOW TO USE THIS ESG REPORTING INDEX

THIS ESG REPORTING INDEX AIMS TO COMPLEMENT OUR INTEGRATED ANNUAL REPORT BY PROVIDING A BROADER RANGE OF ESG DISCLOSURES.

The GRI reporting frameworks allow us to provide information in a structured and consistent way, enabling our stakeholders to analyse our performance over time, and relative to other organisations. The purpose of each of these frameworks and information on how they should be used are described below, alongside our reporting boundaries and methodologies.

Throughout this ESG Reporting Index we often refer to our Annual Report and website, where more information on our strategy, standards and policies can be found.

Section	What is in this section and how to use it
Introduction	An overview of our ESG reporting approach and our materiality assessment.
ESG Materiality	What matters to our stakeholders.
GRI Index	A broad and comprehensive set of disclosures on organizational impacts that are relevant to a wide range of stakeholders, in line with the GRI framework. Some topics are material to our supplier sites and some to the countries where we make and sell our products.
Assurance Statement	Independent assurance is a key part of our approach to reporting. Again, this year, we engaged Ernst & Young (EY) to provide limited assurance on some key ESG metrics.



ESG MATERIALITY

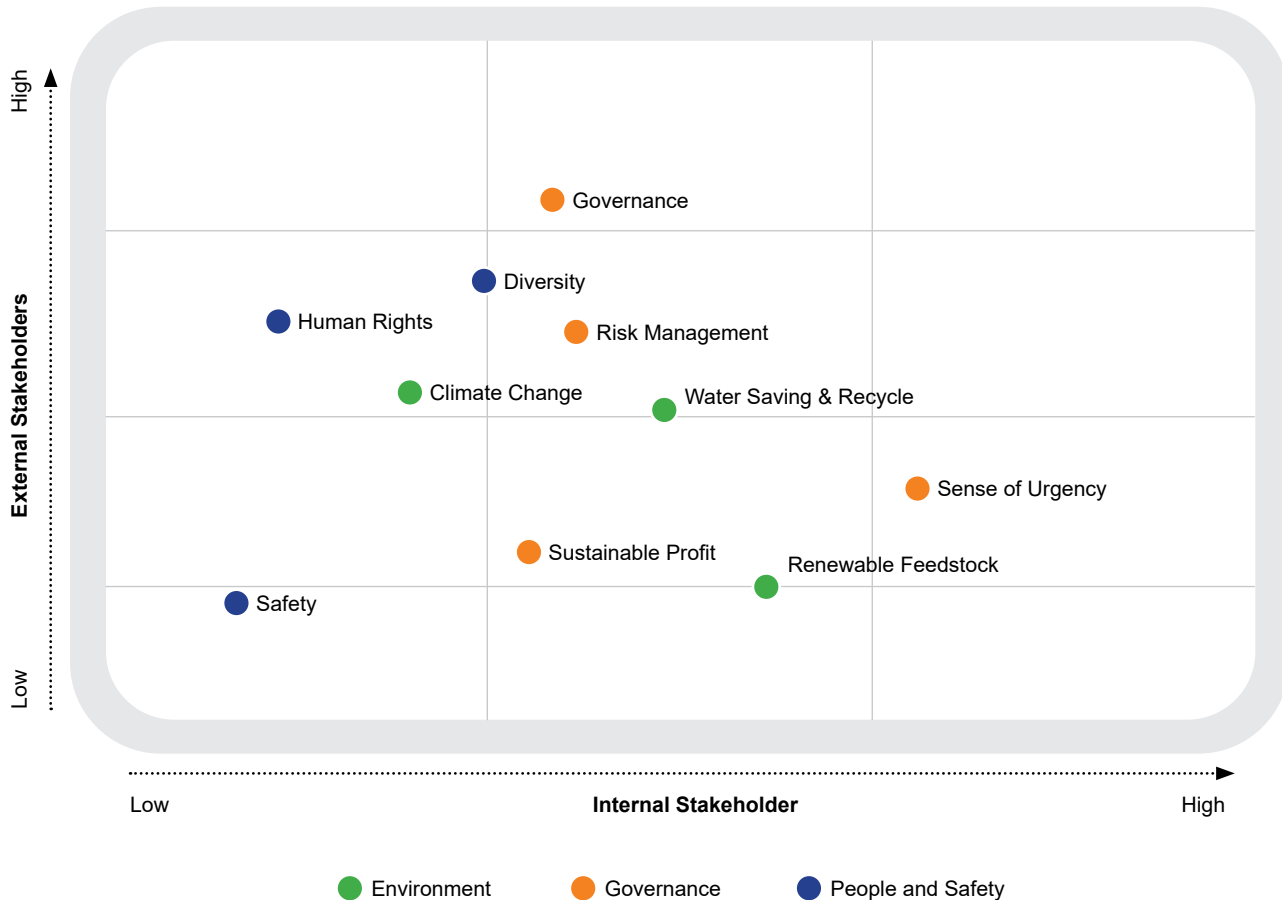
This assessment looked at the external trends shaping our operating environment and how we can most effectively align our work with the UN Sustainable Development Goals. We interviewed many internal and external stakeholders and explored the findings in workshops with experts from our business and senior management, customer communications.

We also held a workshop with our Executive Committee from plant locations and had multiple interactions reviewing the strategy with our senior management.

We review materiality on an annual basis, considering stakeholder comments – including those arising from our internal

subject matter experts financial analysis and external developments.

We believe all the topics presented in our materiality assessment below are important to our business. This matrix illustrates the view of both internal and external stakeholders about which topics are most critical.



THIS INDEX OUTLINES OUR RESPONSE TO THE GRI SUSTAINABILITY REPORTING STANDARDS

Our definition of material is relatively broad and includes issues that surfaced as part of our materiality assessment. We have reported on GRI standards, against the priorities set by our ESG materiality review. We continue to report against the most recent versions of the GRI Standards, reporting in a transparent manner to global standards of good practice on a range of environmental, economic, and social parameters.

GRI Standards		Our Strategic Focus Area	
Universal Standards	1 Foundation	<ul style="list-style-type: none"> Reporting principles 	<ul style="list-style-type: none"> Doing business in a sustainable manner
	2 General Disclosures	<ul style="list-style-type: none"> Organisational profile and reporting practices Activities and workers Governance Strategy, policies and practices Stakeholder engagement 	<ul style="list-style-type: none"> Doing business in a sustainable manner
	3 Material Topics	<ul style="list-style-type: none"> Process to determine material topics List of material topics Management of material topics 	<ul style="list-style-type: none"> Doing business in a sustainable manner
Topic Standards	Economic		<ul style="list-style-type: none"> Inclusion and diversity Maintain no-1 position in the industry
	Environmental		<ul style="list-style-type: none"> Dedicate sincere efforts towards sustainability
	Social		<ul style="list-style-type: none"> Provide Education to underprivileged children Clean drinking water to the community Clean & Green surroundings



GRI INDEX

HOW WE HAVE COMPLIED WITH THE GRI STANDARDS

This report has been prepared in line with the GRI 2021 Standards. The material in this report references the following disclosures:

FOUNDATION

GRI 1-1 to 1-8 from GRI 1: Foundation 2021

GENERAL

GRI 2-1 to 2-30 from GRI 2: General Disclosures 2021

MATERIAL TOPICS

GRI 3-1 to 3-3 from GRI 3: Material Topics 2021

ECONOMIC

GRI 201-01 to 201-04 from GRI 201: Economic Performance 2016

GRI 202-01 to 202-02 from GRI 202: Market Presence 2016

GRI 203-01 to 203-02 from GRI 203: Indirect Economic Impacts 2016

GRI 204-01 from GRI 204: Procurement Practices 2016

GRI 205-01 to 205-03 from GRI 205: Anti-corruption 2016

GRI 206-01 from GRI 206: Anti-competitive Behaviour 2016

GRI 207-01 to 207-04 from GRI 207: Tax 2019

ENVIRONMENTAL

GRI 301-01 to 301-03 from GRI 301: Materials 2016

GRI 302-01 to 302-05 from GRI 302: Energy 2016

GRI 303-01 to 303-05 from GRI 303: Water and Effluents 2018

GRI 304-01 to 304-04 from GRI 304: Biodiversity 2016

GRI 305-01 to 305-07 from GRI 305: Emissions 2016

GRI 306-01 to 306-05 from GRI 306: Waste 2020

GRI 308-01 to 308-02 from GRI 308: Supplier Environmental Assessment 2016

SOCIAL

GRI 401-01 to 401-03 from GRI 401: Employment 2016

GRI 402-01 from GRI 402: Labour/Management Relations 2016

GRI 403-01 to 403-10 from GRI 403: Occupational Health and Safety 2018

GRI 404-01 to 404-03 from GRI 404: Training and Education 2016

GRI 405-01 to 405-02 from GRI 405: Diversity and Equal Opportunity 2016

GRI 406-01 from GRI 406: Non-discrimination 2016

GRI 407-01 from GRI 407: Freedom of Association and Collective Bargaining 2016

GRI 408-01 from GRI 408: Child Labour 2016

GRI 409-01 from GRI 409: Forced or Compulsory Labour 2016

GRI 410-01 from GRI 410: Security Practices 2016

GRI 411-01 from GRI 411: Rights of Indigenous Peoples 2016

GRI 412-01 to 412-03 from GRI 412: Human Rights Assessment 2016

GRI 413-01 to 413-02 from GRI 413: Local Communities 2016

GRI 414-01 to 414-02 from GRI 414: Supplier Social Assessment 2016

GRI 415-01 from GRI 415: Public Policy 2016

GRI 416-01 to 416-02 from GRI 416: Customer Health and Safety 2016

GRI 417-01 to 417-03 from GRI 417: Marketing and Labelling 2016

GRI 418-01 from GRI 418: Customer Privacy 2016



GRI INDEX

UNIVERSAL STANDARDS

GRI 1: FOUNDATION

REPORTING PRINCIPLES

Disclosure		Our response
1-1	Accuracy	<p>We clearly, consistently and transparently report our performance through our annual report available on company website</p> <p>We explain our methodology for calculating performance against targets in the Reporting boundaries and methodologies section of this ESG Reporting Index. Ernst & Young Associates LLP (EY) was engaged to provide independent limited assurance over selected information in this ESG reporting Index.</p>
1-2	Balance	<p>We report against stretching targets and GRI indicators, whether or not our performance has been strong.</p> <p>This gives a balanced view of the impacts we make, which we have defined by considering the views of a range of stakeholders.</p> <p>We aim to present information in such a way that readers can find all the information they seek, including our responses to all GRI Standards.</p>
1-3	Clarity	<p>Our ESG and responsibility information is described at a high level on our website, with examples to bring our strategy to life.</p> <p>Our approach to ESG reporting is outlined in this report. A guide on how to use this ESG Reporting Index can be found on page 5 of this ESG Reporting Index.</p>
1-4	Comparability	<p>We continue to report against our external targets, as well as respond to universal standards such as the GRI Standards. We have designed our Annual Report and this ESG Reporting Index to enable stakeholders to easily review our performance over time, and to help readers find comparable information.</p>
1-5	Completeness	<p>Our coverage of material topics is explained in the Material topics section on page 6 and the scope of our performance measures are outlined in the Reporting boundaries and methodologies section on pages 49-52 of this ESG Reporting Index.</p>
1-6	Sustainability context	<p>Our Annual Report explains the wider context in which we operate and presents our sustainability performance in relation to both our corporate performance and global sustainable development issues, including the Paris Agreement and the UN SDGs.</p> <p>Our Annual Report also presents how our material issues – that is, economic, environmental and social issues – relate to our long-term strategy, risks, opportunities and goals, including throughout our value chain.</p>
1-7	Timeliness	<p>We continue to publish this ESG Reporting Index alongside the Annual Report.</p>
1-8	Verifiability (Reliability)	<p>The Reporting boundaries and methodologies section can be found on pages 49-52 of this ESG Reporting Index. In some cases, our data and processes are assured by third parties.</p> <p>Ernst & Young Associates LLP (EY) was engaged to provide independent limited assurance over selected non-financial information in this ESG Reporting Index.</p>



GRI 2: GENERAL DISCLOSURES

ORGANISATIONAL PROFILE AND ITS REPORTING PRACTICES

Disclosure		Our response																								
2-1	Organisational details	<p>Legal name: Privi Speciality Chemicals Limited</p> <p>Nature of ownership and legal form: Privi is a public listed company listed on the Bombay Stock Exchange Limited and National Stock Exchange of India Ltd.</p> <table><tr><th>Name of Exchange</th><th>Stock Code</th></tr><tr><td>BSE Ltd.</td><td>530117</td></tr><tr><td>National Stock Exchange of India Ltd.</td><td>PRIVISCL</td></tr></table> <p>Number of locations where plants and/or operations/offices of the entity are situated:</p> <table><tr><th>Location</th><th>Number of plants</th><th>Number of offices</th><th>Total</th></tr><tr><td>National</td><td>8</td><td>2</td><td>10</td></tr><tr><td>International</td><td>–</td><td>2*</td><td>2</td></tr></table> <p><i>*our International Offices are located in USA and The Netherlands.</i></p> <p>Markets served by the entity:</p> <table><tr><th>Location</th><th>Number</th></tr><tr><td>National (No. of States)</td><td>21*</td></tr><tr><td>International (No. of Countries)</td><td>38</td></tr></table> <p><i>Note: * Number of States includes 3 Union Territories</i></p>	Name of Exchange	Stock Code	BSE Ltd.	530117	National Stock Exchange of India Ltd.	PRIVISCL	Location	Number of plants	Number of offices	Total	National	8	2	10	International	–	2*	2	Location	Number	National (No. of States)	21*	International (No. of Countries)	38
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2-2	Entities included in the consolidated financial statements	We describe the sustainability reporting within the Reporting boundaries and methodologies section of this ESG Reporting Index. Our annual report has the detailed information of holding/ subsidiary / associate companies / joint ventures on pg no. 63 and also has standalone & Consolidated financial statement on page no. 123-264.																								
2-3	Reporting period, frequency and contact point	<p>Reporting period: Year ended March 2023.</p> <p>Ashwini Saumil Shah, Company Secretary,</p> <p>Telephone number: +91 9870158955</p> <p>Email: ashwini.shah@privi.co.in</p>																								
2-4	Restatements of information	Our approach to restating information from previous reporting periods is included within the Reporting boundaries.																								
2-5	External assurance Assurance policy and practice	<p>Our policy is to align our reporting of non-financial information with the most up-to-date, and what we consider to be the best, standards and protocols available at the beginning of our fiscal year. More information on our annual report and on our ..</p> <p>Ernst & Young</p> <p>EY, an independent auditor, was engaged to provide independent limited assurance over selected information in the ESG Reporting Index</p>																								



