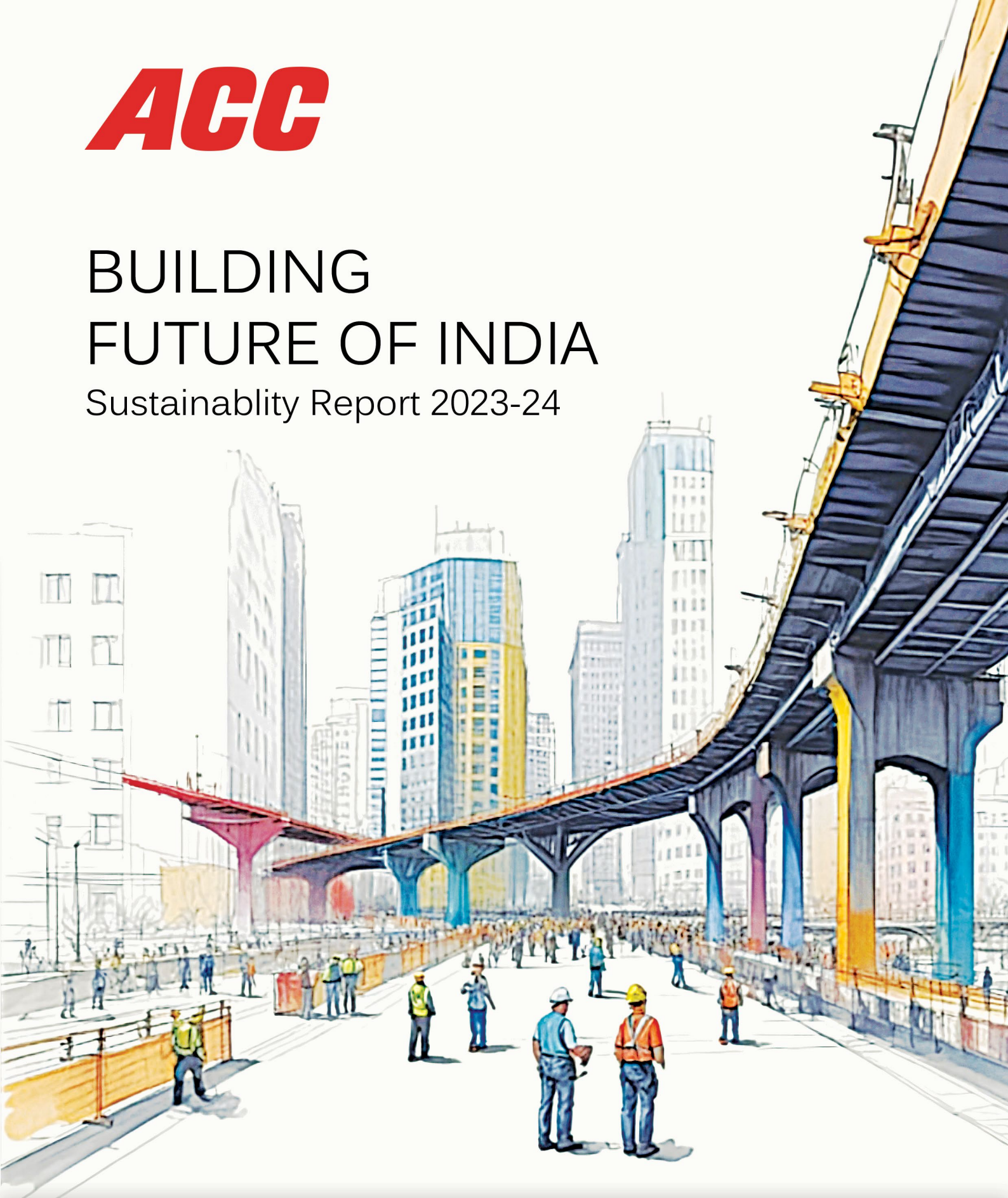




# BUILDING FUTURE OF INDIA

Sustainability Report 2023-24





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# Report Overview

At ACC Limited, we are driven by a vision to create a future that is inclusive and sustainable. The Sustainability Report for FY 2023-24 provides a comprehensive overview of our performance, progress, and prospects, highlighting our achievements and operational excellence.



This Report serves as a platform to share our experiences, learn from our successes and setbacks, and engage with our stakeholders to co-create an inclusive and sustainable tomorrow.

### Reporting Principle

The Report provides a comprehensive overview of our non-financial performance, prepared in accordance with the Global Reporting Initiative (GRI) 2021 Universal Standards. The Report is also aligned with the principles of the United Nations Global Compact (UNGC), Sustainability Accounting Standards Board (SASB), World Economic Forum (WEF)-core metrics, United Nations Sustainable Development Goals (UN SDGs) and GCCA Sustainability Charter.

### Reporting Period

The disclosure in this Report showcases our performance from April 1, 2023, to March 31, 2024. We aim to provide transparent and regular updates on our performance through our annual reporting practice, which will enable stakeholders to track our progress and growth over time.

### Scope and Boundary

The scope of the Report encompasses all our Integrated Plants, Grinding Units, Ready-Mix Concrete Plants, Mines and Captive Power Plants. The scope excludes subsidiaries and joint ventures. Asian Rajpura and Asian Nalagarh are not included in the reporting for FY 2023-24 as they were recently acquired in January 2024.

### Feedback

Our latest Integrated Annual Report was published in June 2024. All the previously published reports can be accessed on our [website](#). For any questions or comments about our performance or this Report, you may write to us at [esg.adanicement@adani.com](mailto:esg.adanicement@adani.com)

### Independent Assurance

The selected quantitative disclosures in the report which are part of Business Responsibility and Sustainability Reporting framework are assured on limited level by Intertek India Private Limited, an external independent entity in accordance with the requirements of the International Federation of Accountants (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised), Assurance Engagements. The assurance statement can be found in page no 511 to 513 of [ACC Integrated Annual Report FY 2023-24](#). Additionally, the Company's senior management has reviewed the Report for clarity, reliability, and accuracy to ensure that the information presented is accurate and trustworthy.

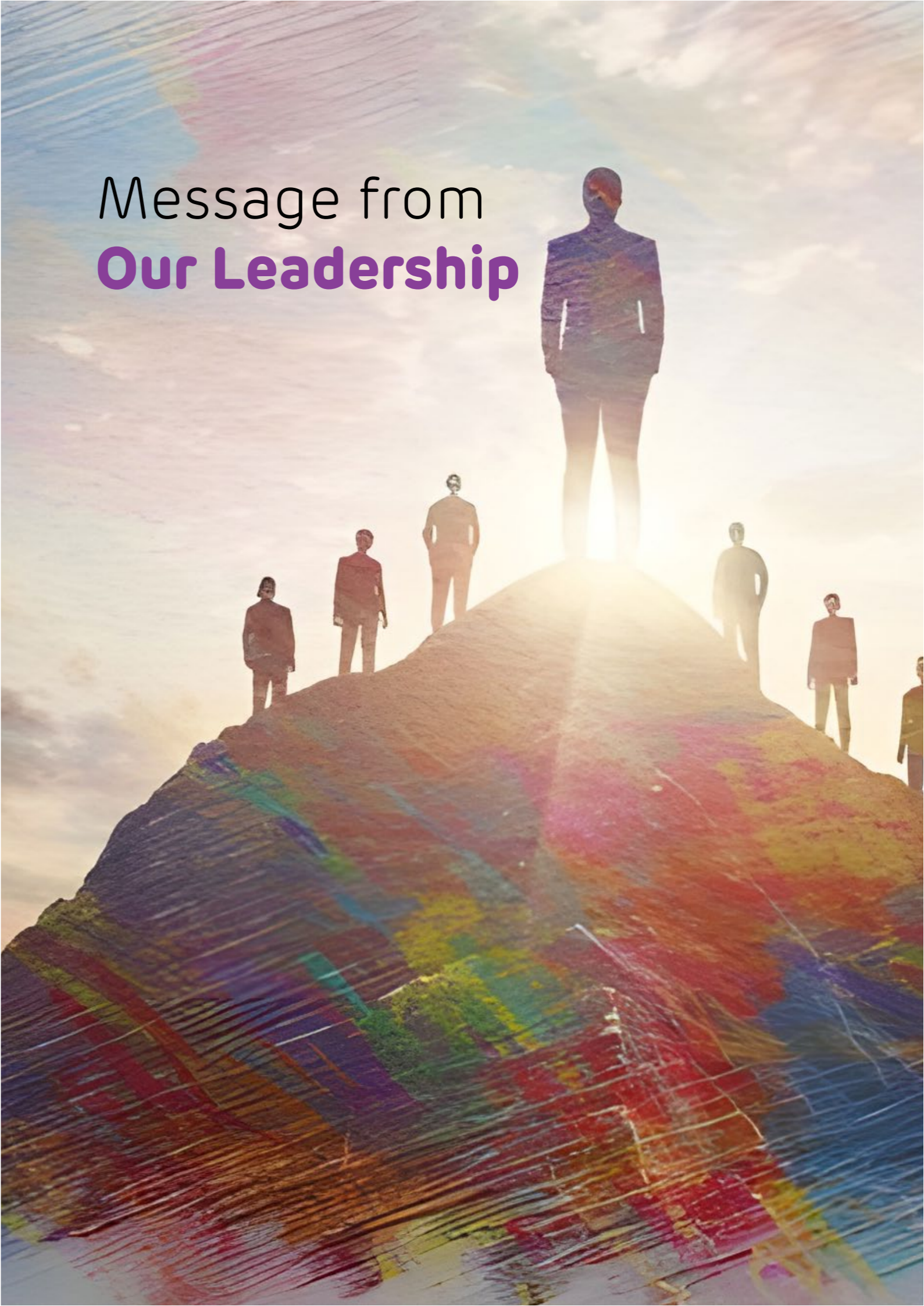
### Restatements of Information

We have recalculated and restated information wherever applicable for the previous years to ensure consistency and comparability with current year information. The effect of restatements has been added in the respective sections as required.

### Forward Looking Statement

This Report includes certain forward-looking statements that describe our company's future plans, objectives, and expectations. These statements are based on our current assumptions and projections, as well as industry trends, and are subject to risks and uncertainties that could cause actual results to differ from those projected.

# Message from Our Leadership





## Dear Shareholders

As part of the diversified Adani portfolio, we continue to strengthen our position as market leaders in the cement industry. Our robust business model and resilient foundation underpin our strong operational and financial performance, propelling us towards capacity expansion. Our firm ESG commitments fuel our expansion efforts, making our business more inclusive and efficient.

Ajay Kapur

Chief Executive Officer

I am pleased to present the Sustainability Report for ACC Limited for financial year 2023-24. This report encapsulates our progress, initiatives, and significant impact. It's a testament to our unwavering commitment to sustainability and our relentless drive for positive change. The report outlines our future objectives and strategies, setting ambitious targets in line with global sustainability frameworks.

Reflecting on the past year, we are proud of the significant strides ACC has made in sustainability. Our firm focus on sustainable progress, guided by our four strategic pillars, has led to an outstanding financial performance while positively impacting the environment and society. Our growth strategy, emphasising capacity building,

operational efficiency, and decarbonisation initiatives, has yielded remarkable results. As a company with strong foundational principles, we are setting new industry standards and positioning ourselves as the lowest cost cement manufacturer. As India progresses, we are honoured to contribute significantly to the nation's growth.

### Strengthening the Nation

As India moves towards becoming a developed nation, the country needs rapid boost in its infrastructure across all segments, we are on track to play our role in driving India's development. During FY2023-24, ACC Limited achieved highest ever annualised profit after tax, while continuing to be debt free.

Our focus on developing low-carbon products and sustainable solutions is evident in the introduction of innovative products such as ACC ECOMaxX, ACC AEROMaxX, and ACC Coolcrete, which offer a diverse range of environmentally friendly options to customers.

ACC, in collaboration with its parent company Ambuja Cements, has initiated ambitious capacity expansion projects. These projects are strategically distributed across various regions of the country and form a comprehensive roadmap that aims to achieve a remarkable capacity of 140 MTPA by FY2028. In a bid to secure self-sufficiency and enhance operational capabilities, we have successfully acquired coal and limestone mines through competitive bidding processes.

### Encouraging Innovation

The steadfast responsibility at ACC to achieve excellence has led us to acknowledge the substantial potential of digitalisation as a pivotal driver in our cement growth strategy. It has become the primary force behind the overhaul of our entire value chain, commencing from quarry to lorry. By integrating technology as a fundamental aspect of our ethos, we have embarked on a journey that harnesses cutting-edge technologies and state-of-the-art applications, including industry 4.0, AI, mobile platforms, GPS, data, and analytics, empowering us to make well-informed decisions on a continual basis. ACC's acknowledgement as an 'Iconic Brand of India' by The Economic Times and one of 'India's Most Trusted Cement Brands' by TRA Research is a testament to our commitment to customers and sustainable practices.

Embracing digitalisation and implementing an advanced digital ecosystem position us as a digitally advanced cement manufacturer with a world-class R&D centre. The excellence of ACC's green products and solutions, along with its dedication to technological progress, positions it as a favoured brand in the construction materials sector.

### Building an Environmentally Sustainable Planet

The aspiration to build a sustainable future is evident through our proactive approach to addressing climate change. We have invested in energy-efficient technologies, implemented measures to reduce dust emissions, initiated water-positive projects, and transitioned to renewable energy sources.

Our focus on developing low-carbon products and sustainable solutions is evident in the introduction of innovative products such as ACC ECOMaxX, ACC AEROMaxX, and ACC Coolcrete, which offer a diverse range of environmentally friendly options to customers. Our role in providing green concrete for the Mumbai Coastal Road Project showcases the enthusiasm towards driving innovation in the industry. With a bold ambition to achieve net zero emissions by 2050, our near-term targets have been endorsed by the Science Based Targets initiative (SBTi), showcasing our resolute enthusiasm for combatting climate change and fostering a more sustainable future. Embracing the principles of the circular economy, we actively integrate a diverse array of alternative fuels and raw materials into our operations to reduce the dependence on finite resources, ensuring sustainability while fostering innovation.

Recognising the urgent need to combat deforestation and preserve natural resources, The Cement Business has pledged to plant 8.3 million trees by 2030, aligning with Adani Group's ambitious plan to plant 100 million trees by 2030. This underscores our active participation towards environmental stewardship for future generations.

### Uplifting People and Communities

Across our operations, we place immense importance on our collective accomplishments within a secure and diverse work environment. By giving priority to diversity, equality, and inclusion, we cultivate a culture of inclusive work environment. The Fulcrum program concentrates on developing leadership skills and prepare future business leaders. Our 'BeConnected' initiative provides a unique platform that empowers women to connect, grow, and thrive. This platform fosters meaningful relationships, mentors, and provide opportunities for growth, enabling women to reach their full potential and drive business success.

Our corporate social responsibility (CSR) efforts in the fields of Education, Healthcare, Sustainable Livelihoods, Skill Development, Community Infrastructure and Women Empowerment, underscores our positive approach towards individuals and communities. ACC CSR initiatives on standalone basis have benefitted more than 1.4 million people, showcasing our dedication towards creating better future for all.

### Towards Good Governance

Maintaining a transparent governance structure is a cornerstone of our business. We are devoted to upholding ethical business practices, complying with all relevant laws and regulations, and continuously evaluating and enhancing our environmental and social performance. Furthermore, we prioritise open and consistent communication with investors, stakeholders, and the public regarding our ESG initiatives, advancements, and challenges.

### Looking Ahead Towards a Better Future

As the Indian economy is poised for a phase of robust growth, ACC remains steadfast in its commitment to core values of integrity,

innovation, and sustainability. With our widespread manufacturing presence, diverse product portfolio, extensive distribution network, and firm commitment to sustainability, we are well-positioned to seize the emerging opportunities in the sector. We will continue to expand our capacities, invest in sustainable initiatives, and leave a positive impact on the planet for future generations.

Our people's passion and expertise continue to drive our growth and solidify our position as an industry leader. We hold an optimistic outlook for the future. The infrastructure development projects and government initiatives present significant avenues for growth. We will leverage our strengths, foster innovation, and explore new opportunities for expansion to achieve sustainable growth and deliver value to our stakeholders.

This report exemplifies our dedication to emerging as a world-renowned leader in the business sphere through our constant adherence to sustainability principles. We also remain committed to contributing to the noble cause of nation-building. We extend heartfelt gratitude to every member of Cement business, for their tireless efforts in establishing a sustainable enterprise that drives India toward a more dynamic and resilient future.

It is our assurance of excellence that propels us forward as we continuously endeavour to establish new benchmarks within the cement industry. With a strong foundation, a dedicated team, and a clear vision, we are positioned to attain even greater accomplishments in the years ahead. Collaboratively, ACC and Ambuja, are shaping the future of the cement industry, ultimately redefining its landscape.

Regards,

**Ajay Kapur**  
Chief Executive Officer



## Dear Shareholders

We, at Adani group's Cement business, focus on long term value creation through integrating capabilities and business partnerships. We adopt unique and disciplined financial management approach, optimal resource utilisation, and adoption of distinctive practices to achieve prudent capital allocation while ensuring on-time completion of all our expansion projects. Our resilient business model and robust foundation of Adani group's business ecosystem, augment our move towards expansion journey.

**Vinod Bahety**  
Chief Financial Officer

At Cement business, we plan to double the capacity to 140 million tonne by FY2027-28. We have an integrated plan in place for expanding our clinker production capacity in sync with the expansion of grinding units. We ensure to uphold our ESG commitments as part of our growth story. We have a dedicated focus to increase utilisation of Alternative Fuel and Raw materials (AFR) while enhancing use of renewable power to the maximum extent possible. We have plan in place to increase the waste heat recovery capacity to 376 MW by FY 2027-28. Our plan to reach 1,000 MW renewable energy is on track to be commissioned by FY 2025-26.

I am pleased to present the noteworthy progress and accomplishments of ACC Limited documented in this year's Sustainability Report.

As an integral part of the diversified Adani Group, We have achieved substantial growth driven by a strategic vision and commitment to its core values. Over the course of the year, the company has exhibited a strong financial footing and positive momentum. Our achievements stand as a testament to the resilience, diligence, and dedication exhibited by our entire team. Our recognition as an 'Iconic Brand of India' by The Economic Times and as one of 'India's Most Trusted Cement Brands' by TRA Research affirms our emphasis on quality and sustainability.

### Strengthening Financial Performance

We have consistently delivered robust financial results, supported by our strategic endeavours

and operational excellence. Our revenue from operations amounted to 19,959 crores, with an EBITDA of 3,555 crore, reflecting a margin of 17.4%. Furthermore, our profit after tax surged to 2,337 crore, showcasing our ability to generate substantial value for our shareholders. We have a debt-free status and maintains a leading working capital cycle of just 14 days, underscoring our operational efficiency and prudent financial management practices.

Our dedication to operational excellence is evident in our performance metrics and multiple initiatives taken focusing on reducing operational costs. Our market capitalisation has reached 46,791 crore, indicating strong investor confidence in our growth trajectory. Additionally, we have proposed a dividend of 7.5 per share for the fiscal year 2023-24, demonstrating our ongoing dedication to delivering consistent returns to our shareholders.

Our strategic focus on cost optimisation has yielded impressive results, with significant savings achieved in energy, logistics, and other operational areas. We have proudly implemented advanced logistics and fleet management digitalisation for real-time vehicle tracking, enhancing efficiency and optimising logistics expenditure. This financial strength is intricately linked with our sustainability performance, as our initiatives in green cement and energy conservation aid our environmental, social, and economic related goals.

### Fostering Innovation

In sync with Adani group's philosophy to foster innovation to drive business growth and market leadership, R&D and innovation continues to be central to our approach to growth. Our ongoing commitment to research and development has resulted in the introduction of low carbon products tailored to the changing demands of the market. We work towards addressing the needs of individual home builders while promoting sustainable construction practices by addressing the various needs related to quality materials, construction methods, and expert professionals. The development

of a pan-India knowledge sharing platform, accessed by over 15,000 architects and engineers, allowed us to advocate and educate professionals about sustainable practices and the utilisation of advanced materials & techniques. These advancements not only enrich our product range but also bolster our competitive position in the market.

### Leading with Responsibility: Enhancing ESG Performance and Stakeholder Value

Our corporate governance framework stands as a basis of our organisational achievements. Our robust board structure and comprehensive policies are established to uphold transparency and accountability. We have adopted ESG governance principles, seamlessly integrating environmental, social, and governance factors into our decision-making processes. The oversight of ESG governance is led by the Corporate Responsibility Committee at the Board, with the full support of other Board-level committees. Additionally, our operations and business conduct are guided by an extensive range of policies. Our focused efforts on business ethics are evident in our transparent governance practices, where instances of non-compliance, corruption, or anti-competitive behaviour are non-existent. This dedication towards governance is reflected in our strategic initiatives and operational practices, meticulously crafted to generate enduring value for our stakeholders.

Our approach to sustainability and climate action is comprehensive. We aim to achieve net zero emissions by 2050, with our near-term targets endorsed by the Science Based Targets initiative (SBTi), showcasing our resolute enthusiasm for combatting climate change. Our Sustainable Development 2030 Plan focuses on four key pillars, notably Climate and Energy, circular Economy, Water and Nature and People and Communities. Rooted on this, we actively embrace the principles mitigating climate change, energy efficiency, water positivity and ecosystem restoration. Our efforts include reducing the clinker factor, decreasing energy

intensity, and integrating waste from other industries into the cement manufacturing process. Through our actions in green cement and other environmentally friendly technologies, we have positioned ourselves as leaders in the industry's drive toward a more sustainable future. By adopting the principles of circular economy, we are optimising use of energy and material resources, embracing a range of alternative fuels and raw materials, and reducing our dependence on finite resources. We aim to integrate 30 million tonnes of waste derived resources into our operations and achieve a thermal substitution rate of 28% by 2030. With a focus on ecosystem restoration, our cement business has pledged to plant 8.3 million, aligning with Adani Group's ambitious plan to grow 100 million trees by 2030. Our sustainability efforts have garnered accolades from industry leaders, as we have been honoured as one of 'India's Top 50 Most Sustainable Companies across multiple industries by BW Businessworld, serving as a testimony to our commitment to sustainable practices and responsible business operations. We have implemented various measures to minimise environmental footprint of our business, including the adoption of eco-friendly mining practices, the optimisation of resource utilisation, and the incorporation of low-carbon products like ACC AEROMaxX, ACC ECOMaxX, ACC Coolcrete, and ACC Bagcrete.

Our corporate philosophy places a strong emphasis on our social practices. We place considerable importance on effectively managing our employees, ensuring their health and well-being, and nurturing our customer relationships. Our priority towards workplace safety drives our continual investment in creating a safe and healthy working environment. These practices are not merely about meeting regulatory requirements but about fostering a culture of care and responsibility towards our employees and communities.

Our Corporate Social Responsibility (CSR) initiatives are centred on the comprehensive development of our communities while

creating social, environmental, and economic value for society. Through vigorous community engagements focused on Community Health, Education, Livelihood Development, Infrastructure Development and Skill Development, we have successfully cultivated a harmonious relationship with the local communities at all our operating locations.

### Embracing the Future with Resolve

Our forward-looking perspective is infused with hope and determination. Our future aspirations are firmly anchored in our dedication to sustainable growth and innovative breakthroughs. We are committed to expanding our operational capacity, introducing eco-friendly products, and enhancing our digital capabilities. Our strategic priorities are clear: to lead in sustainability and climate action, drive innovation for the future, and empower our workforce and communities. With a meticulously crafted plan and the strong dedication of our team, I am confident that we will achieve our goals and continue our legacy of creating value for our stakeholders.

As we strive towards a better future, we are deeply devoted to our nation and its people. The trust and recognition of our stakeholders have been earned through our exceptional overall performance and allegiance towards transparency. Moving forward, we are guided by principles of ethical progress and societal well-being. United in our pursuit of Responsible Growth and the establishment of a Sustainable Future, we are prepared to confront the challenges that lie ahead.

I extend my sincere gratitude for the tremendous support provided to the ACC family. This support has been crucial in strengthening our resolve and reaffirming our commitment to maintaining the trust you have placed in the entire ACC team.

Regards,

**Vinod Bahety**  
Chief Financial Officer

# The Adani Portfolio of Companies





# The Adani Portfolio of Companies

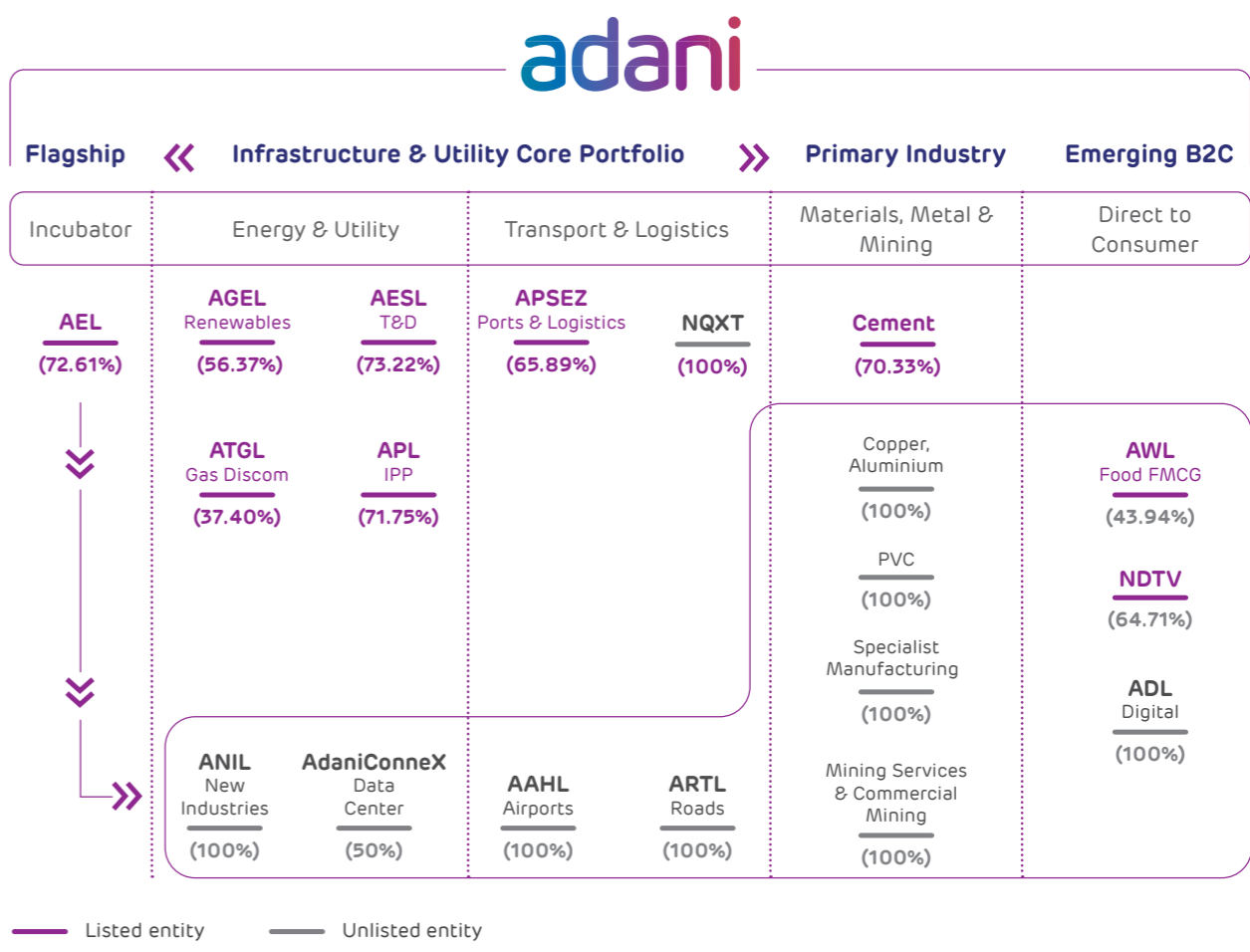
## ‘Growth with Goodness’

The Adani portfolio of companies, headquartered in Ahmedabad, India, was founded and spearheaded by the visionary entrepreneur Gautam Adani. The group's operations began in 1988 with a commodity trading business under the flagship company Adani Enterprises Limited (formerly Adani Exports Limited). Today, the Adani portfolio is one of India's largest and fastest-growing diversified business conglomerates, encompassing industries such as transportation, logistics, energy and utilities, materials, metals, mining, and various B2C sectors. The portfolio consists of eleven publicly traded companies, including four investment-grade (IG) rated businesses, and is the sole Infrastructure Investment Grade bond issuer in India.

The Adani portfolio adheres to the philosophy of ‘Growth and Goodness’, focusing on sustainable

and responsible development aligned with national priorities. Notably, the Adani Group has committed USD 100 Billion by 2030 for a green transition, including the creation of an Integrated Green Hydrogen Ecosystem with three Giga factories to develop 10 GW solar panels, 5 GW wind turbines, and 5GW hydrogen electrolyzers and expanding the portfolio of Adani renewables to 50 GW. Five major companies – Adani Ports, Adani Green Energy, Adani Energy Solutions, ACC Cement and Ambuja Cements Limited – have committed to achieving net-zero by 2050. Furthermore, a pledge has been made at WEF's 1t.org to plant 100 million trees by 2030. The Adani Foundation currently touching over 9.1 million lives and is positioned to address the critical needs of New India in area like health, nutrition, education, basic sanitation, woman's livelihood and skill development.





### Adani Portfolio Structure



(%) Adani family's equity stake in the Adani portfolio companies  
(%) AEL equity stake

Holdings are as on March 31, 2024, except for cement, in which holding is as on April 30, 2024.

Our portfolio leads the way in empowering critical sectors of the Indian Economy

<b>Transport and Logistics</b> Logistics (seaports, airports, logistics, shipping and rail), public transport infrastructure (roads and highways construction). 	<b>Materials, Metals and Mining</b> Cement, mining development and operations, copper, petrochemicals, defence and aerospace. 
<b>Energy and Utility</b> Power generation, transmission and distribution, renewable energy (solar, wind, hybrid and pump hydro storage), green hydrogen, data center, water management. 	<b>B2C</b> Natural Gas and Infrastructure (City Gas distribution, EV charging, Compressed biogas production, smart meters), Agro (Commodities, branded edible oil, packaged food products, cold storage and grain silos) media and entertainment, digital lab. 



## Vision

To be a world class leader in businesses that enrich lives and contribute to nations in building infrastructure through sustainable value creation.



## Our Values

### Trust

We shall believe in our employees and other stakeholders.

### Courage

We shall embrace new ideas and businesses.

### Commitment

We shall stand by our promises and adhere to high standards of business.

## Our Culture

### Passion

Performing with enthusiasm and energy



### Results

Consistently achieving goals



### Dedication

Working in commitment in pursuit of our aims



### Integration

Working across functions and business to create synergies



### Entrepreneurship

Seizing new opportunities with initiatives and ownership



With the Adani Portfolio spread across multiple segments, Cement is one of our key business verticals. India is committed to achieving its ambitious economic targets through infrastructure growth and modernisation. With programmes focused on connectivity, logistics, and reforms, India aims to become the world's third largest economy within the next three years. The cement sector is poised for sustained demands and growth.

Aligning with national growth aspirations, we have ventured into cement business through Adani Cement. Through acquisitions and rapid growth plans, we have established ourselves as prominent players in the Indian cement Industry. Further, with our position as one of the largest renewable energy companies in the world, we are well positioned to manufacture premium quality green cement well in lines with the principles of circular economy.

# Adani Cement

Adani Cement is the second largest cement player in India, aiming to contribute to national infrastructure development. This has been supported by the acquisition of Ambuja Cements and ACC Limited in September 2022.

Further, we have expanded our capacity through acquisition of Asian Concrete and Cements Private Limited, Sanghi Industries Limited and a grinding unit at Tuticorin. We boast a current capacity of 78.9 MTPA at the end of FY 2023-24. With 61 MTPA capacity under various stages of execution, we aim to achieve 140 MTPA capacity by FY 2027-28.

## Adani Cement: Geographic Footprint

18

Integrated Cement Plants

19\*

Grinding and blending units

78.9\* MTPA

Cement Production Capacity

1,00,000+

Channel Partners

06

Bulk Terminals

86

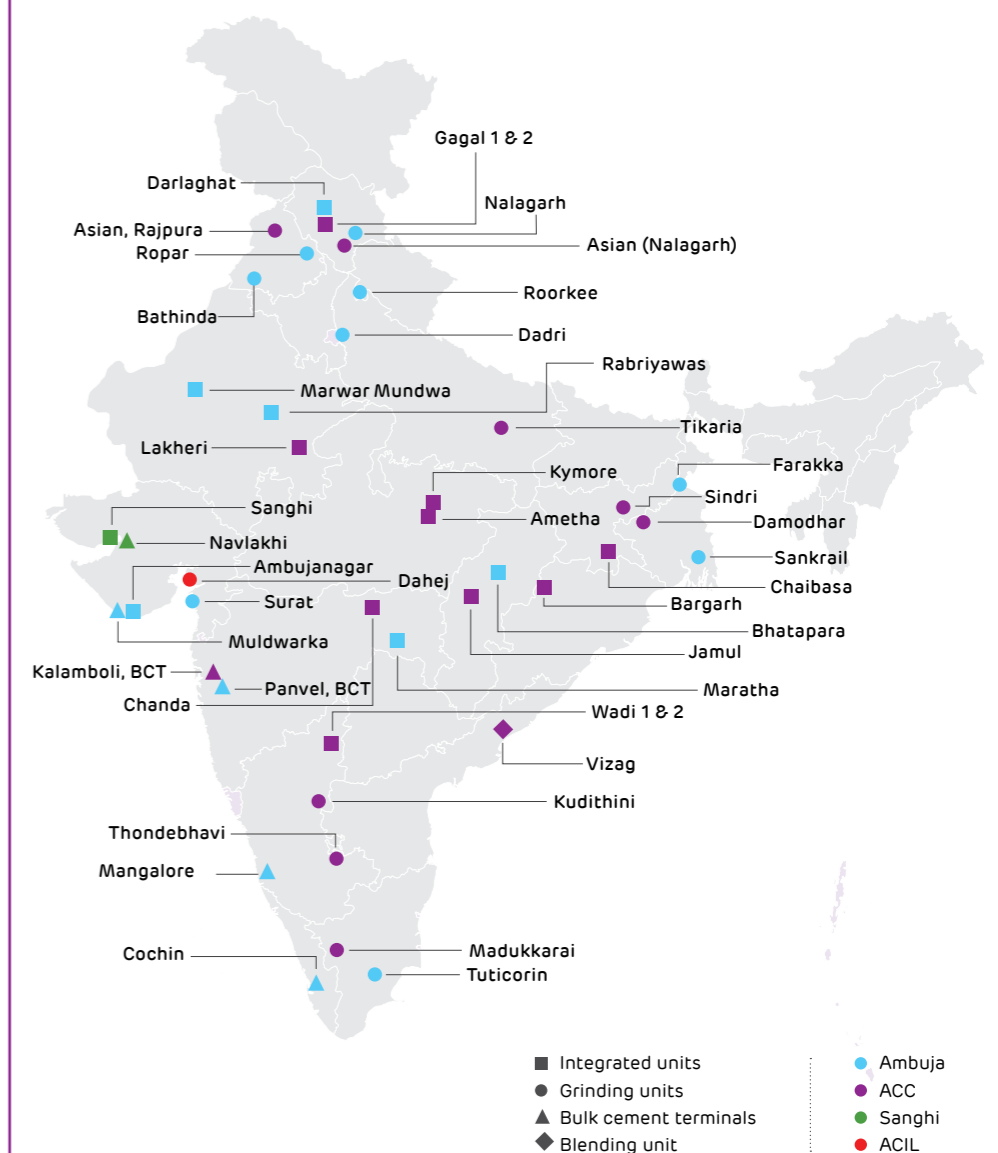
Ready Mix Plants

10

Captive Ships

04

Jetties



Map not to scale, used for representation only

\*Note: Including Tuticorin Grinding Unit acquired in April 2024.