GRI 2: GENERAL DISCLOSURES

ACTIVITIES AND WORKERS

Disclosure		Our response																																																																			
2-6	Activities, brands, products and services	<p>The Company is the manufacturer and supplier of wide varieties of aroma chemicals. The products are supplied to a large number of Flavours & Fragrance (F&F) companies globally, which includes the top 10 F&F houses in the world. Apart from this, the products are also supplied to FMCG companies like Procter & Gamble, Reckitt & Benckiser. Aroma chemicals supplied to fragrance houses like Givaudan, Symrise & Firmenich are utilized in manufacturing varieties of fragrance which are eventually used in products like detergents, soap, cream & perfumes etc.</p> <p>These fragrance ingredients are also used in home care, personal care, fabric care, oral care, fine fragrances, food products like beverages, snacks, dairy products, sweets etc.</p> <p>The Company also supplies the products through distributors located at different parts of the world. These distributors further supply the material to the end users.</p>																																																																			
2-7	Employees	<p>Employees and workers</p> <table><tr><th rowspan="2">S. No.</th><th rowspan="2">Particulars</th><th rowspan="2">Total (A)</th><th colspan="2">Male</th><th colspan="2">Female</th></tr><tr><th>No. (B)</th><th>% (B / A)</th><th>No. (C)</th><th>% (C / A)</th></tr><tr><td colspan="7">EMPLOYEES</td></tr><tr><td>1.</td><td>Permanent (D)</td><td>542</td><td>501</td><td>92.44%</td><td>41</td><td>7.56%</td></tr><tr><td>2.</td><td>Other than Permanent (E)</td><td>130</td><td>114</td><td>87.69%</td><td>16</td><td>12.31%</td></tr><tr><td>3.</td><td>Total employees (D + E)</td><td>672</td><td>615</td><td>91.52%</td><td>57</td><td>8.48%</td></tr><tr><td colspan="7">WORKERS</td></tr><tr><td>4.</td><td>Permanent (F)</td><td>169</td><td>169</td><td>100.00%</td><td>Nil</td><td>Nil</td></tr><tr><td>5.</td><td>Other than Permanent (G)</td><td>389</td><td>389</td><td>-</td><td>Nil</td><td>Nil</td></tr><tr><td>6.</td><td>Total workers (F + G)</td><td>558</td><td>558</td><td>100.00%</td><td>Nil</td><td>Nil</td></tr></table>	S. No.	Particulars	Total (A)	Male		Female		No. (B)	% (B / A)	No. (C)	% (C / A)	EMPLOYEES							1.	Permanent (D)	542	501	92.44%	41	7.56%	2.	Other than Permanent (E)	130	114	87.69%	16	12.31%	3.	Total employees (D + E)	672	615	91.52%	57	8.48%	WORKERS							4.	Permanent (F)	169	169	100.00%	Nil	Nil	5.	Other than Permanent (G)	389	389	-	Nil	Nil	6.	Total workers (F + G)	558	558	100.00%	Nil	Nil
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2-8	Workers who are not employees	<p>Most people who work on our behalf are employed by Privi. As of March 2023, the total number of our extended workforce from agencies was 389 and they are hired for Factory Units located at Mahad, Maharashtra and Jaghadia, Gujarat. This does not include people working through Consultancy, Master Service Agreements or Statements of Work. The number of people in the agency extended workforce is reported using our HR vendor management system.</p> <p>As with most manufacturing companies, we also employ contractors and their numbers may vary across the factory units. For the most part, when we use contractors, it's for:</p> <ol style="list-style-type: none">Logistics (from the end of the packaging line), such as warehouse operators, forklift truck drivers and loadersCleaning, catering and site security.																																																																			



GRI 2: GENERAL DISCLOSURES

GOVERNANCE

Disclosure	Our response
2-9 Governance structure and composition	<p>Our governance structure is included in the Governance report section of the Annual Report on pages 37-54.</p> <p>Our President, Mr. R S Rajan is ultimately accountable for overall performance against ESG goals and targets, while responsibility for the companies progress and Governance lies with the Management.</p> <p>Company gives update on the ESG Strategy and Performance to Board every quarter during the Board Meetings. When an issue or risk relating to other ESG topics is discussed, the Board or Committee may assign an officials to look into it and report back. President and Chairman and Managing Director are responsible for implementing strategy across the organization and driving performance. The Executive Committee is provided with a quarterly update on performance against our targets and Progress plan.</p> <p>At the time of publication of our Annual Report, the Board was made up of 7 members: Privi has an optimum mix of Executive and Non-Executive Independent Directors including woman director. All the members of the Board are competent and are persons of repute with strength of character, professional eminence, having the expertise in their respective disciplines to deal with the management functions of the company. As on 31st March 2023, the Company's Board consists of 7 (Seven) Directors out of which 5 (Five) Directors are Non-Executive Independent Directors and 2 (Two) Executive Directors including Chairman & Managing Director (CMD).</p> <p>The Committee of the Board is responsible for overseeing, amongst other areas, risk and compliance/ethics programmes, Sustainability & CSR (Corporate Social Responsibility). The Organisation's risk assessment & Sustainability charter includes questions of climate change and review of all Company's risks including climate change related issues is done by the Board of Directors.</p> <p>For more information, see the Governance report section of our Annual Report. The terms of reference of all Board committees are available on our website.</p>
2-10 Nomination and selection of the highest governance body	<p>The Nomination Committee – made up of all the independent Non-Executive Directors and the Chairman of the company – is responsible for keeping under review the composition of the Board and senior leadership positions. The Committee makes recommendations to the Board concerning Board appointments. Criteria for Board appointments include skills, knowledge, experience and diversity.</p>
2-11 Chair of highest governance body	<p>The Chairman and Managing Director of the Company.</p>
2-12 Role of the highest governance body in overseeing the management of impacts	<p>Privi has an optimum mix of Executive and Non-Executive Independent Directors including woman director. All the members of the Board are competent and are persons of repute with strength of character, professional eminence, having the expertise in their respective disciplines to deal with the management functions of the company.</p> <p>The Committee of the Board is responsible for overseeing, amongst other areas, risk and compliance/ethics programmes, Sustainability & CSR (Corporate Social Responsibility). The Organisation's risk assessment & Sustainability charter includes questions of climate change and review of all Company's risks including climate change related issues is done by the Board of Directors. The Board of Directors is highest governance body, and the duties of the Board of Directors include assessment of the Company's climate change risk management. See GRI 2-9 Governance structure and composition for more information about our delegation of authority and executive-level responsibility for economic, environmental and social topics.</p> <p>Our Annual Report and this Business Responsibility and Sustainability Reporting are approved by the Board, and are ultimately signed off by our President and Chief Financial Officer.</p>



GRI 2: GENERAL DISCLOSURES

GOVERNANCE

Disclosure	Our response
2-13 Delegation of responsibility for managing impacts	See GRI 2-9 Governance structure and composition for more information about our delegation of authority and executive-level responsibility for economic, environmental and social topics.
2-14 Role of the highest governance body in sustainability reporting	Our Annual Report is approved by the Board, and are ultimately signed off by our Chief Executive and Chief Financial Officer
2-15 Conflicts of interest	The Board has agreed an approach and adopted guidelines for dealing with conflicts of interest, and responsibility for authorising conflicts of interest is included in the schedule of matters reserved for the Board. Our Code also references how potential conflicts of interest are managed. The Annual Report includes disclosures on conflicts of interest. More information is included in the Board of Directors section of the Annual Report on page no. 72.
2-16 Communication of critical impacts	The Board maintains a process for communicating critical concerns through the Audit Committee, which reviews the effectiveness of our systems of internal control and risk management, and is responsible for overseeing all actions taken relating to whistleblowing activities.
2-17 Collective knowledge of the highest governance body	<p>The Board's collective knowledge and experience of ESG is enhanced with background reports on various economic and ESG topics that it receives throughout the year. Some of these reports are discussed in detail in Board meetings. Additionally, our ESG Executive Working Group leads discussion of ESG topics and our Society 2030: Spirit of Progress plan, including at our Annual Strategy held during the year, again improving the Board's knowledge and expertise in this area.</p> <p>The Committee of risk assessment review risks associated with our economic and ESG performance. This improves Directors' experience of risks associated with climate change and other ESG topics.</p> <p>The Board is also responsible for reviewing our Annual Report and Business Responsibility Sustainability Report, which gives important contextual and performance information on economic and ESG topics.</p> <p>The Board helped shape and approved our approach to ESG performance and receives an update on our performance against those targets at least twice a year.</p>
2-18 Evaluation of the performance of the highest governance body	<p>We evaluate the performance and effectiveness of the Board, its committees and Directors every year.</p> <p>The details of Directors' remuneration is given under the Corporate Governance section of the Annual Report Key aspects are included in the Directors' remuneration report under Corporate Governance Section of the Annual Report on page 88.</p>
2-19 Remuneration policies	At the company's Annual General Meeting, shareholders have approved the Remuneration to be paid to Chairman and Managing Director of the Company. The Nomination & remuneration policy, was approved by the Board on November 05, 2020. The remuneration policy will be presented for renewal as and when required. The remuneration committee details and remuneration policy on page no. 13 - 16 of our annual report.
2-20 Process to determine remuneration	The remuneration including criteria for determining qualifications, positive attributes, independence of a director etc mentioned in our Annual Report on pages 16-19. This report includes ratio of the Directors Remuneration to the median of Employees remuneration, % increase in the remuneration.



GRI 2: GENERAL DISCLOSURES

GOVERNANCE

Disclosure	Our response
2-21 Annual total compensation ratio	We report the Median remuneration of respective category including Board of directors (BOD), Key Managerial Personnel (KMP), Employees other than BOD and KMP, Workers in our Business Responsibility and Sustainability Report (BRSR) which is part of annual report page no. 87-88.

STRATEGY POLICIES AND PRACTICES

Disclosure	Our response
2-22 Statement on sustainable development strategy	In our Annual Report on pages 06-07, our Chairman and Managing Director comment on how our role in ESG strategy and targets support our Performance Ambition to be one of the best performing, most trusted and respected consumer products companies in the world.
2-23 Policy commitments	<p>policy commitments and approach</p> <p>Our code of conduct sets out what we stand for as a business and how we demonstrate the highest standards of integrity and ethical behaviour. It is guided by our purpose and values. It provides clarity on how we are expected to behave to build the trust and respect of everyone who interacts with us.</p> <p>We have policies, standards and guidelines covering specific areas of our work. We review these every year to make sure we take account of any changes in our external environment and update them accordingly through Executive Committee approval. They reflect our values and our commitment to doing business the right way – and can be found on our website.</p> <p>Policy commitment to respect human rights</p> <p>Our Human Right Policy covers a list of recognised human rights and a list of specific at-risk groups that we give particular attention to.</p> <p>The authoritative intergovernmental instruments that we are committed to are referenced within our policies and standards. We have committed to the UN Global Compact (UNGC) on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, Due diligence.</p> <p>We review and refresh our Code at least every three years and our Policies and Standards annually. Where deemed necessary, we may update any of these documents throughout the fiscal year</p>
2.24 Embedding policy commitments	<p>Neither compliance nor conducting our business with integrity are negotiable – and our approach to risk and compliance helps us to encourage the right behaviours and attitudes in our people and to ensure responsible business conduct in everything we do.</p> <p>We undertake annual mandatory training on our Code and key policies. HR is responsible for managing those who have not completed the training via Learning management System (LMS).</p>



GRI 2: GENERAL DISCLOSURES

STRATEGY POLICIES AND PRACTICES

Disclosure	Our response
2.25 Processes to remediate negative impacts	<p>Our ambition to progressing sustainably for a responsible tomorrow, we strive to remediate any negative impacts we have caused or contributed to. We do this through our grievance mechanisms, which provide a framework for dealing with any adverse impacts that arise.</p> <p>Our environmental and social grievance mechanisms</p> <p>Our grievance mechanisms cover a wide range of social and environmental issues such as impacts on society; human rights, health, safety; harassment and discrimination; and environmental damage and other environmental issues.</p> <p>Our key grievance mechanism is our third-party HR helpdesk for employees and website, which can be accessed by anyone in our value chain, including contractors, suppliers, customers and consumers.</p> <p>For employees, reporting issues directly to colleagues – line managers, the Legal team, the Human Resources (HR) team or Business Integrity managers. Grievances are investigated independently and, where necessary, anonymized to protect those raising the issue.</p> <p>Environmental grievances are addressed locally and also reviewed quarterly by the relevant functional Risk Management meetings for trends areas of focus. Findings are escalated to the highest Governance team at corporate level to develop mitigations as appropriate.</p> <p>How we assess the effectiveness of our grievance mechanisms</p> <p>We engaged with local judicial or non-judicial grievance mechanisms to address matters when needed. As well as routine tracking and review, we also review assessments through our Risk Management programme, which assesses supplier risk prior to onboarding. Within our human rights risk domain, we require all suppliers to detail how grievances are reported to their management. We are also able to review grievance mechanism effectiveness within our supply chain through non-compliance from the Sedex Members Ethical Trade Audit (SMETA) supplier assessment systems. Our reviews have led us to work more closely with Sedex on SMETA activities, and with suppliers, to assess and strengthen compliance with labour standards.</p> <p>On environmental grievances, our Environment teams in each unit location review grievances to consider whether mitigation has been effective and whether grievances have been addressed. The effectiveness of this approach is monitored by:</p> <ul style="list-style-type: none"> • Drawing on internal and/or independent external expertise and feedback • Conducting meaningful consultation with potentially affected groups and other relevant stakeholders • Reviewing internal and external audit schedules
2-26 Mechanisms for seeking advice and rising concerns	<p>Our grievance redressal policy which has details of committee members, and it is accessible to all our employees and by those in our value chain, including contractors, suppliers, customers and consumers. For people to raise concerns about compliance with the law, our Code, any of our policies or standards, or any other compliance or ethics matter is kept confidential as per the policy standards.</p> <p>We do not tolerate reprisals against anyone who reports a concern or helps with an investigation in good faith. Anyone found to be involved in retaliation against an individual who has raised a concern will be subject to disciplinary action.</p>