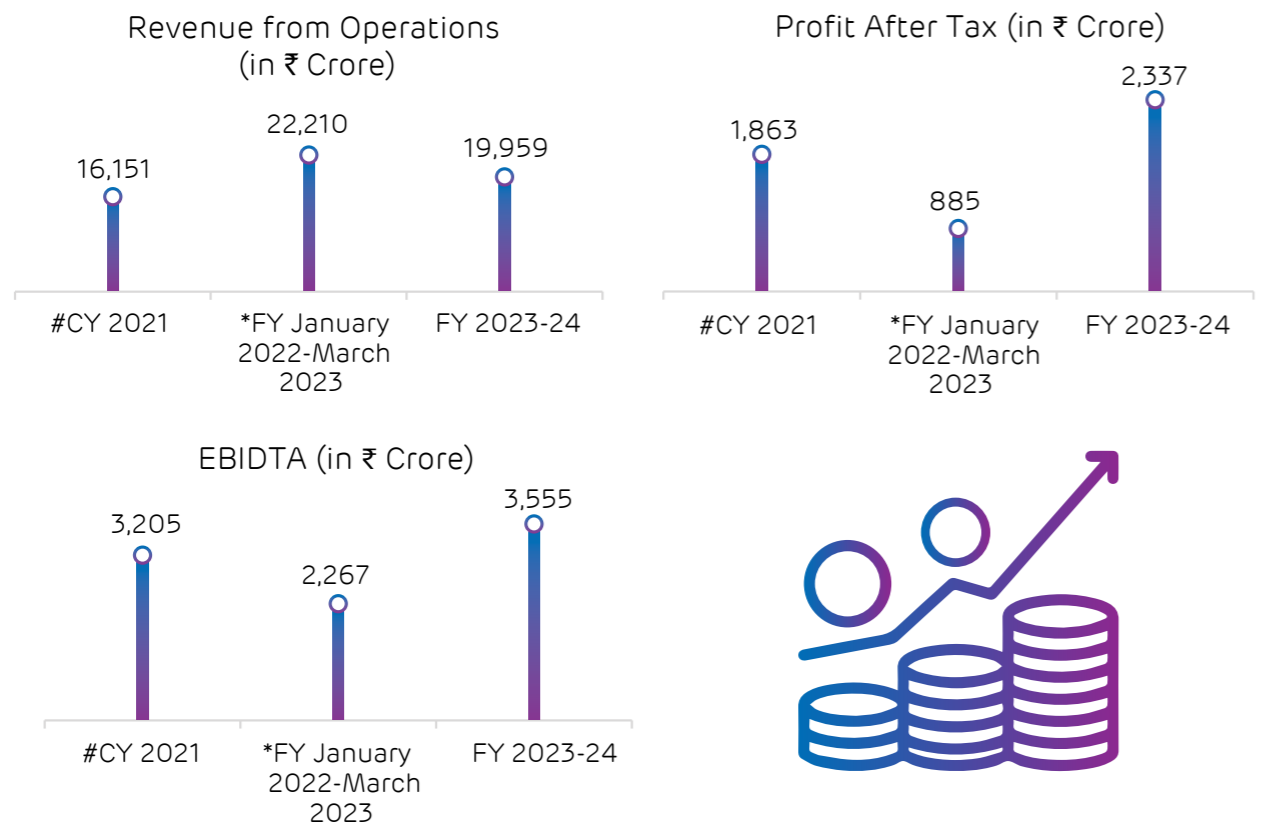
# ACC Limited: A Snapshot

Recognised as 'India's Most Trusted Cement Brands' by TRA Research in its Brand Trust Report 2024 and one of the 'Iconic Brands of India' by The Economic Times. ACC Limited, a distinguished member of the diversified Adani Portfolio, is one of India's foremost producers of cement and ready-mix concrete, trusted for over 87 years. Incorporated in 1936, we have actively partnered in India's inclusive development, driving progress and sustainability. With our headquarters in Ahmedabad, Gujarat, we are listed on the

Bombay Stock Exchange (BSE) and National Stock Exchange (NSE). Over the years, we have set up manufacturing and grinding units, along with ready-mix concrete plants across the length and breadth of India. We have set up 11 Integrated Units, 9 Grinding and Blending Units, 1 Bulk Cement Terminal and 86 ready-mix concrete plants with 38.55 MTPA installed cement manufacturing capacity and 52,500+ channel partners.

## Financial Performance

We have a robust balance sheet emphasising our strong financial performance and with consistent efforts, we experienced accelerated growth, primarily driven by increased sales volumes in the reporting year.



#In 2022, post our acquisition by Adani Group, we have changed our reporting cycle from Calendar Year (January to December) to Financial Year (April- March). Hence, the data reported for 2020 and 2021 are on calendar year cycle and for the current reporting year is in Financial Year cycle.

\*The Company had changed its financial year end from December 31 to March 31 in FY 2022-23. Therefore, the figure for FY 2022-23 is for 15 months

## Our ESG Performance

**Net Zero Commitment**  
by 2050 with near term (2030) targets validated by SBTi

**Renewable and Green Energy**  
13.1% Renewable Energy used

**Circular Economy**  
12.7 Million Tonnes of waste-derived resources used

**Water Positive**  
ACC is 1x Water Positive

**Plastic Negative**  
ACC is 7X plastic negative

**4.9 Million Trees Planted**  
till FY 2023-23

**Carbon Emissions**  
Scope 1: 513 Kg/tonne of cementious Material

**Clinker Factor**  
55.6%

**Training Hours**  
15.5 Training Hours for Employees

**CSR Beneficiaries**  
0.3 million (1.4 million till date)

**CSR Spent**  
37.59 Crore

**Local Sourcing of Raw Material**  
98.97% from within India

**Ethics and Integrity**  
Zero Complaints

**Data Security**  
Zero Complaints

**Anti-Bribery and Anti-Corruption**  
Zero Complaints

**Independent Directors**  
100% Board Committees chaired by Independent Directors

# Product Portfolio

Our focus is to deliver high-performance products and services for a variety of customer segments. The focus on premium brand positioning and attributes such as durability, strength, and performance has helped us revolutionise the construction industry in India. In FY 2023-24, 95.6% of our product portfolio is constituted of blended cement.

## Gold Range

A super premium line-up of unique products for catering to specialised applications.

### ACC Gold Water Shield

Specially formulated cement, makes concretes stronger and denser.



### ACC F2R Superfast

Scientifically developed with superior strength and superfine quality that enables robust construction in a short time.



### ACC Concrete+ Xtra Strong

Specially formulated cement with unique binding properties, designed to provide higher strength.



## Silver Range

The Silver Range premium offerings are targeted at value-conscious buyers looking for high-quality cement at affordable prices.

### ACC Suraksha Power

Loaded with unique strength multipliers, providing homes with strength that increases over time.



### ACC Suraksha Power+

Developed with engineered Particle Size Distributor (PSD) technology, its advanced formula along with tamper-pro packaging, enhances the superior quality.



### ACC HPC Long Life

High-performance cement that forms strong bonds and makes dense concrete to provide the consumer with long-lasting homes.



### ACC Super Shaktimaan

Scientifically made cement that fulfils the consumers' need of making their homes strong from the inside, year after year.



## Ready Mix Concrete (RMX)

Apart from cement, we also have a customised range of RMX to meet the specific requirements of diverse clientele, from small homes to mega projects.

### RMX Innovative Solutions

#### ACC ECOMaxX

Low carbon footprint with the use of CO2 reduced binders offering superior durability and finish.

#### ACC JETSETCRETE

Designed to gain ultrahigh early strength within a few hours with self-levelling features.

#### ACC PERFOMaxX

Highest commercial (M 140) grade concrete available in India

#### ACC AEROMaxX

State-of-the-art, sustainable, future ready ultralight filler and insulation concrete



## Solutions and Products

### Construction Chemicals

The ACC LeakBlock range of construction chemicals gives 360° water resistance capability to structures.



### ACC ADMIX

ACC ADMIX range is a new-generation super plasticiser based on a modified Poly Carboxylate Ether (PCE) based polymer, designed to impart exceptional performance in concrete.

### ACC ADMIX

- ACC ADMIX LP-4300
- ACC ADMIX MP-5400
- ACC ADMIX HP-6500
- ACC ADMIX HVF-7900

Dry Mix Range for Retail Customers

This consumer-friendly packaging and ease of use help make home-building easier.

ACC LeakBlock  
Waterproof  
Plaster



ACC Xtra Strong  
Tile on Tile  
Adhesive



ACC Xtra Strong  
Exterior Tile  
Adhesive



ACC Xtra Strong  
Premium White  
Adhesive




Self-Curing  
SURAKSHA  
READY USE  
PLASTER 101



Dry Mix Range for Institutional Customers

This range is designed to address the key pain points of institutional consumers. Available in 40 kg packs, these products provide customised solutions to suit the various requirements of customers along the construction cycle.

Ready Use Plaster 101	Self Curing Plaster 200	Waterproof Plaster 201	Thin Bed Jointing Mortar 105	Grout 250	Grout 275
	Tile Fix 111	Tile Fix 222	Tile fix 333	Fibre reinforced Mortar PMM 340	Premium White Adhesive



ACC Green Building Centre (GBC)

The Green Building Centre (GBC) brings under one roof all the components of an ecosystem that will enable affordable housing and sanitation. It focuses on making materials, products and services available at a single location, thus enhancing customer ease and experience.

ACC AAC Block

- Lightweight and ideal for institutional and large commercial projects, this material comes highly recommended by architects and engineers.
- It boasts unique selling points such as earthquake resistance, fire resistance, and excellent thermal insulation. Notably, it enables fast construction while saving on steel and cement costs.



ACC High-Strength Paver Blocks

- Produced by a high-capacity Vibro Compaction dual-process dry mix machine, these pavers offer extra strength and a top-notch finish. Customisable based on customer requirements, they can achieve strengths exceeding M-50 MPA, offering not only robustness but also high flexural capabilities.
- They are ideal for driveways, industrial areas, and external pavement spaces



ACC Kerb Stone

- These stones serve multiple purposes. They serve as road dividers and provide secure locking for pavers in landscaping.
- Known for their high strength, they feature perfect corners and aesthetically pleasing designs.



ACC Cover Blocks

- ACC Cover Blocks play a crucial role in ensuring even concrete spread across surfaces, improving roof strength. They provide superior protection to reinforcement bars (rebars) by preventing rust and corrosion.



ACC Chequered Tiles

- These are designed for use in open areas like driveways and ramps, providing an excellent anti-skid solution. They come in a variety of aesthetically pleasing colours and designs, ensuring both functionality and visual appeal.



ACC Designer Paver Blocks

- ACC Designer Paver Blocks are versatile and suitable for paving in high-traffic areas, building premises, pedestrian plazas, shopping complexes, and more. Notably, these paver blocks boast high strength, up to M-50 strength, ensuring durability and resilience across diverse applications.



ACC Cement Bricks

- This is an excellent choice for constructing both load-bearing and non-load-bearing walls. Their uniform shape and size contribute to a 15-20% cost saving in wall construction, while the low breakage rate further enhances efficiency. These bricks are produced using fully automatic Vibro-Compaction technology, ensuring consistent quality and reliability in construction projects.



ACC Concrete Saucer Drain

- A concrete saucer drain is a drainage system specifically crafted to handle surface water runoff effectively. This drainage solution is commonly employed in pedestrian areas, malls, parking lots, and similar spaces where efficient water management is essential.



ACC Prestress and Precast Boundary Wall

- These boundary solutions stand out for their easy installation, speeding up construction. With significant cost benefits over alternatives, they are ideal for large-scale projects, providing an efficient and cost-effective choice for establishing boundary walls.



Quality Control Lab

- As a commitment to quality assurance, ACC's Green Building Centre features a fully equipped Quality Control Lab. This facility sets us apart from other manufacturers, ensuring meticulous testing and adherence to industry standards.



Pavement and Floor Construction

ACC Green Interlocking and Designer Paver Blocks and Slabs

Easy to install, maintain and repair and can be used for various traffic conditions. Designer blocks enhance aesthetics of landscapes.

ACC Green Concrete Plain and Chequered Tiles

Anti-skid tiles available in several aesthetically pleasing colours and designs, easy to install, maintain and repair.

ACC Kerb Stone and Drain

ACC Kerb Stone is used with or without channel cover.

ACC Green Drains and Manhole Covers

Drains and manhole covers in various designs and sizes to facilitate road and pavement construction .



ACC Green Concrete Products

ACC Precast LightPole

Precast light poles, which are premanufactured concrete poles used for lighting purposes, offer several benefits over traditional cast-inplace or steel poles.

ACC Prestressed CycleTrack Tile

Red Coloured precast concrete tile (for cycle Tracks) size 7ftx2ft, laid down to enhance the durability, robustness and longevity.

ACC Concrete Tactile

Concrete tactile paving is designed to assist individuals with visual impairments or mobility challenges.

ACC Garden Swiss Benches

Superior quality, multiple designs and easy to install

ACC Green Concrete Cover Blocks

Technically superior solution to prevent corrosion of steel rebars and facilitates a uniform concrete cover during construction



“

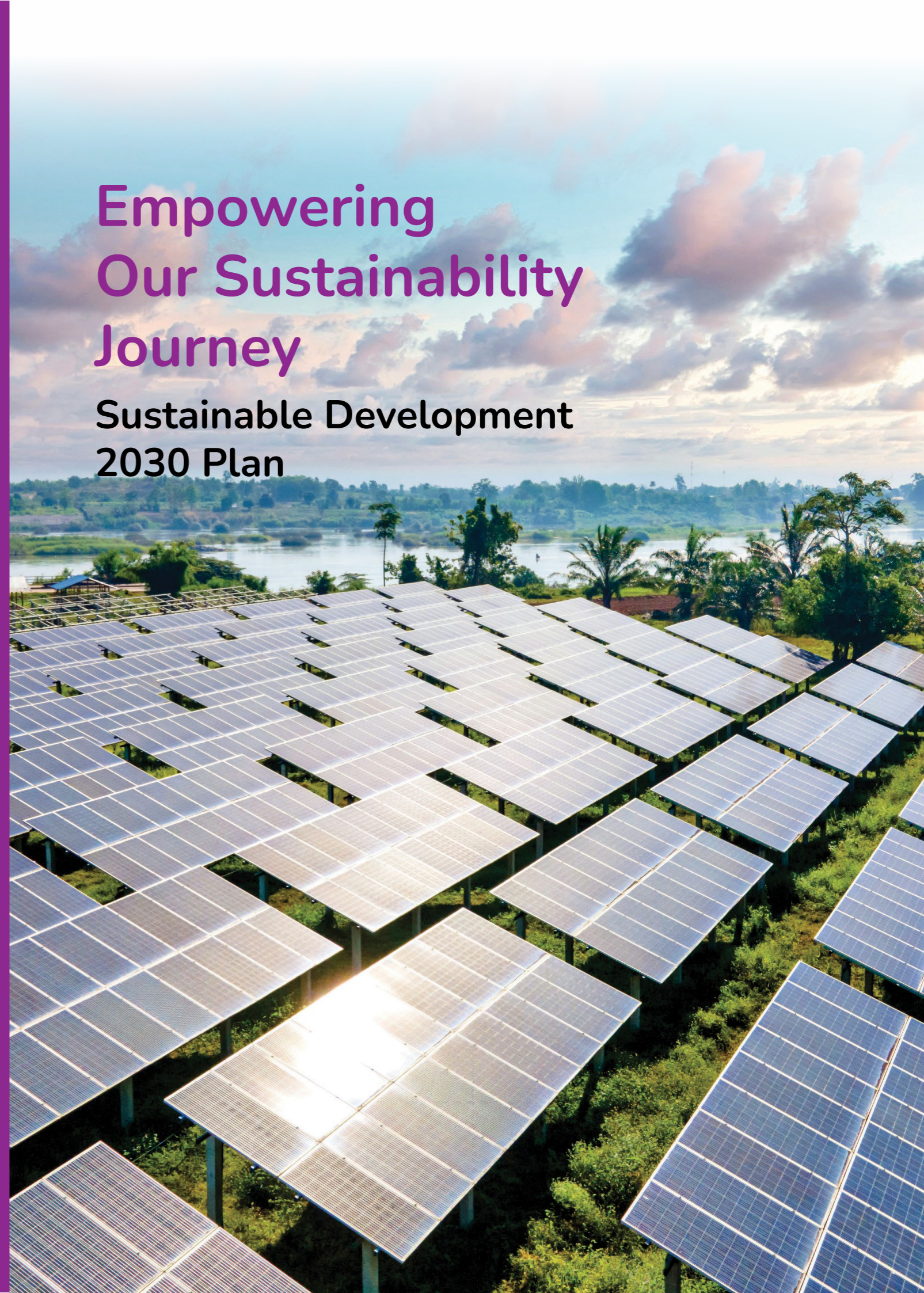
We are committed to making strategic investments in crucial areas of our operations with the vision of becoming one of the most competitive cement manufacturers in the country. Our efforts are centred around improving energy efficiency, use of renewable and green energy ,increasing the use of alternative fuels and raw materials and optimising clinker factor in our manufacturing processes as part of our journey towards green cement. We have implemented various measures to boost productivity and reduce our environmental footprint. In line with our company's commitment to be Net Zero by 2050, we are actively exploring future initiatives in carbon capture and utilisation, use of green hydrogen and use of rotodynamic heater in cement making”.



**Sukuru Ramarao**  
COO-Manufacturing

# Empowering Our Sustainability Journey

## Sustainable Development 2030 Plan



# Empowering Our Sustainability Journey

## Sustainable Development 2030 Plan

In our Sustainable Development (SD) 2030 plan, we have outlined our sustainability objectives around four fundamental pillars: climate and energy, circular economy, water and nature, and people and community. We are dedicated to judicious resource utilisation, reducing environmental impact, and devising inventive solutions for responsible growth. These endeavours have resulted in industry-leading benchmarks, particularly in green product development, fossil fuel substitution, and process optimisation.



### Our ESG Goals and Targets

Objective	Lead Metrics	2030 Target	2024 Performance	SDGs Impacted
<b>Climate and Energy</b>				
The Company aims to reduce its CO2 emissions	CO2 emitted	Scope 1: 465 kg/tonne of cementitious material (including CPP)  Scope 2: 10.4 kg/tonne of cementitious material	Scope 1: 513 kg/tonne of cementitious material  Scope 2: 21 kg/tonne of cementitious material	<div>7 AFFORDABLE AND CLEAN ENERGY</div> <div>11 SUSTAINABLE CITIES AND COMMUNITIES</div> <div>13 CLIMATE ACTION</div>
<b>Circular Economy</b>				
The Company aims at replacing natural resources with alternative waste materials	Waste derived resources	30 million tonnes	12.7 million tonnes	<div>7 AFFORDABLE AND CLEAN ENERGY</div> <div>11 SUSTAINABLE CITIES AND COMMUNITIES</div> <div>13 CLIMATE ACTION</div> <div>17 PARTNERSHIPS FOR THE GOALS</div>
	Thermal Substitution Rate (TSR)%	28%	9.15%	
<b>Water and Nature</b>				
The Company strives for operational excellence to reduce its environmental footprint. This pillar primarily focuses on two aspects: water and biodiversity	Water positivity index	5x water-positive	1.0x water-positive	<div>9 INDUSTRY INNOVATION AND INFRASTRUCTURE</div> <div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div>15 LIFE ON LAND</div>
	Trees planted	5.93 million	0.91 lakhs (4.9 million till date)	
<b>People and Community</b>				
The Company's rich legacy of community development and caring for its people, path-breaking leadership and corporate empathy contribute to societal progress	No. of beneficiaries	3.5 million	0.3 million (1.4 million till date)	<div>1 NO POVERTY</div> <div>2 ZERO HUNGER</div> <div>3 GOOD HEALTH AND WELL-BEING</div> <div>4 QUALITY EDUCATION</div> <div>8 DECENT WORK AND ECONOMIC GROWTH</div> <div>10 REDUCED INEQUALITIES</div> <div>11 SUSTAINABLE CITIES AND COMMUNITIES</div> <div>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</div>
	Lost time injury frequency rate	<0.1	0.62 (Workers) 0.38 (Employees)	

A group of people, mostly in white shirts, are gathered around a highly reflective, dark table. They are stacking their hands on top of each other in the center of the table. The background shows a wooden slatted wall and some indoor plants. The scene conveys a sense of teamwork and collaboration.

## Stakeholder Engagement and Materiality Assessment

# Stakeholder Engagement

At ACC Limited, the active engagement of all stakeholders is fundamental to the realisation of our strategic objectives. Our approach is designed to foster transparent and open communication and to understand and address the expectations and concerns of our diverse stakeholder groups. The engagement is guided by a comprehensive [Stakeholder Engagement Policy](#) ensuring a standardised approach to stakeholder communication and interaction.

Stakeholder engagement is not a one-time activity but an ongoing process that evolves with the changing dynamics of our business environment and stakeholder expectations. The Stakeholder Relationship Committee at the Board level oversees this process, ensuring that stakeholder interests are consistently prioritised in our decision-making processes.

The committee convenes every quarter, to review engagement activities and provide recommendations to the Board.







## Stakeholder Engagement Process





Our stakeholder engagement framework is structured to identify key stakeholders based on their influence and impact on our operations. This includes individuals or organisations directly or indirectly affected by our activities or those with a vested interest in our operations.

It involves a meticulous process of stakeholder identification, categorisation, and prioritisation. By understanding the unique needs and expectations of each stakeholder group, the engagement strategies are tailored effectively.



The engagement methods are diverse and tailored to the needs of different stakeholder groups. Throughout the year, we maintain ongoing dialogues with stakeholders through various communication channels. This continuous engagement is crucial as it provides us with critical insights that help in identifying key focus areas and refining our strategies. Our process incorporates regular feedback mechanisms and grievance redressal procedures, which are integral to meaningful engagement and effective concern resolution.

Stakeholder Groups	Engagement Mechanisms	Stakeholder Relevance	Frequency
<div>Investors</div> 	<ul style="list-style-type: none"> <li>Stakeholders Relationship Committee to address the grievances of investors and shareholders</li> <li>Annual General Meetings</li> <li>Email ID and toll-free number for investors</li> </ul>	<ul style="list-style-type: none"> <li>Investors are the key capital providers and have an interest in business growth and excellence</li> </ul>	<ul style="list-style-type: none"> <li>Monthly/quarterly/ annually as and when requested</li> <li>One-on-one shareholder interaction as and when requested</li> </ul>
<div>Dealers / Channel Partners</div> 	<ul style="list-style-type: none"> <li>Sales Calls</li> <li>Loyalty Programmes</li> <li>Dealer meets/ Annual Dealer Conference</li> <li>Net Promoter Survey Relationship Building Activities</li> </ul>	<ul style="list-style-type: none"> <li>It is through dealers and channel partners we can reach the larger customer base. We seek to establish a relationship of mutual growth and benefit</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annual survey</li> <li>Annual/continuous process</li> </ul>
<div>Government &amp; Regulatory Authorities</div> 	<ul style="list-style-type: none"> <li>Annual Report</li> <li>Plant Visits</li> <li>Regulatory Compliance reports</li> <li>Regular visits and applications</li> </ul>	<ul style="list-style-type: none"> <li>We regularly interact with the Government to understand new regulations, ensure compliance and uninterrupted operations</li> </ul>	<ul style="list-style-type: none"> <li>Continuous interaction</li> </ul>
<div>Consumers-Individual Home Builders and Contractors</div> 	<ul style="list-style-type: none"> <li>Calls/Visits by customer service engineers</li> <li>Consumer meets and exhibitions</li> <li>Formal and informal feedback</li> <li>Grievances redressal system</li> </ul>	<ul style="list-style-type: none"> <li>Consumers are our key stakeholders as they are the direct users of the product. Through regular interactions, we identify all consumer concerns and expectations which help in achieving business growth</li> </ul>	<ul style="list-style-type: none"> <li>Periodically</li> <li>Continuous Interactions</li> </ul>
<div>Consumers-Institutional</div> 	<ul style="list-style-type: none"> <li>One-to-one sales calls</li> <li>Technical after sales service</li> <li>Key account management system</li> </ul>	<ul style="list-style-type: none"> <li>Our institutional consumers sustain revenue generation and growth and support business excellence</li> </ul>	<ul style="list-style-type: none"> <li>Periodically</li> </ul>
<div>Employees</div> 	<ul style="list-style-type: none"> <li>Townhall Meetings and Webcasts</li> <li>Intranet Portal/ Newsletters</li> <li>Safety committees and toolbox talks</li> <li>Cultural Events</li> <li>Trainings and Reporting Mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>Our employees support our operational performance and strategic objectives</li> </ul>	<ul style="list-style-type: none"> <li>Continuous interactions</li> </ul>

Stakeholder Groups	Engagement Mechanisms	Stakeholder Relevance	Frequency
Vendors and Suppliers 	<ul style="list-style-type: none"> <li>By phone, video conference, e-mail or in person</li> <li>Suppliers' meet</li> <li>Capacity building on supplier Code of Conduct</li> <li>Surveys</li> </ul>	<ul style="list-style-type: none"> <li>We have a large dependency on the timely provision of raw materials from our vendors and suppliers. The operational efficiency depends on timely availability as well as the quality of materials and services we source.</li> </ul>	<ul style="list-style-type: none"> <li>Continuous interactions</li> </ul>
Community 	<ul style="list-style-type: none"> <li>CSR interventions and volunteering initiatives</li> <li>Community events and functions</li> <li>Stakeholder engagement surveys and community advisory panel meetings</li> <li>Social audits</li> </ul>	<ul style="list-style-type: none"> <li>The communities around our operations are our partners in inclusive value creation. We ensure harmonious relationships with the communities to maintain social licence to operate as well as seamless relationships</li> </ul>	<ul style="list-style-type: none"> <li>Continuous interactions</li> </ul>
Media 	<ul style="list-style-type: none"> <li>Press releases</li> <li>Publishing articles and news</li> <li>Meetings and interviews</li> </ul>	<ul style="list-style-type: none"> <li>Media play a significant role in disseminating our story to the wider public and are the channels of interaction.</li> </ul>	<ul style="list-style-type: none"> <li>Need based</li> </ul>
Trade Associations and Industry Bodies 	<ul style="list-style-type: none"> <li>Sharing best practices and benchmarks</li> <li>Participating in regional and national events/conclaves of industry bodies</li> </ul>	<ul style="list-style-type: none"> <li>Through trade associations and industry bodies, we actively voice our concerns and are involved in various advocacy groups. We respond and engage with the government during public consultations on issues that are relevant to our business</li> </ul>	<ul style="list-style-type: none"> <li>Need based</li> </ul>



## Materiality Assessment

The principle of materiality is central to our Environmental, Social, and Governance (ESG) framework. It helps us delineate the most critical issues that affects our people, planet, profit and delivers prosperity. Our materiality assessment process involves input from both management and stakeholders (internal and external) to validate the material topics. It allows us to gain a deep understanding of the topics that are most relevant to our stakeholders and those that have significant actual and potential impacts on our business.

Given the evolving ESG landscape, we conduct a detailed materiality review annually. This helps us reconsider and update the identified material topics, ensuring they remain aligned with our business objectives and stakeholder expectations. Keeping up with the changing sentiments and to streamline our business process, we undertook a dynamic high level materiality review, examining and updating the findings of our formal assessment. The assessment was conducted in accordance with the GRI -3, SASB and MSCI Construction Sector Standards and through peer analysis. This assessment was aligned with the double

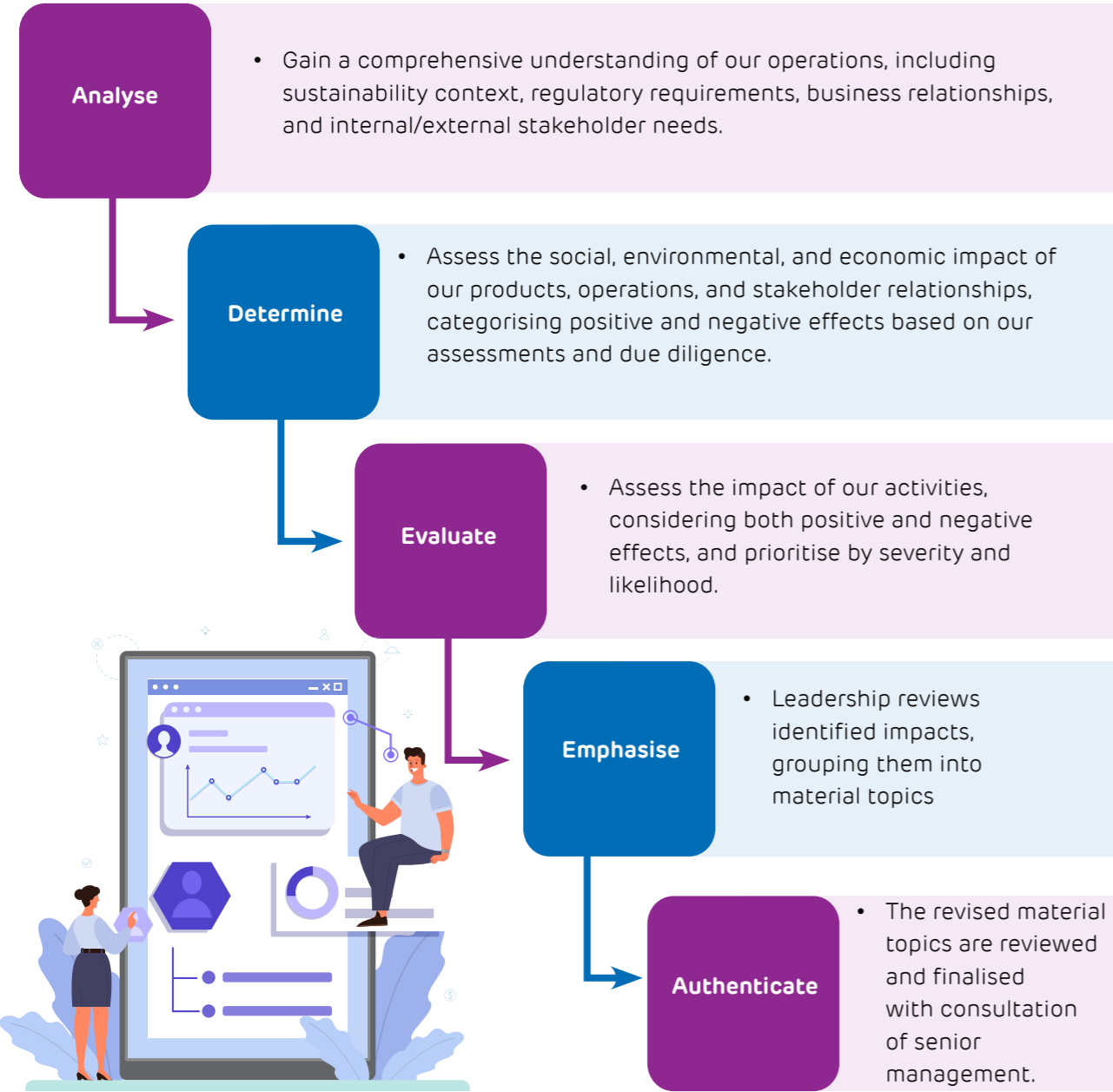
materiality framework, incorporating both financial and impact materiality.

The double materiality framework is a critical aspect of our materiality review process, as it acknowledges the reciprocal relationship between financial materiality and impact materiality. Incorporating double materiality philosophy supported us to assess and prioritise ESG issues that may have both a direct impact on our financial performance and a broader impact on society, the environment, and other stakeholders. It also aligns with the increasing focus on sustainable finance, integrating the consideration of environmental and social impacts into financial decision-making.

The exercise also involved the identification of business impacts on the economy, environment and people including human rights with the classification of the impacts into actual/potential, positive/negative, reversible/irreversible and short-term/long-term. This has led to the reconsideration of the existing material topics with new additions as well as the merger of a few.

Materiality Assessment Process












Our materiality assessment process is thorough and multi-faceted, encompassing the following key steps:









This comprehensive approach to materiality assessment enhances our ability to address the most critical issues impacting our business and the wider community.

We have finalised 16 topics material to our business which are mapped to Key Performance Indicators (KPIs) that are examined annually with our business objectives to assess the progress and performance. Further, the results of the materiality assessment are integrated into the ERM framework by mapping the associated material topics with each business risk. By integrating these into respective business risks, the financial impact was identified and thereby supported us in assessing the financial materiality. The details are further elaborated in Risk Management section of this Report. The following table illustrates the list of material topics prioritised across E, S and G dimensions.