GRI 2: GENERAL DISCLOSURES

STRATEGY POLICIES AND PRACTICES

Disclosure	Our response
2-27 Compliance with laws and regulations	<p>Environmental compliance</p> <p>Our approach to water, energy, biodiversity, emissions, and effluents and waste is described in the Business Responsibility and Sustainability Report in the annual report. This report is part of our overall approach to managing our environmental impact and complying with all local laws and regulations, or with our own standards and our supporting framework of policies.</p> <p>The President and Vice President sustainability is responsible to reviews environmental and compliance performance regularly during the year, including at quarterly Environmental Compliance reviews, managed by our Governance function. There are also routine reports and annual review of performance against yearly and longer-term targets.</p> <p>Omissions: the total number and the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period.</p> <p>Reason: not applicable.</p> <p>Explanation: we do not report fines that the business does not consider to be material.</p>
2-28 Membership of associations	<p>We have establish several social aspects– that is, industry-funded bodies that work with governments to reduce the harmful use of products. For more information regarding engagement with public and regulatory associations is published in our annual report page no. 103.</p> <p>We are proud signatories of a number of initiatives, including Science Based Targets initiative, UNGC's the UNGC and UNFCCC (United Nations Framework Convention on Climate Change) and reporting Communication on Progress (COP).</p>

STAKEHOLDER ENGAGEMENT

Disclosure	Our response
2-29 Approach to stakeholder engagement	<p>We define our stakeholders as all those who affect, are affected or could be affected by our business.</p> <p>We engage internal and external stakeholders, including employees, investors, commercial partners, governments, NGOs, local communities and consumers.</p> <p>We actively engage stakeholders at local and global levels. At a local level, employees across our business engage their colleagues, local governments, customers, media and community groups on issues of immediate concern to them. At a global level, we engage investors, customers, suppliers and multinational organisations such as UN agencies and NGOs. For more information on the annual report page no. 84-86.</p>
2-30 Collective bargaining agreements	<p>We have a strong commitment to transparent dialogue. In fiscal 23, 100% of our permanent workers were covered by collective bargaining agreements.</p>



GRI INDEX

TOPIC STANDARDS

ECONOMIC

ECONOMIC PERFORMANCE

3-3 Our management approach to economic performance

Our relationships with suppliers, investors, lenders, governments, employees and local community stakeholders have direct economic and social impacts, which we measure, evaluate and manage.

Our annual report speaks how we manage financial performance and includes financial performance measures. Each operating function is responsible for monitoring and reporting economic performance against annual progress plans and targets. That allows us to report on overall performance against our strategy.

The Board, the Executive Committee and management teams at each function level review economic performance at each of their meetings, tracking performance measures and annual operating plans. Details of financial performance measures are in the Annual Report.

Where necessary, we develop or adapt our activities to improve performance against our targets or in response to external factors.

Disclosure	Our response
201-01 Direct economic value generated and distributed	Our revenue this year totalled INR 1577.84 Crore, Economic value distributed includes operating costs (INR 950.78 Crore), taxes (INR 3.34 Crore), employee salaries and benefits (INR 72.37 Crore), payments to providers of capital (INR 7.81 Crore) and community investment (INR 3.33 Crore). Tax paid includes all cash tax paid by the company (INR 3.34) and this disclosure is made through our annual report page no. 204 – 264.
201-02 Financial implications and other risks and opportunities due to climate change	<p>Climate-related risk is identified as one of our principal risks (see pages 65-66 of our Annual Report). It has the potential to affect our business in many ways, The physical climate risks with the greatest disruptive potential are Climatic effect and renewable raw material yield, and we are exposed to transition climate risks associated with the cost of decarbonizing our supply chain, reducing waste, recycling costs and changing consumer behavior. The transition to a lower GHG emission also presents opportunities through innovation to develop more sustainable products.</p> <p>We have taken steps to better understand the direct and indirect impacts of climatic effect on our business, so that we can develop plans to ensure our supply chains remain resilient.</p> <p>We undertook scenario analysis to estimate the impact of climate-related risks on our operations and financial condition. We concluded with implementation of Business Continuity plan (BCP) and review cycle is yearly.</p>
201-03 Defined benefit plan obligations and other retirement plans	<p>We pay gratuities as per payment of Gratuity act. 100% employees are covered under this payment of gratuity act and more information is available on pg no.148 post-employment benefits.</p> <p>Explanation: we comply with all local legislation in relation to retirement plans.</p>
201-04 Financial assistance received from government	<p>We are a publicly listed company and not part-owned by any government.</p> <p>Tax credits information disclosure available on page no. 219 of our annual report.</p>



ECONOMIC

MARKET PRESENCE

3-3 Our management approach to market presence

We operate as a market-based business and sell products in more than 38 countries internationally and more than 21 national states. Each of our markets is accountable for its own performance and for driving growth. For more details, see the Business review and geographical distribution of revenue in Annual Report on pages 03-04.

We assess performance against our strategy using relevant performance measures.

As we develop our overall strategy, we review our market presence, as described in our Annual Report. Our market presence is routinely reported to the the Board. For more details, see the section of Management discussion and analysis (MDA) of the Annual Report on pages 31-36.

Disclosure	Our response
202-01 Ratios of standard entry-level wage by gender compared with local minimum wage	<p>Omissions: ratios of standard entry-level wage by gender compared with local minimum wage.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: we comply with all local legislation in relation to minimum wages in all units irrespective of gender.</p>
202-02 Proportion of senior management hired from the local community	<p>We prefer inclusion and diversity and the ongoing development of our people. We continue to enhance our positive market presence and deepen our understanding of local needs by appointing employees from the local community into senior management roles.</p> <p>Omissions: ratios of the senior management appointment from the local community.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: From the local community' refers to an employee that has citizen from surrounding locality (within 20-25 KM distance). We maintain a balance of local community hires and interstate appointments into senior management roles to support our positive market presence, talent development, and diversity and inclusion.</p> <p>Definitions: 'Senior management' refers to those in top leadership positions (General Manager & above), excluding Executive Committee positions. '</p>



ECONOMIC

INDIRECT ECONOMIC IMPACTS

3-3 Our management approach to indirect economic impacts

As a global business operating in numerous locations, we have many indirect economic impacts on the communities we operate in.

We review indirect economic impacts as part of strategy development and risk management, and we report them to the Board committee. Top management & strategy team keeps monitoring the economic situation locally as well as globally & take appropriate decisions from time to time for course correction to minimize the adverse impact on our business due to VUCA economic situations. We have maintained our suppliers of critical raw materials from across the globe considering the risk mitigation.

Disclosure	Our response										
203-01 Infrastructure investments and services supported	<p>For examples of significant infrastructure and services that we support, see the Sustainability section of our website.</p> <p>Details of the services that we support are outlined in the Corporate social responsibilities section of our annual report pages 22-24. These include community water, sanitation, and hygiene (cleaning) programs, which provide resources to those in need and often contribute to the development of local infrastructure. We prioritize communities near our operational areas.</p> <p>Details of how we support development of infrastructure can be found on our website, in the Sustainability section under GRI 3-3 and GRI 306-01 ESG Reporting Index.</p> <p>Although these infrastructure investments are not classified as commercial, we know that they will help ensure the sustainability of our business operations.</p>										
203-02 Significant indirect economic impacts	<p>There are a diverse array of indirect economic impacts associated with our community investment programs.</p> <p>In FY 2022-23, we invested INR 354.05 Lakhs operating profit in programs to support the communities where we live, work, source and sell. This community investment data includes specific voluntary engagement with charitable organizations or activities that extend beyond our core business activities.</p> <p>Community investment by focus area</p> <table> <tr> <th>Focus area</th><th>Investment (in Lakhs)</th></tr> <tr> <td>Health & Hygiene</td><td>88.86</td></tr> <tr> <td>Environmental Sustainability</td><td>168.01</td></tr> <tr> <td>Education</td><td>97.18</td></tr> <tr> <td>Total</td><td>354.05</td></tr> </table> <p>For more information about the impact of our community investment, and how we contribute to local economic development, see the Corporate social responsibilities section of our Annual Report on pages 22-24.</p>	Focus area	Investment (in Lakhs)	Health & Hygiene	88.86	Environmental Sustainability	168.01	Education	97.18	Total	354.05
Focus area	Investment (in Lakhs)										
Health & Hygiene	88.86										
Environmental Sustainability	168.01										
Education	97.18										
Total	354.05										



ECONOMIC

PROCUREMENT PRACTICES

3-3 Our management approach to procurement practices

We seek to influence supplier behavior and create positive social and environmental change through our procurement practices – who we choose to partner with and how we partner with them.

We select our suppliers based on their ability to deliver services and materials effectively and in a timely fashion, as set out in our vendor assessment program. We expect them to adopt clear commitments and minimum standards on ethical business, human rights and health, safety & sustainability, as set out in our supplier code of conduct.

We evaluate suppliers against various risk processes, such as business continuity and financial risk. These include the risk of bribery and corruption, which we manage through our vendor assessment process, which considers operating, market and sector risks, and which incorporates feedback from our internal reviews and assessments.

Procurement teams review each supplier's ongoing performance against contract and service levels. We assess our suppliers' adherence to specific requirements on issues such as labor and human rights, as we describe from GRI 406-01 to GRI 412-03 in this ESG Reporting Index.

Our Internal Audit, quality assurance team review our procurement practices. From their audit, we produce a report for functional management and relevant Executive Committee members, which includes audit recommendations and corrective action plan in case of non-conformity.

We work extensively with our suppliers to help them manage social and environmental risks and promote positive impact. Privi is a member of the EcoVadis, CDP Supply Chain and Water Security programs, through which we engage key suppliers on measuring and managing their Sustainability performance, carbon emissions and water-related impacts.

Disclosure	Our response
204-01 Proportion of spending on local suppliers	We estimate that more than 64 % of our raw materials dedicated to 'in-country' suppliers for all our sites in Maharashtra & Gujarat.

ANTI-CORRUPTION

3-3 Our management approach to procurement practices

We have an internal Anti-Corruption and Anti-bribery (ABAC) policy. Its core principles are included in our code of conduct that are applied to all our operations and personnel. Routine training is undertaken throughout the business. We drive adherence to the policy through our management and within routine business operations – and we review this adherence during assessments carried out by independent internal assessors. More information on policy is available in the annual report page no. 71-72.

Our Quality Assurance team monitors compliance with our Code, including our internal anti-corruption principles. Our Internal Audit team regularly audits our markets, which includes auditing their compliance procedures. The team specifies any required improvements, along with a mandatory completion date.

The quality assurance team checks that all necessary personnel have completed their Code of conduct training, and reports results to the Executive Committee and the Audit Committee of the Board.

Disclosure	Our response
205-01 Operations assessed for risks related to corruption	Each of our markets is required to carry out a legal compliance risk assessment each year, including considering human rights, bribery and corruption and anti-trust, and to develop mitigation plans for their most significant risks. Every business unit must also carry out assessments of the risk of corruption.



ECONOMIC

PROCUREMENT PRACTICES

Disclosure	Our response
205-02 Communication and training about anti-corruption policies and procedures	<p>Everyone who joins the business has to complete training in our Code within 30 days. The training covers anti-corruption policies and procedures. All employees at manager level and above, and employees in certain non-manager roles, complete an acknowledgement process on code of conduct policy & procedures through HR domain. By completing the acknowledgement process, employees are confirming that they have read and understood our Code and policies, including our policy on anti-corruption.</p> <p>Our compliance program uses a risk-based approach to identify where we should focus our anti-corruption communication and training. This approach considers the external context and functional risks, and the output of our own reviews.</p>
205-03 Confirmed incidents of corruption and actions taken	<p>Material cases are reported in page no. 72 of the Annual Report.</p> <p>Omissions: non-material incidents.</p> <p>Reason: not applicable.</p> <p>Explanation: we disclose details of such matters to the extent that it is required as part of our contingent liability disclosure. This does not include details of all ongoing regulatory investigations or penalties.</p>

ANTI-COMPETITIVE BEHAVIOUR

3-3 Our management approach to procurement practices

We have code of conduct Policy, which is included in Human rights and ethics code of conduct training program. We monitor adherence by reviewing emerging issues and outcomes by routinely assessing all business functions through our internal independent reviews.

Our Quality Assurance team monitors compliance with our Code, which includes our internal competition and anti-trust principles.

For more information on how we evaluate our approach to compliance issues, including anti-competitive behavior, see GRI 3-3 Anti-corruption of this ESG Reporting Index.

Disclosure	Our response
206-01 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	<p>We are required to carry out an annual legal compliance risk assessment, considering anti-competitive behavior, anti-trust and monopoly practices and to develop mitigation plans for their most significant risks. More information is available in the annual report page no. 103.</p> <p>Omissions: any non-public incidents are not reported.</p> <p>Reason: confidentiality constraints.</p> <p>Explanation: we disclose details of such matters to the extent that it is required as part of our contingent liability disclosure. This does not include details of all ongoing regulatory investigations or sanctions.</p>



ECONOMIC

TAX

3-3 Our management approach to tax

We pay tax in accordance with all applicable laws and regulations in the countries where we do business.

Our approach to tax seeks to enable and support our ambition and business strategy, as well as balance the various interests of our stakeholders, including investors, governments, our people, customers, consumers, suppliers and the communities in which we operate.

Our approach to tax, including our commitments, core principles and governance mechanisms, is described in detail in our annual report pages 148-169. The Board of Directors approves our tax strategy, and monitors compliance each year through the Audit Committee.

The senior management with relevant expertise the Chief Financial Officer, is the supervisory body for all group tax activities. This audit Committee reviews relevant developments on issues covered by our taxation process.

For more information about our tax governance and how we evaluate our approach, see page 14 of our annual report, Director's report and further disclosure on pages 148-169 on taxation.

Disclosure	Our response
207-01 Approach to tax	Information about our tax strategy, our approach to regulatory compliance and how our approach to tax links to our business strategy can be found in our annual report page no. 148 and 149.
207-02 Tax governance, control and risk management	Information about our tax governance, risk management and compliance can be found in our financial statements on pages 123-264. A description of our assurance process can be found in GRI 2-5 of this ESG Reporting Index.
207-03 Stakeholder engagement and management of concerns related to tax	A description of our approach to engaging with tax authorities, our public policy advocacy on tax and our process for collecting and considering the views and concerns of stakeholders, including external stakeholders, can be found in our annual report page no. 103.
207-04 Country-by-country reporting	Omissions: country-by-country reporting. Reason: not applicable. Explanation: There are no locations within other countries.



ENVIRONMENTAL

MATERIALS

3-3 Our management approach to materials

The materials we use can largely be categorized as renewable raw materials. The manufacture of finished materials and the use and disposal of our products generates greenhouse gas emissions, uses water and other forms of natural capital, and may create waste.

For more information, see:

- **Our Website:** For more information on our management approach to materials, see the sustainability section pages from our website.

Our general approach to materials is for our Supply chain and Procurement teams to evaluate the impacts linked to their sourcing and to review our suppliers' management processes and applicable certified source of supply in case of plant originated raw materials.

Renewable raw materials

Our vision is to make our raw material supply chains economically, socially and environmentally sustainable and resilient, as described in our Annual report Processing sustainably for a responsible tomorrow page no. 01-02.

We are developing protocols to monitor, report and verify the impact of our renewable sources pilots, which are being implemented across our priority raw materials.

We are working with our suppliers to improve the traceability of raw materials across our sourcing locations and are tracking the volumes of raw materials supplied to us that are covered by sustainability standards and certifications.

Our performance against targets relating to raw materials is reported internally every quarter. Performance is reviewed at board level stakeholders throughout the business, including our Executive Committee.

Disclosure	Our response						
301-01 Materials used by weight or volume	<p>This year, we used approximately 52268.26 tones of raw material out of which 29% volume is of renewable raw materials such as Gum Turpentine Oil (GTO) & Crude Sulphate Turpentine (CST) and 70% volume of procurement is from FSC (Forest Stewardship Council) certified sources.</p> <table> <tr> <th>Raw material</th><th>Volume (Metric Tons/year)</th></tr> <tr> <td>Raw material used</td><td>52268.26</td></tr> <tr> <td>Packaging material used</td><td>1736.212</td></tr> </table>	Raw material	Volume (Metric Tons/year)	Raw material used	52268.26	Packaging material used	1736.212
Raw material	Volume (Metric Tons/year)						
Raw material used	52268.26						
Packaging material used	1736.212						
301-02 Recycled input materials used	<p>Omissions: The quantity of recycled input material used in the manufacture of products.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: We are not using recycled input as a raw material input.</p>						
301-03 Reclaimed products and their packaging materials	<p>Omission: percentage reclaimed products and their packaging materials for each product category.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: There is no use of reclaimed products.</p>						



ENVIRONMENTAL

ENERGY

3-3 Our management approach to energy

Climate change is having increasingly severe physical impacts around the world, while regulatory and policy efforts to control greenhouse gas emissions are increasing the cost of energy from fossil fuels. We have set targets committed to SBTi includes number of targets that aim to cut our carbon emissions, including our target for renewable energy use across our direct operations by 2030.

For more information, see:

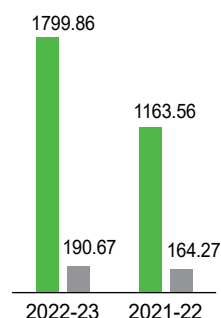
- **Our Website:** For more information on our approach to energy, see the energy conservation under Sustainability section of our website.
- **Our Annual report:** See our sustainability section, Future-proofing Privi through Sustainability Initiatives from our Annual Report on pages 09-12 for information on our approach to energy and performance against our energy-related target. Also see the technology absorption on pages 19-20 of our annual report for more information about our energy-related initiatives.
- See our Net-zero carbon strategy and commitment, Future-proofing Privi through Sustainability Initiatives in the annual report page no. 09.

Our approach to energy is based on four main activities:

1. Reducing energy consumption
2. Recovering and reusing energy
3. Converting energy sources to renewables
4. Minimising energy use across our supply chain.

To track the effectiveness of our approach, we monitor our performance against goals, including those focused on energy and carbon, and report progress every quarter. Performance is reviewed at board level.

by stakeholders throughout the business, including our Executive Committee and the 2030 Grain-to-Glass Strategic Business Review team.

Disclosure	Our response									
<div>302-01 Energy consumption within the organisation</div> <div>Direct and Indirect energy consumption</div> <div><table><thead><tr><th>Year</th><th>Direct energy consumption (TJ)</th><th>Indirect energy consumption (TJ)</th></tr></thead><tbody><tr><td>2022-23</td><td>1799.86</td><td>190.67</td></tr><tr><td>2021-22</td><td>1163.56</td><td>164.27</td></tr></tbody></table><div><div>Direct energy consumption (TJ)</div><div>Indirect energy consumption ((TJ))</div></div></div>	Year	Direct energy consumption (TJ)	Indirect energy consumption (TJ)	2022-23	1799.86	190.67	2021-22	1163.56	164.27	<p>We report two years of direct energy consumption, with our baseline year being 2021. This includes both energy generated and used on site and energy supplied to our facilities.</p> <p>Direct and Indirect energy consumption (TJ)</p> <div><div>1. Direct and indirect energy consumption refers to energy sources that we own or control and generate Scope 1 and purchase Scope 2 (indirect) emissions from, as defined by the WRI/WBCSD Greenhouse Gas Reporting Protocol.</div><div>2. 2021 baseline data, and data for the periods ended 31 March 2022, have been restated in line with the WRI/WBCSD Greenhouse Gas Reporting Protocol and our own environmental reporting methodologies.</div></div> <p>303 Energy included was used for fuel, electricity, heating, cooling and steam.</p> <p>Total direct direct and indirect energy consumption 1990.52 TJ is within EY's independent limited assurance report see on pages 49-52 of this ESG Reporting Index.</p> <p>Omissions: breakdown of energy consumption by heating, cooling and steam.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: the breakdown of energy consumption by heating, cooling and steam is not included here because, currently, this level of detail is unavailable given the inherent complexity of heat recovery systems but we plan to report in upcoming year.</p>
Year	Direct energy consumption (TJ)	Indirect energy consumption (TJ)								
2022-23	1799.86	190.67								
2021-22	1163.56	164.27								



ENVIRONMENTAL

ENERGY

Disclosure	Our response
302-02 Energy consumption outside of the organisation	Purchased goods and services, capital goods, transport and distribution of our brands by third-party logistics.
302-03 Energy intensity	<p>Here we report direct and indirect energy Intensity for the two years. Our baseline year is 2021.</p> <p>Direct and indirect energy efficiency (TJ/Kg production)</p> <p>302-03.1 Direct and indirect energy sources refer to those that generate Scope 1 (direct) and Scope 2 (indirect) emissions as defined by the WRI/WBCSD Greenhouse Gas Reporting Protocol.</p> <p>302-03.2 2021 baseline data, and data for the periods ended 31 March 2022 have been restated in line with the WRI/WBCSD Greenhouse Gas Reporting Protocol and our own environmental reporting methodologies.</p> <p>302-03.3 Energy included was used for fuel, electricity, heating, cooling and steam. Total direct and indirect energy efficiency 63.41 MJ/kg produced, direct and indirect energy intensity (MJ/kg produced) is within EY’s independent limited assurance scope – see pages----- of this ESG Reporting Index. For Reporting boundaries and methodologies, see pages ____.</p>
302-04 Reduction of energy consumption	<p>This year, energy consumption from fuel, electricity, heating, cooling and steam increase by 26.7% (direct and indirect energy consumption) from the prior year was 26.7%Δ.</p> <p>Omission: The percentage reduction in energy consumption.</p> <p>Reason: There is an increase in GHG emissions as compared to last year 2022.</p> <p>Explanation: The consumption has increased as compare to the last year as we introduced three new products as part of expansion. The fuel consumption was more due to consumption of electricity in project civil work as well as R & D, Pilot trials, and other related activities. In addition to this, the volumes of these products manufactured were low as it took time for their market acceptance. Though the production volumes were low and consumption in utilities continued to be high for initial few months till the time operation were streamlined.</p>
302-05 Reductions in energy requirements of products and services	Energy requirements of products and services are not deemed relevant, given that carbon emissions from this energy use do not meet the relevancy criteria stipulated by the WRI Scope 3 Reporting Standard. Specifically, these emissions do not contribute significantly to our overall Scope 3 footprint, nor do they contribute to our business-wide risk exposure.



ENVIRONMENTAL

WATER AND EFFLUENTS

3-3 Our management approach to water and effluents

Water is an essential ingredient in all our ingredients. A lack of access to clean water can affect peoples' health, their livelihoods, ability to grow crops and undertake other types of work.

Given our business, many of our operations are water intensive, and many of our suppliers depend on sufficient water for their operations.

For more information, see:

- **Our Website:** For more information on our management approach to water, see the water section under sustainability pages of our website.
- **Our annual report:** For information about the actual and potential negative and positive impacts of our business operations on water and effluents on the economy, environment and society, and information on our water-related initiatives see our Annual Report on pages 93
- **Our policies and standards:** For information about our strategy and management approach to water and effluents, see Our Water Stewardship Strategy and our policy.

We believe in the importance of water in protecting the environment, human health and economic development in our local communities. Our vision is to preserve water resources and respect the natural cycle of water wherever relevant to our business.

As part of our Environment Policy, we work hard to comply with limits on abstraction and discharges of water. We use water-quality indicators to manage performance and look for locally appropriate solutions, informed by robust scientific assessment for wastewater management. This includes water reuse, where appropriate. We have implemented Reverse Osmosis Plant and Multi Effect Evaporator plant to recycle and reuse waste water which enables to utilize treated water. The organization's Jhagadia unit (Gujarat) is designated as ZLD by Gujarat Pollution Control Board. Further, at Mahad unit (Maharashtra) the organization has already taken initiative in its unit-II to implement ZLD mechanism and for unit III the same is under trial run.

To assess the effectiveness of our approach, we track our performance against our water related targets and monitor progress every six months. Performance is reviewed at unit level quality assurance team. This regular assessment of performance helps manage program risks and opportunities and ensures we have the right level of resources to meet our commitments.

Disclosure	Our response
303-01 Interactions with water as a shared resource	<p>Water is an essential ingredient of all our products and is used throughout our Manufacturing process.</p> <p>We carry out a detailed, data-driven assessment of our impacts and dependencies on water throughout our supply chain. The water is primarily for:</p> <ol style="list-style-type: none"> 1. Steam Generation 2. Process cooling 3. Equipment Cleaning 4. Gardening 5. Drinking and sanitation 6. Process <p>The recycle / discharge of treated wastewater is essential for our process to maintain employee health, product quality, and to avoid process interruption. We withdraw freshwater from Municipal source only. So here we are referring to Municipal Source water (ie water supplied by State Govt. Industrial Development Corporation). We recycle the treated effluent for the above point 1, 2 and point 4 by purifying it through Reverse Osmosis.</p>



ENVIRONMENTAL

WATER AND EFFLUENTS

Disclosure		Our response																								
303-02	Management of water discharge- related impacts	<p>We aim to return all wastewater from operations safely to the environment. Our internal standard sets stringent criteria for wastewater discharge to ensure we meet local and national regulations – and we aim to maximise circularity where appropriate. Water is getting used in our production activities, Privi is committed to not exceeding local discharge requirements (the limits are defined/mentioned on the Environmental Clearance copy which is issues by the state pollution board) and it is a legal requirement to maintain those limits.</p> <p>Each facility monitors total volumes discharges by treatment method (after treatment to common effluent treatment plant - CETP) by reviewing continuous on-site metering.</p>																								
303-03	Water withdrawal	<table><tr><th></th><th>All areas (KL)</th></tr><tr><td rowspan="10">Water withdrawal by source</td><td>Surface water</td><td>0</td></tr><tr><td>– Freshwater</td><td>0</td></tr><tr><td>– Other water</td><td>0</td></tr><tr><td>Ground water</td><td>0</td></tr><tr><td>– Freshwater</td><td>0</td></tr><tr><td>– Other water</td><td>0</td></tr><tr><td>Seawater</td><td>0</td></tr><tr><td>Third party water (MIDC water)</td><td>527156</td></tr><tr><td>Other (Rainwater Harvesting)</td><td>3363</td></tr><tr><td>Total water withdrawal</td><td>530519</td></tr></table>		All areas (KL)	Water withdrawal by source	Surface water	0	– Freshwater	0	– Other water	0	Ground water	0	– Freshwater	0	– Other water	0	Seawater	0	Third party water (MIDC water)	527156	Other (Rainwater Harvesting)	3363	Total water withdrawal	530519	
	All areas (KL)																									
Water withdrawal by source	Surface water	0																								
	– Freshwater	0																								
	– Other water	0																								
	Ground water	0																								
	– Freshwater	0																								
	– Other water	0																								
	Seawater	0																								
	Third party water (MIDC water)	527156																								
	Other (Rainwater Harvesting)	3363																								
	Total water withdrawal	530519																								
303-04	Water discharge	<table><tr><th></th><th>All areas (KL)</th></tr><tr><td rowspan="6">Water discharge</td><td>Surface water</td><td>0</td></tr><tr><td>Ground water</td><td>0</td></tr><tr><td>Seawater</td><td>0</td></tr><tr><td>Third-party water (total)</td><td>34155</td></tr><tr><td>Third-party water sent for use to other organisations</td><td>0</td></tr><tr><td>Total water discharge</td><td>34155</td></tr><tr><td rowspan="2">Water discharge by freshwater and Other water</td><td>Fresh water</td><td>0</td></tr><tr><td>Other water</td><td>0</td></tr></table>		All areas (KL)	Water discharge	Surface water	0	Ground water	0	Seawater	0	Third-party water (total)	34155	Third-party water sent for use to other organisations	0	Total water discharge	34155	Water discharge by freshwater and Other water	Fresh water	0	Other water	0				
	All areas (KL)																									
Water discharge	Surface water	0																								
	Ground water	0																								
	Seawater	0																								
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Water discharge by freshwater and Other water	Fresh water	0																								
	Other water	0																								
<p><i>Please refer to the Reporting boundaries and methodologies section on pages 49-52 of this ESG Reporting Index for more information about how data has been compiled, including the standards, methodologies and assumptions used.</i></p>																										
303-04	Water discharge	<p>In fiscal 23, wastewater was treated on site at our operations using one or more of the following methods: Primary treatment, Secondary treatment, tertiary treatment, reverse osmosis, multiple evaporator (MEE), Agitated Thin Film Dryer (ATFD).</p> <p>Some of wastewater volume was sent to off-site treatment facilities that is Common effluent treatment plant (CETP) as mentioned in GRI 303-04.</p> <table><tr><th>Effluent Treatment</th><th>Volume (KL) of effluent by treatment method</th></tr><tr><td>Effluent treated</td><td>120204</td></tr><tr><td>Third-party water (total CETP)</td><td>34155</td></tr></table>		Effluent Treatment	Volume (KL) of effluent by treatment method	Effluent treated	120204	Third-party water (total CETP)	34155																	
Effluent Treatment	Volume (KL) of effluent by treatment method																									
Effluent treated	120204																									
Third-party water (total CETP)	34155																									



ENVIRONMENTAL

WATER AND EFFLUENTS

Disclosure	Our response						
303-05 Water consumption	<table> <tr> <th></th><th>All areas (KL)</th></tr> <tr> <td>Total water consumption</td><td>496680</td></tr> <tr> <td>Change in water storage, if water storage has been identified as having a significant water-related impact</td><td>0</td></tr> </table> <p><i>Please refer to the Reporting boundaries and methodologies section on pages 49-52 of this ESG Reporting Index for more information about how data has been compiled, including the standards, methodologies and assumptions used.</i></p>		All areas (KL)	Total water consumption	496680	Change in water storage, if water storage has been identified as having a significant water-related impact	0
	All areas (KL)						
Total water consumption	496680						
Change in water storage, if water storage has been identified as having a significant water-related impact	0						

BIODIVERSITY

3-3 **Our management approach to biodiversity**

Our operations/offices in/around are not coming under 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.