Material topics	GRI Topic	Impacts Identified	Key Performance Indicators	Corresponding SDGs
Environment				
Water management	Water and Effluents	<ul style="list-style-type: none"><li>Reduced dependency on natural water resources</li><li>Water scarcity</li></ul>	<ul style="list-style-type: none"><li>Total water withdrawal</li><li>Water discharged</li><li>Water consumption</li><li>Water consumption in water stressed areas</li></ul>	<div><div>6</div>CLEAN WATER AND SANITATION</div> <div><div>14</div>LIFE BELOW WATER</div>
Circular economy	Waste	<ul style="list-style-type: none"><li>Industry waste minimization</li><li>Natural resource conservation</li></ul>	<ul style="list-style-type: none"><li>Waste generated</li><li>Waste diverted from disposal</li><li>Waste directed to disposal</li></ul>	<div><div>7</div>AFFORDABLE AND CLEAN ENERGY</div> <div><div>12</div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div>
Climate & Energy	Energy Emissions	<ul style="list-style-type: none"><li>Rise in Global warming</li><li>Increased dependency on fossil fuels</li><li>Carbon Emission reduction</li><li>Reduced dependency on fossil fuels</li></ul>	<ul style="list-style-type: none"><li>Energy consumption (within the organisation)</li><li>Energy intensity</li><li>Reduction of energy consumption</li><li>Direct (Scope 1) GHG emissions</li><li>Energy indirect (Scope 2) GHG emissions</li><li>Other indirect (Scope 3) GHG emissions</li><li>GHG emissions intensity</li></ul>	<div><div>11</div>SUSTAINABLE CITIES AND COMMUNITIES</div> <div><div>12</div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div><div>13</div>CLIMATE ACTION</div>
Air quality	Emissions	<ul style="list-style-type: none"><li>Human health deterioration</li><li>Dust and air pollution</li></ul>	<ul style="list-style-type: none"><li>Oxides of Nitrogen and Sulphur and other significant air emissions</li></ul>	<div><div>11</div>SUSTAINABLE CITIES AND COMMUNITIES</div> <div><div>15</div>LIFE ON LAND</div> <div><div>13</div>CLIMATE ACTION</div>
Biodiversity	Biodiversity	<ul style="list-style-type: none"><li>Quarrying and Land Disturbance</li><li>Ecosystem conservation</li></ul>	<ul style="list-style-type: none"><li>Operational sites with high biodiversity value</li><li>Conservation efforts across locations</li><li>Number of species preserved.</li><li>Number of saplings planted</li></ul>	<div><div>14</div>LIFE BELOW WATER</div> <div><div>15</div>LIFE ON LAND</div>
Sustainable construction	Non GRI topic	<ul style="list-style-type: none"><li>Reduction in emissions and negative environmental impacts</li></ul>	<ul style="list-style-type: none"><li>Percentage of blended cement used</li><li>Reduction in carbon-footprint</li></ul>	<div><div>11</div>SUSTAINABLE CITIES AND COMMUNITIES</div> <div><div>15</div>LIFE ON LAND</div> <div><div>13</div>CLIMATE ACTION</div>

Material topics	GRI Topic	Impacts Identified	Key Performance Indicators	Corresponding SDGs
<b>Social Dimension</b>				
Human Capital Development	Employment Training and Education	<ul style="list-style-type: none"> <li>Improved productivity and performance</li> </ul>	<ul style="list-style-type: none"> <li>Average hours of training per year per employee</li> <li>Programs implemented and assistance provided to upgrade employee skills</li> <li>Employees receiving regular performance and career development reviews</li> <li>Benefits are provided to full-time employees to take care of their health, family, and death/disability.</li> <li>Return to work and retention rates of employees who took parental leave</li> </ul>	 
Diversity and Inclusion	Diversity and Equal Opportunity	<ul style="list-style-type: none"> <li>Increase in employment opportunities for a diverse workforce</li> </ul>	<ul style="list-style-type: none"> <li>Diversity of governance bodies and employees</li> <li>Women's representation across cadres</li> <li>Inclusion of LGBTQ community</li> <li>The ratio of basic salary and remuneration of women to men</li> </ul>	 
Human Rights	Non-discrimination Freedom of Association and Collective Bargaining Child Labor Forced or Compulsory Labor Security Practices	<ul style="list-style-type: none"> <li>Robust policies and governance to reduce the risk of human rights violations</li> <li>Violations of human rights impact the stakeholders and business reputation</li> </ul>	<ul style="list-style-type: none"> <li>Total number of incidents of human rights and status of corrective actions taken</li> <li>Number of sites covered for human rights assessment</li> <li>Trainings related to human rights</li> </ul>	 
Occupational Health & Safety	Occupational Health and Safety	<ul style="list-style-type: none"> <li>Reduced Incidence of Occupational Injuries</li> <li>Enhanced Employee Morale and Satisfaction</li> <li>Occupational Illnesses and Exposure Risks</li> <li>Reduced risk of injury and loss of life</li> </ul>	<ul style="list-style-type: none"> <li>Number of fatalities, recordable work-related injuries, high consequence injuries reported</li> <li>Number of work-related ill health incidents</li> <li>Initiatives undertaken to promote good health and educate the community on prevention of diseases</li> </ul>	
Community Relations	Local Communities	<ul style="list-style-type: none"> <li>Indirect economic impacts</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of operations with implemented local community engagement, impact assessments, and/or development programs</li> </ul>	   

Material topics	GRI Topic	Impacts Identified	Key Performance Indicators	Corresponding SDGs
Customer Relationship Management	Non GRI topic	<ul style="list-style-type: none"> <li>Improving customer experience and therefore profitability of business</li> </ul>	<ul style="list-style-type: none"> <li>Implementing Customer Relationship Management and maintaining the database</li> </ul>	
<b>Governance Dimension</b>				
Corporate Governance and Business Ethics	Anti-corruption Anti-competitive behaviour	<ul style="list-style-type: none"> <li>Trust and Transparency</li> </ul>	<ul style="list-style-type: none"> <li>Operations assessed for risks related to corruption</li> <li>Communication and training about anti-corruption policies and procedures</li> <li>Confirmed incidents of corruption and actions taken</li> <li>Legal actions for anti-competitive behaviour, ant-trust, and monopoly practices</li> <li>Significant fines and non-monetary sanctions for non-compliance with environmental laws/regulations in the social and economic area</li> </ul>	
Sustainable Supply Chain	Supplier Environmental Assessment Supplier Social Assessment	<ul style="list-style-type: none"> <li>Environmental and social risks across the supply chain</li> <li>Enhanced indirect employment</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of suppliers assessed for which environmental and social risks assessed for improvement</li> <li>Number of local community people employed</li> </ul>	 
Information Technology and Data Privacy	Customer Privacy	<ul style="list-style-type: none"> <li>Gaining the trust of employees and customers through enhanced information technology</li> <li>Threat to data safety due to potential lacunae in IT systems</li> </ul>	<ul style="list-style-type: none"> <li>Total number of substantiated complaints received concerning breaches of customer privacy</li> <li>Number of systems/processes/mechanisms automated or digitalized</li> </ul>	 

# Governance

Building Trust,  
Enhancing Value



# Governance

## Building Trust, Enhancing Value

We foster a culture of transparency, accountability, and integrity. Our corporate governance framework is designed to ensure that our business practices are guided by the highest ethical standards, promoting a culture of transparency and accountability. Our Board, comprising experienced professionals, sets the tone for our corporate governance practices, overseeing our strategy, risk management, and compliance functions. The governance structure is designed to balance the interests of

all stakeholders, ensuring that our decisions are in best interest of the company, our customers, employees, and the environment. With a strong focus on risk management, compliance, and internal controls, we are confident that our corporate governance practices will continue to drive sustainable growth, enhance stakeholder trust, and reinforce our position as a responsible and resilient business.

### Focus Areas



**Robust Governance System**



**Business Ethics**



**Policy Advocacy**



**No Non-Compliance**

**PERFORMANCE HIGHLIGHTS**

**Zero Cases of Bribery and Corruption**

**Zero Breaches of Code of Conduct**

**Zero Cases of Conflict of Interest**

# Corporate Governance

Corporate governance philosophy at ACC stems from our core values and vision. Our value system drives the business with a strong focus on accountability, responsibility and transparency towards all our stakeholders.

The Company is in compliance with the conditions of corporate governance as required under the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 as amended from time to time ("SEBI Listing Regulations"), as applicable.

### Our Corporate Governance Principles



**Ethics and Integrity**

The company and the Board is committed to highest integrity standards. Directors commit to abide by the 'Code of Conduct' and adhere to all applicable regulations and policies demonstrating their integrity to align their actions with our organisation's values.



**Responsible Conduct**

The Board emphasise the Company's role in contributing to neighborhoods, terrains, communities and societies. The company is accountable for its environment and societal impact corresponded by compliance with laws and regulations. The Company's business extends beyond minimum requirements with the objective of emerging as a responsible corporate.










**Accountability and Transparency**


The Boards engage in comprehensive financial and non-financial reporting aligned to best practices relating to disclosures; it follows internal and/or external assurance and governance procedures.

### Board of Directors

The Company is efficiently managed and operates under the supervision of a competent Board. The Board comprises a diverse group of Independent and Non-Independent Directors, with the addition of an Independent Woman Director as mandated by the Act and SEBI Listing Regulations. The Board operates in a one–tier manner and it provides guidance and enforces necessary measures to ensure the expectations of stakeholders are met and obligations towards society are fulfilled.

Director	Profile	No. of other directorships held
 <p><b>Mr. Karan Adani</b> Chairman, Non-Executive Director</p>	Karan Adani holds a degree in economics from Purdue University, USA. With a global perspective and technological expertise, he sets high standards for Adani Group. As the strategic leader, he is responsible for driving business development and overseeing excellence in all operations. His vision is to build the Adani Group's identity around an integrated business model, leveraging his understanding of new processes, systems, and macroeconomic trends	02
 <p><b>Dr Vinay Prakash</b> Non-Executive and Non-Independent Director</p>	Dr Vinay Prakash, is a renowned expert in Mining and has made significant contributions to the Energy, Infrastructure, Metal, and Minerals sectors. He has led the Natural Resources division of Adani Group since its inception, successfully expanding its operations in India and abroad.	01
 <p><b>Mr. Ajay Kapur</b> Whole Time Director and Chief Executive Officer</p>	Mr. Ajay Kapur is the CEO and Whole Time Director of ACC Limited, with over 30 years of experience in the cement, construction, power, and heavy metals sectors. He has been actively involved in various industry forums, including CII, FICCI, and ASSOCHAM.	02

Director	Profile	No. of other directorships held
 <p><b>Mr. Sandeep Singhi</b> Non-Executive and Independent Director</p>	Mr Singhi is a dual-qualified science graduate and law graduate with over 27 years of experience in the legal field. He is a senior partner at Singhi & Co., Advocates & Notary, Ahmedabad, and has been enrolled with the Bar Council of Gujarat since 1989. Additionally, he is a member of the International Bar Association.	02
 <p><b>Mr. Nitin Shukla</b> Non-Executive and Independent Director</p>	Nitin Shukla holds a B.E. in Mechanical Engineering. With over four decades of experience, he has spent nearly half of his career as CEO/MD of joint ventures with multinational companies in India. His expertise spans multiple sectors such as chemicals, construction materials, Metals and Mining, Steel etc showcasing a broad range of skills and knowledge.	03
 <p><b>Mr. Rajeev Agarwal</b> Non-Executive and Independent Director</p>	Rajeev Agarwal, an IIT Roorkee engineering graduate, joined the Indian Revenue Service in 1983. With over 5 years of experience as a full-time member at SEBI, he has extensive knowledge of securities, commodity markets, and taxation. He has developed a strong understanding of global markets through his interactions with international peers and organizations.	03
 <p><b>Mr. Arun Kumar Anand</b> Non-Executive and Non-Independent Director</p>	Mr Arun Kumar Anand has rich experience having worked in different senior positions including Marketing, HR, Finance, etc. As an Investment Officer, he managed the Investment portfolio of LIC of India.	02

Director	Profile	No. of other directorships held
 <p><b>Ms. Ameera Shah</b> Non-Executive and Independent Director</p>	<p>Ms Ameera Shah is the Promoter and Managing Director of Metropolis Healthcare Ltd. With 20 years of experience, she has driven sustained growth and led corporate functions such as finance, strategy, business process optimisation, innovation, and investor relations.</p>	03

The non-executive/ independent directors can hold a maximum of ten other directorships/mandates.

In FY 2022-23, Holcim divested their entire shareholding and control in ACC Limited by way of transfer of 100% shareholding of Holderind Investment Limited (Holderind) to Endeavour Trade and Investment Ltd. (Endeavour), a company belonging to Adani Group.

The partnership with the Adani Group brought about a new era of growth and expansion for our company. With their vast resources and expertise in various industries, we were able to tap into new markets and opportunities that were previously out of reach.

Under the leadership of our new promoters, the Board was reconstituted on 16<sup>th</sup> September 2022. The reconstitution brought in fresh perspectives and ideas, ensuring that we stay at the forefront of innovation and strategic decision-making. The Board's average tenure is approximately 2 years.

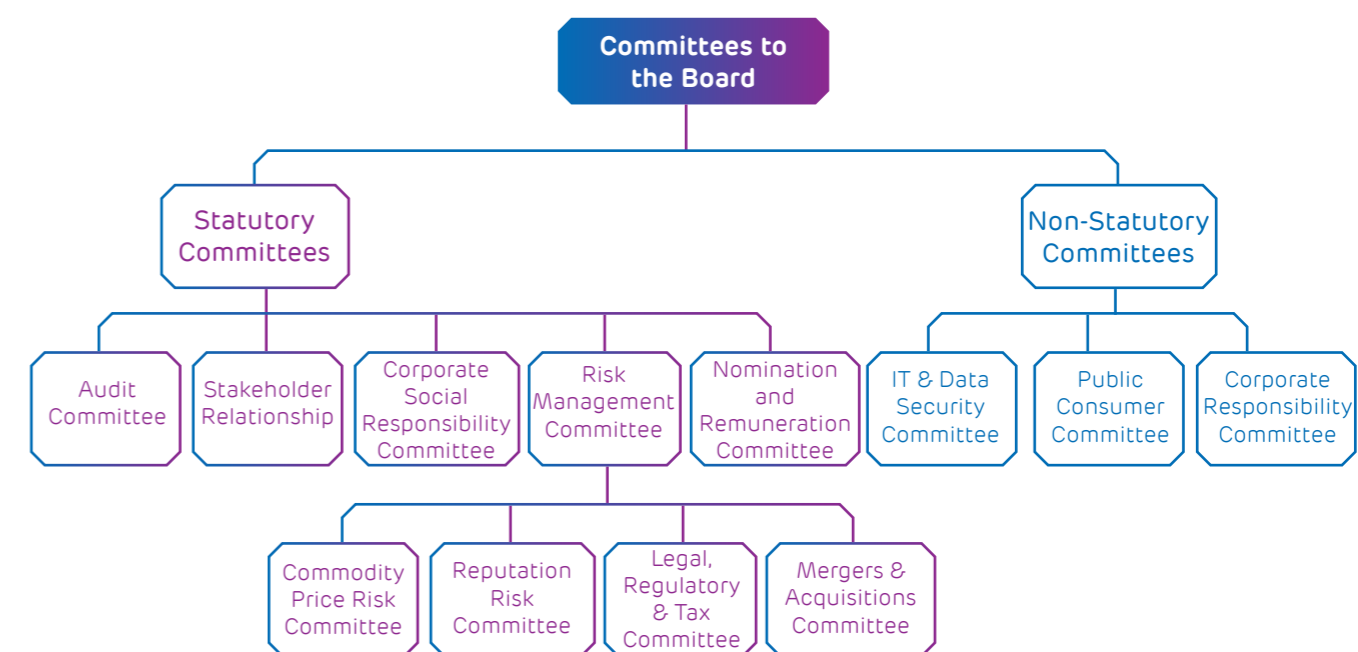
## Board Independence

The Board has an optimum mix of executive, non-executive, and independent directors who work collaboratively to prioritise the interests of stakeholders, particularly shareholders. This diverse composition ensures that decisions are made with impartiality and integrity, leading to effective governance and strategic planning.

The Board comprises of eight directors including one executive director, three non-executive non-independent directors and four non-executive independent directors. We have also set a target share of 50% for independent directors on the Board. All the Independent Directors have confirmed that they meet the criteria of Independence as mentioned under Section 149(6) of the Act and Regulation 16 of the Listing Regulations. The Chairman's office is separate from that of the Whole-time Director and CEO. Mr. Karan G Adani is the Chairman and Non-Executive Director and Mr. Ajay Kapur is the Whole-time Director and CEO .

## Board Committees

The Board has put in place committees and sub-committees to supervise different aspects of the business and drive strong Corporate Governance culture. These Committees are formed with the official approval of the Board and have clearly defined roles as outlined in their Committee Charter of Duties. Regular meetings are scheduled for these committees, and the minutes of these meetings are shared with the Board. Additionally, these committees handle the critical concerns received across the organisation. In this reporting period, there were no concerns communicated to the board that were critical in nature.



By having dedicated groups of individuals overseeing different aspects of the business, we are able to effectively manage risks, make informed decisions, and drive long-term value for our stakeholders.

## Board Diversity

We believe in maintaining a diverse Board that enables in open and honest communication and supports in constructive discussions leading to innovative ideas. In line with it, we have established a [Board Diversity Policy](#) by considering several diversity factors, including but not limited to gender, age, cultural and educational background, ethnicity, professional experience, skills, and knowledge. Furthermore, the Nomination and Remuneration Committee periodically reviews and assesses the Board's composition. The Board currently comprises of eight Directors including one female independent director in line with the Companies Act, 2013 provisions and the SEBI Listing Obligations and Disclosure Requirement (LODR).

## Nomination and Remuneration to the Board

We follow a systematic approach to nominate and select our Board. The Board is appointed/ reappointed based on the recommendations of the Nomination and Remuneration Committee

as well as the Shareholders at the General Meeting(s) or through the means of a Postal Ballot. Board members are elected and re-elected annually based on their performance. Each Board Member is elected individually through defined processes and not as a slate.

We ensure that the Board of Directors are fairly compensated as per the Companies Act, 2013 and the SEBI Listing Obligations and Disclosure Requirement (LODR). The Non-Executive Directors of the Company receive remuneration by way of sitting fees as decided by the Board. The remuneration of the Executive Directors is finalised by the Nomination and Remuneration Committee. The Committee provides its recommendation to the Board based on industry benchmarks and with the aim of rewarding performance.

## Board Familiarisation

We have taken a proactive approach to ensure Director familiarisation process is beyond regulatory requirements. Our comprehensive process ensures that newly appointed Directors receive a thorough understanding of cement industry, our business model, risk and opportunity assessments, updates on new products and innovations, as well as our commitments to sustainability, digitisation, and other key initiatives. Through this extensive

process we intend to make them well informed about their roles and responsibilities and empower to make informed decisions and effectively contribute to continued success.

Training for Board of Directors and KMPs

To remain at the forefront of our industry, continuous learning is imperative for our Board members and senior management. They actively participate in ongoing training sessions, awareness programs, and

familiarisation courses that cover a wide range of ESG topics to enhance their expertise and capabilities. This commitment to learning allows them to stay informed about the latest ESG trends and make proactive decisions that drive the business towards rapid and sustainable growth. Throughout the reporting period, the Board dedicated time to engaging in various training programs that focused on different aspects of ESG. Further, our ESG initiatives and their progress are regularly presented to the board and investors through our quarterly investor presentations.

Category	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact
Board of Directors	8	<ul style="list-style-type: none"><li>Capital Market programme</li><li>Airport Business</li><li>ESG programme</li><li>ESG Global Trends Programme</li><li>Awareness of Manufacturing Processes, CSR Activities, Cement Business</li><li>Capital Profile Programme</li><li>Green Hydrogen Programme</li><li>Data Centre Business</li></ul>
Key Managerial Personnel	8	<ul style="list-style-type: none"><li>Capital Market programme</li><li>Airport Business</li><li>ESG programme</li><li>ESG Global Trends Programme</li><li>Awareness of Manufacturing Processes, CSR Activities, Cement Business</li><li>Capital Profile Programme</li><li>Green Hydrogen Programme</li><li>Data Centre Business</li></ul>

Board Experience

We ensure that the members of the Board come from diverse backgrounds with balanced skillsets to drive better decision making. Our Board members have knowledge and technical expertise in various industries. Two of our independent-non-executive directors have practical work experience in the materials Industry.

Focus Areas and Board Expertise

Business Leadership	Leadership experience including in areas of business development, strategic planning, succession planning, driving change and long-term growth and guiding us and its senior management towards its vision and values.
Financial Expertise	Knowledge and skills in accounting, finance, treasury management, tax and financial Management of large corporations with an understanding of capital allocation, funding and financial reporting processes.
Risk Management	Ability to understand and assess the key risks to the organisation, and legal compliances and ensure that appropriate policies and procedures are in place to effectively manage risk.

Global Experience	Global mindset and staying updated on global market opportunities, competition experience in driving business success around the world with an understanding of diverse business environments, economic conditions and regulatory frameworks.
Merger & Acquisition	Ability to assess 'build or buy' and timing of decisions, analyse the fit of a target with our strategy and evaluate operational integration plans.
Corporate Governance & ESG	Experience in implementing good corporate governance practices, reviewing compliance and governance practices for sustainable growth and protecting stakeholders' interests.
Technology & Innovations	Experience or knowledge of emerging areas of technology such as digital, artificial intelligence, cyber security, data centre, data security etc.

Area of Expertise

Name of the Director	Industry Knowledge (Materials)	Business Leadership	Financial Expertise	Risk Management	Global Experience	Corporate Governance & ESG	Merger & Acquisition	Technology & Innovation
Mr. Karan G. Adani	-	Y	Y	-	Y	Y	Y	-
Mr. Vinay Prakash	Y	Y	Y	Y	Y	Y	Y	Y
Mr. Ajay Kapur	Y	Y	Y	Y	Y	Y	Y	-
Mr. Sandeep Singhi	-	-	-	Y	-	Y	Y	-
Mr. Nitin Shukla	Y	Y	-	Y	Y	-	Y	Y
Mr. Rajeev Agarwal	-	-	Y	Y	Y	Y	Y	-
Mr. Arun Kumar Anand	-	Y	Y	Y	Y	Y	-	Y
Ms. Ameera Shah	-	Y	Y	Y	Y	Y	Y	Y

Board Meetings

All Board members are expected to attend all the Board meetings either in person or virtually. The average meeting attendance for the Board stood at 91.07% in the reporting year. The attendance for each Director for FY 2023-24 is mentioned in the below table.

Name of the director	Category of Directorship	No. of Board Meetings Held in FY 2023-24	No. of Board Meetings Attended in FY 2023-24	% Attendance in the FY 2023- 24
Mr. Karan G. Adani	Non-Executive, Non-Independent	7	5	71.45%
Mr. Vinay Prakash	Non-Executive, Non-Independent	7	6	85.71%
Mr. Ajay Kapur	Whole-Time Director and CEO	7	7	100%
Mr. Sandeep Singhi	Non-Executive, Independent	7	7	100%
Mr. Nitin Shukla	Non-Executive, Independent	7	7	100%
Mr. Rajeev Agarwal	Non-Executive, Independent	7	7	100%
Mr. Arun Kumar Anand	Non-Executive, Non-Independent	7	7	100%
Ms. Ameera Shah	Non-Executive, Independent	7	5	71.45%

Board Effectiveness and Evaluation

The Nomination and Remuneration Committee (NRC) is responsible for determining the criteria to evaluate the performance of Independent Directors. The criteria are set based on the functional and technical aspects, these include effective application of knowledge and expertise, management of stakeholder relationships, integrity, confidentiality maintenance, dedication and independence of behaviour and judgment of the respective Director. The internal performance assessment of the Directors and the Board was conducted by NRC during this reporting period.

To enhance the effectiveness, we have undertaken an independent evaluation which was conducted by a third-party expert at the end of reporting period on our Board performance. The evaluation process focused on Board dynamics and softer aspects and involved independent discussions with all Board members. Insights from the Board members were sought on multiple topics — fiduciary, structure of Board, strategy, talent, participation etc. The findings from the evaluation were subsequently presented to the Board, and consensus was reached on the necessary actions to be taken to improve its overall effectiveness.

Executive Compensation

In accordance with our [Nomination and Remuneration Policy](#), we ensure that key

managerial personnel are fairly compensated. We maintain a competitive advantage by attracting, retaining, and motivating talent through a favourable remuneration structure.

Success metrics of CEO compensation includes fixed and variable compensation. Variable compensation is disbursed upon achieving organizational performance on various targeted KPIs including:

- 1. Future proofing – Technology, digitalization and data analytics
- 2. Growth, Innovation and Market disruption – Growth pursued outside Budget including M&A, partnerships etc.
- 3. Budget delivery – Financial performance and CAPEX

At present, the performance alignment of CEO compensation is mandated on annual basis. However, the goal adjustment as per strategic action plan (STRAP) is captured on PERT model for next five years. Variable compensation takes care of STRAP initiatives as a part of performance metrics.

Mr. Ajay Kapoor is CEO and Whole Time Director for the cement business of Adani which has listed companies, Ambuja Cements Limited (ACL) and ACC Limited. While the administration is managed for both companies centrally at Adani cement and ACL is the holding company of ACC limited with 50.05% of holding, therefore, compensation is drawn only from the accounts of Ambuja Cements Limited.

Indian Corporate Governance Scorecard: The company is placed in the 'Good' category by Institutional Investor Advisory Services (IIAS) in the Indian Corporate Governance Scorecard (2023)\*.

\* The Indian Corporate Governance Scorecard framework is jointly developed by the International Finance Corporation (IFC), Bombay Stock Exchange (BSE), and Institutional Investor Advisory Services India Limited (IIAS). It provides a standardised and objective evaluation of corporate governance practices of enterprises. The scorecard has been developed considering G20 and OECD Principles of Corporate Governance, which are globally accepted benchmark for corporate governance.

Family and Management Ownership

In the current year, we have not granted stock options to the executive director or employees of the Company. The promoter and promoter group hold 56.69% shares and voting rights.

Government Ownership

Life Insurance Corporation of India, a Govt. Corporation has 6.4% stake in the Company as of March 31, 2024. Further, we do not have any golden shares for governmental institutions.

Business Ethics

Business ethics are fundamental to the success of our organisation. We place strong emphasis on development and enforcement of our Codes of Conduct, recognising their importance in guiding ethical behaviour and maintaining a positive work environment across our business.

We ensure the effective implementation of these codes through regular trainings, awareness sessions, and other modes of communication. We also obtain adherence on these codes from the respective stakeholders. Regular audits and assessments are conducted to monitor adherence to the Code and to identify areas for improvement.

Codes of Conduct

The Code of Conduct is an overarching document, that lays down our values, principles and guidelines to conduct business with integrity and professionalism. We have a robust [Code of Conduct for employees](#), a [Code of Conduct for the Board of Directors and Senior management](#) and a [Supplier Code of Conduct](#). The CoC Includes any practice, act, incident, corruption, or behaviour that deviates from our corporate values, ethical principles, or policies, as well as situations that may endanger health, safety, security, or the environment.

Ensuring Effectiveness of Code of Conduct

To uphold the highest standards of ethics and integrity, we have established robust systems and procedures to ensure all employees and covered persons adhere to our Code of Conduct (CoC) in every business transaction. This commitment to compliance is unwavering, with zero tolerance for any violations.

We have clearly defined responsibilities, functionalities, and accounting lines at the organisational, departmental, functional, and team levels. This transparency fosters accountability and enables us to effectively detect and prevent non-compliance.

We encourage employees to report any breaches or potential breaches of our CoC

through our Whistleblower Policy. Our vigil mechanisms ensure that all breaches are thoroughly investigated, and appropriate disciplinary actions are taken. The Chairman of the company has the authority to initiate investigations and make informed decisions based on the findings.

To foster a culture of integrity, we reward employees who report information useful for protecting our interests, improving our control systems, and detecting misappropriation, fraud, or financial indiscipline.

Further, adherence to CoC is also integrated into our employee performance and appraisal process. Any breach of the CoC will be taken into consideration during the year-end performance rating and review. Further compliance mechanism is also linked to employee remuneration, resulting in any significant breach to impact compensation.

During this reporting period our internal compliance system has been verified by an independent external body, which found no non-compliance or breaches during the assessment. This reinforces our commitment to upholding the highest standards of ethics and integrity.

Corruption and Bribery

We uphold a zero-tolerance stance against corruption, prioritising ethical behaviour and fair competition guided by our Anti-Bribery and Anti-Corruption Policy.

The policy clearly defines the acts which can be considered as acts of bribery and corruption. All our operations are assessed for the risks of corruption and bribery on a periodic basis. To maintain a corruption-free environment, we mandate anti-corruption training for all employees across different levels and regions. There were zero cases of corruption, bribery, or anti-competitive practices reported in the reporting year. Further, adhering to our Code of Conduct, we did not make any direct or indirect political and charitable contributions or sponsorships.

Conflict of Interest

All the Board of Directors are to avoid and not be involved in a situation in which he/she may have a direct or indirect interest that conflicts, or possibly may conflict, with the interest of the Company. Any circumstance that potentially involves or may reasonably lead to a Conflict of Interest must be disclosed promptly to the Company Secretary. Owing to our concerted efforts, there were no cases of conflicts of interest in the reporting year.

Money Laundering/Insider Trading

The Code of Internal Procedure and Conduct adheres to the Securities and Exchange Board of India's (SEBI) Insider Trading Regulations (2015). This code applies to designated individuals, as determined by the Board of Directors, and their immediate relatives, ensuring compliance with insider trading prevention. Further, all employees undergo mandatory training on insider trading. We have also built a robust systems and process to ensure continuous tracking and monitoring for the designated individuals as a precautionary measure to mitigate the risk of insider trading. The designated individuals are mandated to obtain necessary approvals to perform any purchases on stock market, non – adherence to this will lead to significant disciplinary actions like penalisation, impact on year-end appraisal etc. In this reporting period, we have identified no cases related insider trading in our organisation.

Antitrust/Anti-competitive Practices

At ACC Limited, we uphold fair competition by abstaining from anti-competitive practices, such as market dominance abuse, collusion, and inappropriate information exchange with competitors. There were no cases of anti-trust or anti-competitive practices in the reporting year.

Reporting Areas	Number of Breaches in FY 2023-24
Corruption and Bribery	0
Discrimination or Harassment	0
Customer privacy data	0
Conflicts of interest	0
Money laundering or Insider trading	0

Whistle Blower Policy

We have implemented a vigil mechanism and established a [Whistleblower Policy](#) for our employees and the Board of Directors and its subsidiaries, adhering to SEBI (Listing Obligations and Disclosure Requirements) Regulations (2015).

The mechanism facilitates the reporting of unethical activities, financial irregularities, and misconduct impacting our reputation or operations. The policy, available on the web portal, outlines reporting procedures, investigation processes, and protection measures for those who raise concerns. All grievances can be reported by writing to [whistleblower@adani.com](mailto:whistleblower@adani.com)

Further, for employees to voice their concerns, we have [Employee Grievance Redressal Policy](#), approved by the Board, which has outlined the process to raise concerns. For any grievance to be raised anonymously, we have 'SpeakUp' a digital platform, which is a confidential, quick and transparent in nature. The platform encourages real time reporting of grievances. All reported grievances are investigated by the Grievance Redressal Committee within a specified time frame.

ESG Governance

The ESG principles are embedded in our vision, policies, and culture, and ensure value creation for all the stakeholders. The ESG governance is headed by the Corporate Responsibility Committee (CRC), consisting of Independent Directors, oversees sustainability-related matters in our business. The Committee meets quarterly and reviews the performance against our targets in each area. The performance and developments are further apprised to the Board by senior management in a timely manner to obtain the consensus.

The other committees significant from ESG performance perspective are Stakeholders' Relationships Committee, Corporate Social Responsibility Committee and Risk Management Committee. These committees' are further supported by the respective teams. These teams works closely with various functions

Corporate Responsibility Committee (CRC)

The CRC is a voluntary committee constituted to assist the Board in fulfilling its responsibilities to oversee all significant sustainability related strategies, policies and programmes. The Committee is constituted by three independent directors and meet periodically, at least once in a quarter and appraise the Board.

Corporate Social Responsibility Committee (CSRC)

The CSR Committee is constituted in accordance with the applicable provisions of Companies Act 2013 and the SEBI LODR Regulation, 2015. The Committee identifies the CSR thrust areas, recommends the CSR expenditure amount as well as overlook implementation and monitoring of CSR Policy.

within the company to identify opportunities for improvement and to monitor progress towards our sustainability goals.

At the executive level, the Corporate Sustainability Steering Committee (CSSW) constituted by various functional representatives supports in driving the sustainability objectives. The committee meetings are held on a need basis to deliberate sustainability related goals, targets, and issues. Further, the committee reports the progress of the same to the Management Committee. The ESG team, with the guidance of senior leadership, has the responsibility for making all disclosures and anchoring ESG initiatives in the business. This team is also responsible for developing and implementing strategies to ensure that our business operations are environmentally friendly, socially responsible, and economically sustainable.

Roles and Responsibilities

Our Board and senior management are actively involved in implementing and monitoring sustainability initiatives. The CRC is responsible for overseeing the sustainability priorities including developing the ESG Report. The Committee played a crucial role in developing

Stakeholders' Relationship Committee (SRC)

The SRC was constituted to assist the BOD to protect the stakeholders' interests effectively and efficiently. The committee looks into various aspects of interests of stakeholders. The committee meets at least once in a quarter and appraise the Board.

Risk Management Committee (RMC)

The RMC is a statutory committee and assist BOD in fulfilling the risk oversight responsibilities. The Committee convenes on regular intervals, at least once a quarter and review and approve risk governance structure, risk assessment, risk management practices as well as the ERM framework.

our SD 2030 Plan, which is our sustainability roadmap and conducts periodic performance reviews to ensure that we are on track to achieve the sustainability goals.

Our Policy Commitments

We are committed to maintaining the highest quality in everything we do; from products we manufacture to workplace safety and our social and community relationships. This is underpinned by our values and policy commitments. The policies act as the guiding light to just and ethical business conduct and streamlined operations. We have set policies across Environmental, Social and Governance dimensions. The policies range from Energy and Climate Change management to POSH, Human Rights and Responsible Advocacy and Code of Conduct and Vigil Mechanism. The policies are duly approved by the Board.

We ensure that the policies are followed and implemented effectively, reinforcing our purpose and guiding principles. The Policies are embedded into business conduct through integration into our business processes and relationships. All the policies are available on our website and accessible to all our internal and external stakeholders at any given point in time.

Environmental Policies	Details	Stakeholder Groups Covered	Board Committees
Corporate Environmental Policy	<p>The Policy also guides in assessing our environmental impacts and measuring and improving our environmental performance by adopting best practices.</p> <p>We are committed to continuously improving our environmental performance by complying with all the applicable regulations and going beyond compliance</p>	Government and regulatory bodies, employees, investors and shareholders, community, and suppliers	Corporate Responsibility Committee (CRC)
Water stewardship Policy	We consider water as a crucial, shared natural resource. The policy guides on legal compliance with all regulations, efficient use of water resources, treatment of wastewater, developing and implementing water strategies and measuring and monitoring water related data on internal water performance.	Suppliers, employees, government and regulatory bodies, community, customers investors and shareholders	
Resource conservation Policy	We are committed to sustainable resource utilisation. The Policy emphasises compliance with all regulations, incorporating the principles of circularity and lifecycle analysis, reducing specific resource use, developing metrics to measure resource consumption, incentivising efficiency measures and raising awareness.	Suppliers, employees, government and regulatory bodies, community, investors and shareholders, and customers.	
Energy management Policy	The Policy provides guidelines to ensure compliance with all applicable regulations, promote use of green energy, drive awareness campaigns, monitor energy performance, set energy related goals and targets and assist suppliers and business partners in their energy management journey.	Investors and shareholders, government and regulatory bodies, customers, employees, and suppliers	
Climate change Policy	We support the goal of Paris Agreement and are committed to manage climate change risks. The Policy guides our climate risk management initiatives including measuring GHG emissions and setting targets, engaging actively in climate change advocacy and investing in low emission alternatives among others.	Government and regulatory bodies, employees, investors and shareholders, and suppliers	
Biodiversity Policy	The Policy guides to integrate the protection and promotion of biodiversity into business strategy. The policy guides on identifying areas of biodiversity importance, compliance with applicable rules, adherence to No Net Loss, and conducting regular risk assessment among others.	Employees, investors and shareholders, government and regulatory bodies, customers, community, and suppliers	
ESG Policy	We aspire for global sustainability leadership in our sector. The policy guides our goal to pursue no harm to people, host communities and the environment.	Employees, investors and shareholders, government and regulatory bodies, customers, community, suppliers	

Environmental Policies	Details	Stakeholder Groups Covered	Board Committees
Waste Management Policy	The Policy guides our waste management practices, legal compliance with applicable laws, promote use of recycled materials, raising awareness for internal stakeholders on and exploring innovative solutions to minimise waste generation.	Employees, investors and shareholders, government and regulatory bodies, customers, community, suppliers	Corporate Responsibility Committee (CRC)
Social Policies	Details	Stakeholder Groups Covered	Board Committees
Policy on diversity equity and inclusion	The Policy demonstrate our commitment to promoting DEI in all HR actions, supporting and empowering all, encouraging respectful communication, developing holistic training programmes as well as detailed the mechanism to be followed for reporting inappropriate conduct.	Employees, investors and shareholders	Corporate Responsibility Committee (CRC), Risk Management Committee (RMC), Corporate Social Responsibility Committee (CSRC), Stakeholder Relationship Committee (SRC), Nomination and Remuneration Committee (NRC)
Policy on prevention of sexual harassment	This Policy has given guidelines for prohibition of sexual harassment at workplace. It has detailed the policy, procedures and definitions pertaining to POSH act.	Employees	
Supplier Code of Conduct	We are committed to responsible and ethical business practices across our supply chain. The Policy has guidelines on regulatory compliance, Human Resources, Health and Safety, Environment Management and Governance. The policy also focus on supplier evaluation and continuous improvement.	Suppliers	
Policy on freedom of Association	The Policy emphasise our support for exercising right to association. We respect the rights of all individuals employed or associated with the Group through business interests, to the freedom of association and the rights of collective bargaining without interference and discrimination	Employees and Workers	
Stakeholder Engagement Policy	We believe that engagement with stakeholders is key to understanding their concerns and expectations. The policy guides our stakeholder identification and engagement mechanism.	All Stakeholders	
Human Rights Policy	We are committed to upholding of fundamental human rights in line with the legitimate role of the business. The policy guides our approach to human rights practices and the rules and procedures to be followed.	Employees, suppliers	
CSR Policy	The Policy details our CSR vision, culture, governance and thrust areas. The policy has also laid down guidelines on CSR project identification, implementation, fund allocation, monitoring mechanisms and duties and responsibilities.	Communities	
Occupational Health and Safety Policy	We firmly believe that OHS is a business imperative to achieve to achieve our goal of Net Zero. The Policy has detailed our commitment to promote safety leadership, ensuring all legal compliance, setting targets, reporting all incidents and empowering people through regular trainings.	Employees, suppliers, and communities	

Social Policies	Details	Stakeholder Groups Covered	Board Committees
Non-Discrimination & Anti-Harassment Policy	we are committed to fostering an inclusive, safe, and respectful environment for all individuals associated with our organisation. The policy lays guidelines to ensure that there are no practices of discrimination and harassment in the organisation. This policy outlines our zero-tolerance approach towards harassment, discrimination and abuse and provides guidelines for addressing and preventing such incidents.	Employees and Workers	Corporate Responsibility Committee (CRC), Risk Management Committee (RMC), Corporate Social Responsibility Committee (CSRC), Stakeholder Relationship Committee (SRC), Nomination and Remuneration Committee (NRC)
Employee Grievance Management Policy	The Policy defines the mechanisms in place to address employee grievances. The policy has also detailed the roles and responsibilities of various parties involved as well as the timeline for grievance process	Employees	

Governance Policies	Details	Stakeholder Groups Covered	Board Committees
Policy on Board Diversity	The Policy is framed to address the importance of a diverse Board in harnessing the unique and individual skills and experiences of various Members of the Board in such a way that it collectively benefits the business and the Company as a whole.	Board of Directors	
Vigil Mechanism/ Whistle Blower Policy	This Policy covers malpractices and events which have taken place, suspected to have taken place and provide a framework to promote responsible and secure whistleblowing.	Employees, customers, suppliers, and communities	
Policy on Code of Conduct for Employees	The Code of Conduct for Employees lays down the good conduct practices for employees. In case of any non-compliance, the policy states the scope for reporting, guidelines and protection measures.	Employees	Corporate Responsibility Committee (CRC) Risk Management Committee (RMC) Corporate Social Responsibility Committee (CSRC) Stakeholder Relationship Committee (SRC) Audit Committee, Nomination and Remunation Committee
Code of Conduct for the Board of Directors and Senior Management of The Company	The Code maintains standards of business conduct of the company and ensure compliance with applicable laws. The Code also lays down standards and values to enhance the image of the company and deter wring doings in business transactions.	Board of Directors, Senior Management,	
Tax Policy	The tax Policy lays down the guidelines to execute the global tax strategy of Adani Group, within the given framework of the ACC's business strategies and models.	Board of Directors, Senior Management,	
Nomination And Remuneration Policy of Directors, Key Managerial Personnel and Other Employees	The policy aims to attract, retain, and motivate Directors, Key Management Personnel (KMP), and employees. The policy establishes clear performance benchmarks, rewards improved performance, and balances fixed, and incentive pay.	Employees, KMPs, and Directors	

Governance Policies	Details	Stakeholder Groups Covered	Board Committees
Clawback Policy	This policy is proposed to safeguard the interest of all the stakeholders against possible misconduct by senior management employee(s) that may cause a restatement of financial statements later resulting in the loss of credibility attributable on account of such misconduct.	Senior Management	Corporate Responsibility Committee (CRC) Risk Management Committee (RMC) Corporate Social Responsibility Committee (CSRC) Stakeholder Relationship Committee (SRC) Audit Committee, Nomination and Remunation Committee
Anti-Bribery & Corruption Policy	We strictly adhere to ethical business practices and comply with all applicable laws and regulations related to anticorruption and anti-bribery. Our Anti-corruption and anti-bribery policies govern our employees' behaviour and prohibit any form of bribery, corruption, and unethical practices.	Employees, customers, suppliers, communities, investors and shareholders, government and regulatory bodies	
Responsible Advocacy Policy	The Policy on Responsible Advocacy specifies the critical and necessary guidelines to be followed by all employees and relevant contractors engaged by ACC and all its subsidiaries in all advocacy activities with internal and external stakeholders.	Employees, Suppliers, Contractors	

### Public Policy Advocacy

Public Policy Advocacy plays a crucial role in shaping our engagement with various industry bodies and trade associations. We actively collaborate with national and international associations to influence public policies and industrial actions that align with the broader vision of business landscape. The following is a list of our associations with various national and international bodies.

Association	Geographic Coverage	Membership Fees
Indian Business & Biodiversity Initiative (IBBI)	National	No membership Fee
Global Cement Concrete Association (GCCA)	National	₹ 5,00,000 per annum
Confederation of Indian Industry (CII)	National	No membership Fee
National Safety Council (NSC)	National	₹ 4,000 per annum
World Economic Forum (WEF)	Global	No membership Fee
Science Based Target Initiative	Global	No membership Fee
UNGC	Global	₹ 1,00,000
FICCI	National	No membership Fee
CDP	Global	₹ 5,70,000
Total Contributions		₹ 11,74,000

Our position on public policies relating to climate change is firmly aligned with the Paris Agreement, reflecting our dedication to reducing carbon emissions and promoting sustainable practices within the cement sector. By actively engaging with trade associations and industry bodies that uphold the principles of the Paris Agreement, we demonstrate our commitment to environmental stewardship and responsible business practices.

Our management system for lobbying activities and trade association memberships is robust, ensuring strategic alignment with organisations that share a commitment to sustainability and climate action. All associations and memberships are overseen and approved by the senior leadership like Chief Executive Officer (CEO) and Chief Financial Officer (CFO) at the organisational level. Further, basis the nature of organisation/think tank we are associated with, there are dedicated contact personnel from the respective functions who look after the engagement to ensure it is in alignment with our policy positions.

We do not associate with any association or body that is not aligned with the goals of the Paris Agreement. To ensure this, we

have established a rigorous reviewing and monitoring process to assess our public policy engagements and lobbying activities. This process involves regular evaluations to verify that the advocacy efforts and trade association memberships remain consistent with the climate change policy positions of aligned organisations across all our operations.

**ESG Assurance: Strengthening Accountability**

To ensure the accuracy of the publicly disclosed information we undergo both internal and external assurance. We have a comprehensive internal assurance process enabling the sustainability SPOCs at each of our sites and in relevant functions at corporate office to meticulously examine the supporting evidence and information. Additionally, our corporate ESG team conducts the final internal data assurance to ensure the accuracy and integrity of our data. Externally, independent third-party assurance is obtained for all data published by our Company for the mandatory data disclosure under SEBI mandated BRSR. This ensures the credibility and reliability of the information shared with the public.



**Risk Management**

**In an ever-evolving business landscape, risk management is crucial for ensuring sustainable business resilience. We have implemented a robust Enterprise Risk Management (ERM) framework designed to identify, assess, and mitigate potential risks. This proactive approach enables us to navigate uncertainties and capitalise on opportunities effectively.**

**Risk Governance**

Our approach to risk governance is deeply strategic and meticulous. We adhere rigorously to our defined risk appetite and tolerance levels, employing a robust internal and external risk assessment process.

Risk governance is overseen by the Risk Management Committee (RMC) at the Board level. The RMC oversees the adequacy of the ERM process and monitors the mitigation plans. To bolster our efforts, the committee has established four sub-committees, each tasked with supporting specific aspects of risk management. These sub-committees ensure a comprehensive approach to addressing risks across various domains, enhancing our ability to anticipate challenges and implement proactive measures.

At the executive level, the risk management process is overseen by the Chief Finance Officer (CFO), who oversees setting risk control standards. Quarterly reporting to the Risk Management Committee is led by the CEO and CFO, ensuring transparency and accountability.

The identified risks are assigned to functional heads (risk owners), for instance, a resource supply related risk will be assigned to that function. The risk owner keeps track of the risk, risk movement and effective implementation of mitigation measures.

To promote an effective risk culture across the organisation, we have undertaken various measures such as focused trainings. The identified business risks are also considered while product development as they help mitigate market and demand side instabilities. Risk Management trainings are also provided to all employees on a regular basis to increase awareness.

**Risk Management Framework**

Our Enterprise Risk Management framework integrates with the Adani Group Policy Landscape, evaluating risks in an unbiased manner and managing them with structured support from various corporate functions. We regularly conduct internal audits for our all functions including ERM. This is done by Management Audit & Assurance Services (MA&AS), an internal audit committee.

**Outcome of the Risk Management Framework Activities**

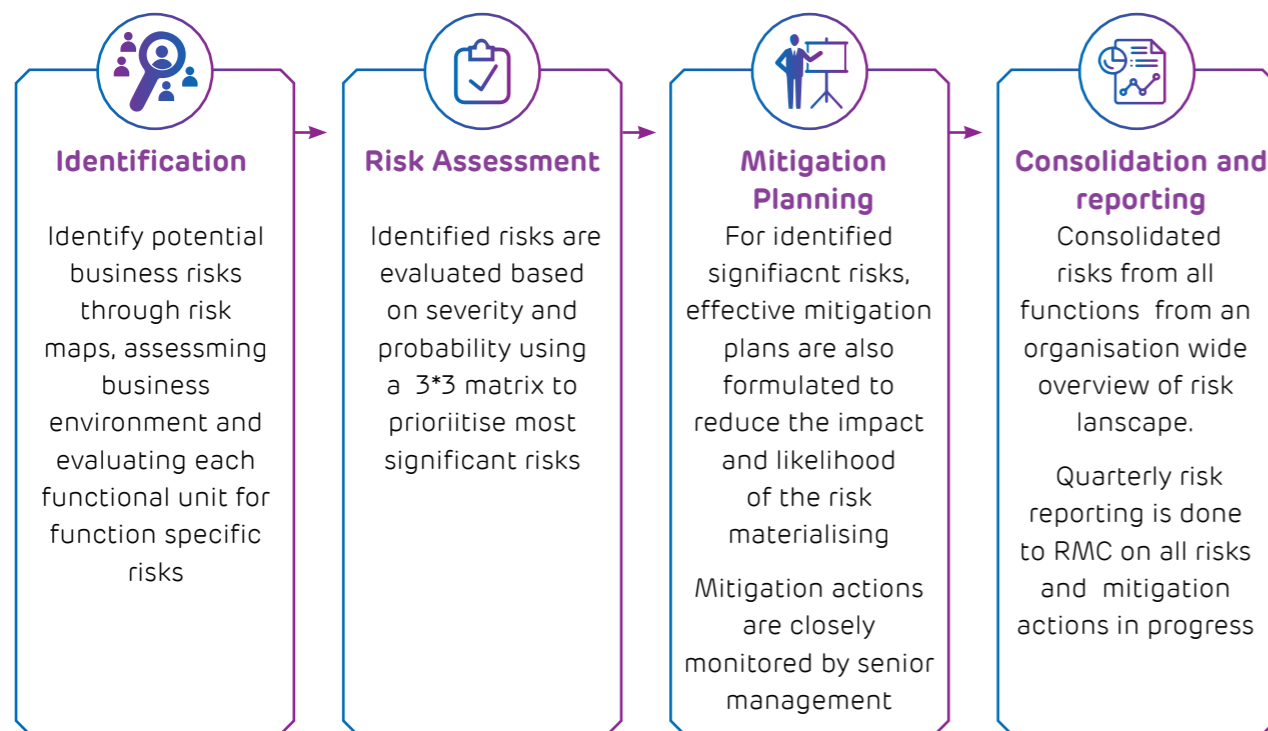
**Strategic initiatives for critical risks**

**Comprehensive description of every risks**

**List of Most critical risks**

**Risk Management Process**

The risk management process is designed to identify, evaluate, and mitigate potential risks that could impact our operations and objectives. By employing advanced tools and methodologies, we ensure a proactive stance in managing uncertainties, thereby safeguarding business continuity and regulatory compliance. This involves the following strategic steps:



## Business Risks

The following are the top five high priority risks identified along with the devised mitigation strategy. We review our exposure to risks on a regular basis, at least twice a year. Further to this, the risks are covered in detail in the Integrated Report for FY 2023-24 (Page number 53-55).

Risk	Risk Exposure (Severity and Probability)	Associated Material Topic	Mitigation Strategy
Maintaining Market Share	High	-	<ul style="list-style-type: none"> <li>The risk is addressed through strategic capacity expansion aiming for 140 MTPA by FY 2027-28.</li> <li>Additionally, we focus on enhancing brand equity through innovation and digitisation, thereby fortifying its competitive edge, and ensuring resilience against industry challenges.</li> </ul>
Comply with new regulations	High	-	<ul style="list-style-type: none"> <li>We adopted a proactive approach by employing transformation, upgrade, and modification initiatives.</li> <li>We have launched projects across operations to control pollution and meet new emission standards (for dust, SOx, and NOx) mandated by the government.</li> <li>This ensures regulatory compliance and helps in positioning as a responsible leader in environmental stewardship, mitigating risks associated with regulatory changes effectively.</li> </ul>

Risk	Risk Exposure (Severity and Probability)	Associated Material Topic	Mitigation Strategy
Fuel and Raw Material Security	High	Climate and Energy	<ul style="list-style-type: none"> <li>We prioritise long-term delivery strategies by optimising the fuel mix, enhancing plant efficiency, and increasing the use of alternative energy sources such as WHRS and solar power.</li> <li>Efficient procurement of raw materials like coal, limestone, and fly ash at competitive prices and suitable quality is crucial for maintaining production efficiency.</li> <li>Secured adequate limestone resources and actively identified suitable blocks for acquisition to ensure a steady future supply.</li> </ul>
Cybersecurity	High	Information Technology and Data Privacy	<ul style="list-style-type: none"> <li>Implemented immediate actions to protect confidential information, including identifying and blocking data leakage sites that pose threats to its network.</li> <li>Plans are underway to establish a secure and monitored environment dedicated to using AI-based tools securely.</li> <li>Our procedures, firewalls, and regular system upgrades are aligned with the latest security standards.</li> <li>Cybersecurity policies and procedures are updated periodically to stay ahead of evolving threats.</li> </ul>
Health and Safety	High	Occupational Health and Safety	<ul style="list-style-type: none"> <li>We place critical importance on health and safety by systematically reviewing systems, processes, and procedures to identify and address gaps.</li> <li>Initiatives such as the Unchaai Kendra and Life Saving Safety Rules enhance safety awareness and prevent accidents, promoting a safer working environment both onsite and offsite.</li> <li>Regular risk assessments are undertaken to enable proactive management of risks, ensuring continuous improvement towards achieving Zero Harm.</li> </ul>



## Emerging Risks

We are acutely aware of the evolving global landscape and the associated risks that impact both the industry and the broader environment. We have identified a few emerging risks that can potentially affect our business.

Risk	Category	Description	Impact	Mitigating Actions
Increased Carbon pricing regulations	Economic risk	There is growing consensus on carbon emission regulations around the world. Many countries have introduced direct carbon pricing for select industries.	With cement being one of the hard to abate sectors, pricing on emissions will pose a challenge to us. This will lead to increased operational costs thereby reducing profitability and impacting our expansion plans.	We are increasing the share of renewable energy and fuels in our portfolio.  By 2030 we are aiming to achieve 30% TSR as compared to 9.7% in the reporting year.  Further, focusing on reducing process emissions, 96% of our product portfolio comprises blended cement.
Shift towards sustainable building materials	Societal	As governments and individuals become increasingly aware of the environmental impact of construction, there is a growing demand for sustainable building materials that have a lower carbon footprint.	Increasing customer side demand for sustainable building materials will decrease demand for traditional cement.	96% of our current cement portfolio is constituted by blended cement with a reduced clinker factor.  The products are also certified by GRIHA, a mark of excellence in sustainable building practices
Expectations of Faster Career Shifts	Societal	The young workforce has expectations of faster career growth and shifts.	The growing expectation of the workforce for faster career growth and shifts leads to lower retention rates and increased hiring cost. Further, the location of plants in remote locations poses a challenge in attracting the right talent.	We are positioning as an employee friendly workspace with a higher focus on wellbeing, equal pay, and equal opportunity.  Further, we have invested in training programmes for regular upskilling as well as offer internal transfer options for employees.
Climate-Exacerbated Logistic Breakdowns	Environmental	Climate change risks were posing as a threat to operations. This has now expanded to impacting to logistics and supply chain as well, impacting raw material availability and procurement capacity.	Supply chain and logistics breakdowns will lead to transportation disruptions and raw material shortages. Also, as cement has shorter shelf life, disruption in outbound logistics will lead to product wastage thereby affecting revenue.	We are increasing our supplier base with higher procurement from local suppliers. Further, we are diversifying logistics routes and introducing new modes of transportation.

## Tax Transparency

At ACC, tax and related payments represent the character of what we are (and hence influence what we do). Our governance commitment ensures that tax affairs are managed ethically and methodically, leading to stakeholder assurance.

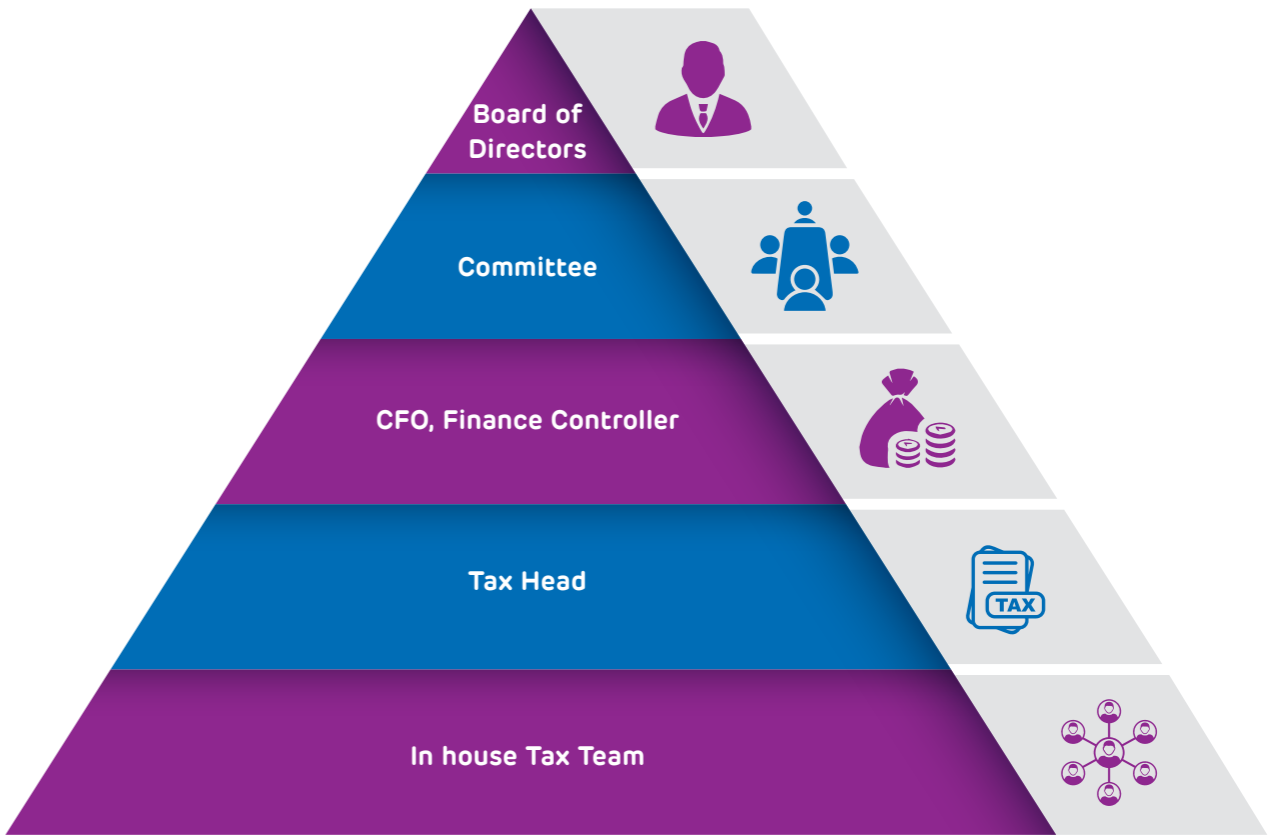
We are dedicated to maintaining the utmost integrity and transparency in our tax practices as guided by our Tax Policy. The Policy covers various elements such as our principles on tax policy, accountability and governance, transfer pricing and tax risk management and reporting.

### Tax Governance

Our tax governance framework adheres to legal, regulatory, and reporting standards. We prioritise accurate and punctual tax filings, safeguarding us from penalties and fostering our reputation as a responsible corporate entity.

Our tax function is governed by a robust and ethical framework, overseen by a dedicated team of professionals led by subject matter experts. This team, which includes external specialists, when necessary, has established standard operating procedures that adhere to international best practices, ensuring consistency and transparency. The Board of Directors serves as the highest decision-making authority for all tax-related matters, providing oversight and guidance to ensure compliance with the highest standards of ethics and professionalism.

The Legal, Regulatory and Tax Committee at the Board level exercise oversight with respect to the structure, operation, and efficacy of our tax compliance programme along with reviewing compliance with applicable laws and regulations.



Our Approach to Tax

Our approach to tax are guided by the following principles



Our Tax Strategy

We are committed to paying our fair share of taxes in accordance with the law, without attempting to evade or circumvent taxation. We strive to operate our businesses efficiently and create value for our shareholders. Our approach tax optimisation is based on ensuring that any transactions are driven by a legitimate business purpose and substance, rather than solely seeking to minimise tax liabilities.

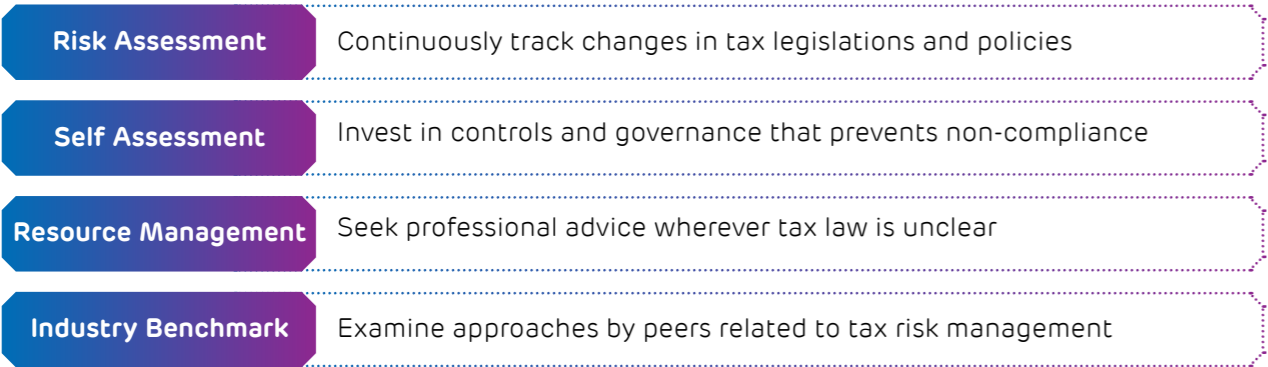
We continually monitor and analyse tax laws and concessions to optimise our tax footprint within the boundaries set by regulatory authorities. Our tax planning is guided by a strong sense of integrity, ensuring that we only claim tax incentives and deductions that align with our business strategy and are supported by genuine investments and economic substance.

When we invest in a location, we prioritize building lasting connections with investors, local governments, employees, and communities. This commitment is rooted in our responsibility to contribute positively to the areas where we operate. We fulfil this obligation by collecting and remitting taxes on behalf of the government, demonstrating our commitment to transparency and accountability.

We strive to be fully compliant with all applicable tax laws and regulations in the jurisdictions where we operate, and we take our statutory obligations seriously. Our approach is one of zero-tolerance towards non-compliance and any delays in meeting our tax obligation.

Tax Risk Management

Our Approach



We adhere to principles that manage various tax risks while maintaining good relationships with public authorities and avoiding reputation risks. These principles include addressing technical risks through compliance with legislation and seeking expert opinions, managing operational risks with diligent judgment and professional advice, ensuring compliance risk control for data related to tax filings and documentation,

fostering open, fair, and transparent dealings with tax authorities, and accurately reporting tax risks according to accepted accounting and reporting principles. Our tax risk management approach is integrated with our governance framework, which emphasizes identifying, managing, monitoring, and mitigating tax risks in accordance with best practices.

Tax Process and Controls

Our tax processes and controls are guided by the following pillars:



We have established a robust system of processes and controls to ensure the accurate and timely fulfilment of tax obligations. These processes include tracking and monitoring pending tax liabilities, ensuring compliance with all necessary regulations, and maintaining real-time status updates. Standardised operating procedures are in place to govern tax-related activities, guaranteeing consistency and efficiency. From a control perspective,

our system incorporates checks and balances, including a maker-reviewer-approver framework, to ensure that all transactions are thoroughly reviewed and approved before completion.

Further details of our tax strategy and tax risk management can be found in our [Tax Transparency Report](#), which is made available for public.



# Cybersecurity

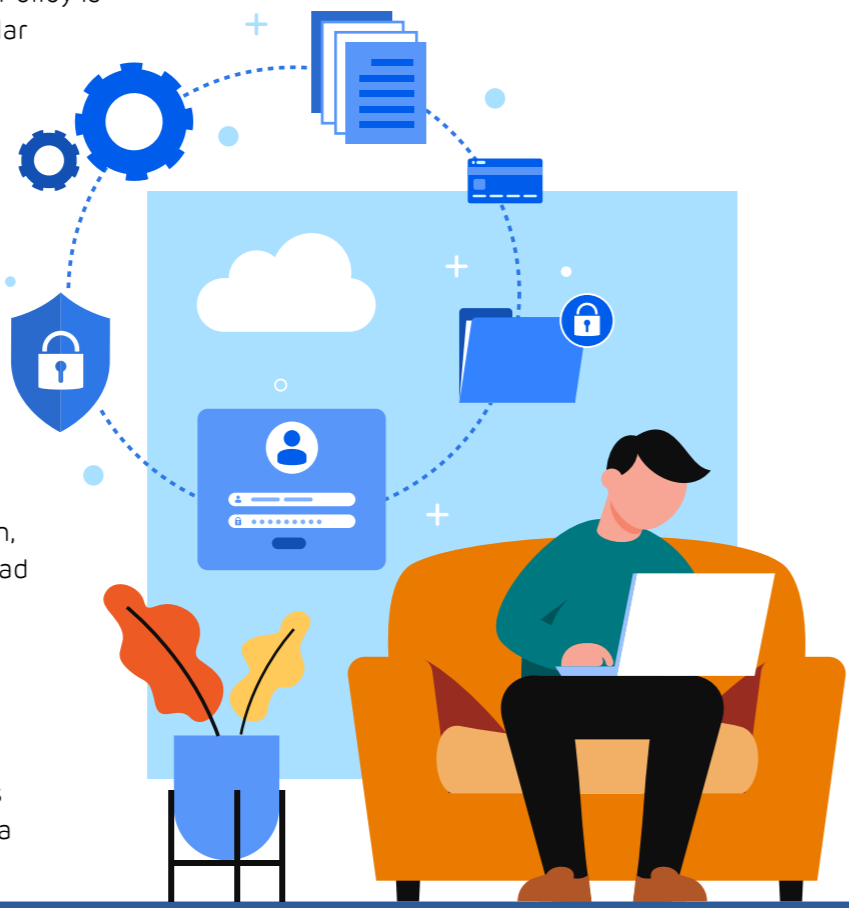
Over the past year, we have made significant investments in strengthening our cybersecurity defences, with a dedicated focus on protecting its critical business assets. Cybersecurity practices are overseen by the Information Technology and Data Security Committee at the Board level and the Chief Digital Officer at the executive level.

We have established a comprehensive cybersecurity program to proactively manage and mitigate cyber risks, ensuring the confidentiality, integrity, and availability of our sensitive data and systems. For all employees, Information Security Policy is available internally. Further, regular cybersecurity trainings are provided to employees through our online training platform. Employees are encouraged to report any event or attempts related to cybersecurity events. All incidents reported are duly investigated and actions are taken as deemed appropriate.

Our Security Operations Centre (SOC) leverages cutting-edge solutions across multiple layers, including Brand Protection, End Point Security, Cloud Workload Protection, Perimeter Security, Multi-Factor Authentication, Data Protection and Encryption, and Application Security. The cybersecurity measures adhere to industry-recognised standards such as ISO and NIST, backed by a

robust security architecture and governance framework. All security operations are centrally managed by our in-house Advanced Digital Technologies, a 24x7 cyber defence centre, providing 24/7 monitoring and response capabilities to ensure the highest level of protection.

We do quarterly vulnerability assessment of our cyber architecture and network devices. Further, our IT infrastructure and information security management systems have been audited by external auditor in the reporting period.



## Vulnerability Assessment and Third Party Audit

We do quarterly vulnerability assessment of our Azure, AWS and Onprem servers and Firewall, Router and L3 switches network devices. We have also undertaken third party audit for our 2wo plants and three applications, acescent, Deal connect and SAP. Further, statutory audit is carried out by Ernest &Young.

“



**Hemal Shah**  
Chief Digital Officer

Our commitment to excellence has underscored technology’s tremendous potential as a crucial driver in our growth plan. We are continuously working to enhance operational effectiveness through technological advancements. By integrating technology into our organizational culture, we have embarked on a path that harnesses cutting-edge technologies including AI, enabling us to make well-informed decisions on a daily basis across our business operations. The digital backbone has enabled us to be more agile, make informed decisions faster, and significantly enhance our operational efficiency. We have developed a comprehensive digital transformation strategy to optimize business processes and utilise resources for sustainable business expansion, all while ensuring adherence to regulatory standards.”

Digital Innovation

Over the past few years, we have consistently incorporated digital technologies into our core business processes, including sales, logistics, material management, manufacturing, control systems, and technological operations. This strategic implementation of technologies is aimed at improving operational efficiency and gaining a competitive edge by reducing the turnaround times of our operations across our value chain. Through a well-defined digital transformation strategy, we focus on improving business processes and maximising resources to drive sustainable business growth while complying with regulatory requirements.

Our established comprehensive digital command and control centre provides end-to-end visibility into our business processes and

systems across the value chain. This centralised monitoring will enable real-time monitoring of production, demand, sales, and logistics under one umbrella and contribute towards strategizing efficient emission reduction actions. With the help of artificial intelligence (AI) and machine learning (ML)-based tools, we efficiently forecast demand, optimise production, and manage distribution for lean and efficient functioning. We have effectively integrated an advanced logistical and fleet management system that enables real-time tracking of vehicle locations and estimated arrival times. This innovation has noticeably enhanced delivery speed and efficiency while optimizing logistics costs, resulting in increased profitability and improved EBITDA margins.



Cement Network Operating Centre (CNOC)

case study



We embarked on a digital transformation journey to create a centralised real-time dashboard to monitor and display various parameters related to our manufacturing, sales, finance, logistics, and sales navigation operations. Our aim was to create a single platform to visualize plant-wise data, providing insights into key performance indicators (KPIs) and enabling data-driven decision-making.

The dashboard provides real-time monitoring of various parameters such as mill temperature, CO ppm, and micro-climate conditions in the manufacturing process. It also displays data on the amount and type of cement/product produced, along with information on the mode of transport (road/rail) used. Estimated sales figures and targets are displayed, us to track production against targets. Additionally, the dashboard allows for real-time tracking of delivery vehicles,

including third-party logistics vendors, providing data on loading/holding/on-trip/unloading status, trip mapping, and live location. This feature enables customers to track their orders and receive updates on expected delivery times.

The safety features of the dashboard provide real-time monitoring of driver behavior, including sudden braking, overspeeding, wrong route taken, driving mode, and long driving time. This data can be displayed and presented site/state-wise, enabling us to identify areas for improvement and implement measures to ensure the safety of its drivers and assets. With this centralised platform, we are poised to make data-driven decisions to optimise operations, improve efficiency, and enhance customer satisfaction. By leveraging real-time data and analytics, we aim to reduce costs, increase productivity, and gain a competitive edge in the market.

# Nature in Focus

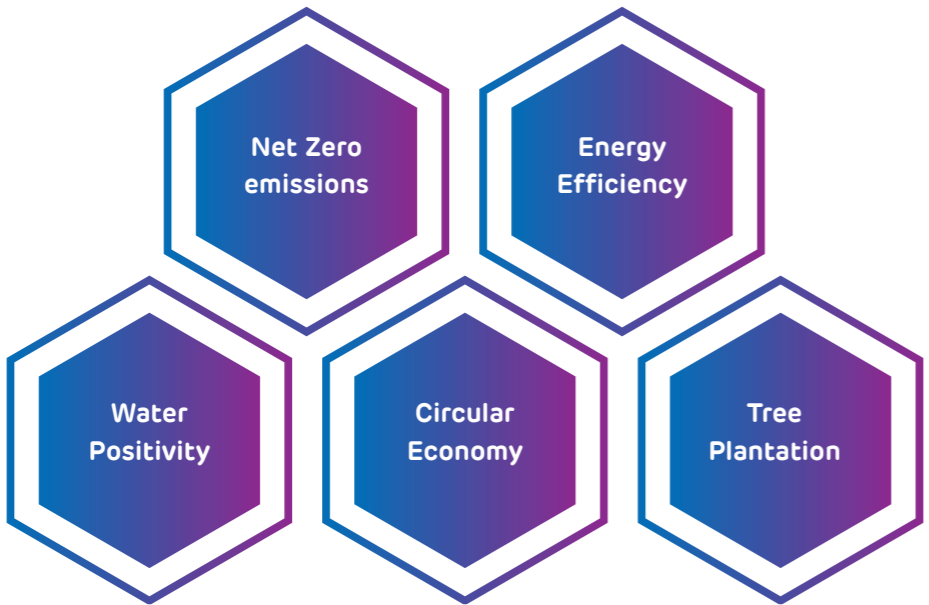
Our Approach to  
Environmental Sustainability



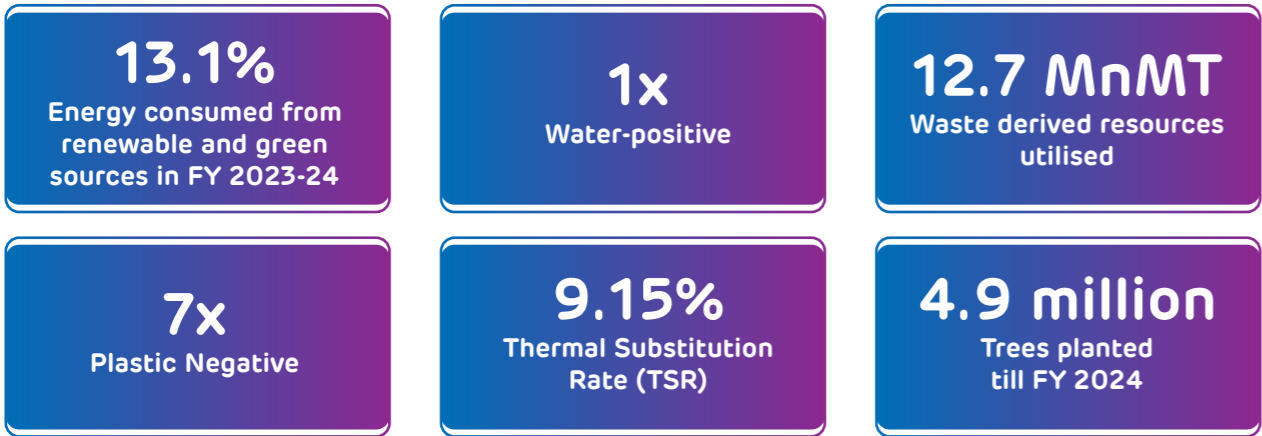
We take pride in being a responsible corporate citizen focusing on minimising our environmental footprint while maximising our positive impact. From using energy and resources judiciously, and reducing waste generation to achieving water positivity, we are not merely managing the resources but making

a positive impact on the environment. We also recognise the importance of biodiversity and actively nurture its development, for the critical role it plays in maintaining ecological balance and supporting local ecosystems. Through these, we are dedicated to creating a sustainable future for generations to come.