We measure and report our impact, mitigate the risks and work towards improving the environment, where appropriate. We also carry out environmental impact assessments for sites.

Our sites are also not close to the habitats of threatened species, as designated by the International Union for Conservation of Nature (IUCN). In all cases, we are managing these sites in line with our licence conditions and are aiming to meet the expectations of local stakeholders

Disclosure	Our response
304-01 Operational sites owned, leased, managed in, or adjacent to protected areas or areas of high biodiversity value outside protected areas	Not applicable since none of operational site is under high biodiversity protection area.
304-02 Significant impacts of activities, products and services on biodiversity	<p>None of our operations or land that we own has a significant impact on protected areas, or on areas of high biodiversity value outside protected areas.</p> <p>Omissions: Impact of activities, products and services on biodiversity.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: we plan to do assessment of our upstream effects on biodiversity.</p>
304-03 Habitats protected or restored	We have implemented initiatives to protect and restore habitats. For example, The Company is supporting the crocodile conservation project of the Government near Mahad in Savitri River. This initiative promotes reforestation activities and the preservation of local species to maintain landscape & biodiversity.
304-04 IUCN Red List species and national conservation list species with habitats in areas affected by operations	<p>Omissions: The IUCN Red List species and national conservation list species with habitats in areas affected by operations.</p> <p>Reason: Not applicable.</p> <p>Explanation: The operational units are not coming under IUCN Red List species and national conservation list species with habitats in areas affected.</p>



ENVIRONMENTAL

EMISSIONS

3-3 Our management approach to emissions

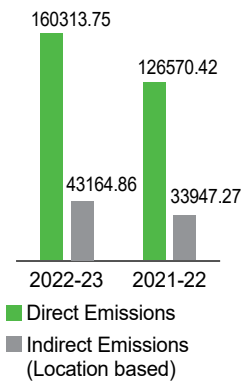
Climate change is having increasingly severe physical impacts around the world. We recognize that there is a climate emergency and we are committed to reducing our emissions across Scope 1, 2 and 3, in line with the Science Based Targets initiative guidance.

For more information, see:

- **Our Website:** For more information on our approach to emissions reduction and commitment available on sustainability section of our website, which includes our Net-Zero Strategy.
- **Our Annual report:** See the sustainability's initiatives from our Annual Report on pages 06-07 for information on our approach to emissions and performance against our emissions targets. Also see the Reporting boundaries and methodologies section on -----of this ESG Reporting Index for more information about how we measure and report on our targets.

We are actively increasing the use of renewable energy in our operations and working towards reducing our energy-related emissions. To meet our target to be net zero in our direct operations by 2050, we have set a Science Based Targets initiatives and getting them approved targets by SBTi to reduce our emissions by 50% by 2030 from our 2021 baseline.

In addition to our operational emissions target, we are also working with our suppliers to help them access low-cost, reliable renewable energy.

Disclosure	Our response														
305-01 Direct and indirect GHG emissions (location based) (CO₂eMT) 305-02 Direct and indirect Emissions CO₂e (tonnes)	Direct and indirect carbon emissions (location based) this year were 203478.6 (tonnes CO ₂ e) (2022: 160517.7 (tonnes CO ₂ e)), comprising direct emissions (Scope 1) of 160313.8 (tonnes CO ₂ e) (2022: 126570.4 (tonnes CO ₂ e)) and indirect emissions (Scope 2) of 43164.86 (tonnes CO ₂ e) (2022: 33947.27 (tonnes CO ₂ e)).														
Direct and indirect Emissions CO₂e (tonnes)	Direct and indirect GHG emissions (location-based) (tonnes CO₂e)														
 <p>160313.75 126570.42 43164.86 33947.27</p> <p>2022-23 2021-22</p> <p>■ Direct Emissions ■ Indirect Emissions (Location based)</p>	<ol style="list-style-type: none"> CO₂e figures are calculated for Scope 1, using the WRI/WBCSD Greenhouse Gas Reporting Protocol Guidance and for scope 2 indirect emissions, the relevant emission factors from the country of operation (Central Electricity Authority India), as applicable. 2021 baseline data, and data for the periods ended 1 April 2021 and 31 March 2022, have been stated in line with the WRI/WBCSD Greenhouse Gas Reporting Protocol and our own environmental reporting methodologies. <p>Direct GHG emissions xIndirect GHG emissions</p> <p><i>Within EY's independent limited assurance scope – see pages 49-52 of this ESG Reporting Index.</i></p>														
305-03 Other indirect (Scope 3) GHG emissions	Scope 3 GHG emissions (Total – 5.9 million metric tonnes) <table border="1"> <thead> <tr> <th>Sources of Scope 3 GHG^{1,2} emissions</th><th>Metric tonnes CO₂e (2023)</th></tr> </thead> <tbody> <tr> <td>Employee commuting</td><td>16742.770</td></tr> <tr> <td>Business travel</td><td>33</td></tr> <tr> <td>Purchased goods: services</td><td>49.24</td></tr> <tr> <td>Upstream transportation and distribution (Category 4 Inbound logistics)⁴</td><td>3193</td></tr> <tr> <td>downstream transportation</td><td>40697</td></tr> <tr> <td>Total</td><td>52440.27</td></tr> </tbody> </table>	Sources of Scope 3 GHG ^{1,2} emissions	Metric tonnes CO ₂ e (2023)	Employee commuting	16742.770	Business travel	33	Purchased goods: services	49.24	Upstream transportation and distribution (Category 4 Inbound logistics) ⁴	3193	downstream transportation	40697	Total	52440.27
Sources of Scope 3 GHG ^{1,2} emissions	Metric tonnes CO ₂ e (2023)														
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Upstream transportation and distribution (Category 4 Inbound logistics) ⁴	3193														
downstream transportation	40697														
Total	52440.27														



ENVIRONMENTAL

EMISSIONS

Disclosure	Our response						
305-04 GHG emissions intensity	<p>This year, intensity ratio of our Scope 1 and 2 GHG emissions was 6.48 kg CO₂e per kg product (2022: 5.61kg/kg produced) and the location-based Scope 2 GHG emissions was 1.37 kgCO₂e per kg of product (2022: 1.18kg/kg).</p> <p>Please refer to the Reporting boundaries and methodologies section on pages 49-52 of this ESG Reporting Index for more information about how data has been compiled, including the standards, methodologies and assumptions used.</p>						
305-05 GHG emissions reductions	<p>The percentage increase of absolute carbon emissions (direct and indirect carbon emissions by weight) from the prior year was 26.7%.</p> <p>Omission: The percentage reduction in GHG emissions.</p> <p>Reason: There is an increase in GHG emissions as compared to last year 2022.</p> <p>Explanation: The consumption has increased as compare to the last year as we introduced three new products as part of expansion. The fuel consumption was more due to consumption of electricity in project civil work as well as R & D, Pilot trials, and other related activities. In addition to this, the volumes of these products manufactured were low as it took time for their market acceptance. Though the production volumes were low and consumption in utilities continued to be high for initial few months till the time operation were streamlined.</p> <p><i>Within EY's independent limited assurance scope – see pages 49-52 the Annual Report.</i></p>						
305-06 Emissions of ozone-depleting substances	<p>The Emissions of Ozone depleting substances not generated.</p> <p>Omission: Emissions of Ozone depleting substances.</p> <p>Reason: There is no generation of ozone-depleting substances in emissions.</p> <p>Explanation: Not applicable since, there is no generation of ozone-depleting substances in emissions.</p>						
305-07 NOx, SOx and other significant air emissions	<p>Emissions from stationary combustion sources have impacts on the environment. In 2023, we emitted tonnes of NOx and SOx. NOx and SOx are determined using measured stack monitoring.</p> <p>These is measured but are not calculated air emissions as we are implementing systems in upcoming year. The overall total NOx and SOx levels, which remain low compared with background NOx and SOx data.</p> <p>NOx and SOx emissions by year (tonnes)</p> <table> <tr> <th></th><th>2022-23</th></tr> <tr> <td>NOx</td><td>6.13 mg/Nm3</td></tr> <tr> <td>SOx</td><td>13.85 kg/day</td></tr> </table>		2022-23	NOx	6.13 mg/Nm3	SOx	13.85 kg/day
	2022-23						
NOx	6.13 mg/Nm3						
SOx	13.85 kg/day						



ENVIRONMENTAL

WASTE

3-3 Our management approach to waste

First & foremost, we keep working in our R&D to minimize the process waste by yield improvements & using green chemistry routes. To minimize the waste we send to landfill, we work with certified waste handlers and, together, operate a hierarchy of actions: eliminate, reduce, reuse, recycle, recover and dispose.

For suppliers under contract, we have also included wording in our standard templates to encourage dialogue and action to reduce waste. We have added terms and conditions related to Sustainability's criteria into order contract. We are also working through our Sustainable Solutions program with customers, suppliers and researchers to find and accelerate breakthrough solutions to make our product more sustainable.

To track the effectiveness of our actions, we monitor waste streams, promoting awareness of the need to increase resource efficiency. We also monitor levels of waste recycling and waste-to-energy recovery.

We report our performance through our annual report, including those that contribute to waste minimization, on a monthly and quarterly basis. Performance is reviewed at operational level throughout the business by quality assurance team. Compliance with our Environment Policy and Waste Elimination Standard is continually monitored and reviewed by Supply Chain and Environmental Compliance meetings, managed by our Governance function.

Disclosure	Our response
306-01 Waste generation and significant waste-related impacts	<p>Co-products and by-products from distilling represent the key waste streams from our operations and are also a resource for further use. Applying circularity measures is central to our approach to handling these materials and reducing any waste-related impacts. We mitigate risk by selling co-products and by-products to another manufacturer used these by products into manufacture of cleaning reagents, fragrance applications such as phenyl floor cleaner, disinfectant toilet cleaner processes.</p> <p>we partner with our suppliers to carry out regenerative techniques. Downstream, we try to minimise waste through circular-economy initiatives, such as our Eco friendly industries in Turbhe Navi Mumbai, for example.</p>
306-02 Management of significant waste-related impacts	<p>As a manufacturing company selling products globally, we believe we have a responsibility and the resources to bring about positive change in the way that society produces and manages waste. We aim to do this by creating more efficient production and recycling infrastructure, developing sustainable and partnering with our suppliers to eliminate waste in their own operations.</p> <p>We work with third parties to manage the waste that is created when producing and manufacturing our products. Before selling waste, we have mandate to get the environmental clearance copy of the seller to ensure that disposal will be in approved manner as per national laws. In fiscal 23, following a review of third-party waste handler contractual agreements, we signed an agreement with Eco Friendly Industries to manage Zero Waste to Landfill terms going forward.</p>



ENVIRONMENTAL

EMISSIONS

Disclosure		Our response			
306-03	Waste generated	Hazardous waste reused, recycled and sent to landfill (tonnes)			
		Hazardous waste to landfill	Other disposal (incineration without reuse)	Hazardous waste used or recycled	Total hazardous waste
		4732.31	154.69	205.5	5092.5
		Waste by composition, in metric tonnes (t) ¹			
			Waste diverted from disposal (used or recycled)	Waste directed to disposal (landfill/incineration)	Total waste generated
	Co-products spent/sold	5583.4	4887	10470.4	
Please refer to the Reporting boundaries and methodologies section on pages 49-52 of this ESG Reporting Index for more information about how data has been compiled, including the standards, methodologies and assumptions used.					
306-04	Waste diverted from disposal	Waste diverted from disposal by recovery operation, in metric tonnes (t) ^{1,2}			
			Total waste generated	Waste diverted from disposal (used or recycled)	Waste directed to disposal
		Hazardous waste	10470.4	5583.4	4887
		Non-hazardous waste	2831.5	0	2831
		Total	13301.94	5583.4	7718.5
306-05	Waste directed to disposal	Waste directed to disposal by disposal operation, in metric tonnes (t) ^{1,2}			
			On-site	Off-site	Total
		Haz-waste			
		Incineration (with energy recovery)	0	-	-
		Incineration (without energy recovery)	0	154.69	154.69
		Landfilling ³	0	4732.31	4732.31
		Other disposal operations	-	5583.4	5583.4
		Total			10470.4
		Non-hazardous waste	-	-	-
		Incineration (with energy recovery)	-	-	-
		Incineration (without energy recovery)	-	-	-
		Landfilling	-	-	-
		Other disposal operations	-	-	2831.5
		Total			2831.5
		1. Haz waste directed to disposal quantity is quantity sold to vendors who are using this as a input raw material.			
2. Non-haz waste is being sold to the scrap vendor and data by type of operation is not available.					



ENVIRONMENTAL

SUPPLIER ENVIRONMENTAL ASSESSMENT

3-3 Our management approach to supplier environmental assessment

Many of the environmental impacts of the products we sell take place within our supply chain. Assessing the performance of our suppliers is an important step in supporting them to manage and reduce these impacts.