### Focus Areas



### Key Highlights



### Related Material Topics



## Environment Management

Our [Corporate Environment Policy](#) guides our actions to ensure environmentally conscious and responsible business practices. Our dedication towards sustainability is anchored in a comprehensive Environmental Management System (EMS). This not only ensures compliance with applicable standards but also surpasses industry benchmarks, enabling us to actively address various aspects. All our plants are ISO 14001:2015 and ISO 45001:2018 certified and we conduct regular

audits and ensure these certifications are renewed periodically. We meticulously track our environmental performance to identify areas of improvements. Significant investments are made towards environmental projects and performance improvement. The table below demonstrates our environmental investments over the past four years covering 100% of our operations.

### Environmental Investments

Parameter	#CY 2020	#CY 2021	FY 2022-23	FY 2023-24
Capital Investments (In ₹)	1,230,000,000	409,400,000	138,402,152	1,942,723,000
Operating Expenses (In ₹)	-	1,075,000,000	903,651,142	1,811,799,000
Total Expenses (In ₹) (= Capital Investment + Operating Expenses)	1,230,000,000	1,484,400,000	1,042,053,294	3,754,513,000
Savings, cost avoidance, income, tax incentives (In ₹)	251,000,000	591,000,000	107,300,000	27,340,485

### Environmental Fines

We acknowledge the significance of regulatory compliance in ensuring responsible and sustainable business practices. We adhere to a comprehensive range of environmental regulations across different sectors ensuring all necessary permissions and approvals are secured. For effective compliance monitoring, we use Legatrix software and take prudent

measures to ensure there are no non-compliances. However, in the reporting year due to exceedance in the results of Ambient Air Quality Monitoring ETP and STP outlets of Cement Plant, we had to forfeit a bank guarantee of ₹ 10,00,000. Further, we have taken appropriate mitigating actions to prevent the occurrence of such instances in the future.

Parameter (₹)	#CY 2020	#CY 2021	FY 2022-23	FY 2023-24
Number of violations of legal obligations/regulations	1	0	1	1
Amount of Fines (₹)	4,500,000	0	1,000,000	10,00,000
Environmental Liability accrued at year end (₹)	0	0	0	0

#In 2022, post our acquisition by Adani Group, we have changed our reporting cycle from Calendar Year (January to December) to Financial Year (April- March). Hence, the data reported for 2020 and 2021 are on calendar year cycle and for the current reporting year is in Financial Year cycle.

# Climate Change Management

Addressing climate change is an urgent priority in today's business landscape. We recognise the imperative of managing climate change and striving towards a low-carbon future. Guided by our Climate Change Policy, our climate management strategy has been meticulously crafted to mitigate our carbon footprint, effectively respond to changing climate-related risks, and bolster worldwide sustainability endeavours.

## Key Highlights

Net Zero by 2050

### Net Zero Commitment

We are leading the way in climate action and sustainability by committing to achieve Net Zero Emissions by 2050.

The SBTi, a collaboration among CDP, the United Nations Global Compact, the World Resources Institute (WRI), and the World Wildlife Fund (WWF), encourages companies to move towards a low carbon economy. We have pledged our commitment to the SBTi, with our 2030 targets officially validated and approved and net zero targets are under validation. These targets can be reviewed on the SBTi's target dashboard.

In addition, ACC is in line with the Global Cement and Concrete Association's (GCCA) Roadmap for Net Zero Concrete by 2050.

Internal Carbon Pricing (ICP)  
Calculated based on per metric tonne of CO<sub>2</sub> (tCO<sub>2</sub>) reduction

### SBTi Targets

We are committed to achieving net zero emissions by 2050 as part of the Science Based Targets Initiative (SBTi). Our 2030 targets are validated and approved by SBTi on September 23, 2021, which can be accessed at <https://sciencebasedtargets.org/target-dashboard>. The targets are inclusive of emissions from captive power plants (CPP) as well.

ACC limited commits to by reduce scope 1 GHG emissions 21.3% per tonn of cementitious material by 2030 from a 2018 base year. We also commits to reduce Scope 2 emissions by 48.4% per tonn of cementitious material within the same time frame. The target boundary includes biogenic emissions and removal from bioenergy feedstock.



Ramesh Sharma  
COO-Business Operations



In alignment with the 'Net Zero' target set for 2050 and the near terms targets for 2030 validated by SBTi, we have embarked on a pioneering approach within the industry. We are currently enacting strategies to enhance sustainability and reduce costs within its logistics operations through optimising its transportation mix. These efforts are being bolstered by meticulous route planning, adherence to primary sources, renegotiation of commercial terms, and the incorporation of GPS and other technologies. The objective is to achieve cost savings while simultaneously enhancing the overall efficiency of the logistics processes."



Climate Strategy

Our climate related adaptation and mitigation measures are in coherence with the national and international policies and commitments, including the Nationally Determined Contributions (NDCs) of the country under Paris Agreement and the United Nations Sustainable Development Goals (UNSDGs). Our climate strategy is centred on reducing our carbon footprint, enhancing resilience, and achieving Net Zero emissions.

Furthermore, a comprehensive climate risk assessment has been carried out for all our manufacturing plants in accordance with TCFD and IFRS S2 framework to identify the associated physical and transitional risks. We have examined anticipated financial risks at both the site and organisational levels. Based on these assessments, we have formulated a climate strategy and actions to mitigate the adverse effects of climate change and bolster business resilience. We have integrated the recommendations of TCFD into our climate risk assessment process.

Climate Governance

The Board and our senior leadership team are fully committed to achieving our climate goals and periodically review our progress against the targets set under each pillar. Based on the progress made, they provide the

necessary guidance to ensure we stay on track. To ensure effective monitoring of progress, we break down the broader objectives into functional levels and regularly review progress scorecards at the plant and corporate levels. The respective functional heads are responsible for monthly reviews of progress scorecards. This allows us to make timely interventions and provide the necessary guidance to ensure we achieve our targets.

Board Oversight

The Corporate Responsibility Committee, which includes independent directors, oversees our ESG and sustainability efforts, including climate change mitigation. It plays a key role in shaping our SD 2030 Plan and aligning with a 1.5°C Business Ambition. The committee meets quarterly to assess our performance in Climate, Circular Economy, People, Water and Nature and Communities, and provides guidance on ESG and climate-related risks. Senior management is responsible for executing the sustainability strategy, with progress reviewed regularly by both management and the board. The CRC leads efforts to address climate risks and reduce carbon footprint, with updates provided during quarterly meetings. The ESG team shapes the agenda and supports implementation, while the Risk Management Committee (RMC) oversees sustainability and ESG risks.



At ACC, the governance mechanisms that encompass climate-related issues are tasked with assessing and directing annual budgets, supervising major capital expenditures, overseeing acquisitions, mergers, and divestitures, evaluating, and directing strategy, overseeing the establishment of corporate targets, monitoring progress towards corporate targets, and evaluating and directing our risk management process.

Management Responsibility

At ACC, the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) play crucial roles in driving our climate strategy and sustainability initiatives. At the management level, the Management Committee (ManCom), is responsible for evaluating the financial performance and position of the organisation and making key strategic decisions. The senior leadership team, like COO and Functional Heads oversees setting targets and tracking key metrics related to various parameters. The team works closely with plant heads to track sustainability key performance indicators (KPIs) and has led initiatives to enhance infrastructure for renewable energy and waste heat recovery.

The CEO, who is also a Board Director, has overall responsibility for addressing climate-related issues and leading our sustainable development strategies. The CEO presents regular updates on climate change initiatives to the Board, ensuring alignment with the group's overall strategies. The CEO is informed by executive-level committees and functional managers on operational performance and planning, enabling informed decision-making.

Climate Related Incentives

At ACC Limited, we strongly believe in the importance of achieving our sustainability targets, which is why we link the performance evaluation and pay of our senior management and Board members to meeting these targets. We consider climate to be the most material issue for our business and therefore, a significant proportion of management employees have at least one Key Performance Indicator (KPI) linked to climate-related objectives, which forms a part of their performance evaluation. Additionally, we have a reward and recognition program for all employees, and our management compensation includes targets for achieving synergies, including energy savings, below we have charted out the information in a detailed manner.

Entitled for Incentive	Type of Incentives	KPIs	Incentivised KPI
Chief Executive Officer	Monetary	<ul style="list-style-type: none"><li>Achievement of climate related target</li><li>Reduction in absolute GHG emissions</li><li>Energy efficiency improvement</li><li>Increased share of low carbon energy in total energy consumption</li><li>Increased share of revenue from low-carbon products or services in the product or service portfolio</li></ul>	<ul style="list-style-type: none"><li>The CEO's monetary rewards are in the range of 20-30% of the Variable compensation.</li><li>By incentivising the CEO's compensation for the achievement of climate related targets, the company ensures stronger management of its climate change strategy and monitor and improve performance on its climate-related targets.</li></ul>
Chief Finance Officer	Monetary	<ul style="list-style-type: none"><li>Achievement of finance related target</li><li>Reductions in GHG emissions</li><li>Increase in the use of renewable energy</li><li>Increase in WHRS</li><li>Company performance against climate related sustainability Index (DJSI CSA, CDP Climate Change etc.)</li></ul>	<ul style="list-style-type: none"><li>The CFO's monetary rewards are in the range of 20-30% of the Variable compensation.</li><li>By incentivising the CFO's compensation for the achievement of climate related targets, the company ensures stronger management of its climate change strategy and monitor and improve performance on its climate-related targets.</li></ul>

Entitled for Incentive	Type of Incentives	KPIs	Incentivised KPI
Chief Operating Officer	Monetary	<ul style="list-style-type: none"> <li>Reduction in absolute GHG emissions</li> <li>Energy Efficiency Improvement</li> <li>Improvement in Clinker factor optimisation</li> <li>Carbon Capture and other initiatives</li> </ul>	<p>ACC Limited has introduced a set of climate-related metrics that will influence the Chief Operating Officer's (COO) variable compensation package, accounting for 20-24% of their total variable compensation. The metrics include:</p> <ul style="list-style-type: none"> <li>Complying with new kiln emissions standards (3%)</li> <li>Meeting fly ash addition targets (5%)</li> <li>Maintaining clinker productivity and efficiency parameters (3%)</li> <li>Delivering on sustainable development ambitions and improving CO2 and Water, Air, and Soil Health (WASH) KPIs (5%)</li> <li>Reducing specific thermal energy consumption</li> <li>Reducing specific electric energy consumption.</li> </ul> <p>By linking the COO's compensation to these climate-related targets, we can effectively drive our climate transition plan and monitor progress towards achieving our sustainability goals.</p>
Plant Head	Monetary	<ul style="list-style-type: none"> <li>Achievement of Climate transition plan KPI</li> <li>Implementation of an emission reduction initiative</li> <li>Implementation of employee awareness campaign and training program on climate related issues</li> </ul>	<p>At ACC Limited, Plant Heads have direct accountability for meeting sustainability goals, with a focus on climate change mitigation. Their performance is measured in areas such as reducing CO<sub>2</sub> emissions, increasing the use of alternative fuels, improving energy efficiency, and promoting sustainable development. Achieving these targets can result in significant monetary rewards, tied to 20-25% of their total variable compensation.</p> <p>The specific targets that Plant Heads are expected to meet include:</p> <ul style="list-style-type: none"> <li>Improving energy efficiency in thermal and electric systems.</li> <li>Maximising the use of TSR (Thermal Substitution Rate) by co-processing industrial and non-industrial wastes, including biomass and plastics, in kilns and captive power plants, reducing the use of conventional fuels like coal.</li> <li>Enhancing the absorption of fly ash in PPC (Portland Pozzolana cement).</li> <li>Delivering sustainable development KPIs.</li> <li>Providing training on sustainability climate change, biodiversity module.</li> <li>Implementing an incentive mechanism for lower management cadre to encourage climate change mitigation action.</li> </ul> <p>By linking Plant Heads' compensation to climate-related targets, we can ensure stronger management of our climate transition plan and monitor performance on our climate-related targets at the Plant level.</p>

Climate Risks and Opportunities

The cement manufacturing industry faces a multitude of risks, including physical risks, limited access to raw materials, energy-intensive production methods, and the challenge of meeting evolving regulatory standards, particularly those concerning climate change. For identifying and managing climate-change-related business risks, we have a defined risk management framework, that supports in identifying , assessing, managing, and monitoring these risks. The framework is integrated in organizations' overall Enterprise Risk Management (ERM) framework. We have determined our climate related risks into two distinctive categories as per the IFRS S2 recommendations.

- **Physical Risk:** Chronic changes in climate that impact the firm's investments.
- Acute Physical Risks : Cyclones, flooding, drought, wildfires
- Chronic Physical Risks: Water stress, temperature extremes
- **Transition Risks:** Markets and Technology shifts, reputation, and Policy/legislative changes

However, these risks also represent opportunities for the company to innovate and lead in sustainability. By investing in alternative fuels, improving energy efficiency, use of renewable and green energy and developing low carbon products, we can mitigate risks and gain a competitive advantage, enhancing our reputation and meeting the evolving expectations of stakeholders and regulatory bodies.

Climate Risk Assessment

As we navigate the complexities of the industry, we are acutely aware of the various risks that confront us. To mitigate these risks and ensure business continuity, we have integrated climate change-related risks into our overall Enterprise Risk Management (ERM) strategy to assess the exposure and level of risk involved. As part of it, we have performed a comprehensive Climate Risk Assessment, aligned with TCFD recommendations and IFRS S2 framework to identify potential climate related risks and opportunities. The climate assessment covers all our operational locations, considering a range of time horizons, including short-term, medium-term, and long-term. The assessment considers model factors in quantitative and qualitative information, using historical empirical data to arrive at factors indicative of potential risks in both Physical (acute and chronic) and transitional (current and emerging regulation, technology, legal, market and reputational) risks.

Climate change-related risks are identified, assessed, managed, and monitored using a multidisciplinary company-wide risk management strategy which is then integrated in our overall Enterprise Risk Management (ERM) framework. Our climate risk management process is aligned with recommendations and requirements following the Climate Risk Assessment. The ERM process includes actions we undertake takes to sense, evaluate, monitor, and respond to internal and external risks.

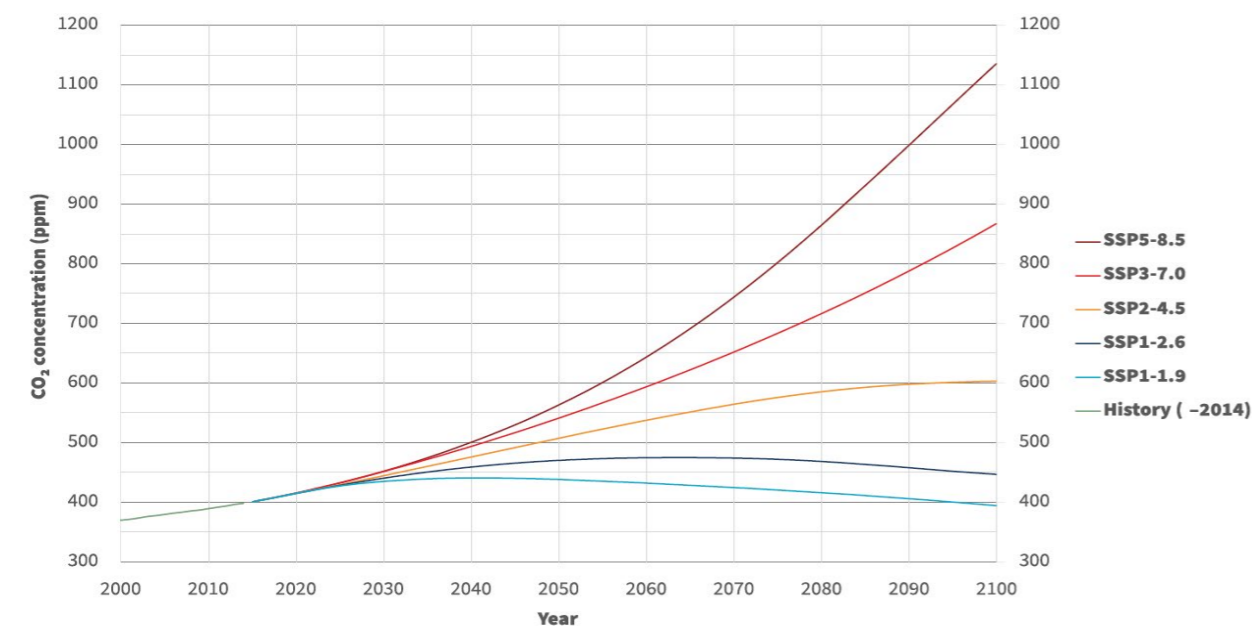




Physical Risks Assessment

We undertook thorough site-by-site climate risk assessment, evaluating the physical risks associated with various climate-related events under different IPCC scenarios. The assessment considered eight types of physical risks: coastal flooding, drought, fluvial flooding, pluvial flooding, temperature extremes, tropical cyclones, water stress, and wildfires. The analysis was conducted under three distinct scenarios: SSP1-2.6, SSP2-4.5, and

SSP5-8.5. These scenarios represent different pathways for greenhouse gas emissions and their associated climate change impacts, allowing us to better understand the potential consequences of various climate-related events. This comprehensive exercise enabled us to identify and understand the potential climate-related risks facing our sites and inform our strategic decisions.



Atmospheric CO<sub>2</sub> concentrations by SSP across the 21st century

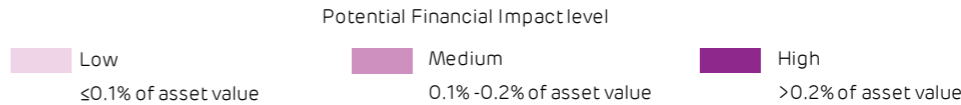
Through the application of scenario analysis, we have gained a deeper understanding of the potential risks and opportunities associated with various greenhouse gas reduction scenarios. This approach has enabled us to comprehensively examine the probable physical and transitional risks and opportunities presented by climate change and their potential impact on our business in the long term. We have also assessed our current asset portfolio and investment prospects against these scenarios, evaluating the resilience of our strategic plans in the face of a range of possible outcomes. Furthermore, we have identified opportunities to enhance the strategic and business resilience to plausible climate-related risks and opportunities by adjusting our plans and financial strategies accordingly.

The assessment found that ACC Limited sites do not face any risk due to coastal flooding, wildfire, and drought.

Impact in terms of % of asset value at risk

Physical Risk	SSP 2.6			SSP 4.5			SSP 8.5		
	2020-29	2030-39	2040-49	2020-29	2030-39	2040-49	2020-29	2030-39	2040-49
Temperature Extremes									
Water Stress									
Pluvial Flooding									
Tropical Cyclone									
Wildfire									

Note: The analysis indicates that ACC Cement sites do not face any risk due to coastal flooding, fluvial flooding, and drought



Summary of impact due to physical risks as a percentage of asset value

Physical Risks

Risk Category	Risk Subcategory	Risk Description	Risk Mitigation
Acute Physical Risk	Flood Pluvial	Excessive rainfall can lead to pluvial flooding, which can cause significant damage and disruptions to daily operations.	<ul style="list-style-type: none"><li>Develop an emergency response plan for fluvial and pluvial flooding, outlining evacuation procedures, equipment shutdown protocols, and coordination with emergency services.</li><li>Conduct site evaluations and choose locations less prone to flooding, and perform regular maintenance on drains and water harvesting structures to prevent issues.</li><li>Implement flood modeling and risk assessments using historical data and climate models to design mitigation measures.</li><li>Install flood protection infrastructure, such as barriers and levees, to redirect or contain floodwaters.</li><li>Ensure foundations and support structures are designed to withstand flood forces, and design the site with proper elevation and grading for drainage.</li><li>Use waterproof materials, sealants, and measures to prevent water ingress into buildings, equipment, and electrical connections.</li><li>Install flood monitoring systems with real-time monitoring capabilities for early warning alerts.</li><li>Implement backup power systems, conduct regular drills and capacity building for employees and contractors, and ensure waste storage areas are flood-proof.</li><li>Obtain insurance coverage to mitigate financial impact of flood-related damages.</li><li>Collaborate with suppliers to ensure a continuous supply chain and develop contingency plans for disruptions.</li></ul>

Risk Category	Risk Subcategory	Risk Description	Risk Mitigation
Acute Physical Risk	Cyclone	Over the past four decades, a concerning trend has emerged, with the frequency of intense cyclones (Category 3 and above) rising steadily from 1979 to 2017. If this pattern continues as climate change progresses, it's likely that the number of devastating cyclones will increase. High wind speeds, a hallmark of these intense storms, pose a significant threat to our infrastructure and assets, potentially leading to catastrophic damage	<ul style="list-style-type: none"><li>• Integrating annual weather forecasts into supply chain decisions to mitigate risks in sourcing raw materials, fuels, and essential components.</li><li>• Establishing robust communication systems to disseminate warnings and instructions to all employees.</li><li>• Designing and engineering structural components to withstand fierce winds and flying debris.</li><li>• Using cyclone-rated roofing materials and ensuring roofs are securely fastened.</li><li>• Adhering to local building codes and industry standards for wind load requirements.</li><li>• Conducting regular drills and capacity building for employees and contractors.</li><li>• Reinforcing electrical infrastructure to withstand fierce winds and potential power surges.</li><li>• Using robust materials and construction techniques to enhance the structural integrity of high-rise towers.</li><li>• Implementing advanced monitoring systems to track weather conditions and receive real-time updates on approaching cyclones.</li><li>• Installing remote shutdown systems to safely shut down the plant before the cyclone arrives.</li><li>• Ensuring proper grounding of equipment and installing lightning protection systems.</li><li>• Obtaining appropriate insurance coverage to mitigate financial losses.</li><li>• Developing procedures for safe plant shutdown in the event of a cyclone.</li><li>• Anchoring mobile equipment to prevent dislodgment.</li></ul>
Acute Physical Risk	Wildfire	Temperature and precipitation patterns play a significant role in shaping the conditions that foster wildfires. As temperatures rise, regions prone to wildfires become increasingly warm and dry, heightening the risk of intense wildfires. This escalating threat to wildfire intensity poses a substantial risk to our assets and can also lead to potential shutdowns	<ul style="list-style-type: none"><li>• Conducting a detailed risk analysis using historical data and fire behavior models to understand the potential impact of wildfires on our plants.</li><li>• Developing an emergency response plan that outlines procedures for wildfire incidents, including roles and responsibilities, evacuation routes, communication protocols, and coordination with local fire departments and authorities.</li><li>• Building partnerships with local fire departments and emergency services, sharing information on infrastructure locations, and coordinating response efforts.</li><li>• Conducting regular training sessions and drills to ensure employees and personnel are familiar with emergency procedures and understand their roles during a wildfire event.</li></ul>

Risk Category	Risk Subcategory	Risk Description	Risk Mitigation
Acute Physical Risk	Wildfire		<ul style="list-style-type: none"><li>• Ensuring regular maintenance of vegetation around the plant by trimming, mowing, or removing dry and flammable materials.</li><li>• We also ensure that all systems and equipment meet National Fire Protection Authority (NFPA) fire safety standards and local fire authority requirements. To create a defensible space around the plant, we:<ul style="list-style-type: none"><li>- Clear flammable materials and maintain a buffer zone to prevent the spread of wildfires.</li><li>- Construct firebreaks and maintain clear access roads within and around the plant to slow down or prevent wildfire spread.</li><li>- Install automated water sprinklers, fire suppression systems, and advanced fire detection and monitoring systems to quickly identify and respond to wildfire threats.</li><li>- Use fire-resistant materials and design features in construction to reduce vulnerability to fire damage.</li><li>- Deploy surveillance cameras with thermal imaging to monitor for signs of fire in and around the plant.</li><li>- Use fire-resistant landscaping techniques, such as planting fire-resistant vegetation and maintaining low vegetation height.</li></ul></li></ul>
Chronic	Extreme Temperature	The planet-wide warming caused by climate change has led to a diverse range of consequences, with rising global temperatures triggering a multitude of impacts	<ul style="list-style-type: none"><li>• Conduct a detailed risk analysis using historical data and climate models to understand the potential impact on our plants.</li><li>• Use high-quality, heat-resistant materials in equipment and infrastructure.</li><li>• Insulate pipes, ducts, and components to reduce heat transfer.</li><li>• Install shading devices, reflective roofing materials, and backup cooling systems to reduce heat absorption.</li><li>• Provide personal protective equipment (PPE) for workers, improve building insulation and ventilation, and conduct regular inspections to prevent equipment failures.</li><li>• Implement flexible work schedules, provide hydration stations, and optimise production processes to minimise heat generation.</li><li>• Explore weather monitoring systems to track temperature variations and anticipate necessary precautions.</li><li>• Regularly review emergency response plans and ensure appropriate cooling measures for critical equipment and personnel safety.</li></ul>

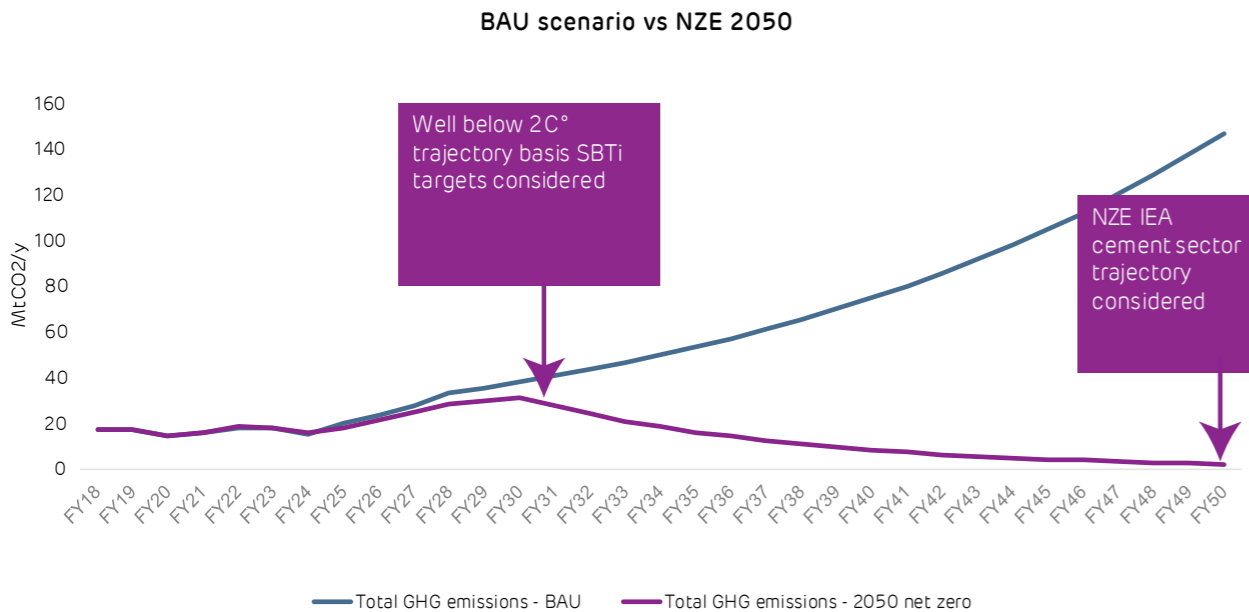


Risk Category	Risk Subcategory	Risk Description	Risk Mitigation
Chronic	Water Stress	Persistent water scarcity can intensify the effects of climate change, resulting in more frequent and severe droughts and heatwaves. This can lead to an increased risk of devastating wildfires, changes in the distribution of flora and fauna, and detrimental impacts on human well-being. Moreover, reduced water availability can compromise food security, leading to social unrest and conflict as people compete for this precious resource	<ul style="list-style-type: none"><li>• Conduct a detailed risk analysis using historical data and water availability forecasts to understand the potential impact on our plant.</li><li>• Invest in water conservation measures, such as rainwater harvesting, water reuse, and recycling.</li><li>• Implement closed-loop systems to reduce freshwater intake and optimise water usage.</li><li>• Develop drought-tolerant cement technologies and explore alternative cooling methods.</li><li>• Conduct regular water audits, install smart water meters, and detect leaks promptly to improve efficiency.</li><li>• Replace water-cooled systems with air-cooled alternatives, and adopt dry or semi-dry cleaning methods.</li><li>• Educate employees on water conservation practices and upgrade water-efficient machinery and fixtures.</li><li>• Develop a comprehensive water balance model to track water inflows, usage, recycling, and outflows.</li></ul>

### Transition Risk Assessment

Transition risks are associated with the transition to a low-carbon business model, which includes regulatory, technological, and market reforms to address climate change mitigation and adaptation requirements.

#### Scenario Analysis for Transition Risks



### Climate - Related Physical and Transitional Risk

Risk Category	Risk Subcategory	Risk Description	Risk Mitigation
Transitional	Policy and Legal	The PAT scheme regulates energy-intensive industries, including cement production, by setting specific energy-saving targets for each plant over a three-year cycle. A market-based mechanism allows for the certification and trading of excess energy savings. Failure to meet targets results in financial penalties for shortfalls. Additionally, Renewable Purchase Obligations (RPO) require companies to source a minimum percentage of their energy from renewable sources. Future policy developments may incorporate carbon pricing mechanisms like Carbon Credit Trading Schemes, potentially affecting operations and finances if non-compliance occurs.	<ul style="list-style-type: none"><li>• Conduct regular third-party energy audits to verify compliance and identify areas for improvement.</li><li>• Develop robust compliance management systems to ensure adherence to all regulatory requirements and avoid penalties.</li><li>• Develop and regularly update contingency plans to quickly address any shortfalls in emission reductions.</li><li>• Implement advanced real-time emission monitoring and reporting systems to ensure compliance with regulatory requirements.</li></ul>
	Technology	The slow uptake of low-carbon technologies like CCUS could pose operational risks due to their limited commercial viability. Implementing these technologies could increase costs, as they are still in the development stage. Moreover, the rapidly evolving regulatory and policy environment, as well as the lack of clear commercial evidence, adds uncertainty and potential risks to operations	<ul style="list-style-type: none"><li>• Conduct comprehensive feasibility studies before investing in new technologies, including technical, economic, and environmental assessments.</li><li>• Diversify investments across multiple innovative technologies to spread risk and avoid over-reliance on a single technology.</li><li>• Evaluate the maturity and readiness of new technologies using Technology Readiness Levels (TRL) before committing significant resources.</li><li>• Develop clear exit strategies for each technology investment, including criteria for discontinuing the project when necessary.</li></ul>

Risk Category	Risk Subcategory	Risk Description	Risk Mitigation
Transitional	Market	Despite having a secure supply of raw materials through their captive limestone mines, ACC Cement Ltd. is vulnerable to financial impacts due to the rising cost of fuels such as coal and coke, which are affected by changing climate conditions	<ul style="list-style-type: none"> <li>Explore local sourcing of raw materials and conduct regional resource mapping to minimise transportation costs and carbon emissions.</li> <li>Optimise our use of alternative fuels like biomass, waste, and non-fossil fuels to reduce costs and emissions.</li> <li>Implement climate-resilient supply chain optimisation strategies to streamline transportation and improve efficiency.</li> <li>Leverage AI and machine learning to predict raw material and fuel price fluctuations, enabling data-driven procurement decisions.</li> <li>Engage in industrial symbiosis by partnering with nearby industries to utilise their waste products as raw materials, reducing waste and increasing resource efficiency.</li> </ul>
	Technology	As industries worldwide prioritise sustainability and environmental responsibility, decarbonisation efforts are underway, including the early retirement of captive power plants that have traditionally served as essential energy sources for industrial operations. We expect this trend to continue in India, potentially leading to the premature retirement of captive power plants before their useful life is exhausted, in order to accelerate the adoption of low-carbon technologies. This may have significant financial implications.	<ul style="list-style-type: none"> <li>Implement low-carbon technologies incrementally, allowing us to continue using existing assets while gradually transitioning to new systems.</li> <li>Develop a strategic plan to repurpose or sell retired assets, ensuring we maximise their residual value and minimise waste.</li> </ul>

### Risks and Opportunities with most Significant Impacts

The following table illustrates the risks and opportunities with the most significant impact on our business:

Type of Risk	Description of the risk	Estimated financial Implication (INR Cr.)	Annualised cost of response to risk (INR Cr.)	The average time frame for the implication of the risk
Market Risk	<p>The increased cost of raw materials used as fuels (coal, coke) due to changing climatic conditions poses a significant threat to our business operations.</p> <p>Climate change is expected to impact global supply chains, leading to increased costs for raw materials and energy. As a major cement producer, we rely heavily on coal and coke as primary energy sources for our operations</p>	54.44	13	3-10 Years
<b>Mitigation Actions</b> <ul style="list-style-type: none"> <li>Explore local sourcing of raw materials and conduct comprehensive regional resource mapping to reduce transportation costs and emissions.</li> <li>Enhance the use of alternative fuels such as biomass, waste, or non-fossil fuels to lower costs and emissions.</li> <li>Implement climate-resilient supply chain optimisation strategies to minimise transportation costs and improve efficiency.</li> <li>Utilize AI and machine learning to predict raw material and fuel price fluctuations, enabling optimised procurement strategies.</li> <li>Leverage industrial symbiosis by collaborating with nearby industries to convert their waste products into raw materials for cement production, promoting a circular economy.</li> </ul>				
Pluvial Flood	Excessive rainfall can lead to pluvial flooding, which poses a significant risk to our operations, as it can cause damage to our facilities and disrupt our business activities	36.75 – 42.23	24.69	1-3 Years
<b>Mitigation Actions</b> <ul style="list-style-type: none"> <li>Develop an emergency response plan for fluvial and pluvial flooding, outlining evacuation procedures, equipment shutdown protocols, and coordination with emergency services.</li> <li>Conduct site evaluations and choose locations less prone to flooding and perform regular maintenance on drain and water harvesting structures to prevent issues.</li> <li>Implement flood modelling and risk assessments using historical data and climate models to design mitigation measures.</li> <li>Install flood protection infrastructure, such as barriers and levees, to redirect or contain floodwaters.</li> <li>Ensure foundations and support structures are designed to withstand flood forces and design the site with proper elevation and grading for drainage.</li> <li>Use waterproof materials, sealants, and measures to prevent water ingress into buildings, equipment, and electrical connections.</li> <li>Install flood monitoring systems with real-time monitoring capabilities for early warning alerts.</li> <li>Implement backup power systems, conduct regular drills and capacity building for employees and contractors, and ensure waste storage areas are flood-proof.</li> <li>Obtain insurance coverage to mitigate the financial impact of flood-related damages.</li> <li>Collaborate with suppliers to ensure a continuous supply chain and develop contingency plans for disruptions.</li> </ul>				

Opportunities

IFRS Opportunity Category	Opportunity Description	Estimated financial Implication (INR Cr.)	The average time frame for the opportunity	Annualised cost for developing the opportunity (INR Cr.)
Energy Source- Use of lower emission sources of energy	Climate related transition provides us the opportunity to transition to low carbon energy sources. As a part of commitment towards achieving Net Zero emissions, we continue to expand portfolio of renewable and green energy sources. ACC Limited aims to power 60% of its expanded capacity through 1 GW of solar and wind power and 376 MW of waste heat recovery system by FY 2027-28. Use of renewable energy and increase in energy efficiency can help in reducing emissions and lowering operational costs.	273.16	3-10 Years	24.50

Physical Climate Risk Adaptation

Basis detailed climate risk assessment conducted, none of our sites are at risk of physical climate risks. However, we are developing site-specific strategies to ensure that climate risks and associated mitigation/ adaptation measures are in place to minimise the impact of events on our operations in case of occurrence. Our plan includes a target to

implement relevant adaptation measures within the short, medium and long term as deemed appropriate for existing operations.

As we continue to progress towards a sustainable future, we are committed to implementing these measures proactively and expeditiously, ensuring that 100% of our new operations are designed with resilience.



Internal Carbon Pricing

We have implemented an Internal Carbon Pricing (ICP) mechanism to drive a culture of sustainability and climate responsibility. By assigning a financial value to carbon emissions, we are empowered to make informed decisions that reduce our environmental footprint, mitigate financial risks, and drive low-carbon investments.

Our Internal Carbon Price USD 28 per ton of CO<sub>2</sub>.

Objectives for Implementing Internal Carbon Pricing

**Emissions Reduction**

Achieve targets and drive energy efficiency across the organisation.

**Employee Engagement**

Change internal behavior and raise awareness about carbon reduction among employees.

**Carbon Planning**

Develop a Carbon Operating Plan for each product and function to guide decision-making.

**Investment Decisions**

Incorporate carbon emissions considerations into investment decisions to prioritise low-carbon projects

**Supplier Selection**

Include carbon emissions considerations in the supplier selection process to prefer low-carbon vendors

**Operational Efficiency**

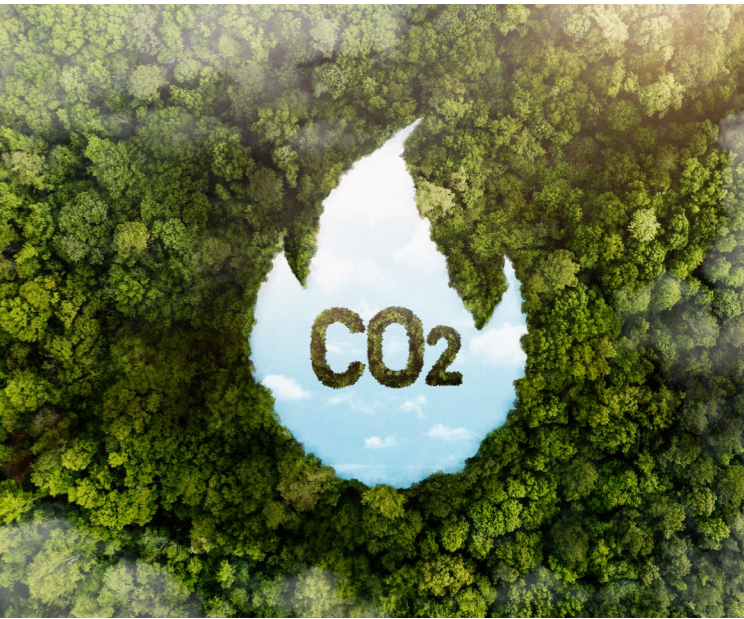
Optimise personnel placement to minimise carbon emissions and reduce overall carbon footprint

**Regulatory Compliance**

Reduce exposure to climate-related regulations and ensure compliance with changing regulatory requirements

We have developed a shadow pricing mechanism to quantify the financial impacts of various risks at each site, aggregating them at the organisational level. This enabled us to assess and manage climate-related risks while identifying and capitalising on opportunities for sustainable growth. Our carbon price is determined at USD 28 per ton of CO<sub>2</sub>.

ICP has unlocked the development of low-carbon projects that were previously not feasible due to lower internal rates of return and longer payback periods, for instance increasing the share of renewable energy and setting up Waste Heat Recovery System (WHRS). By leveraging ICP, we have been able to prioritise carbon reduction initiatives and ensure that they are adequately funded.



# Energy and Emissions Management

We are committed to minimising our energy consumption and carbon footprint while maintaining the reliability and efficiency of our production processes.

Our comprehensive [Energy Management Policy](#) guides us in driving energy efficiency throughout our operations. Our approach

encompasses the use of alternative fuels, setting ambitious energy-saving targets, promoting renewable energy sources, and embracing cutting-edge technologies. With a focus on judicious consumption, we are making streamlined investments in innovation, setting targets for energy efficiency share of green power and monitoring energy savings.

## Key Highlights

39.5 MW

Waste heat recovery system commissioned

13.1%

Renewable and green energy consumption

5.2 Lakh tonnes

of alternative fuel consumed substituting 9.15% of thermal energy

Regular energy audits and assessments are undertaken to identify improvement areas and to monitor our performance against established targets and commitments. Our operations are ISO 50001 certified, and we review and update our certifications to ensure ongoing compliance and continuous improvement. We also provide training to our employees to raise awareness about the importance of energy conservation and responsible practices. We have developed an in-house training course on Energy and Emissions, which is available in our online training platform 'E-Vidyalay-Percipio.Com', accessible to all. Significant R&D investments have been made towards identifying opportunities and techniques to reduce energy consumption.

We are continually reducing our specific thermal and electrical energy consumption to optimise our energy expenses. We have adopted targets to reduce energy consumption by 2030. This effort not only helps in cost reduction but also directly impacts carbon emissions, allowing us to lower our carbon footprint.

## Energy Consumption

We recognise the significance of effective energy management to optimise operational costs and to minimise our environmental footprint. We have implemented a robust energy management system that monitors and optimises our energy performance across our operations.

We follow a data-driven culture, where we regularly review key performance indicators (KPIs) during monthly management meetings to identify areas of improvement. This enables us to continuously optimise our energy efficiency, reducing overall energy consumption and costs.

We harness the power of renewable energy sources to minimise our thermal energy and grid electricity consumption. We have made significant strides in leveraging solar and wind energy, as well as optimising waste heat from our processes..

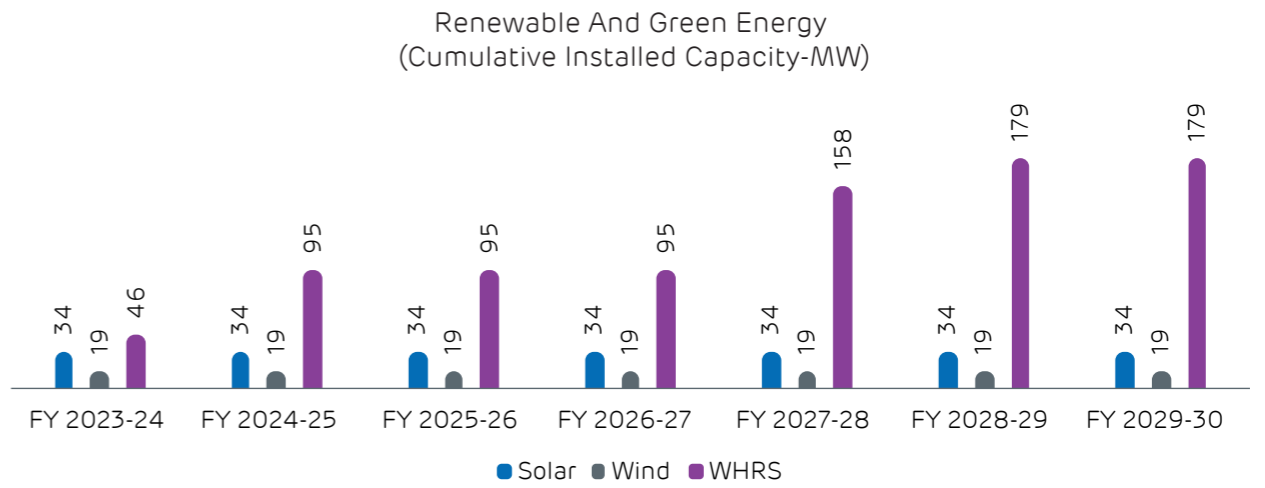
Total Energy Consumption within the organisation (in MWh)

	#CY 2020	#CY 2021	*FY Jan 2022-March 2023	FY 2023-24
Total non-renewable energy consumption	1,87,77,775	2,09,19,860	22,393,413.5	17,071,321.5
Total renewable energy consumption	3,72,252	5,06,769	1,743,228.3	1,368,982
Total Energy Consumption	19,150,027	21,426,629	24,136, 641.89	18,440,303.10

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\*The Company had changed its financial year end from December 31 to March 31 in FY 2022-23. Therefore, the figure for FY 2022-23 is for 15 months.

## Enhancing the Share of Green Power



We have an ambitious plan to increase our share of green power to 60% by FY 2027-28, a significant milestone in the industry. We are focusing on solar and wind energy, as well as Waste on Waste Heat Recovery System (WHRS).

We have made notable progress in increasing the use of renewable energy, with our share

rising to 13.1% of our total energy mix in the year 2023-24, a significant improvement from 7.22% in the previous year.

We have planned investments of over ₹10,000 crores in green power projects, a testament to our dedication to reducing our carbon footprint.





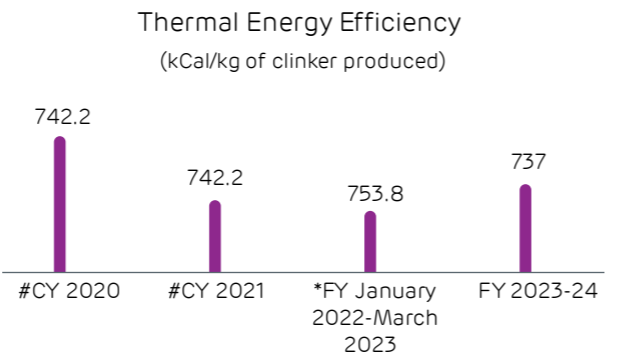
## Our PAT Performance

The Perform, Achieve, Trade (PAT) programme by the Bureau of Energy Efficiency in India, mandates energy-intensive industries to track their energy consumption, achieve set targets and undergo compulsory energy audits. It is a performance-based initiative introduced by the Government of India to improve energy efficiency and reduce the carbon footprint of industries. Under this scheme, designated industries are required to achieve specific energy-saving targets set by the Bureau of Energy Efficiency (BEE).

In our capacity as a conscientious cement producer, our facilities were identified as Designated Consumers (DCs) falling under the PAT Scheme. We have achieved a significant reduction in the specific thermal energy consumption, with a decrease from 747.8 kCal per kilogram of clinker produced in 2019 to 737 kCal per kilogram of clinker produced in FY 2023-24.

Unit Notified	EScerts Issued
Lakheri	13,299
Gagal I	5,921
Gagal II	17,696
Kymore	11,352
Jamul	54,475
Chaibasa	-302
Bargarh	3,600
Wadi I and Wadi II	31,688
Chanda	20,902
Tikaria	14
Sindri	0
Madukkarai	713
Kudithini	-3,474
Thondebhavi	-2,899

All the identified plants have achieved the targets by implementing energy efficient initiatives like technology change, and upgradation of old equipment, except for Chaibasa and Thondebhai-Kudithini. For Chaibasa, we have achieved the PAT target by purchasing E-Certs. For Thondebhai and Kudithini, we are working towards achieving our targets by purchasing E-Certs before the due date of FY 2025-26.

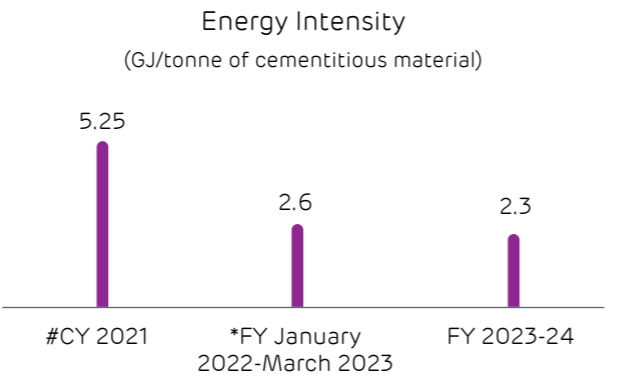


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## Energy Intensity

Our energy intensity per tonne of cementitious material produced stood at 2.3 GJ/tonne of cementitious material.



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## Air Emissions

We comply with regulatory requirements by reporting ambient air quality, effluents, and process emissions in real time.

To ensure effective monitoring and control of our air emissions, we have deployed Technical Information Systems (TIS) at our plants. These

systems provide senior management with real-time data on process and emission parameters at both plant and corporate levels. This enables us to track and optimise our performance, ensuring that we meet the highest standards of environmental responsibility.

Parameter	Unit	#CY 2020	#CY 2021	*FY January 2022-March 2023	FY 2023-2024
NOx	Metric Tonnes	15,082	12,754	18,094	9,721
SOx	Metric Tonnes	1,957	3,021	1,939	469
Particulate matter (PM)	Metric Tonnes	293	382	450	268
Direct Mercury Emissions	Metric Tonnes	0	0	0	0

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We have also implemented various air pollution control measures. Electrostatic Precipitators (ESP) and bag filters are installed to reduce flue and dust emissions. Additionally, traditional conveyor belts were replaced with closed conveyor belts to minimise material transfer and dust generation. To further control dust, dust suppression measures such as water sprinkling are employed.

Continuous Emission Monitoring Systems (CEMS) are installed at all our plants to track

SOx, NOx, dust/particulate matter, and other significant emissions from the kiln and raw mill stacks. These systems are digitally displayed enabling real-time tracking and monitoring.

We have also established a thorough plan to manage Nitrogen oxide (NOx) emissions at our integrated cement facilities. Our strategy involves a combination of primary and secondary methods to guarantee that our emissions stay below the specified limits mandated by regulatory bodies.

# Measuring Our Carbon Emissions

The cement sector is one of the largest industrial energy consumers and emitters of greenhouse gases, accounting for approximately 7% of global CO<sub>2</sub> emissions. We are committed to reducing our carbon footprint and minimising our environmental and climate related impact.

## Emissions Inventory

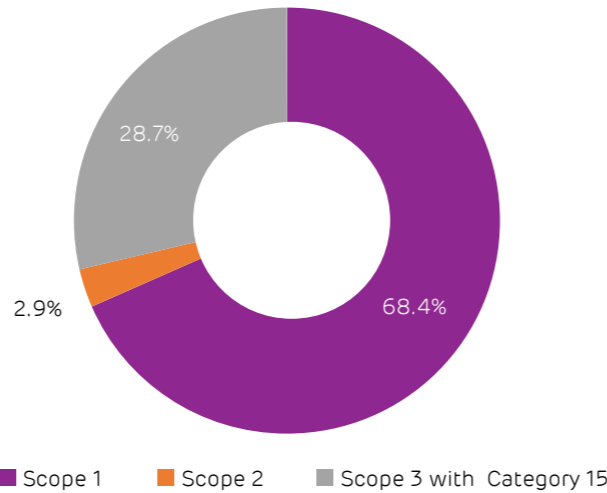
In this reporting period, we undertook an analysis and review of our GHG inventory. The inventory review has helped to understand the hotspots and supported us in devising a reduction strategy. We have adopted the GHG protocol (revised) corporate standard for accounting and estimating our scope 1 and scope 2 emissions. This comprehensive approach enables us to track and manage our emissions across our operations, identify areas for improvement, and develop strategies to mitigate their impact. We use the emission factors from the database of the World Business Council for Sustainable Development's (WBCSD) Cement Sustainability Initiative (CSI) CO<sub>2</sub> protocol and the Intergovernmental Panel on Climate Change (IPCC), India GHG Protocol, and DEFRA to calculate the emissions.

We have followed a systematic approach to estimate our Scope 1 and Scope 2 emissions. As part of it, we have defined the organisational boundary and categorised the sources of emissions as per the guidance provided in GHG protocol (revised) corporate standard. For Scope 1, we have included Stationary emissions (CO<sub>2</sub> from kiln fuels and CO<sub>2</sub> from

non-kiln fuels), Process emissions (CO<sub>2</sub> from raw material calcinations, and CO<sub>2</sub> from organic carbon in raw materials), Mobile emissions (CO<sub>2</sub> from non-kiln fuels like company owned vehicles) and non CO<sub>2</sub>, GHG emissions like refrigerants etc. We have used direct emission measurement based on the activity and used appropriate data bases like IPCC, DEFRA and sector specific tools to account and estimate our scope 1 emissions. For Scope 2, we have identified purchased electricity from the grid as source of emissions. We have followed location based approach to estimate the Scope 2 emissions.

As per the analysis, it was noted that majority of our GHG emissions is accounted in Scope 1 (contributing to 69% of total GHG emissions), while Scope 2 and Scope 3 emissions contribute 3% and 28% emissions respectively.

### Our GHG Inventory



Parameter	Unit	#CY 2020	#CY 2021	*FY January 2022-March 2023	FY 2023-24
Total Scope 1 emissions (Gross)	tCO <sub>2</sub> e	13,654,648	1,53,96,082	1,74,67,685	14,532,542
Total Scope 2 emissions (Location Based)	tCO <sub>2</sub> e	5,25,939	5,72,421	6,54,793	6,05,457
Total Scope 3 emissions	tCO <sub>2</sub> e	1,680,471	24,49,077	35,01,802	6,016,541

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We understand the importance of addressing Scope 3 emissions in our journey to Net Zero. Aligning with this we took a judicial approach by re-evaluating and re-prioritising our value chain impact based on their greenhouse gas emissions, their commitment to reducing them, and their strategic significance to our business. Further, we encourage our value chain partners to reduce their environmental footprint.

For Scope 3 Emissions, a detailed analysis was conducted to identify categories relevant to our business and 11 out of 15 Scope 3 categories were identified as applicable. For each of these categories, data was collected and assessing

the level of data accuracy and accounting accuracy, calculation methodology was devised for based on applicable GHG emission factors (US EPA, India GHG, DEFRA, etc). The different methodologies employed are with reference to Corporate Value Chain Scope 3 Accounting and Reporting Standard by GHG Protocol. The methodologies include Spend-Based Method, Average Data Method, Hybrid Method and Supplier Specific Method. A detailed inventory report was developed for each category covering the scope, calculation methodology, exclusions, responsible department and total emissions in tCO<sub>2</sub>e.

Scope 3 GHG Emissions (tCO<sub>2</sub>e) FY 2023-24

Downstream Scope 3 GHG Emissions (tCO <sub>2</sub> e)	
Category 1: Purchased goods and services	1,050,020
Category 2: Capital goods	1,849,281
Category 3: Fuel-and energy-related activities (not included in scope 1 or scope 2)	1,902,050
Category 4: Upstream transportation and distribution	8,48,186
Category 5: Waste generated in operations	10,431
Category 6: Business travel	1,123
Category 7: Employee commuting	2,404
Category 8: Upstream leased assets	1,174
Category 10: Processing of sold products	2,00,478
Category 12: End of Life of Sold Products	28,425
Category 14: Investments	122,969
Total Scope 3 Emissions	6,016,541

Emission Intensity

Parameter	Unit	FY 2023-24
Gross Scope 1 Intensity (Gross Scope 1/ Cementitious materials produced)	tCO <sub>2</sub> e /T cementitious material	0.504
Scope 2 GHG Emission intensity	tCO <sub>2</sub> e /T cementitious material	0.021
Gross Scope 1 + Scope 2 GHG Emission intensity	tCO <sub>2</sub> e /T cementitious material	0.525
Gross Scope 1 + Scope 2 GHG Emission intensity	tCO <sub>2</sub> e /rupee of turnover	0.000076

Emission Reduction Initiatives

We have made a firm commitment to decrease our carbon footprint and have pledged to reach net-zero emissions by 2050, aligning with the Science-Based Targets initiative (SBTi). The validation of our 2030 targets by SBTi highlights our strong focus on sustainability.

To achieve this ambitious goal, we have embarked on a comprehensive journey to reduce our greenhouse gas emissions. Our efforts include:

Leveraging advanced technologies to enhance energy efficiency and reduce energy consumption across our operations.	Implementing energy-saving strategies to optimise energy usage and minimise waste.	Transitioning to renewable energy sources to power our plants and reduce dependence on fossil fuels.
Investing in Waste Heat Recovery Systems (WHRS) to generate clean energy and reduce our environmental footprint.	Exploring alternative fuels and reducing our reliance on fossil fuels to minimise our carbon impact.	Sourcing materials from sustainable and environmentally responsible suppliers to minimise the environmental impact of raw material extraction and processing.

Reducing our clinker factor in our cement products and increasing the proportion of green products in our portfolio.

Our Decarbonisation Levers

We are proactively implementing measures to reduce our emissions and minimise our environmental impact. Our decarbonisation journey is focused on optimising energy efficiency, leveraging alternative fuels, and

improving our Thermal Substitution Rate (TSR). We are also developing new products with lower clinker content and maximising the use of supplementary cementitious materials like fly ash, slag, and waste gypsum.

- Scope 1 GHG emissions
- Energy Efficiency
  - Use of alternate fuel
  - Thermal Substitution rate improvement
  - Development of new low carbon products (Low Clinker Content)
  - Maximising the use of supplementary cementitious materials like fly ash, slag, and waste gypsum
  - Higher use of waste heat

- Scope 2 GHG emissions
- Decarbonisation electricity
  - Use of renewable energy
  - Use of green energy - Waste Heat Recovery System (WHRS)
- Scope 3 GHG emissions
- Decarbonise supply chain
  - Supplier engagement
  - Procurement policy and choices
  - Operational Policies
  - Business Model Innovation
  - Modal shift in transportation

Energy Efficiency Initiatives

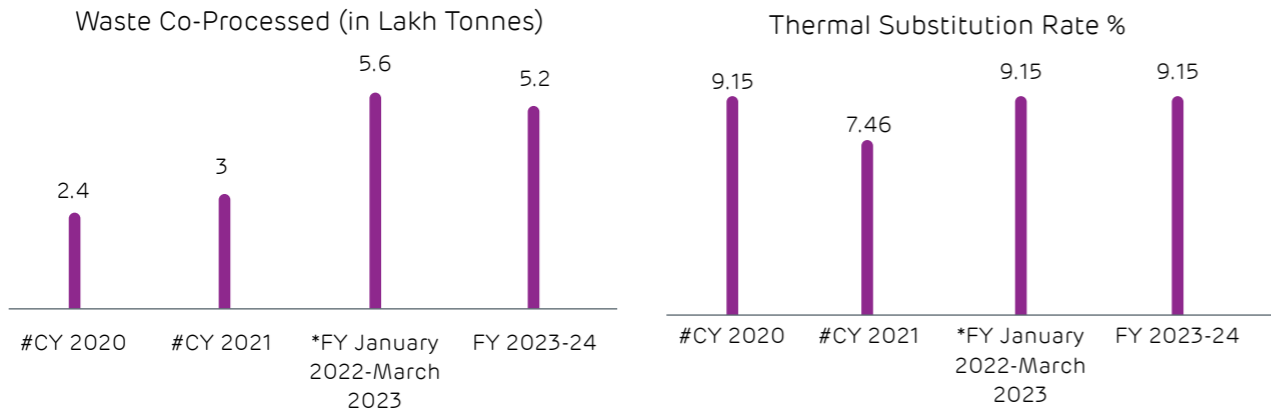
Modified mill internals to improve productivity and decrease energy usage	Adjusted grinding media patterns, resulting in a reduction in energy consumption during grinding processes	Modified coolers to enhance heat recuperation, thereby reducing fuel consumption. Inefficient coolers have been replaced with more efficient alternatives, further reducing thermal energy consumption
Substituted classifying liners in cement mills, contributing to a decrease in electrical energy consumption	Upgraded its transportation equipment to more energyefficient modes, reducing energy consumption during material movement	Automated mill and kiln operations using emerging technology to improve specific energy consumption through consistent operations

Alternative Fuel Resources

In our efforts to ensure efficient waste management and replace fossil fuel with Alternative Fuel Resources we are ramping up our investments to modernise and upgrade our facilities. We have also installed AFR preprocessing and feeding systems

instrumental in diversifying fuel sources and reducing reliance on traditional fuels.

Our expert teams are dedicated to working closely with customers across diverse sectors to facilitate the increased utilisation of waste in the manufacturing process.



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As we continue to upgrade our waste management infrastructure, we have been able to increase our dependence on Alternative

Fuel Resources and aim to achieve a 28% Thermal Substitution Rate (TSR) by 2030.

ACC Wadi Cement Plant's Innovative Approach to Waste Management

ACC Wadi plant has set a new benchmark in sustainable waste management by significantly increasing its thermal substitution rate (TSR) through the co-processing of waste. With a daily production capacity of 14,000 tons of clinker and the ability to co-process over 1,000 tons of waste, Wadi has emerged as a pioneer in the industry. The plant's innovative approach to pre-processing and co-processing waste from various sources has enabled us to achieve a TSR of over 20% in a month.

By focusing on sustainable and innovative solutions, we are not only contributing to the Swachh Bharat mission but also supporting the creation of a green economy. The plant has established partnerships with municipalities and waste processing facilities to segregate inert, recyclables, and non-recyclables. The non-recyclable fraction, which includes plastics, textiles, paper, cardboard, wood, and rubber, is then co-processed by Wadi's state-of-the-art facilities.

Through the Geoclean partnership, Wadi has established relationships with large and small municipalities, providing sustainable solutions for both fresh and legacy municipal waste. The plant's initiatives not only divert significant volumes of waste from landfills but also eliminate the need for large public investments in waste management. By sustainably co-processing the non-recyclable Solid Combustible Fraction (SCF) or Refuse-Derived Fuel (RDF), Wadi is addressing the challenge of urban waste management while contributing to a cleaner and healthier environment.

Significant investments are underway to further ramp up the waste treatment capacities at the plant. With its focus on innovative waste management solutions, the ACC Wadi cement plant serves as a model for other industries to follow, demonstrating the potential for sustainable development and environmental stewardship.



# Waste Management and Circular Economy

We have strategically adopted principles of circular economy to transform our production process. This involves shifting from a linear take-make-dispose model to a more sustainable reduce-reuse-recycle framework. By doing so, we aim to minimise waste, optimise resource use, and close the loop on our production cycles.

At the core of our strategy is the use of alternative raw materials and fuels. We have reduced our reliance on natural resources by replacing traditional cement production process with co-processing which led to use of 0.52 million tonnes of alternative fuels in 2023-24, and has replaced about 9.15% of our total thermal energy consumption. Furthermore, we have effectively substituted expensive natural gypsum with more economical by-products, a strategic decision that has preserved cement quality. By exploring eco-friendly coprocessing for thermal substitution and resource conservation, we have optimised the use of industrial waste.

### Our Targets

Target	Target Year	Progress IN FY 2023-24
Utilise 30 MMT waste derived resources	2030	12.7 MMT Waste-derived resources utilised
Achieve a 28% Thermal Substitution Rate	2030	9.15% TSR

### Key Highlights

Target to reuse  
**30 MT waste by 2030**

**Zero Hazardous waste**  
sent to landfill

**7x**  
Plastic Negative  
by co-processing plastic waste

### Material Management

Our key raw materials to produce cement and ready-mix concrete include limestone, slag, fly ash, gypsum, additives, and aggregates. In our endeavour to achieve set circular economy targets, we are constantly making efforts to reduce our dependency on renewable materials and use alternative materials. These substitutes include slag and fly ash, waste materials produced in the power and steel industries thereby incorporating in our cement manufacturing process to develop products like blended cements etc. This approach has not only reduced our dependency on mined resources but also helped us reduce the impact on the environment. Our waste-derived resources consumed during the reporting year stand at 12.7 million metric tonnes.

Clinker is an essential component in the cement manufacturing process. We are cognizant that clinker production generates carbon emissions and therefore we have implemented various initiatives to reduce clinker composition in the cement without compromising on quality. Through these initiatives, we have achieved a clinker factor of 55.6%.

Our commitment to a circular economy in our manufacturing processes defines our raw materials management. We used 12.7 million metric tonnes of recycled input materials.

### Recycled Input Materials

	Unit	#CY 2021	*FY January 2022-March 2023	FY 2023-24
Cement Manufacturing				
Total recycled raw materials used	Million tonnes	11.09	14.62	12.7

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### Waste Management

We are dedicated to reducing waste generation. We meticulously collect and segregate all waste at the source, classifying it into hazardous and non-hazardous categories. Each type of waste is then stored separately in designated areas. Regular waste audits are conducted to identify improvement opportunities with devised action plans to reduce waste generation. We have set targets to reduce our waste generation along with regular investments made to reduce waste generation. We send zero waste to landfills and regularly conduct awareness trainings for our employees to reduce waste generation.

In the year 2023-24, we generated approximately 0.5 million tonnes of total waste.

### Waste Generated (In MT)

Category	FY 2023-24
Plastic Waste	39,206.58
E-waste	45.60
Bio-medical Waste	43.23
Construction and Demolition Waste	10,344.31
Battery Waste	38.00
Radioactive Waste	0.30
Other Hazardous Waste.	77.09
Other Non-hazardous Waste Generated	449,524.84
Total	499,279.95

Waste Disposal

By implementing advanced waste management techniques, we have significantly reduced the waste we generate. We ensure the proper disposal of E-waste, biomedical waste, scrap, etc., through authorised recyclers accredited by regulatory agencies. At the majority of our plants, plastic waste and used oil are co-processed in cement kilns, eliminating waste disposal in landfills.

Our recycling commitment extends to using waste-derived resources, including fly ash, slag, gypsum, and other materials, to produce cement. We utilise a substantial amount of waste from other industries, reducing our reliance on mined resources and preventing environmental disposal. In FY 2023-24, the company utilised 12.7 million tonnes of waste-derived resources.

Our waste management initiatives include:

- Disposing of plastic waste mainly through co-processing and a minimal amount, such as burst bags, through authorised scrap dealers.
- Incinerating biomedical waste at authorised Common Biomedical Waste Treatment Facilities.
- Recycling E-waste through authorised recyclers.
- Reusing hazardous waste (used oil, discarded drums) in plants or co-processing it in cement kilns, with non-co-processable quantities sent to a common authorised facility.
- Selling scrap to authorised vendors.
- Repurposing mining overburden for backfilling within the mines.

Waste Disposal (MT)

Category	CY 2020#	CY 2021#	FY January 2022-March 2023*	FY 2023-24
Total waste recycled/ reused	10,798	19,634	11,806	4,99,159
Total waste disposed	1	2.00	1.2	120
Waste landfilled	0			0
Waste incinerated with energy recovery	0	-	-	0
Waste incinerated without energy recovery	0	-	1.1	0
Waste otherwise disposed, please specify:	0			120
Onsite*	0	-	0.1	0
Waste with an unknown disposal method	1	2.00	-	0

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7x Plastic Negative

We have embraced a ‘Plastic Negative’ stance, reinforcing our dedication to environmental sustainability. As a pioneer in this initiative, we achieved a sevenfold plastic negative impact. By utilising co-processing in cement kilns, we effectively removed seven times the amount of plastic waste from the environment compared to what is generated by our plastic packaging. This notable achievement highlights our resolve to reduce plastic pollution and promote a more sustainable future.

Circular Economy

A circular economy in the cement industry emphasises sustainability through the efficient use of resources, reduction of waste and the recycling of materials. We are dedicated to

minimising environmental impact by reusing industrial products and utilising a variety of alternative fuels and raw materials, thus decreasing reliance on finite resources and fostering sustainability and innovation in our operations. We incorporate waste-derived resources like fly ash and slag from the power and steel industries into our cement manufacturing process as clinker substitutes.

Furthermore, we have effectively substituted expensive natural gypsum with more economical by-products, a strategic decision that has preserved cement quality. By exploring eco-friendly coprocessing for thermal substitution and resource conservation, we have optimised the use of industrial waste.

Minimising Waste through GeoClean

case study



Through our waste management division, Geoclean, we are leading the way in tackling the societal challenges arising from increasing waste volumes. As a trailblazer in the industry, we have mastered the effective co-processing of waste in cement kilns.

By utilising co-processing technology, Geoclean ensures the complete recycling and resource recovery from waste. We have made significant investments to enhance our pre-processing and co-processing facilities, converting diverse waste streams into a uniform mixture suitable for co-processing in cement kilns. Currently, we operate four specialised pre-processing facilities equipped for blending liquids, shredding solids and sludge, and homogenising waste before its

sustainable co-processing at six locations. The Geoclean co-processes waste from industries and municipalities in our kilns as an alternative fuel source. This practice reduces our reliance on conventional fuels, leading to the conservation of natural resources and the mitigation of greenhouse gases, thus fostering a circular economy. During the reported period, we have successfully co-processed approximately 0.52 million tonnes of alternative fuels, accounting for 9.15% of our total thermal energy consumption. Further, we are very excited to note that the Thermal Substitution Rate (TSR) or co-processing rate has been on an upward trend, and we aim to achieve a 23% rate by 2030.

# Water Management



## Highlights

<b>55%</b> of freshwater consumption from rainwater harvested	<b>05%</b> Water recycled
<b>1x</b> Water Positive	<b>Zero</b> Wastewater discharged
<b>7.9 Mn KL</b> Rainwater harvested	<b>14.34 Mn KL</b> Water Consumption



Water is a critical natural resource and a fundamental pillar of our Sustainable Development Plan 2030. We approach the management of water with a holistic view, integrating best practices and innovative solutions to ensure we make a positive impact on the environment and communities. Water use assessments are regularly conducted to identify improvement opportunities.



## Regular trainings and awareness sessions are conducted for employees on water efficiency management

We have been investing in rainwater harvesting initiatives restoring village ponds, construction of check dams, water conservation at closed mines and groundwater recharge for a long time to mitigate the risk of lack of water. As a result, we are onetime water positive. Our cement manufacturing process employs a dry process. Processes such as dust suppression, cooling and human consumption are the key areas for water consumption. Additionally, our product portfolio consists of products that ensure minimum water consumption.

Our [Water Stewardship Policy](#) defines our principles and lays out a clear framework for responsible water use ensuring that our water needs do not compromise the needs of the local communities. Regular trainings and awareness sessions are conducted for employees on water efficiency management.

### Our Water Stewardship Framework



#### Reduce dependency on freshwater

Strive to reduce our reliance on freshwater resources for our operations



#### Ensure Water Security

Safeguard water security for communities and beyond



#### Become Water Positive

Strive to become water positive through integration of sustainable water practices

### Water Withdrawal and Consumption

We meticulously track and monitor our water consumption and minimise our dependency on freshwater through efficiency measures. We have set internal targets to reduce water use and to achieve 5X water positive by 2030.

We strive to reduce our dependency towards freshwater sources and have implemented several water efficiency measures to ensure we reach our target. During the reporting year, our specific water consumption stood at 0.49 KL per tonne of cementitious material. Our water withdrawal is the same as water consumption.