We work with suppliers on environmental issues through our climate change and water security supply chain programmes with CDP, and by implementing our sustainable strategy.

Through Ecovadis platform, we invite our suppliers to assess their transparency, their ability to perform in the area of Sustainable environment, Human rights, Ethics and Sustainable procurement initiatives they have in place through the assessment questionnaire.

Our Procurement function reviews suppliers against a range of factors including quality, cost, reliability and sustainability, indicating overall effectiveness and suitability. To assess environmental performance, our Procurement teams leverage performance indicators, as outlined above. We have held detailed reviews with our largest suppliers about their environmental performance and developed specific action plans around areas for improvement. We have added Sustainability terms and conditions into our order contracts.

Environmental performance of our suppliers is reviewed by the Procurement function together with quality assurance team, which reports Quality Assurance Review team, which meets half yearly through internal audits. We develop mitigation and improvement activities as appropriate.

Disclosure	Our response
308-01 New suppliers that were screened using environmental criteria	We screen suppliers according to their category and spend when considering environmental criteria. This is to make sure we're driving the greatest impact within our supply chain when working with suppliers on Sustainability's terms and conditions. We have made a set of questionnaire (Sustainability's assessment) as a criteria for vendor approval process to ensure that each supplier is screened for environmental criteria.
308-02 Negative environmental impacts in the supply chain and actions taken	<p>We have identified a variety of environmental impacts associated with our supply chain. Many of our suppliers report to multiple customers through EcoVadis. CDP, removing the need to duplicate data-reporting requests.</p> <p>We have carried out a Supplier sustainability assessment of all our suppliers and identified 90% following best practices of sustainability. We are updating the assessment criteria going forward to get the emissions data from suppliers by inviting them for a training program.</p>



SOCIAL

EMPLOYMENT

3-3 Our management approach to employment

We are committed to providing a safe, healthy and flexible working environment for all our people. We also strive to create a working environment that is inspiring and where talent is nurtured, developed and rewarded. We promote an inclusive culture where our employees feel secure, respected and valued for their contribution.

For more information, see:

- **Our policies and standards:** We comply with all local labour laws and regulations and expect our suppliers to do the same.

In addition, our Human Rights Policy includes our own policies for employees and our Partnering with Suppliers Standard sets the minimum standards for our suppliers.

We measure employee engagement as one of our overarching performance measures, as set out in our annual employee engagement survey. Based on the outcomes of this survey, in addition to ongoing engagement programmes, teams develop their own action plans to improve employee engagement and satisfaction.

Our HR team routinely reviews our policies and standards to ensure they are sufficiently rigorous and will continue to strengthen our reputation as an employer. This helps us retain our employees while also attracting new people to the business. Our Executive Committee is provided with half-yearly updates on talent planning.

Disclosure	Our response																											
401-01 New employee continued hires and employee turnover	<p>Employee turnover in fiscal 23 was 14.02 % for permanent employees and 0.59% for permanent workers.</p> <p>In fiscal 23, we hired 137 employees, which included strategic investments in key growth priorities.</p> <table><tr><th rowspan="2"></th><th colspan="3">FY 2022-23</th><th colspan="3">FY 2021-22</th></tr><tr><th>Male</th><th>Female</th><th>Total</th><th>Male</th><th>Female</th><th>Total</th></tr><tr><td>Permanent Employees</td><td>13.97%</td><td>14.63%</td><td>14.02%</td><td>10.89%</td><td>12.0%</td><td>11.0%</td></tr><tr><td>Permanent Workers</td><td>0.59%</td><td>Nil</td><td>0.59%</td><td>0.59%</td><td>Nil</td><td>0.59%</td></tr></table>		FY 2022-23			FY 2021-22			Male	Female	Total	Male	Female	Total	Permanent Employees	13.97%	14.63%	14.02%	10.89%	12.0%	11.0%	Permanent Workers	0.59%	Nil	0.59%	0.59%	Nil	0.59%
	FY 2022-23			FY 2021-22																								
	Male	Female	Total	Male	Female	Total																						
Permanent Employees	13.97%	14.63%	14.02%	10.89%	12.0%	11.0%																						
Permanent Workers	0.59%	Nil	0.59%	0.59%	Nil	0.59%																						
401-01 Benefits provided to full-time employees that are not provided to temporary or part-time employees	<p>Benefits provided to employees vary across the units where we do business. In the Mahad & Jhagadia unit, for example – we make no differentiation in relation to access to benefits between employees and permanent workers: all employees have access to the same benefits applicable to their grade and location, regardless of the number of hours worked.</p> <p>Omissions: list of benefits, details across all locations.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: benefit packages are provided according to national guidelines to ensure we capitalise on local knowledge and remain competitive. We do not currently collate this information for a single statement.</p>																											
401-02 Family leave	<p>We comply with all local legislation in our provision of family leave and provide benefits beyond minimum requirements at all our operational facilities. We have maternity leave policy which offers women in all markets a minimum 26 weeks of fully paid maternity leave.</p>																											



SOCIAL

LABOUR/MANAGEMENT RELATIONS

3-3 Our management approach to labour/management relations

We have a strong commitment to discuss the concerns of all our people, including those who are represented through a trade union or works council. Our HR team builds relationships with these groups where they exist and is encouraged to involve employee representatives early in business decisions to give them an opportunity to contribute to key issues.

In operational units where the right to freedom of association is restricted by law, we support the development of alternative means of representing employees' interests, by investing in individual consultations.

For more information, see:

- Our employee engagement programme: We have Dedicated Learning Management System which has training modules that cover our Code and related quiz competition to uphold our commitment to treating employees with respect and integrity. We expect our suppliers to adhere to these principles, as is outlined in our Partnering with Suppliers Standard.

We measure employee engagement as one of our overarching performance measures, using our annual Your Voice employee survey. Based on the outcomes of this survey and our ongoing engagement programmes, each team develops its own action plan to improve employee engagement and satisfaction.

Our HR team routinely reviews our policies and standards to ensure they are sufficiently rigorous and will continue to strengthen our reputation as an employer. This helps us retain our employees while also attracting new people to the business.

Disclosure	Our response
402-01 Minimum notice periods regarding operational changes	We adhere to the law in countries that define a minimum consultation period and requirements for collective and individual consultation. We also aim to redeploy affected employees or find suitable alternative employment for them wherever possible. If we can't do that, we pay severance or redundancy. We also offer outplacement support, which varies by market, to help those who leave Privi to find another job.

OCCUPATIONAL HEALTH AND SAFETY

3-3 Our management approach to occupational health and safety

We maintain best practices for occupational health and safety, which apply to all our operations and business units. These standards aim to make sure that everyone, everywhere, is safer together when working on site, at home and on the road. Our end-to-end health and safety excellence strategy aims to deliver a world-class health and safety culture and environment where everybody plays their part.

For more information, see:

- **Our Website:** For more information about our management approach to health, safety and wellbeing for our employees, contractors and visitors.
- **Our reports:** For more information about measure and report on our health and safety data, see the annual report page no. 80.

Our health and safety policy ensures that:

- Assure compliance with our Health & safety standards
- Undergo regular formal assurance audits
- Maintain and assure legal compliance assessment processes
- Train employees in hazard identification and incident reporting
- Track actions robustly, including learning from incidents and identified hazards (unsafe behaviours and conditions).



SOCIAL

OCCUPATIONAL HEALTH AND SAFETY

To track the effectiveness of our approach, our site, functional teams regularly monitor and review occupational health and safety. We report our performance measures to Quality Assurance internal audit quarterly.

Performance trends are monitored closely and intervention activities – such as capability building and improvements to processes with associated investments in systems, technology, assets and resources – are implemented as required.

The goal of benchmarking is continuous improvement. Given we are always striving to improve our Health and Safety performance and are keen to understand how our culture and approach measures against our competitors or similar businesses, we have embarked on a benchmarking exercise. The expectation is that we begin to understand what they are doing that makes them successful and use the learning outcomes to challenge our own approach and strategy.

Disclosure	Our response
403-01 Occupational health and safety management system	We implement our Occupational Health and Safety Management System by adhering to our risk management standards and through a robust assurance programme.
403-02 Hazard identification, risk assessment and incident investigation	<p>The system covers our workers and activities across our functions, from procurement, manufacturing and production to marketing, sales and distribution. It includes on-site third-party contractors and third-party logistics providers.</p> <p>Through an risk management programme, we assess risk, identify work-related hazards and implement appropriate mitigation measures and programmes.</p> <p>A key element to safety at all our locations is hazard reporting. It assists us in identifying and rectifying unsafe conditions or behaviours as well as recognising positive behaviours. Through our global Health, Safety and Wellbeing Policy, all employees are encouraged to report work-related hazards as soon as possible and remove themselves from work situations they believe could cause injury or ill health.</p> <p>We also have recognition schemes in place to proactively encourage every employee to look after their own and their colleagues' health and safety. Our learning platform, LMS platform, has tailored guidance about how to report and investigate work-related incidents, how to identify hazards and how to assess risks to determine corrective actions.</p>
403-03 Occupational health services	Our Occupational Health and Safety Strategy aims to create a culture free of work-related injury and illness for workers and a happier, healthier and more engaged workforce. Our continued focus on our global risk management standards makes sure that health, safety and wellbeing controls are in place.
403-04 Worker participation, consultation and communication on occupational health and safety	<p>We have scheduled employee consultation forums – such as safety committees – at facility level.</p> <p>Our safety committee also require employees to be involved in risk assessment and change-management processes where they relate to health and safety.</p> <p>Our dedicated health and safety page and health and safety module on Learning Management System, our internal learning management system, aim to improve health and safety communication and visibility across our supply chain.</p>



SOCIAL

OCCUPATIONAL HEALTH AND SAFETY

Disclosure	Our response
403-05 Worker training on occupational health and safety	<p>All our sites complete a training needs assessment to determine their occupational health and safety training requirements.</p> <p>We train our people on occupational health and safety through several channels, including:</p> <ul style="list-style-type: none"> • Learning Management System (LMS), which is a learning management platform our people can access every day for occupational health and safety capability and awareness content. Some of this training is mandated and assigned to workers and is based on the requirements of their role. • Occupational health and safety training, such as manual handling training, emergency preparedness plan, forklift truck training and explosive atmospheres training, which is delivered by approved internal and external trainers. • Other subject-matter-expert training, delivered through video conferencing.
403-06 Promotion of worker health	<p>We promote worker health and encourage workers to access local services and systems, as and when required, through several channels:</p> <ul style="list-style-type: none"> • Our Benefits team facilitates non-occupational medical and healthcare services. We provide optional medical insurance, which is communicated to employees through internal communication channels. • We have scheduled of stress management program, mental health program twice in a year where employees can find learning on physical, mental, social and financial wellbeing and other courses, such as Women health care session by the external trainers and topic experts. We have provided all employees with access to the digital app and we offer an Employee Assistance Programme through helpdesk.
403-07 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<p>We build health and safety requirements and performance measures into our third-party service-level agreements. This lets us prevent and mitigate significant occupational health and safety impacts directly linked to our operations, products or services through our business relationships.</p>
403-08 Workers covered by an occupational health and safety management system	<p>All our employees must comply with the mandatory requirements of our Health & Safety Policy, as well as adhere to all relevant risk management standards. Adhering to these requirements is continually assessed by Internal Audit teams.</p> <p>Our sites are accredited to the ISO 45001 (or equivalent) Occupational Health and Safety Management System Standard and are regularly audited against this standard by an approved third party.</p> <p>No employees or workers are excluded from the occupational health and safety management system.</p> <p>Health and safety performance is monitored through regular site, regional and global business performance meetings.</p> <p>Our code for suppliers – has been developed to help drive higher standards in all aspects of our supply chain. In relation to health and safety, our aim is to create a proactive health, safety and wellbeing culture and working environment in which all occupational injuries and illness are foreseeable and preventable. We expect all our suppliers to act in a manner that demonstrates their personal and collective commitment to this aim.</p>



SOCIAL

OCCUPATIONAL HEALTH AND SAFETY

Disclosure	Our response
403-09 Work-related injuries	<p>Any work-related incident, involving injury or illness, where a healthcare professional or we as a business recommend one or more days away from work, is reportable to us: for example, any unplanned, identifiable event that results in personal injury or harm.</p> <p>Severe injury and fatality prevention</p> <p>All business units are required to work towards prevention of Severe and Fatal Incident, This aims to eliminate the risks that lead to severe or fatal incidents and ensures suitable and sustainable controls are in place. Local and regional teams make sure employees and workers are trained on these requirements and conduct frequent, robust self-assessment audits to measure ongoing compliance to this mandatory programme.</p> <p>Accident rates</p> <p>This year, our lost-time accident frequency (LTA) target was successfully delivered with a rate of '0'.</p> <p>Our global lost-time accident frequency rate (LTA) per full-time employees (FTE) was 0.002. This means our overall target of less than or equal to '0' was achieved this year. We have reported these LTA rates to Directorate of Industrial Safety and Health (DISH) and national safety council of India and Privi has received NCS awarded in year 2023.</p> <p>This year, there were no employee fatalities on or off our sites and no contractor fatalities on our sites.</p> <p>Rational breakdowns by injury type are not included because, the low LTA numbers, the trends are not statistically significant. We do not include absenteeism rates because we do not collect this data at a global level.</p>
403-10 Work-related ill health	<p>Any work-related incident, involving injury or illness, where a healthcare professional or we as a business recommend one or more days away from work, must be reported to us. Acute onset of occupational illness is included in our LTA definition, however, occupational disease rates are not disclosed because of variances in capabilities, national regulatory barriers which prevent the recording or disclosure of many communicable diseases.</p> <p>Our health and safety standards require occupational health monitoring for new employees and specific worker groups and for specific conditions, including lung function and audiometry assessments for shift workers, and assessments for lone workers and for professional drivers. Our standards also include industrial hygiene monitoring requirements for specific work groups or conditions, including workplace chemical exposures, noise, vibration and ionising radiation.</p>