### Water Withdrawal (Million m<sup>3</sup>)

Source of Water	#CY 2020	#CY 2021	*FY January 2022-March 2023	FY 2023-24**
Ground water	0.17	0.20	0.81	1.13
Surface Water	3.46	3.53	3.42	5.20
3rd party purchase/ municipal water	0	0	0.002	0.08
Total Water Withdrawn	4.07	4.62	12.05	14.34
Total Freshwater Consumption	4.07	4.62	12.05	14.34

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\*\* In FY 2023-24, water consumption is reported for manufacturing operations, CPP and townships whereas in earlier years, it included only manufacturing operations

### Operations in Water Stressed Areas

We are aware of the importance of managing water resources, particularly in water-stress areas. Across the country, four of our cement manufacturing plants are located in water-stressed regions. To ensure sustainable water management, we conduct regular assessments to monitor our water usage and ensure compliance with regulatory requirements. Additionally, we also conduct water risk assessments across our plants to assess the baseline water stress, risk of the regulatory landscape and future changes in the availability of water at the organisational level.

Utilising the WRI Aqueduct-based India Water Tool, we conducted an initial screening of water risks across all 20 of our sites. This exercise revealed that four sites fall into the extremely high baseline water stress category, five sites into the high category, one site into the medium category, and three sites into the low category. Following the World Business Council for Sustainable Development (WBCSD) recommendations, we performed a detailed local-level analysis of ground and surface water availability, engaging each site directly.

This analysis determined that only four of our sites— Jamul, Lakheri, Thondebhavi, Madukarai and Sindri are in water-stressed areas. During the reporting year, the total freshwater consumption in these water-stressed areas was 16,73,251 m<sup>3</sup>, with 12,29,957 m<sup>3</sup> coming from harvested water.

### Water Consumption in Water-Stressed Areas (Million m<sup>3</sup>)

FY 2022-23	FY 2023-24
0.91	0.44

In the reporting year, we undertook a nature risk assessment study which also assessed our impact and dependency related risks. The assessment included potential quantity and quality related risks as well as the impact of our operations on local stakeholders like communities. At the local plant level, we regularly keep updated on regulatory changes through continuous interactions with local regulatory bodies. This also supports in identifying future potential regulatory changes.

## Water Recycling and Reuse

We emphasise recycling and reusing water thereby reducing our reliability on external freshwater sources and reducing environmental impact and overall water footprint. Through our innovative water recycling initiatives, we use recycled water for dust suppression and gardening purposes. In the year, we have recycled 5% of the total water consumed. We have implemented a Zero Liquid Discharge (ZLD) system at all our operations ensuring no discharge of water beyond our premises.

## Water Conservation

Rainwater harvesting is a sustainable solution that complements our efforts to become water positive. By capturing and storing rainwater through various initiatives across our operations, we have managed to successfully harvest 7.9 million KL of water.

Some key initiatives under rainwater harvesting are as follows:

- We utilised the closed mine pits to collect water which has resulted in groundwater recharge which can be used by communities.

- By identifying ponds that need revival, we collaborated with the rural communities to replenish the ponds in the village.
- We partnered with governments for water conservation projects such as the construction of check dams.
- Developed and executed in-house modular (zero water) curing solution at around 3,300 sites, saving around 39 million litres of water.
- We engaged with local communities to ensure water security through rainwater harvesting.

## Water Positivity

Our collective harvesting and conservation initiatives have substantially achieved us to become 1x water positive in the reporting period. This mean that our water credit and debit to environment is same. We aim to continue being water-positive through sustainable water management practices, with an aim to achieve 5x water positivity by 2030.

**1x water Positive**





## Accelerating Green Solutions

We are committed to driving sustainable growth and minimising our environmental footprint. We believe that innovation and technology are key to achieving this goal and have introduced a range of green solutions that not only reduce our carbon footprint but also enable our customers to build sustainably.

### Low Carbon Products

We stand as the industry leader in producing and distributing blended cement, renowned for its eco-friendly properties with significantly reduced clinker content. By incorporating waste materials like slag and fly ash, we not only contribute to environmental preservation but also facilitate the construction of robust and enduring infrastructure nationwide.

Our Expert Green Concrete, ACC ECOMaxX, is a game-changer in the industry, offering a 30% in CO<sub>2</sub> emissions and earning green points from the Indian Green Building Council (IGBC). With its launch, we have expanded our portfolio of green products to 96%, making us the industry leader in producing and distributing blended cement.

We have made a significant step towards sustainability by having our entire range of blended cement products, including ACC Suraksha, ACC Concrete Plus, ACC Gold, ACC F2R, and ACC HPC, certified and listed in the esteemed GRIHA (Green Rating for Integrated Habitat Assessment) green product catalogue.



GRIHA is a national green rating system conceived by the Ministry of New and Renewable Energy, Government of India, with the goal of promoting sustainable development and environmental stewardship. The GRIHA Council, responsible for evaluating and certifying green building products in India, has recognized ACC's blended cement products for their eco-friendly attributes. The evaluation

process involved a comprehensive assessment of our blended cement products based on third-party test results, industry benchmarks, and environmental certifications.

This prestigious certification demonstrates our commitment to producing sustainable building materials that meet the highest environmental standards.

Type & Description of product(s)	% of total revenues from the product category in FY 2024	Estimated total avoided emissions per year	Comment
Low carbon product(s): Blended Cement	92.4%	8,933,773 tCO <sub>2</sub> e	Total avoided emissions are calculated by calculating clinker which has been substituted by MIC (Mineral Component) excluding Gypsum multiplying with specific net CO <sub>2</sub> emission per tonne of Clinker.
Avoided emissions for third parties: Use of alternative fuel	-	331,021 tCO <sub>2</sub> e	The credits for indirect savings from the use of Alternative Fuel reflect the CO <sub>2</sub> emission reductions achieved at landfills and incineration plants, where these wastes would otherwise be disposed

Responsible Mining Practices

We recognise the importance of minimising our environmental footprint and have adopted a zero-waste mining approach. For all our mining operations, we have adopted cutting-edge technology to boost equipment productivity, reduce energy consumption and waste generation. At most of our mines, limestone is transported through covered conveyor belts. This results in minimised stock rehandling and reduced transportation costs.

We use innovative methods to extract limestone from our owned mines near our integrated plants, including controlled blasting with high-precision electronic detonators to

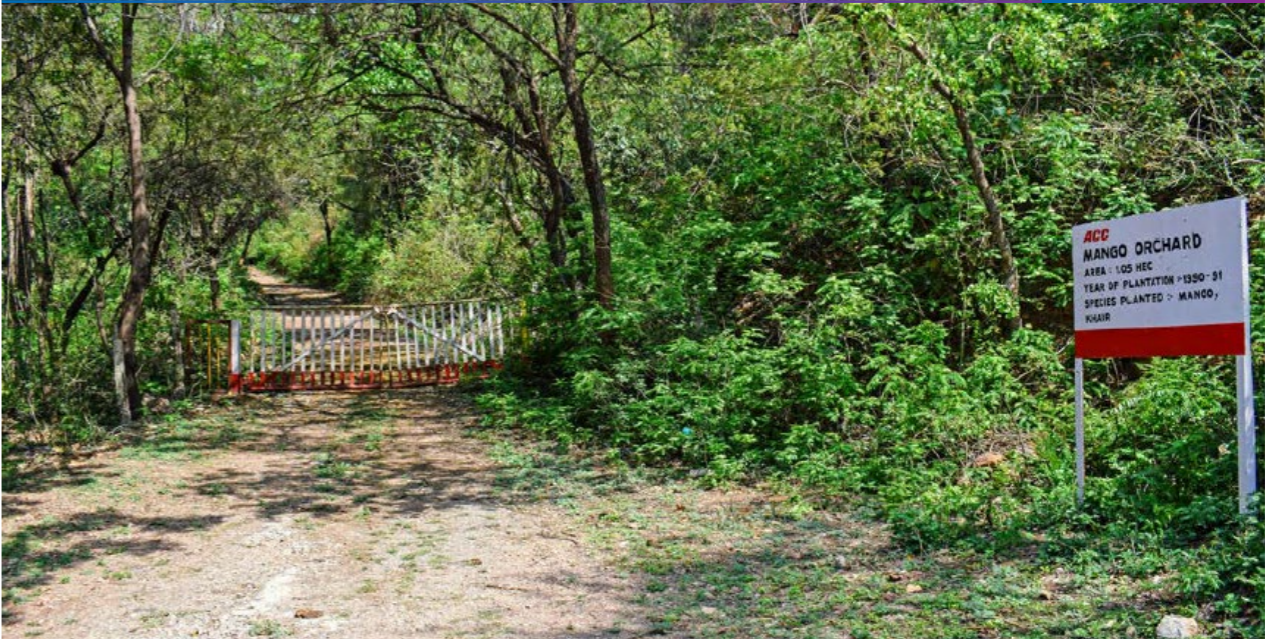
enhance safety and minimise environmental impact.

Tested scientific mining techniques are employed to conserve minerals and perform drilling with dust suppression measures. Our haul roads are well-maintained and regularly sprinkled with water to reduce dust emissions. We transport limestone in covered tippers to prevent spillage and dust during transit and green belts are maintained to reduce dust pollution and preserve biodiversity.

Water conservation efforts in closed mine pits contribute to water harvesting and ground water recharge.

Mine Rehabilitation: Mango Orchard Development at ACC Gagai

case study



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Sustainable Construction

Green Building Centres: Our Green Building Centres have established a robust presence throughout India, comprising 75 entrepreneurs as manufacturers and distributors. These centres cater to consumer needs by offering quality green building materials, contributing 1.30 crore in earnings, and demonstrating strong performance in sustainability. Our customer-centric approach is evident with over 700 direct influencers and specifiers connected within a year, each directly creating 30 livelihoods and indirectly supporting 120 livelihoods.

Contractor Engagement: We recognise the importance of contractor engagement in promoting sustainable construction practices. We have launched ACC Atoot Bandhan 2.0, a contractor loyalty programme that aims to empower and incentivize contractors to build enduring homes. Our Abhimaan contractor loyalty programme provides insurance coverage for contractors and their spouses enrolled in the Gold and Platinum categories. We annually train over 5,000 masons and contractors in various in-house applicator programmes, focusing on promoting sustainable construction practices. These modules cover project management, repair, waterproofing, steel estimation, earthquake-resisting structures, estimation and costing, rainwater harvesting, advanced wall solutions, etc.

Knowledge Sharing Initiative: We leverage our knowledge-sharing platform for architects and engineers to advocate and educate professionals about sustainable construction practices, advanced materials, and techniques. Over 15,000 professionals have participated in diverse knowledge-sharing activities through this platform, encompassing both physical and virtual modes. Our team of technical experts provides technical guidance and supervision for slab casting at 7,200+ customer sites. This ensures that our customers receive high-quality slabs that meet their expectations.

By accelerating these green solutions, we are committed to creating a more sustainable future for our customers, employees, and the environment.

GRIHA Council's Green Product Certification and Enlistment

ACC's entire range of blended cement products such as ACC Suraksha, ACC Concrete Plus, ACC Gold, ACC F2R, ACC HPC are certified and enlisted in GRIHA's green product catalogue.

GRIHA (Green Rating for Integrated Habitat Assessment) is a national green rating system of India conceived by the Ministry of New and Renewable Energy, Government of India. The GRIHA Council has developed a Green Product Catalogue providing all necessary information on green building products available in the country.

ACC's blended cement products have undergone evaluation based on various third-party test results, benchmarks, and environmental certifications, among other criteria. This evaluation was successfully completed by the GRIHA Council for all of ACC's blended cements manufactured across the country, encompassing all plants and geographical units.





## Biodiversity Management

At ACC, we understand that biodiversity is crucial for maintaining ecological balance and enhancing environmental resilience. Our company is committed to protect and enhance biodiversity by integrating biodiversity conservation and enhancement into operational decision-making process and taking measures to avert and minimise the impacts on nature across businesses following the principle of avoid, minimise, restore/rehabilitate and offset.

Demonstrating our commitment, we have established a comprehensive [Biodiversity Policy](#). The Policy integrates biodiversity protection and promotion into our core business strategy, steering us towards a sustainable and nature-positive business model.

The policy is applicable to all units with operational and financial control and extends to our value chain, vendors, suppliers, and logistic partners. The suppliers and value chain partners are expected adhere to the Policy and set a commitment to avoid operational activities near sites containing globally or nationally important biodiversity.

### Our Commitment

The Adani Group, India's largest and fastest growing portfolio of diversified businesses has pledged to grow 100 million trees by 2030. This pledge was made on 1t.org the "Trillion Trees Platform" of the World Economic Forum. Adani Group's commitment to growing 100 million trees by 2030 is the largest 1t.org pledge in India so far and among the most ambitious corporate pledges globally (<https://www.1t.org/pledges/growing-100-million-trees-by-2030>).



1t.org is a multi-stakeholder platform serving a global movement to conserve, restore and grow 1 trillion trees by 2030, in support of the UN Decade on Ecosystem Restoration. This initiative specifically seeks the engagement of the corporate sector. The broader trillion trees movement aims to slow down climate change by removing large amounts of carbon dioxide from the atmosphere, providing much-needed progress towards climate, biodiversity and SDGs.

In this commitment of the Group, ACC has a target to grow 5.9 million trees by 2030, out of which 4.9 million trees are already planted till FY 24.



**5.9 Million**

Trees by 2030

**4.9 Million**

Trees Planted till FY 24

#### Member of IBBI (India Business and Biodiversity Initiative)

We are a signatory to the India Business and Biodiversity Initiative (IBBI), facilitated by the Confederation of Indian Industry (CII) and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH. As a signatory to the IBBI, we are committed to the objectives of the Convention on Biological Diversity (CBD).



## No Net Deforestation Commitment

### case study

In accordance with the no-deforestation sentiment of the COP26 resolution, under the United Nations Framework Convention on Climate Change (UNFCCC), and in harmony with Sustainable Development Goals 13 (Climate Action) and 15 (Life on Land), we have made a No Net Deforestation commitment as part of our biodiversity policy. We ensure to follow prudent practices to have no deforestation as part of operations and manage forest areas within our mines effectively.

The Adani Group has committed to the World Economic Forum's Trillion Trees Platform (1t.org) to grow 100 million trees by 2030. Within this initiative, we aim to grow 5.93 million trees by 2030.

We adhere to the Indian laws and regulations such as the Forest Conservation Act and the Compensatory Afforestation Fund Management and Planning Authority (CAMPA)

act which assure us that we comply to no net deforestation.



As per the Forest Conservation Act, 1980 and the Compensatory Fund Act, 2016, we are obliged to compensate all the forest land which is deforested for any operational activity with appropriate amounts of afforestation. We also have a Mine Closure plan at all our mining locations in place, which includes the plans of compensatory afforestation/ rehabilitation at the mining locations at the time of closure. We need to maintain compliance with these regulations. We also are compliant to the Green Belt Development guidelines as stated by the Government, where we have to make provision for 33% of land under green area for all projects requiring Environment Clearance.

## Nature Risk Assessment

We have carried out detailed Nature Risk Assessment including Biodiversity Risk Assessment in the reporting period. The study was based on the Taskforce on Nature-related Financial Disclosures (TNFD) LEAP approach. This method enabled the identification, assessment, and reporting of nature-related impacts and dependencies. The TNFD defines dependencies as ecosystem services that an organisation relies on for their business processes to function, such as a clean and regular water supply. Organisations also have impacts on environmental assets and ecosystem services that may be positive or negative. Short-term impacts on nature can result in changes in the quality and resilience of environmental assets, which in turn create medium- and long-term risks for organisations, given their dependencies.

Nature-related risks are defined as the potential threats posed to an organisation linked to its dependencies on nature and

nature impacts. These can derive from physical, transition and systemic risks.

**Physical risk:** Risks arising when natural systems are compromised, due to the impact of climatic (i.e. extremes of weather) or geologic (i.e. seismic) events or changes in ecosystem equilibria, such as soil quality or marine ecology.<sup>76</sup> These can be event driven (acute), chronic, or both.

**Transition risk:** Risks that result from a misalignment between an organisations or investor's strategy and management and the changing regulatory and policy landscape in which it operates. Developments aimed at halting or reversing the damage to nature, such as government measures, technological breakthroughs, market changes, litigation and changing consumer preferences can all impact risks.


Nature-related opportunities are defined as activities that create positive outcomes for organisations and nature by avoiding or reducing impact on nature or contributing to its restoration.

The production of cement has a high and direct dependence on natural capital, specifically associated with abiotic services, such as raw materials from minerals (e.g., limestone) and water used in the process. However, indirectly, the business depends on natural capital by requiring ecosystem regulation services that allow the continuity of operations, among these are climate and water regulation, protection against floods and storms. Also, the sector has impacts on natural capital when it carries out mining operations which requires a removal of the layers of the earth's crust to access the raw material, in this process land use changes and flora and fauna is affected.

Assessment Process


The TNFD LEAP Approach was used to assess nature-related impact and dependency, with a focus on identifying potential risks and opportunities.

The TNFD Framework provides a risk management and disclosure framework on nature related issues and encourages organisations/financial institutions to integrate nature into their strategic decision making and supports capital allocation from nature-negative to nature positive outcomes. LEAP approach is an integrated process to identify, assess and report on nature-related issues.




**Locate business interface with nature**

Sites were assessed for the presence of Protected Areas (PAs), Key Biodiversity Areas (KBAs), Sites of Conservation Importance.




**Evaluate nature related dependencies and impacts**

Nature-related dependencies and impacts of business activities on the natural environment was evaluated.



**Assess nature related risks and opportunities**

Based on the dependencies and impacts on nature, the possible nature-related risks and potential opportunities it might face was assessed.



**Prepare to respond and report**



Scope of Assessment

The biodiversity risk assessment covers nature related critical areas to understand and address potential impacts and dependencies on nature. The study covered 16 operations of ACC Ltd across India, including both Integrated Units and Grinding Units. These operations were assessed for their impacts and dependencies

on biodiversity and ecosystem services. The study identified significant dependencies on natural capital, particularly raw materials like limestone and water, and highlighted the sector's indirect dependencies on ecosystem regulation services such as climate and water regulation and protection against floods and storms.

Integrated Unit	Grinding Unit
ACC Bargarh Cement Plant, Bargarh, Odisha	ACC Chaibasa, West Singhbhum, Jharkhand
ACC Kymore Cement Plant, Katni, Madhya Pradesh	ACC Sindri, Sindri, Jharkhand
ACC Ametha Cement Plant, Katni, Madhya Pradesh	ACC Thondebhavi, Chikkaballapur, Karnataka
ACC Gagal Cement Plant, Bilaspur, Himachal Pradesh (I & II)	ACC Kudithini, Bellary, Karnataka
ACC Jamul Cement Plant, Durg, Chhattisgarh	ACC Madukkarai, Coimbatore, Tamil Nadu
ACC Chanda Cement Plant, Chandrapur, Maharashtra	ACC Damodar, Purulia, West Bengal
ACC Lakheri Cement Plant, Bundi, Rajasthan	ACC Tikaria, Amethi, Uttar Pradesh
ACC Wadi Cement Plant, Gulbarga, Karnataka (I & II)	Asian fine Cement Pvt. Ltd., Rajpura

Assessment Focus

The assessment was based on the datasets/information provided by the sites/operations in the form of Biodiversity Mapping tool and publicly available information (secondary sources). All upstream and downstream activities were not included.

**Operations of ACC Ltd**

The assessment was focused on ACC Ltd own operations which includes Integrated and Grinding Units (16 operations across India).

**Impact Zone of Operations**

The operation were mapped for a 10 km radius (operation taken as center point) to understand the potential impacts and dependencies the operations might have on nearby biodiversity and ecosystem services.

Identifying Impacts, Dependencies, and Nature-Related Risks

- Desk assessment of sites, mapping operations within 10 km of protected areas, migratory routes, and Ramsar Wetland sites using tools like DOPA, e-bird India, and Global Mangrove Watch.
- The IBBI Ecosystem Services Matrix tool was used for ecosystem and service mapping, and risk identification was aligned with criteria from the International Finance Corporation Performance Standard 6, UN CBD's Post-2020 Global Biodiversity Framework, CSA, and the TNFD Framework.



Risk Matrix

Post assessment, a risk categorisation matrix was developed for each site for impact and dependency. The matrix has been developed on two parameters:

- 1) Impact of operations on Biodiversity and Ecosystem Services
- 2) Dependency of operations on Biodiversity and Ecosystem Services.

	High Dependency	Medium Dependency	Low Dependency	No Dependency
High Impact	Very High Material Risk	Very High Material Risk	High Material Risk	High Material Risk
Medium Impact	Very High Material Risk	High Material Risk	Medium Material Risk	Medium Material Risk
Low Impact	High Material Risk	Medium Material Risk	Low Material Risk	Low Material Risk
No Impact	High Material Risk	Medium Material Risk	Low Material Risk	Very Low Material Risk

Prioritisation of sites for biodiversity management

The assessment identified high-risk sites that require immediate attention to mitigate adverse impacts on biodiversity. The study categorised sites based on their proximity to eco-sensitive zones, the presence of species with high conservation value, and the incidence of water stress or other environmental challenges. Two of our sites, ACC Gagal Cement Plant and ACC Chaibasa Grinding Unit, have been prioritised for detailed assessment due to their high scores on the risk assessment scale.

Priority categorisation	Total score	
Top Priority Operations	71 to 100	High risk operations to achieve No Net loss of biodiversity
Second Priority Operations	41 to 70	Medium risk operations to achieve No Net loss of biodiversity
Third Priority Operations	0 - 40	Low risk to achieve No Net loss of biodiversity

The study considered significant dependencies on natural capital, particularly raw materials like limestone and water, and also the indirect dependencies on ecosystem regulation services such as climate and water regulation and protection against floods and storms.

Our Exposure

Parameter	Number	Area (In Ha)
Total sites	Integrated Units – 11 Grinding Units - 8	6,466.24
Sites covered in the assessment	19 (100%)	6,466.24
Sites with Significant Biodiversity Impact	2	374.51
Sites with Biodiversity Management Plan	2	374.51

Risks and Opportunities

The risk assessment revealed several risks and opportunities in our operations. The risks and opportunities were identified for each site, and they are widely categorised under the following:

**Regulatory Risks:** Operations located within eco-sensitive zones or near protected areas are subject to stringent environmental clearance requirements.

**Physical Risks:** Increased incidents of water stress, flooding, cyclones, and drought in certain areas pose significant challenges.

**Transition Risks:** High impacts and dependencies on biodiversity and ecosystem services necessitate robust management plans to mitigate adverse effects.

Opportunities identified include the potential for enhancing biodiversity through nature-based solutions and integrating biodiversity conservation into operational decision-making. Opportunities for ACC include enhancing its greenbelt development to mitigate dust

emissions, implementing rainwater harvesting systems, and adopting nature-based solutions to achieve No Net Loss (NNL) of biodiversity. By adopting the TNFD Framework, we are planning for capital allocation from nature-negative to nature-positive outcomes, thereby supporting long-term sustainability goals.

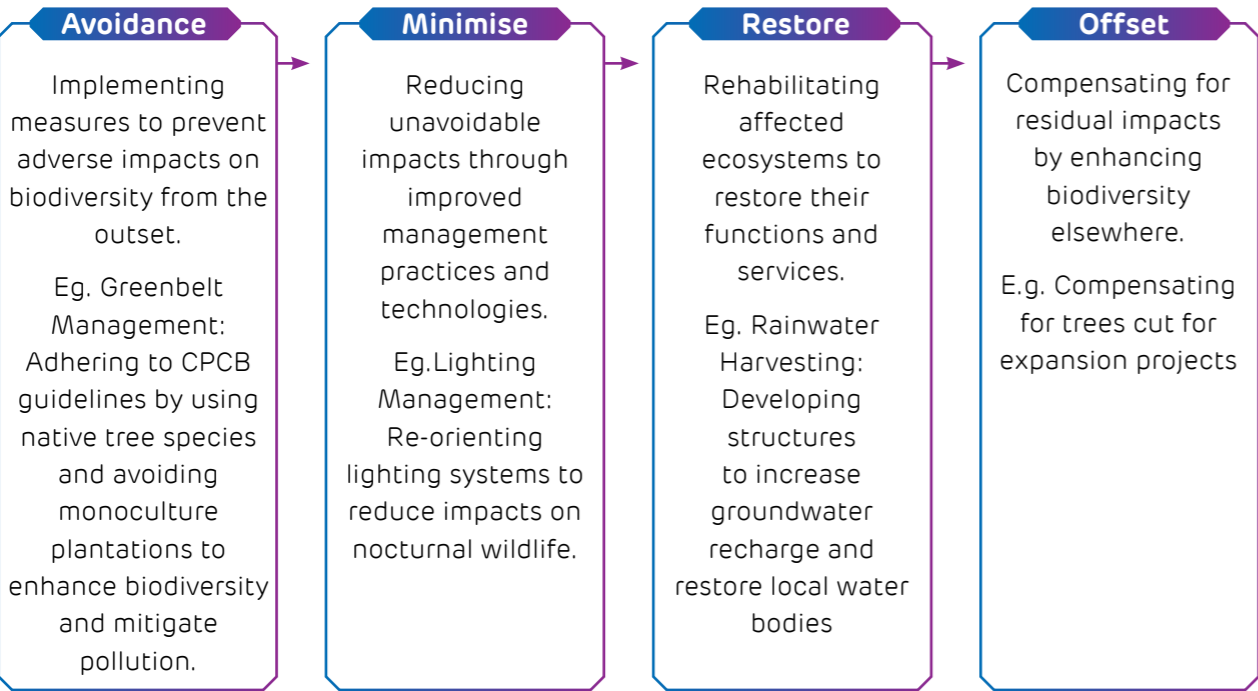
Biodiversity Action Plan

To address the identified risks, we have developed a Biodiversity Action Plan (BAP) that incorporates nature-based solutions and follows the IUCN Mitigation Hierarchy. The BAP also includes a specific monitoring indicator tool to track progress and ensure compliance with the No Net Loss commitment. This tool helps measure the effectiveness of implemented actions and supports continuous improvement in biodiversity management.

The group level biodiversity action plan has committed to meet the No Net Loss based on IUCN Mitigation Hierarchy i.e., Avoid, Minimise, Restore and offset which can be implemented by sites as per their specific need.

No Net Loss Action plan
<ul style="list-style-type: none"><li>Biodiversity &amp; Ecosystem Service (B&amp;ES) risk to business</li><li>Guidance document to be adopted at Group level and at site level which contains details of impacts of operation during various phases of project i.e., Planning, Construction, Operation and Decommissioning. This guidance document will help in understanding the examples impacts and dependencies and respective measures which are provided in Biodiversity Action Plan.</li><li>Action Plan by adopting nature-based solutions to meet the No Net Loss commitment.</li><li>Action areas to go for avoidance, minimization, restoration and offsetting B&amp;ES impacts</li><li>ACC Ltd Specific Monitoring Indicator tool developed to map the progress made by each operation to meet.</li></ul>

Biodiversity Mitigation Hierarchy



Biodiversity Protection and Enhancement Measures

At ACC Limited, to align with biodiversity protection, we have implemented following detailed process to ensure the protection and enhancement of biodiversity. This process is applicable for a 10km vicinity around our campuses. These measures are in accordance with our biodiversity policy to protect and enhance the biodiversity around our plant locations.

**Mapping operations** located within 10 km radius of protected areas, migratory routes and Ramsar Wetlands sites. Tools like DOPA, e-bird India and Wildlife Protected areas were used, Global Mangrove Watch, ENVIS, Wetlands of India Portal etc. .Following this, the Quadrat's method is used to account for the total number of species of shrubs, herbs, and trees.

Data about **Circumference at Breast Height (CBH) or Diameter at Breast Height (DBH)** and basal cover for each tree, shrub and herb species observed during the monitoring is maintained.

Additionally, we also identify the number local, **migratory, and resident migratory birds** in and around our plant premises.

**Development of ACC Ltd group level biodiversity action plan** to meet the No Net Loss commitment based on IUCN Mitigation Hierarchy i.e., Avoid, Minimise, Restore and offset.



**ACC Biodiversity Policy** and IUCN **No Net Loss (NNL)** guidance documents were referred for the assessment.

To help characterise the diversity and richness of species, we use the **Shannon Diversity Index (H)** index that considers both the abundance and evenness of species present in the community

As per the **Wildlife Protection Act** and the IUCN guideline, we categorise the identified bird species in to rare, endangered, and threatened.

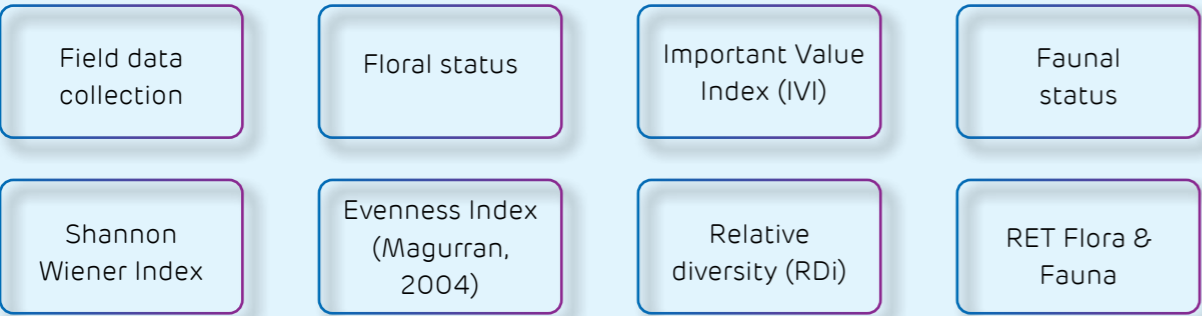
# Biodiversity Assessment at Gagal

case study



## Assessment Methodology

We have implemented the following steps to assess biodiversity for our most critical plants, and through these measures, we have adopted mitigation strategies to achieve no net loss.



## Floral and Faunal Diversity

Floral and faunal diversity of an area provides information about a good and healthy environment. A total of 132 Tree species, 34 Shrub species, 85 Herb species, 25 climber species and 22 Grasses were cumulatively recorded during the biodiversity assessment from the Core and Buffer zone of our operations.

### Floral Diversity

**Native/Exotic Ratio:** Core Zone: 71% of tree species were native, and 29% were exotic. Detailed analyses for shrubs and herbs revealed a significant presence of native species.

**Diversity Index:** The diversity index was calculated as Shannon Wiener Index (H). The ACC Cement Gagal has a tree diversity index of 2.78 which represents a good diversity at site.



## Faunal Diversity

Rich faunal diversity is the indicator of a healthy ecosystem. A total of 113 faunal species were recorded during the survey at ACC Cement Gagal, Barmana Himachal Pradesh. A total of 68 species were recorded in the core zone and 91 species were recorded in the buffer zone. The highest number of species were recorded for Birds (73 species) followed by Butterflies (26 Species), Mammals (9 Species) and Reptiles (5 Species).

**Diversity Index:** The diversity index was calculated as Shannon Wiener Index (H). The following table shows the diversity indices for various components of fauna. The overall diversity index is good at site for birds and butterflies and moderate for mammals and reptiles. The values depend upon season and length of study.

Shannon Wiener Index (H)	Core	Buffer
Birds	2.62	2.46
Mammals	1.16	1.41
Reptiles	1.33	1.1
Butterflies	2.3	2.78





The image shows a group of women and children in traditional Indian attire. In the foreground, two women are seated and exchanging Indian Rupee banknotes. The woman on the left is wearing a pink sari and a pink headscarf, while the woman on the right is wearing a red sari and a red headscarf. Both are adorned with traditional jewelry, including bangles and necklaces. In the background, other women and children are visible, some wearing yellow and pink headscarves. The setting appears to be an indoor space with a pink door and a window with a white grid pattern.

# Our Social Footprint

## Empowering Inclusive Growth

# Our Social Footprint

## Empowering Inclusive Growth

Social footprint is guided by our core values of collective wellbeing, community engagement, and environmental responsibility.

We prioritise inclusive value creation, empowering our workforce with opportunities for growth and development. We foster strong relationships with the communities we serve, investing in skill development, education, health and infrastructure to drive local prosperity. Our customers are at the heart of everything we do, receiving exceptional products and services that meet their needs and exceed their expectations. Additionally, we partner with suppliers who share our commitment to integrity, sustainability, and social responsibility, ensuring a resilient and responsible supply chain that benefits all stakeholders.

### Our Focus Areas

Occupational Health and Safety

Talent Acquisition and Development

Community Support

Employee Engagement

Develop Talent Pipeline

Supply Chain Management

Customer Engagemnet and Satisfaction

### Key Highlights

Zero fatalities

15.5 Average training hours per employee

37.49 crore Spent on CSR activities

1.4 million CSR beneficiaries

11,250 New Dealers and channel partners Onboarded

98.97% Spent on local procurements

## Workforce Management

Our workforce embodies our core values: Courage, Trust and Commitment, which are principles for shaping our success and impact on society. We deeply value our people acknowledging that their contributions drive our achievements and enrich the lives of those we serve. We strongly believe in creating a conducive work environment and ensuring their wellbeing. This commitment is evident in our progressive human resource management strategy, backed by investments and efforts to adapt to evolving workforce expectations. In the reporting year, our total workforce strength combining employees and workers stands at 3,884 including differently abled individuals.

### Our Employees and Workers

Age Group	Female	Male	Total
<30	75	227	302
30-50	87	2,880	2,960
>50	12	603	615
Total	184	3710	3884

### Talent Acquisition and Retention Approach

We recognise that attracting and retaining top talent is essential for driving innovation, maintaining operational efficiency, and achieving sustainable growth in the industry. Our focus on talent acquisition extends beyond filling positions, it involves identifying individuals who not only possess the required skills and expertise but also align with our values and culture.

We invest in comprehensive recruitment strategies, leveraging diverse channels and platforms which include online job portals, social media platforms, professional networks, internal job postings and campus hiring programmes for potential candidates. Our employees are encouraged to refer candidates, who possess the required skill sets and align with our culture and values. Furthermore, we provide opportunities for our existing employees to apply for new roles or positions that are in line with their career aspirations and skills through an internal job posting platform.

New Hires Details

	# CY 2020	# CY 2021-22	*FY 2022-23	FY 2023-24
Total New Hires	225	611	572	707
% of open positions filled by internal candidates	68	45	52.81	99
Average Hiring Cost/ FTE (₹)	₹ 2,19,890	₹ 1,38,735	₹ 38,986	₹ 1,39,000

#In 2022,post our acquisition by Adani Group, we have changed our reporting cycle from Calendar Year (January to December) to Financial Year (April- March). Hence, the data reported for 2020 and 2021 are on calendar year cycle and for the current reporting year is in Financial Year cycle.

In the reporting year, 99% of our hiring were through internal transfers and job postings and only two new hires were taken from outside.

The details of new hires is disclosed in our [Integrated Annual Report](#) (Page 93)

Employee Turnover Rate

	#CY 2020	#CY 2021	FY 2022-23	FY 2023-24
Total Turnover Rate	8.87%	15%	20.73%	29.04%
Voluntary Turnover Rate	8%	15%	15%	33.06%

#In 2022,post our acquisition by Adani Group, we have changed our reporting cycle from Calendar Year (January to December) to Financial Year (April- March). Hence, the data reported for 2020 and 2021 are on calendar year cycle and for the current reporting year is in Financial Year cycle.