SOCIAL

TRAINING AND EDUCATION

Disclosure	Our response
3-3	<p>Our management approach to training and education</p> <p>We place great emphasis on continuous learning as a means of developing our people – it is a core pillar of values Safety, Sustainability, Sense of urgency, Transparency. By using training-needs identification at manufacturing unit level, we identify skills required to win now, and in the future. In addition, we leverage our performance management process to identify development opportunities for every employee across the organisation. We evaluate employees' performance against annual objectives and identify where they may benefit from our extensive range of internal and external training programmes. In addition, each function assesses its own training needs based on its performance goals, and guides employees to the right training, at the right time. To achieve even more targeted training in fiscal 23, we have focused on company-wide capability priorities, as agreed with the Internal audit committee, that is, digital upskilling and reskilling, ESG upskilling, and leadership and people management upskilling. See GRI 404-02 below for more detailed information.</p> <p>We have a well-established process for analysing the efficacy of our management approach to occupational training and education, with regular reviews of take-up, specifically relating to our strategic capability requirements. Our Learning Management System is responsible for driving this activity and assessing progress. Where potential improvements are identified, these are translated into an action plan, which is implemented by HR vice president and their market teams.</p>
404-01	<p>Average hours of training per year per employee</p> <p>We track employee training hours — within Learning Management System – LMS (our learning and development platform) and onsite classroom trainings.</p> <p>Using Precision Learning, we have made progress towards our goal of shifting to a more targeted approach that helps close skill gaps and develop new capabilities in emerging business priorities.</p> <p>This year, the system recorded a total of 7572 learning hours, with each of the employees in the Learning Management system and classroom receiving an average of 9.88 hours per employee. This represents an increase in learning hours per employee compared with the previous fiscal year of 8.10 hours.</p> <p>Omissions: training hours per employee, by gender.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: gender is a sensitive data field that is not included in our training measurement systems. To protect the integrity of sensitive data, we collect it only when absolutely necessary. There is no current use case for training data to be analysed by gender. Data is typically analysed and provided by Manufacturing location, management level or by topic.</p>
404-02	<p>Programmes for upgrading employee skills and transition assistance programmes</p> <p>We want our people to be able to access learning opportunities that improve performance and deliver growth. Our mission is for our people to access training and development that is relevant to them, simply and effectively.</p> <p>Our learning and development platform, Learning Management System (LMS), contains a library of external learning resources that complement our own proprietary learning content and provide our people with access to best-in-class learning on any device, anywhere, at any time.</p> <p>Most of our employees use to supplement their personal development via individual development plans and performance goals, as part of their appraisal system. LMS also supports leadership development programmes such as Quiz, which in fiscal 23 was focused on enhancing coaching skills across our senior leader by blending virtual learning with attendance at Train the Trainee Programme.</p>



SOCIAL

TRAINING AND EDUCATION

Disclosure	Our response
404-03 Percentage of employees receiving regular performance and career development reviews	<p>In fiscal 23, 100% of our employees received regular performance reviews.</p> <p>Our performance and talent management processes encourages managers and employees to have regular meaningful performance and development conversations. Setting clear performance and development goals and discussing achievements against these goals on a regular basis is key for growth – both for our people and the business.</p> <p>Omissions: data by gender and employee category.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: performance management processes in some parts of the world (especially in some of our Supply roles), are managed outside Workday, our HR information management system. In some cases, markets follow locally defined or required guidelines. As described in GRI 404-01, we do not collect data by gender unless there is a strong business case for doing so.</p>

DIVERSITY AND EQUAL OPPORTUNITY

3-3 **Our management approach to diversity and equal opportunity**

We are committed to creating the most inclusive and diverse culture possible, not just because it's the right thing to do, but because we believe this commitment helps us to recruit and retain the best employees, achieve better performance and have a greater impact on society.

We have a number of initiatives aimed at strengthening the diversity of our talent as a whole, promoting inclusive leadership and ensuring that our workforce reflects the markets where we operate. To track the effectiveness of our approach to diversity and equal opportunity, we monitor a number of inclusion and diversity goals each month, which our Audit Committee reviews half yearly. We also keep track of our employees' experience of diversity through our annual survey.

Across our industry, manufacturing and STEM (science, technology, engineering and mathematics) roles have traditionally been male- dominated, but we are committed to shifting the narrative on this to create an industry that is truly diverse and inclusive. We are working hard to achieve this through graduates, apprenticeships.

Disclosure	Our response
405-01 Diversity of governance bodies and employees	<p>The percentage of female employees is 8.48%. In addition, women make up 20% of our Executive level and 12.5 % of our Board.</p> <p>Omissions: employee profile information by age and specific group.</p> <p>Reason: not applicable.</p> <p>Explanation: leadership is analysed in more detail in the Annual Report. Membership of other groups, such as those described above, is not typically analysed for additional insight.</p>
405-02 Ratio of basic salary and remuneration of women to men	<p>Omissions: ratio of basic salary and remuneration of women to men.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: given the complexity of our operations, we don't currently collect this data.</p>



SOCIAL

NON-DISCRIMINATION

3-3 Our management approach to non-discrimination

All our employees have the right to expect that their human identity and dignity will be fully respected in the workplace, and we reject any form of discrimination.

We ensure adherence to our non-discrimination policies through internal review and in response to feedback received through formal, external processes. Our evaluation includes assessment of our evaluation data and other engagement mechanisms, such as through our HR Business Partners who provide HR services to our various departments.

Disclosure	Our response				
406-01 Incidents of discrimination and corrective actions taken	<p>We have measures in place to monitor and manage any allegations of discrimination, and we raise awareness among our employees through various function-wide and local programmes .</p> <p>These relate to individuals not displaying the leadership behaviours we expect including our core business value of treating all employees with respect. We have implemented disciplinary action to address the concerns raised in the substantiated matters, ranging from counselling to termination.</p> <p>For more information on such disclosures in made through our annual report page no. 89 & 90.</p> <table> <tr> <th></th><th>No. of complaints</th></tr> <tr> <td>Total number of discrimination non-compliances</td><td>0</td></tr> </table>		No. of complaints	Total number of discrimination non-compliances	0
	No. of complaints				
Total number of discrimination non-compliances	0				

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

3-3 Our management approach to freedom of association and collective bargaining

We have a strong commitment to industrial dialogue, supporting the right of employees to join or not join a trade union, as outlined in our Global Human Rights Policy. We also expect this of our suppliers, as outlined in our Partnering with Suppliers Standard. This is a contractual requirement.

We aim to maintain regular, open dialogue with unions over issues of common interest. We also believe in the same principles for our suppliers.

We use internal reviews and our supplier assessment process to evaluate our approach. Reviews include input from trade unions and any feedback we receive through our engagement mechanisms.

Disclosure	Our response				
407-01 Freedom of association and collective bargaining	<p>We have HR helpdesk, where employees may raise concerns on an anonymous or non-anonymous basis about any issue they have, including violations of people's rights to exercise freedom</p> <p>of association and collective bargaining. The internal assessment was done by internal audit team and there were no cases found which was also assessed externally through SMETA (Sedex Members Ethical Trade Audit) audit by SGS India Pvt. Ltd.</p> <table> <tr> <th></th><th>No. of non-compliances</th></tr> <tr> <td>Total number of freedom of association and collective bargaining non-compliances</td><td>0</td></tr> </table>		No. of non-compliances	Total number of freedom of association and collective bargaining non-compliances	0
	No. of non-compliances				
Total number of freedom of association and collective bargaining non-compliances	0				



SOCIAL

CHILD LABOUR

3-3 Our management approach to child labour

We act in line with the United Nations Guiding Principles on Business and Human Rights. We do not permit child labour within our operations or those of our suppliers or business partners.

We assess child labour risk through our own vendor assessment and ongoing due diligence processes.

For more information, see:

- GRI 3-3 of this ESG Reporting Index for more information about our management approach to human rights assessment.
- Our Policies & Standards: Details of our approach to child labour are set out in our Human Rights and code Policy.

Disclosure	Our response				
408-01 Child labour	Through our assessments and within our activities, we have not identified any risk of the child labour, as defined by the International Labour Organization's Standards of Child Labour Convention, 1999. We have reviewed higher-risk areas of our supply network, including supply chains, and are not aware of any operations that have significant risks related to child labour. We have done the internal assessment on Child labour by internal audit team and there were no cases found which was also assessed externally through SMETA audit by SGS India Pvt. Ltd.				
	<table> <tr> <th></th><th>No. of Cases</th></tr> <tr> <td>Issues of non-compliance under the category of children and young workers</td><td>0</td></tr> </table>		No. of Cases	Issues of non-compliance under the category of children and young workers	0
	No. of Cases				
Issues of non-compliance under the category of children and young workers	0				

FORCED OR COMPULSORY LABOUR

3-3 Our management approach to forced or compulsory labour

We act in line with the United Nations Guiding Principles on Business and Human Rights. We do not permit forced or compulsory labour within our operations or those of our suppliers or business partners.

Through our human rights impact assessments, we continue to assess forced or compulsory labour risk through our ongoing due diligence processes. We have done the internal assessment on Forced/compulsory labour by an internal audit team and there were no cases found which was also assessed externally through SMETA (Sedex Members Ethical Trade Audit) audit by SGS India Pvt. Ltd.

For more information, see:

- GRI 3-3 of this ESG Reporting Index for more information about our management approach to human rights assessment.
- **Our Policies and Standards:** Details of our approach to forced or compulsory labour are set out in our Human Rights and Codes Policy.

Disclosure	Our response				
409-01 Forced or compulsory labour	<p>We're not aware of any operations that have significant risks related to forced or compulsory labour.</p> <p>Within our supply chain, incidents of non-compliance raised under Employment is freely chosen are captured through four-pillar ethical audits.</p> <p>We are following up with the suppliers as part of their corrective action plans to ensure open non-compliances are resolved.</p>				
	<table> <tr> <th></th><th>Suppliers</th></tr> <tr> <td>Number of non-compliance under the category of Employment is freely chosen</td><td>Nil</td></tr> </table>		Suppliers	Number of non-compliance under the category of Employment is freely chosen	Nil
	Suppliers				
Number of non-compliance under the category of Employment is freely chosen	Nil				



SOCIAL

SECURITY PRACTICES

3-3 Our management approach to security practices

Our BCP (Business Continuity Plan) outlines our four pillars of security: Information security, physical security (including of our products and assets), investigations, and business continuity and crisis management. This Plan is underpinned by a number of minimum standards and guidelines that every site must adhere to.

We operate security programmes in all markets and at all sites, with nominated and trained individuals responsible for the programme. The level of security in each at each site is determined by its size, risk levels and any local requirements.

All sites are supported by a central team of security experts, who have functional responsibility for security delivery across all our units at Corporate level. This team runs global training – such as our online personal safety training – oversees global security communications and awareness, and helps to ensure we satisfy external regulations and requirements.

We take a risk-based approach to security, with a programme to identify and assess risks and produce mitigation plans.

We review security risks routinely and communicate with our people around the world to raise awareness. The Audit and Risk Committee review our approach and relevant risks as part of our corporate risk management programme.

Market adherence policies and standards is continually monitored through reviews and audits.

The audit team regularly benchmarks its practices and performance with other multinationals

Disclosure	Our response
410-01 Security personnel trained in human rights policies or procedures	<p>Omissions: the percentage of security personnel, including third-party organisations, who have received formal training in human rights policies or specific procedures and their application to security.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: we do not record this data since our security staff contracts and training practices vary by market, with some being direct security employees and others third-party contractors. It's a contractual requirement</p> <p>for third-party security personnel to adhere to our Code, which incorporates our Global Human Rights Policy.</p>

RIGHTS OF INDIGENOUS PEOPLES

Disclosure	Our response
411-01 Incidents of violations involving rights of indigenous peoples	We do not believe this is material to our business. We do, however, consider land rights in our human rights impact assessments.



SOCIAL

HUMAN RIGHTS ASSESSMENT

3-3 Our management approach to human rights assessment

We have policies and processes consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and continue to embed human rights throughout our operational facilities.

Specialists in human rights conducted Human Rights impact assessment (HRIAs) alongside our teams, which received training to support their role. We also make sure that members of teams with direct involvement in specific areas of human rights risks, such as procurement, receive appropriate training.

Having completed comprehensive HRIAs in each of our markets to identify the most salient human rights risks for our business and supply chains, we have started to embed the findings and recommendations into our routine enterprise risk management processes. This will make sure our interventions are sustainable and let us track emerging risks.

Our human resource group is accountable for setting our human rights governance framework and monitoring its effectiveness. We measure the effectiveness of our human rights governance through our internal framework and Audit team, in addition to monitoring

Disclosure	Our response
412-01 Operations that have been subject to human rights reviews or impact assessments	<p>All our business units and operations are required to carry out a risk assessment, which includes human rights as part of the review process.</p> <p>Beyond this, as part of our commitment to act in accordance with the UNGPs, All operational units have developed action plans to address specific salient risks. From fiscal 24, all direct operations will be required to complete a detailed annual human rights self-assessment questionnaire, and take remedial action where necessary.</p>
412-02 Employee training on human rights policies or procedures	<p>We communicate on human rights, code of conduct through policies and standards, This can be watched on, our internal learning management system (LMS).</p> <p>We train our teams on our Sustainable Business Practices, which includes guidance on how we manage human rights and labour standard risks within our supply chain. We also train employees specifically at our sites about human rights, ethics and awareness, to ensure the integrity of our supply chain and to reduce the risk of human trafficking. Our training for people in our Procurement and Sustainability functions who have direct responsibility for our human rights, responsible sourcing or supply governance programmes.</p> <p>Omissions: total hours of training on human rights.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: training sessions about our Code and policies vary in duration, so it's not possible to accurately report the number of hours spent on specific subjects during training sessions.</p>
412-03 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	<p>All our suppliers are contractually obliged to abide by the standards set out in our Code or Partnering with Suppliers Standard, which includes specific human rights requirements – either through specific contract clauses or, if not bound by a contract, by the requirement to meet our Partnering with Suppliers Standard, which is stipulated in our standard purchase order terms and conditions.</p>



SOCIAL

LOCAL COMMUNITIES

3-3 Our management approach to local communities

We aim to strengthen the communities we operate in by providing engaging, safe and diverse places to work for our employees; building sustainable and inclusive supply chains; and delivering programmes that empower communities and the individuals within them, enabling them to grow.

As part of this approach, we are committed to promoting human rights throughout our value chain (see GRI 3-3). We also invest in promoting positive drinking, building thriving communities and reducing our environmental impact.

- **Our Website:** For information on activities and approach to local communities and information about our human rights governance process, see the Corporate Social Responsibilities (CSR) section of our website. For our policies, section under corporate governance on investor relations.
- **Our Annual Report:** For information on our performance against our commitments to local communities, see the Champion inclusion CSR report section of our Annual Report on pages 21 to 25.

Disclosure	Our response
413-01 Operations with local community engagement, impact assessments and development programmes	We run community programmes in all our operational sites. We carry out detailed research on key community programmes to understand their full impact: for example, this year we have assessed Learning for Life, our business and hospitality training programme for under-represented groups. Recommendations to enhance the programme will be implemented from fiscal 24. Similar studies have assessed the impact of our smallholder farmer programmes and our water, sanitation and hygiene programmes in Maharashtra.
413-02 Operations with significant actual and potential negative impacts on local communities	<p>The social impacts of our operations and community investment are discussed in our Annual Report on pages 21-25</p> <p>Omissions: the location of operations and the significant actual and potential negative impacts of operations.</p> <p>Reason: information unavailable/incomplete.</p> <p>Explanation: we discuss significant actual and potential negative impacts on local communities at local levels but do not collate and report this by specific location.</p>

SUPPLIER SOCIAL ASSESSMENT

3-3 Our management approach to supplier social assessment

Many of our real and potential social impacts are found in our supply chain. Assessing the performance of our suppliers is an essential step in reducing any negative impacts and promoting positive ones. Our Sustainable Procurement policy sets out the minimum social, ethical and environmental standards we require suppliers to follow as part of their contract with us. Those standards set out our commitment to acting in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), and International Labour Organization conventions and recommendations.

Our Sustainable Business practices training programme enables us to identify, assess and manage social and ethical impacts in our supply chain.

Our Sustainable Business practices also includes an initial screening process. Where the process, the supplier must register with EcoVadis, Sedex and complete a Sedex self-assessment questionnaire. Independent site audits are conducted for few suppliers Where we identify instances of non-compliance, we raise a corrective action plan report and work with that supplier towards a resolution.

Human rights in our supply chain

We have been signatories to the UNGCs since 2023 and continue to embed human rights throughout our value chain. We do this through our comprehensive internal audits and risk assessment, prioritised by risk and based on a mapping process.

Our three external business and supply chain risks are labour rights, including child labour risks; labour standards for contract workers; and sexual harassment in the hospitality sector.



SOCIAL

SUPPLIER SOCIAL ASSESSMENT

Disclosure	Our response
414-01 New suppliers that were screened using social criteria	<p>All suppliers of procurement-managed spend go through the screening process described in GRI 3-3 of this ESG Reporting Index. This includes areas such as labour standards, human rights including child labour, and legal compliance.</p> <p>We have embedded Sustainability's terms & Conditions within the contractual clauses and tender processes for selecting new suppliers. Our suppliers are therefore incentivized to make progress against the environmental, social and governance focus areas laid out in our Partnering with Suppliers Standard. Doing so will increase their chances of winning new business or maintaining current business.</p>
414-02 Negative social impacts in the supply chain and actions taken	<p>All suppliers flagged as a potential risk are required to complete self-assessment questionnaire. We've asked suppliers to engaged with EcoVadis assessment process which has pillar of sustainable procurement and we ask suppliers to renew their membership.</p> <p>We are also involved in programmes such as building supply-chain capability so that member organizations and their suppliers are competent in executing robust responsible sourcing programmers, developing common evaluation methodologies and also shared tools including a deep dive on living wages. Our intention is to provide direct supplier training and capability building, as well as providing a platform to pilot new tools and methodologies that support the promotion of human rights and collective mitigation of human rights risks.</p>

PUBLIC POLICY

3-3 **Our management approach to public policy**

As part of processing sustainably for a responsible tomorrow, we engage with governments, public interest groups, industry associations and a broad range of similar bodies around the world.

In doing so, our aim is always to comply with all laws governing political activity.

Our Corporate Relations team manages our engagement with stakeholders on public policy matters, assessing risk and aiming to support the delivery of our strategy including, for example, promoting positive drinking, health & hygiene, education and relevant fiscal and regulatory policies.

The team corporate Social Responsibility policy risks and opportunities and develops our strategy in line with our Performance Ambition at market and global levels. We regularly monitor and evaluate international trade, indirect tax and regulatory risks around the world, analysing their impact and developing mitigation and response strategies.

We track the effectiveness of our approach across our markets through internal reporting frameworks and ensure we adopt our strategy and allocate resources appropriately throughout the year.

The Audit Committee and the management-level Audit and Risk Committee review our overall approach, along with the management of specific policy issues, as part of our overall corporate risk management activity.

We continue to make good progress carrying out our policy strategy in key markets and have strengthened our network of stakeholders. We are also improving our analysis of policy issues through economic modelling.

Disclosure	Our response
415-01 Political contributions	<p>We have not given any money for political purposes in the area of our operational units, made no donations to political organisations nor incurred any political expenditure during the year.</p> <p>No particular political persuasion was supported, and contributions were made with the aim of promoting a better understanding of our business and our views on commercial matters, as well as a generally improved business environment.</p>



SOCIAL

CUSTOMER HEALTH AND SAFETY

3-3 Our management approach to customer health and safety

We aim to design and make products that are always safe for consumers and that meet their expectations in terms of smell, consistency and presentation. We have a programme of certification for our sites that includes:

- Site internal assessment
- Market independent assurance of adherence to standards
- ISO 9001, ISO 14001, ISO 45001 for our production facilities
- RSPO (Roundtable on sustainable palm oil) certification

At the date of this ESG Reporting Index, 100% of our business units were certified to ISO 9001 and 80-90% to ISO 14001 & ISO 45001 certified as mentioned in the annual report page no. 67. We have returned to on-site audits after two years of remote surveillance audits because of Covid-19 travel restrictions.

We review customer safety at a number of levels across the organisation, depending on the severity of the issue.

Our management-level Audit and Quality Assurance team reviews our key risks relating to customer health and safety, counterfeit products and contamination.

The Supply and Procurement, chaired by the Vice President, monitors our top performance measures for quality, tracking total and critical pack defects, and distribution defects.

Market-level teams meet monthly with the market head of governance to review these performance measures, along with other global and local quality performance measures, and escalate any issues to the market head of supply chain. This is part of our broader environment, health, safety and quality agenda.

Disclosure	Our response
416-01 Assessment of the health and safety impacts of product and service categories	<p>Our products are mostly low risk in that they are unlikely to be a source of food poisoning and are stable at ambient temperatures. All products are subject to liquid testing and inspection for defects – which includes critical defects relating to product safety and legislative requirements.</p> <p>We have continued to review and update our quality and risk management standards. These are shared with all production sites as they are published.</p>
416-02 Incidents of non-compliance concerning the health and safety impacts of products and services	<p>To the best of our knowledge, we have had no incidents of non-compliance with regulations resulting in a fine, a penalty or a warning.</p>

MARKETING AND LABELLING

3-3 Our management approach to marketing and labelling

We take seriously our duty to develop, produce, market and sell our brands responsibly, and all our marketing is governed by our supplier code Policy. Our product has Labels and packaging which includes ingredient information as per GHS (Globally Harmonized system) and Classification, Labelling and Packaging (CLP) guidelines.

We have a cross-functional review process in place for all marketing communications that ensures compliance with the Marketing functions. On rare occasions, where communications are in breach of the Code, we revise them accordingly. Our Marketing, Legal, Brand Technical and Regulatory functions review packaging and labelling of new products to ensure they comply with the Consumer Information Standard.

We review the Marketing practices every two years to ensure it remains best-in-class compared with rigorous standards in our industry, and that it is consistent with evolving technologies.

Our market-based teams, including general managers, review the efficacy of marketing communications, as do our global brand teams and global Marketing function. By continually assessing our communications, we gain feedback that helps improve future campaigns.



SOCIAL

MARKETING AND LABELLING

Disclosure	Our response
417-01 Requirements for product and service information and labelling	Our approach is as follows: <ul style="list-style-type: none"> Sourcing of components of the product or service: We do not provide sourcing information for our ingredients; none of our product labels includes this information. Content, particularly with regard to substances that might produce an environmental or social impact: Legislation typically requires a statement of allergen content on products; where applicable, products contain this information. Disposal of the product and environmental/social impacts: The packaging and information is provided on packaging components where required by legislation.
417-02 Incidents of non-compliance concerning product and service information and labelling	<p>We take compliance with product, service information and labelling regulations seriously. Given the breadth of our portfolio we may, on occasion, be subject to challenge, for example, where legislative changes occur with short notice.</p> <p>We address these issues rapidly by means of working closely together with regulators and brand teams to agree the necessary course of action in each case.</p> <p>While we accept some small risk in our labelling, we have an absolute zero-risk policy when it comes to product safety.</p>
417-03 Incidents of non-compliance concerning marketing communications	This year, no complaints about Privi's Product were upheld by the regulators and/or industry bodies.

CUSTOMER PRIVACY

3-3 **Our management approach to customer privacy**

We hold business data of customers and suppliers, employees and other individuals, including prospective and former employees. Our Data Privacy policy has been designed to protect all data that we handle in our business activities. For more information on the mechanisms in place to receive and respond to consumer complaints and feedback is published through our annual report page no. 106 to 107.

Our Code and Data Privacy Policy set out our key principles and standards in how we handle data in line with our values, data protection laws and respect for privacy.

Our Vice President Information technology leads a cyber security programme to defend against cyber-attacks. That includes seeking to protect information assets through embedding a security aware culture, implementing compliance management procedures and operating an intelligence-driven cyber resilience programme. He is supported by the Senior Manager Information technology, together they co-chair the Digital and Technology Risk Management in reviewing key security risks and mitigations.

They report on the status and mitigations for enterprise risks to the Audit and the Audit Committee once in a year.

Our Audit and Risk team periodically audits our Data Privacy Programme. Any findings are reviewed, with mitigation and improvement activities developed as appropriate, including escalation to the Audit and Risk Committee and the Audit Committee if required.

Data privacy issues may also be raised through our helpdesk info@privi.co.in and helpline no. +91 22 33043500 to line managers, market legal counsels, data privacy stewards, the HR team or directly to the.

Disclosure	Our response
418-01 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>We follow our internal procedures when we receive any individual requests to exercise data rights, including the right to access information or to unsubscribe from marketing communications.</p> <p>This year, there have been no known instances of action against us in the concerning consumer privacy.</p>





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Independent Assurance Statement

To,

The Management and Board of Directors

Privi Speciality Chemicals Limited

Privi House, A-71, TTC,

Thane Belapur Road, Near Kopar Khairne,

Navi Mumbai, Mumbai City

Maharashtra 400709

Scope

We have been engaged by Privi Speciality Chemicals Limited to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements ('ISAE 3000 (Revised)'), here after referred to as the engagement, to report on Privi Speciality Chemicals Limited's Sustainability Disclosure (the "Subject Matter") contained in Privi Speciality Chemicals Limited's (the "Company's") Sustainability Report of FY 2022-23 (the "Report").

Criteria applied by Privi Speciality Chemicals Limited

In preparing the Sustainability Report FY 2022-23, Privi Speciality Chemicals Limited applied Global Reporting Initiative (GRI) standards, including the GRI Sector Standard criteria; Such criteria were specifically designed for Sustainability Report FY 2022-23; As a result, the subject matter information may not be suitable for another purpose.

Privi Speciality Chemicals Limited's Responsibilities

Privi Speciality Chemicals Limited management is responsible for selecting the Criteria, and for presenting the Sustainability Report FY 2022-23 in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records, and making estimates relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY's Responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ('ISAE 3000 (Revised)'). The terms of reference for this engagement as agreed with Privi Speciality Chemicals Limited. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.





Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement, and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Description of procedures performed.

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although 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. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making inquiries, primarily of persons responsible for preparing the Sustainability Report FY 2022-23 and related information and applying analytical and other appropriate procedures. Our procedures included:

- Conducted interviews with selected personnel at locations listed below to understand the process for collecting, collating, and reporting the subject matter as per Global Reporting Initiative (GRI) framework.
- Evaluated the appropriateness of the quantification methods used to arrive at the non-financial disclosures presented in the subject matter, Undertook analytical review procedures to support the reasonableness of the data through consultations with the site team and corporate sustainability team;
- Conducted data reliability and accuracy checks on a sample basis, at Corporate Office and the below mentioned units/locations, of the disclosures of the GRI Standards as mentioned in Annexure 1
 - Privi Speciality Chemicals Limited, Mahad, Maharashtra
 - Privi Speciality Chemicals Limited, Jhagadia, Gujarat
 - Corporate Office, Navi Mumbai, Maharashtra
- Review of select qualitative statements in various sections of the Sustainability Report of FY 2022-23.



**Other matters**

The assurance scope excludes:

- Data and information outside the defined reporting period (1st April 2022 to 31st March 2023)
- Data and information on the economic and financial performance of the Company
- Data, statements, and claims already available in the public domain through Annual Report, Sustainability Report, or other sources available in the public domain.
- The Company's statements that describe the expression of opinion, belief, inference, aspiration, expectation, aim, or future intention provided by the Company.
- The Company's compliance with regulations, acts, and guidelines with respect to various regulatory agencies and other legal matters

Our Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to Sustainability Report FY 2022-23 for the year ended 31st March 2023 for the period from 1st April 2022 to 31st March 2023 in order for it to be in accordance with Criteria.

Restricted use: This report is intended solely for the information and use of Privi Speciality Chemicals Limited and is not intended to be and should not be used by anyone other than Privi Speciality Chemicals Limited.

For and on behalf of Ernst & Young Associates LLP

Chaitanya Kalia
February 7, 2024
Mumbai, India





Annexure 1:

GRI Indicator	Disclosure Title
General Disclosures	
2-7	Employees
Materials	
301-1	Materials used by weight or volume
301-2	Recycled input materials used
Energy	
302-1	Energy consumption within the organization
302-3	Energy intensity
Water and Effluents	
303-3	Water withdrawal
303-4	Water discharge
303-5	Water consumption
Emissions	
305-1	Direct (Scope 1) GHG emissions
305-2	Energy indirect (Scope 2) GHG emissions
305-3	Other indirect (Scope 3) GHG emissions (Category 6- Business Travel)
305-4	GHG emissions intensity
Waste	
306-3	Waste generated
306-4	Waste diverted from disposal
306-5	Waste directed to disposal
Employment	
401-1	New employee hires and employee turnover
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees
401-3	Parental leave
Occupational Health and Safety	
403-9	Work-related injuries
Training and Education	
404-1	Average hours of training per year per employee
Diversity and Equal Opportunity	
405-1	Diversity of governance bodies and employees





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