Total Turnover Rate (FY 2023-24)

	<30	30-50	>50
Male	70.79%	32.06%	33.15%
Female	35.62%	43.71%	73.68%

Further, strengthening our employee retention strategy, we have devised specific measures in place to facilitate long term employee association and retention within the organisation. This includes various measures including Retention Bonus for employees that are paid after specific duration. This serves as long-term measures, enabling employee retention.

Employee Support and Wellbeing Measures

The wellbeing of our employees is at the core of our organisation’s ethos. Physical and mental health as well as the overall satisfaction of the workforce, profoundly impacts productivity, commitment, and overall success. Higher emphasis is placed on cultivating a workplace that fosters and nurtures well-being. This includes providing robust healthcare benefits, implementing wellness initiatives, offering flexible working arrangements, and promoting harmonious work-life balance.

We provide several employee benefits such as health and accident insurance, maternity and paternity benefits, retirement benefits in terms of provident fund, Gratuity and financial support etc. During the reporting year, we spent ₹734 crore on employee benefits.

Healthcare Initiatives

We promote a culture of wellbeing amongst employees, offering a range of initiatives to support their physical, mental, and emotional health. From arranging fitness classes and access to sports facilities to wellness challenges and access to health resources,

employees have access to tools and programs designed to enhance their physical fitness and overall wellness.

Moreover, we understand the impact of workplace stress on mental and emotional well-being and actively promote initiatives to support our employees in these areas. One such initiative is the emotional Wellness program launched under the Adani Cares platform, in collaboration with independent counselling and advisory services. This program provides employees with comprehensive support and guidance creating a supportive work environment where mental and emotional wellbeing are prioritised.

We also have some other key initiatives to support the holistic healthcare of our employees:

- Preventive Health Initiatives**  
Every potential candidate undergoes a detailed health check-up prior to onboarding process. These annual check-ups are mandatory for all employees and cater to specific age requirements. To facilitate health check-ups for all employees, we have collaborated with diagnostic centres and hospitals across the country.
- Health Awareness**  
Our focus on holistic wellbeing is through several services we offer to our employees in-house and otherwise. We seek to promote overall health and wellbeing through regular communication with the workforce by emails, webinars and seminars. We also offer in-house allied services for clinical and tele-consultations, physiotherapy, yoga, dietary requirements etc. We have a medical team available in the corporate office as well as the plants. This team can be contacted for medical advice and through tele-consultation covering both curative and preventive healthcare.
- Clinical Support During Hospitalisation**  
In case of hospitalisation of the employee, we provide support and guidance throughout the hospitalisation process. They

provide their support to the hospitalised employee through continuous contact with the medical team ensuring best medical care. We launched a holistic healthcare mobile application called “Adani Emcare” to simplify the healthcare needs of employees and their families. The application has vital features which include basic health reports, historical checkup data, graphical health trends, blood bank and blood group directories, cashless hospital integration, downloadable Mediclaim cards, a health library, and the option to upload personal health documents. To ensure access is restricted to employees only, we have implemented pertinent security measures.

Work-Life Balance Initiatives

In today’s fast paced corporate environment, achieving a harmonious work-life balance is crucial. And our working hours guidelines support this. We believe that fostering a culture that values and supports the wellbeing of employees is key to unlocking their full potential. We offer flexible working and remote working options to support our employees. We also have a generous leave policy which can be availed by employees as required. Our Special leaves can be availed by an employee for personal or professional purposes such as long-term illnesses, paternity, maternity, amongst others. Our Sabbatical leave aims to provide a model framework through which they can prioritise their growth personally and professionally through continuous learning. We also provide childcare facilities for our employees to help our employees manage their work and family commitments effectively.

Financial Support

We are committed to providing comprehensive financial support to our employees to navigate their financial journeys with confidence and security. In our endeavour to reduce the immediate financial burden from events such as life-threatening diseases, educational initiatives, we provide interest free financial assistance. Some of the other areas where financial support is provided are:

- We recognise the importance of financial stability and home ownership for our employees. To promote home ownership, we provide a Housing Loan Interest Subsidy scheme to provide financial support to employees on their home ownership journey.
- We provide car lease options to our employees on pre-tax reduction basis.
- We support our employees in their children's higher education in India or abroad through Children Education Loan interest subsidy.
- We provide financial assistance to our employees who wish to support their children's aspiration in sports and higher education.

Health Insurance

We offer extensive coverage in our health insurance for our employees and workers. We Introduced a Top-up scheme to cover

additional needs in medical emergencies where expenses go beyond the regular health insurance amount. Furthermore, all employees and workers are covered by accident insurance in compliance with legal requirements.

We also safeguard our employees from challenging and unforeseen circumstances through our 'Group Term Life Insurance Policy'. In the event of untimely death of an employee, we maintain an 'Employee Death Relief Policy', this ensures significant support to the deceased person's family. Further, parents of employees are also covered for critical diseases without any additional cost.

Parental Leave

We recognise the importance of supporting employees during early parenthood and offer parental leave options to ensure they can balance their professional responsibilities along with their family commitments.

Parental Leave FY 2023-24

	Male	Female
Total number of employees entitled to parental leave	3,710	174
No. of Employees who took parental leave	70	10
Total number of employees that returned to work in the reporting period after parental leaves ended	70	8
Total number of employees that returned to work after parental leaves ended that were still employed 12 months after their return to work	58	8
Return to Work Rate	83.33%	75%
Retention Rate	52.38%	22.22%

Miscellaneous Support Programmes

Apart from specific benefits, several other benefits are provided to our employees and workers. At our cafeterias, we offer services at a subsidised rate as part of employee and worker benefits. For purchase of SIM card and mobile device, we provide financial assistance, and all employees are provided with mobile plan.

In the unfortunate event of an employee's untimely death, the group provides crucial and immediate financial support. We are dedicated to ensuring the families of the deceased employees receive the highest level of care and respect. We offer various services such as extended Mediclaim insurance, careers support debt forgiveness, relocation assistance and legal guidance.

“



Manoj Kumar Sharma  
Chief Human Resources  
Officer

As a growing organisation, our human resource strategy focuses on talent management, career advancement, transparent and equitable rewards and recognition, employee engagement, and retention. The organisation places a high priority on the comprehensive well-being of its employees and offers a diverse range of support programs to ensure their holistic welfare. We are committed to fostering a diverse and adaptable workforce, prioritising the development of our employee's skills and capabilities through innovative learning programs. The Learning and Development department is responsible for identifying training needs and ensuring the implementation of a variety of on-the-job training initiatives. These efforts are supported by internal faculty, subject matter experts, and functional leaders.”



# Employee Development

## Upskilling for Progress: Learning and Development

We accentuate the importance of continuous learning and skill development for our employees to enhance their performance and accelerate their professional career progression. We have designed robust learning and development programme for employees at all management levels to facilitate a seamless learning process. There are specialised learning modules, virtual instructor-led master classes and customised webinars.

We have adopted a 70:20:10 learning philosophy, where 70% of learning occurs through on-the-job training, 20% through interactions with superiors, and 10% through structured training interventions. Line managers play a crucial role in supporting the training and development of new employees during the onboarding process. This onboarding journey includes both business-specific and discipline-specific learning, facilitated through our e-vidya digital portal. The portal provides a comprehensive platform for employees to access relevant training materials and resources, ensuring a smooth and effective integration into their roles.

Average Hours of Training for Employees (FY 2023-24)

	Junior Management	Middle Management	Senior Management
Male	11	31	2
Female	18	17	8



Employee Development Programmes

In addition to the numerous training programmes conducted, we have specific employee development programmes and initiatives devised with specific objective. Select people are identified for the programmes and are trained accordingly over the duration of the programme. We have implemented the Takshshila initiative, a talent development programme at the group level like Fulcrum and NorthStar. Under these programmes, we nominate some of our high potential employees to improve their capabilities. Additionally, we also participate in leadership programmes at Adani Group level aimed at building a robust pipeline of future leaders ready to take challenging roles.

Programme Name	Details	Participants	Benefits
Fulcrum	The nine-month Leadership Development Programme aims to cultivate internal leaders capable of steering diverse Adani businesses. This comprehensive programme goes beyond traditional leadership frameworks, focusing on business and functional acumen, strategic leadership, and capacity building. Targeted at CXO-level leaders, the programme prepares them to tackle complex challenges and drive growth.	3	<ul style="list-style-type: none"><li>• Improve business synergy and functioning</li><li>• Develop leadership skills and ability to handle stress, ambiguity.</li><li>• Overall personality development and improvement in other competencies</li><li>• Build diverse team across business and leverage speed of trust</li></ul>
NorthStar	The 11-month Leadership Development Programme, in partnership with Ivy League institutions, equips middle-level leaders with versatility and adaptability. The comprehensive curriculum covers business cycles, financial management, people skills, communication, and strategic planning. Targeting middle-level managers, this program prepares them for future leadership roles.	6	<ul style="list-style-type: none"><li>• Overall improvement in all the competency and dimension of Adani Behavioural Competency Framework (ABCF) when compared before and after the programme</li><li>• The relative combined attrition rate in the 4 cohorts till date since 2017 is half of the attrition across the group</li><li>• 21% of the NorthStar participants till date have been elevated at least 2 levels/grades or above in the organisation</li><li>• 18% of the participants have moved into different businesses from the ones they were when attending the programme</li></ul>
Takshshila	The 12-month Leadership Excellence Programme, in collaboration with the Indian School of Business, prepares participants for leadership success. The comprehensive program includes classroom learning, interactive sessions, 360-degree feedback, action learning projects, and individual coaching to equip leaders with the skills and knowledge needed for excellence.	2	<ul style="list-style-type: none"><li>• To develop leadership skills</li><li>• All participants from Takshshila 1 has moved up and taken up roles and responsibilities which are two levels/grades higher than their roles when attended the programme .</li></ul>



Performance Evaluation

At ACC Cement, we have established a comprehensive Performance Management System (PMS) to promote clarity, transparency and setting clear expectations for our workforce. Our system includes various activities such as performance measurement, year-end reviews, ratings, promotion recommendations, moderation, and individual feedback. Goals are set at the beginning of the year and employees are assessed based on that. We also have regular conversations and continuous feedbacks going on, ensuring performance review is an ongoing process.

A key component of this system is the bell curve performance appraisal, also known as Forced Ranking or Forced Distribution. This method compares individual employee performance in specific categories like competencies and achievements, allowing us to effectively distinguish between high and low performers.

The bell curve method helps us recognise top performers and identify areas for

improvement, thereby informing decisions regarding promotions, rewards, and career development opportunities. This ensures a fair and consistent evaluation of employee performance across our organization. All eligible employees, including permanent staff, undergo an annual performance appraisal as per our guidelines. The appraisal and increment for workers are decided in consultation with their unions. During the reporting year, 100% of the employees received performance and career development reviews.

Human Capital Return on Investment

Human Capital Return on Investment (HCROI) is one of the key metrics we use to evaluate our profitability in relation to employee costs. The metric measures profitability that is specifically linked to human capital investments. It offers a unique perspective on the value created, providing insight into how effectively it leverages its employee base to generate economic returns

	#CY 2020-21	# CY 2021-22	*FY Jan 2022-March 2023	FY 2023-24
Total Revenue (₹ Cr)	13,7v	16,151	22,210	20443.74
Total Operating Expenses (₹ Cr)	11,489.43	13,803	17,246.81	17924.66
Total employee-related expenses (salaries + benefits) (₹ Cr)	852.31	840.9	843.7	733.5
Total Capital Return on Investment	3.69	3.79	1.63	4.43

#In 2022,post our acquisition by Adani Group, we have changed our reporting cycle from Calendar Year (January to December) to Financial Year (April- March). Hence, the data reported for 2020 and 2021 are on calendar year cycle and for the current reporting year is in Financial Year cycle.

\*The Company had changed its financial year end from December to March in FY23. Therefore, the figure for the previous year is for 15 months.

Employee Wellbeing Surveys

We actively engage with our employees through comprehensive surveys to understand their experiences and enhance their well-being while fostering a positive work environment. The Company engaged with the employees through online platform ‘Your Voice Matters’. This tool allows to gauge employee thoughts on various facets, from daily operational matters to strategic topics. The aspects covered in the survey are as follows:

**Work environment:** (e.g. “There is a culture of respect from leadership/co-workers and people across the organization”.)

**Job satisfaction:** (e.g. “Your work gives you a strong sense of fulfillment and satisfaction”.)

**Purpose:** (e.g. “Your work is in alignment with your purpose.”)

**Happiness:** (e.g. “You feel excited coming to work every day.”)

**Stress:** (e.g. “Your manager remain patient and calm even in the pressure situations.”)

**Policies and Proccess:** (e.g. You are satisfied with the travel portal and policies.”)

57% employees participated in the survey, voicing their concerns, and expressing their interests, and 82% of the participants rated a score => 4/5, translating to high level of wellbeing.

The last survey conducted had reported an employee satisfaction score of 54. The survey carried out in the reporting year was the first survey carried out after acquisition of the Company by Adani Group in September 2022. The insights gathered from the survey are used to influence policies and actions. This year target was to have 80% of employees in Highly Satisfied category. The target for FY 2026 is to improve it by 5%. The following table illustrated our employee satisfaction survey results across the years.

Employee Engagement Survey Details	
Responses received (Survey Respondents)	1,361
Total employees	2,385
(Survey Population)	2,385
Employees with score =>4 (High level of wellbeing)	1,112
Employees with score =<2 (Low level of wellbeing)	85





## Diversity, Equity and Inclusion

We believe sustainability goes hand in hand with diversity, equity, and inclusion. We recognise that nurturing a culture of diversity and inclusion is the right thing to do and essential for driving innovation, fostering creativity, and thus achieving long-term success. Further, strengthening our commitment to inclusivity and to mainstream differently abled people through provision of opportunities, we have established Differently Abled People (DAP) Guidelines for differently abled people.

### Diverse Workforce Management

At ACC, we create an inclusive environment where all employees feel valued, respected, and empowered to contribute their unique perspectives. We embrace diversity in all forms, including but not limited to race, ethnicity, gender, age, sexual orientation, disability, religion, nationality, and socio-economic background. We are confident that by celebrating our differences and promoting inclusivity, we can unlock the full potential of our workforce and drive meaningful change within our organisation and beyond.

We have established inclusive workplace policies that promote equity and fairness for all employees. Our Diversity, Equity and Inclusion Policy aligns with our group commitment and provides a strategic framework for monitoring and improving organisational capabilities to strengthen representation and promote an inclusive culture.



We inculcate diversity in various aspects of human resource management. We have guidelines on differently abled people to ensure their inclusion in the workforce. We try to mitigate unconscious bias in the recruitment phase while educating managers to ensure fair and equitable hiring decisions. While we do not discriminate based on nationality, as our operations are in India, 100% of our workforce are constituted by Indian nationals. Our workforce represents various diversity factors such as geographical areas, languages, cultural backgrounds etc. Additionally, we train our employees to raise awareness of unconscious bias and promote inclusive behaviours. We also provide training on harassment and discrimination to create an inclusive work atmosphere. We believe in the equality of all our employees and have established a Policy on

the Prevention of Sexual Harassment (POSH). The policy provides a framework for taking necessary action in the case of harassment of women. We believe in creating a positive work environment for all our employees, where all members of the workforce are treated equally, fairly and with dignity. In FY 2023-24, there were no cases of discrimination and harassment or on POSH.

We are committed to providing equal employment opportunities for people with disabilities, recognising that diversity has many dimensions. We have implemented several initiatives at our workplace to improve accessibility for disabled employees. We have eight differently abled employees were part of our workforce.

Women in Workforce

Parameter	% share of women
Share of women in total workforce (as % of total workforce)	4%
Share of women in all management positions, including junior, middle and top management (as % of total management positions)	6%
Share of women in junior management positions, i.e. first level of management (as % of total junior management positions)	16%
Share of women in top management positions (as % of total top management positions)	4%
Share of women in management positions in revenue-generating functions (as % of all such managers)	4%
Share of women in STEM-related positions (as % of total STEM positions)	4%



BeConnected

We are focusing on increasing gender diversity and have set a target to have 10% of women in the cement business by 2030.

In an effort to strengthen gender diversity, we introduced “BeConnected,” an initiative designed to create a vibrant and inclusive workplace culture. Specifically tailored to empower women, this platform provides a dynamic space for professional growth,

networking, and mentorship. Through regular sessions, expert talks, and interactive activities, “BeConnected” fosters community among women employees, encouraging them to share their experiences, collaborate on innovative ideas, and support one another. This initiative has allowed us to promote the growth and well-being of our female workforce, recognising and celebrating their valuable contributions.

BeConnected Activites

International Women's Day Celebration 2023

Nurturing health and wellness initiatives

Finance management workshops

Outdoor activities and team-building exercises

Awareness program on Prevention of Sexual Harassment (POSH)





## Human Rights

Respecting human rights is ingrained in our corporate culture and core values. We are guided by international frameworks such as the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organisation Conventions. In line with our Human Rights Policy, we uphold fundamental human rights for all our stakeholders, including employees, associates, vendors, contractors, and customers. We maintain zero tolerance for child labour and forced labour in any form, including within our supply chain. We strive to create awareness regarding human rights amongst our workforce, and we successfully provided training to 87% of our employees during the reporting period. On assessing our operations, we found no risk of child labour or forced labour.

We recognise that our operations and supply chain may impact human rights. We strive to ensure fair wages, safe working conditions, and freedom of association for all employees. Collaborating with suppliers allows us to ensure adherence to our Policy and implementation of responsible sourcing practices.

We respect the rights of all employees and associates to the freedom of association and collective bargaining without interference and discrimination. Workers are free to join unions and elect their representatives. We also allow these elected representatives to carry out their work within the organisational boundary. Our commitment to Freedom of Association aligns



with our Policy on Freedom of Association. In FY 2023-24 100% of our workers were part of trade unions, however, none of our employees are a part of trade unions.

We have an Employee Grievance Management Policy that has a detailed grievance mechanism that allows employees to raise issues anonymously. The grievance redressal process is defined in detail in the policy.

Human Rights Assessment and Due Diligence

At ACC, we have established an organisation wide human rights due diligence process to identify potential human rights risks

and mitigate the same. This extends to our operations and covers various human rights related issues such as child labour, forced labour, discrimination, equal remuneration, freedom of association and rights to collective bargaining.

We conduct human rights assessments for all our operations on an annual basis. 100% of our operations were covered in the assessment and there were no actual or potential risks or violations identified. As there were no risks identified, mitigation plans and remediation actions were not devised. However, we proactively take measures to ensure there are no human rights risk in our operations.



Pay Equality

At ACC, we steadfastly commit to gender-neutral remuneration as a cornerstone of our sustainability efforts. We believe that all employees, regardless of gender, ethnicity, or any other characteristic, should receive equal pay for equal work. Our compensation structure is designed to ensure fairness and transparency, with regular reviews conducted to identify and address any disparities.

Gender Pay Indicators (FY 2023-24)

Employee Level	Average Men Salary (₹ Cr.)	Average Women Salary (₹ Cr.)
Executive level (base salary only)	10,856,316	-
Executive level ((base salary + other cash incentives)	33,281,338	-
Management level (base salary only)	540,396	282,612
Management level (base salary + other cash incentives)	1,441,897	755,894
Non-management level (base salary only)	204,470	193,932

We firmly believe that closing the gender pay gap promotes social justice, enhances organisational performance, and fosters a more inclusive workplace culture.



# Occupational Health and Safety

At ACC, we believe that a safe and healthy workplace is the foundation for productivity, morale and success. We are committed to ensuring the health and safety of our employees, contractors, and stakeholders. Our Occupational Health and Safety (OHS) management system is designed to cultivate a robust safety culture, aiming for 'Zero Harm' across all our operations. This commitment is reflected in our comprehensive safety policies, regular training programs, and continuous improvement initiatives. Prioritising health and wellbeing, we have a long history of embedding safety in our culture.

04

ACC units recognised with 5 awards from external bodies

1,08,968

Manhours spent on Saksham Safety training

Safety practices at ACC are guided by the Occupational Health and Safety Policy at the corporate level and supported by Standard Operating Procedures (SOPs). The policy applies to all our operations, business units, suppliers, visitors, customers, and other stakeholders. Ensuring extended safety practices and OHS compliance requirements also form a part of our procurement and contractual requirements. Our safety policies are distributed and communicated across all plants, ensuring that every employee is aware of their responsibilities and the safety protocols. We emphasise compliance with high-risk processes such as critical control management, structural integrity assurance, and electrical safety.



“



**Pankaj Singh**  
Chief Safety Officer

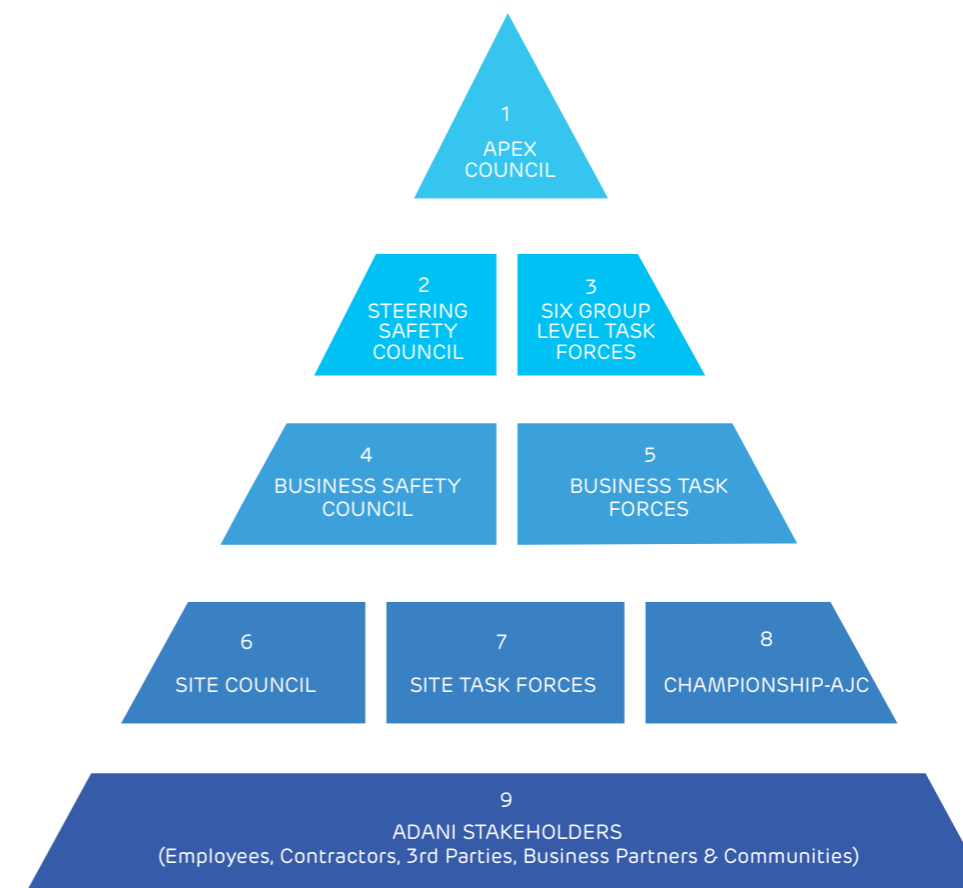
Ensuring the safety and well-being of our Adani Cement team is our paramount priority. We are committed to fostering a workplace free from harm. By adhering to stringent safety regulations and industry best practices, we have successfully mitigated numerous risks. Our relentless pursuit of 'Zero Harm' drives us to continually assess and enhance our safety protocols. Through initiatives such as competency development, regular audits, and our 'We Care' program, we are building a robust safety culture. Together, let's create a workplace where everyone returns home safely every day."

## Safety Governance

Upholding the highest values and adopting the best performance, our safety performance is guided by our robust governance structure. Our OHS governance framework is built on clear policies and active safety committees. We have established a top-down approach where executive leadership drives safety initiatives, supported by a bottom-up engagement from the workforce.

Safety governance at ACC is overseen by the Corporate Responsibility Committee at the Board level which is apprised quarterly on safety performance. We have established a comprehensive Safety Management System

at the group level with clearly defined responsibilities and accountabilities. The Apex Council is at the helm of group safety governance comprising of senior leadership team. Steering Safety Council is formed by the Safety Service Head and Group Head, business safety Heads and business leaders. Further, there are group-level task forces and site-specific council and task forces to ensure safety governance at each level. Safety KPIs are integrated into performance appraisals for senior leaders. In FY 2023-24, a total of 413 safety committee meetings were conducted. These committees play a vital role in overseeing safety protocols and driving initiatives to enhance workplace safety.



## Occupational Health and Safety Management System

AT ACC, we have implemented an Occupational Health and Safety Management System, verified by ISO 45001. The system covers all our operational locations, employees and contractual workers. Safety audits are conducted periodically by the internal safety team as well as external independent auditors to ensure compliance with our OHS management system. In FY 2023-24, four safety audits were carried out, involving 21 leadership members across various sites. These audits help identify potential hazards and implement corrective actions.

### 'Zero Harm' Safety Culture

We aim for 'Zero Harm' across operations and for our people. In line with this, we have devised a safety roadmap defined by the 5C Framework 'Commitment, Communication, Capability, Conformance and Culture. This aims to create an integrated safety culture among people, thus minimising risks of hazards and safety incidents. Through this we aim to ingrain safety excellence in every employee through coordination, cultural shift and technological innovation to run knowledge into action.

### Hazard Identification and Risk Assessment

To create a safe working place, it is vital to identify and mitigate actual and potential safety related risks. We have adopted Hazard Identification and Risk Assessment Programme (HIRA) based risk assessments to identify, evaluate and mitigate actual and potential safety related risks. Risks and hazards are identified through risk studies, safety audits and job hazard analysis. Risk assessment exercises are conducted regularly and identified risks are contained based on severity and magnitude. For the identified risks, action plans are developed with quantified targets. Further, while responding to emergency situations, the actions are integrated as required.

### Incident Reporting

All safety related incidents are to be reported mandatorily. We have implemented the Gensuite portal for reporting safety indicators and used drone applications during high-risk processes such as shutdowns and silo cleaning. This technological intervention allows for real-time monitoring and analysis of safety-critical parameters. All identified risks/incidents are to be reported within the specific time frame. All employees and workers are trained to remove themselves from any work situation that is hazardous or can cause harm. We have defined procedures detailed out to investigate work-related injuries, ill health, diseases and

incidents. For all incidents root cause analysis is carried out and corrective actions are taken as needed post investigation.

### Employee and Worker Participation

Our focus is on establishing a positive safety culture across our organisation. We encourage employees and workers to raise their concerns, suggestions and any safety hazards identified. Onsite worker and employee participation are ensured through site level committees. Each site level committee comprises of labour union representative, a site safety representative, a site health team representative and a management representative. This ensures fair representation of all. Our safety initiatives have seen widespread participation from employees at all levels. For example, the Saksham Samvaad initiative facilitated direct interaction between 415 cement business leaders and the workforce, promoting a culture of safety and engagement. Stakeholder groups and worker participation in OHS activities.

The individual in person engagement facilitated an open communication platform fostering safety leadership and ensuring prompt response and faster incident resolution. Further, the employees and workers are engaged in the safety journey through quarterly safety campaigns. Monthly safety themes are identified and implemented. Taking a step forward, best safety practices across the operations are acknowledged and shared through knowledge sharing platforms.

### Safety Training

Training and capability building are central to our OHS management strategy at ACC. We believe that well-trained employees are essential for maintaining a safe working environment. Safety trainings needs are identified, and the training calendar is charted for the year. Trainings are taken by internal and external trainers on a variety of topics ranging from risk assessment and incident investigation to the safe execution of high-risk activities. The trainings equip all employees and workers on safe and responsible behaviour, to identify near misses and potential threats and to report incidents. Over the past year, ACC has conducted extensive training programs, accumulating 108,968 man-hours of safety training.

We have implemented a proficient needs identification process across our plants, enrolling process engineers in logistics and process safety excellence programs

### Saksham Program

Saksham program run by Safety team is a video based induction module for contract workers. Each of them have to undergo a mandatory 4 hours session at each site. So far we have logged over 200K manhours since it started last year. This program covers our LSSR, other important safety requirements and everything is communicated thru video to make it effective and language agnostic. This has been received very well and has a higher degree of recall when we follow them up with Saksham Samvad.

at prestigious institutions like IIT Kharagpur. Line managers have undergone capacity enhancement training in risk assessment, incident investigation, and high-risk activity management. These specialised training efforts demonstrate our commitment to ensure and adhere to safety practices and safe working conditions.

### Safety Strategic Action Plan (STRAP)

#### case study



Safety Strategic Action Plan was developed with defined safety related focus areas. Under STRAP, six priority areas were identified, which are the following:

- Leadership Commitment
- Capacity and Capability Building
- Monitor and Support Business Units for ensuring strategic safety performance
- Reduce Incident Severity
- Technological and Digitisation Initiatives
- Safety Engagements/ Community Safety Initiatives under Safety Culture

Under each of the priority areas, specific initiatives were taken across the operational locations. Each initiative has defined quantitative KPIs to measure progress. More than 40 initiatives were undertaken which were spread across areas such as Building Capacity for High Risk Processes and Internal Audits, Safety assessments, Work at height reduction, Road Safety, Prevention of Tipper Toppling, Reduction of risk with moving machinery, Safety Campaigns on 'Unchaai' and digitisation of permit to work system among others.

Safety Performance Indicators

At the organisational level, we track the lead and lag safety indicators, ensuring a proactive and comprehensive approach to maintaining a safe work environment. Lead indicators are proactive measures that help identify potential safety issues before they occur. These indicators serve as early warning signs that can help prevent accidents and injuries.

Lag indicators are reactive measures that reflect the historical safety performance, and provide valuable insights into past safety performance, serving as a reflection of the effectiveness of the safety measures that have been implemented.

By tracking both lead and lag indicators, we can gain a holistic understanding of our safety performance. This comprehensive approach allows for proactive identification and mitigation of potential safety hazards while also evaluating the effectiveness of existing safety measures.

Health and Safety Lead and Lag Indicators (FY 2023-24)

Key Performance Indicator	UoM	
Health and Safety: Lead Indicators		
Concern (Hazards & VPC)	Number	1,18,939
Safety Walkthrough by Senior Leadership Team	Number	4,704
Near Miss	Number	4,029
Safety Committee Meetings	Number	413
Permit To Work Audit	Number	4,762
Emergency Mock Drill	Number	361
Health and Safety: Lag Indicators		
Fatality (On-site)	Number	0
Lost time Injury (LTI)	Number	28
Restricted Workday Cases (RWC)	Number	3
Medical Treatment Cases (MTC)	Number	2
First Aid Cases (FAI)	Number	36
Lost time Injury frequency rate(LTIFR)	Number	0.60
Total Injury frequency rate (TIFR)	Number	0.71

Our Safety Performance

Our commitment to safety is reflected in our performance data, which shows significant improvements in several key metrics over the past year. Through a Management Information System (MIS), safety performance is monitored on a monthly basis for defined KPIs. Safety Performance Indicator Scorecards are developed to ensure performance against set targets.

We have been proactive in reporting and correcting safety concerns. In the reporting year, a total of 118,939 safety concerns and hazards were reported and corrected. Additionally, 4029 near-misses were reported, and corrective actions were taken, demonstrating our commitment to preventing accidents before they occur. These improvements highlight the effectiveness of our safety initiatives and continuous monitoring efforts.

Parameter		# CY 2020	# CY2021	*FY Jan 2022-March 2023	FY 2023-24
Fatalities	Employees	0	0	0	0
	Workers	2	0	2	0
Lost-Time Injury Frequency Rate (LTIFR)	Employees	0.14	0	0.19	0.38
	Workers	0.44	0.34	0.24	0.62

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\*The Company had changed its financial year end from December 31 to March 31 in FY 23 . Therefore, the figure for FY 2022-23 is for 15 months

Occupational Health Management

At all our sites, we have a system of regular health checkups of employees and workers. Most of our operations have medical care facilities in the form of hospitals/community health centres or dispensaries. A regular watch is kept on the employee health trend. The medical care facilities even cater to the needs of communities where we operate.



Safety Conclave 2024

The 3-day Safe udAAAn Conclave marked a historic moment for Adani Cement, bringing together all safety professionals for the first time. Themed around “RRR: Reboot, Recharge, Roar ... to WIN”, the event emphasized safety as a core responsibility and a key driver of business growth. The deliberations were in line of ensuring our udAAAn journey is sustainable with safety at its core.

The conclave kicked off with a high-powered inaugural session featuring Dr. Lalit Gabhane, Director General of the National Safety Council of India, and Mr. Rajesh Kumar Jha, Chief Projects Officer at Adani Cement. The event

was also attended by senior leaders from the cement business. Dr. Gabhane emphasized the growing importance of safety in the competitive world and its role in building a “Viksit Bharat” (Developed India) by 2047. Mr. Jha empowered the team to take bold steps towards achieving harm-free operations and projects, urging them to sweat to ensure zero harm at their sites. It marked a significant shift towards a stronger safety culture. It emphasized that safety is not just a departmental responsibility, rather a collective effort. Mr. Sukuru Ramarao (Chief Operating Office, Adani Cement Business) stressed upon

the importance of operational discipline as an integrated part of daily life. He emphasised zero tolerance for non-compliance and behavioral violations, urging the team to work cohesively for a safe udAAAn and continuous risk reduction. Sh Hemal Shah (Chief Digital Officer) urged the team to embrace digitalisation and explore its potential to streamline processes. He also demonstrated the power of technology by conducting a virtual visit of Ambujanagar plant using drone. The team was enthused with digital energy seeing the immense potential of embracing technology as we progress on our journey.

We also had the opportunity to hear from one of the industry veterans, Mr. Suresh Tanwar from the British Safety Council, who shared his insights on “Progressive Safety Culture”. His energetic deliberations left the team with a lot of food for thought as they progress on their safety leadership journey

The conclave culminated in a powerful drum circle event, symbolizing the unified spirit and rhythm of the team. As they created magic with their hands on the drums, the message resonated loud and clear: One Team, One Tone, One Vibration – a symphony of safety excellence.



## Customer Relationship

We prioritise cultivating robust, transparent, mutually beneficial relationships with our diverse customer bases as fundamental to achieving long-term success. Our clientele spans individual home builders, contractors, RMX manufacturers, institutions, government agencies, builders, and manufacturers of pre-cast fabricated concrete blocks and asbestos sheets. Customer relationship management is fundamental to develop long-term success of business.

We hold ourselves accountable to the highest product quality standards and endeavour to create an enriching experience for all our customers. We consistently seek to comprehend and surpass customer expectations through active engagement to achieve customer satisfaction and create a lasting positive impact. We employ various communication channels such as e-mails, customer satisfaction surveys, and grievance mechanisms to address concerns and maintain transparent dialogue. Furthermore, we prioritise data privacy, ensuring our customer interactions uphold the strictest confidentiality standards.

### Customer Relationship Management

A robust Customer Relationship Management (CRM) system is central to our customer management approach. In an ever-evolving landscape, we embrace digital applications and interfaces to gather insights from our diverse customer base. By meticulously analysing this data, we enhance our ability to engage with customers effectively and deliver unparalleled service.

Committed to continuous improvement, we tirelessly refine our products and processes to cater to our customers' evolving needs. Through advanced analytics using real-time data, we tailor our services to address distinct customer needs, delineating service offerings into various segments along the value chain. By Artificial Intelligence (AI) and Machine Learning (ML) tools, we forecast demand, optimise production, and streamline distribution. Strategic utilisation of AI and ML-based logistics platforms grants us a competitive advantage and ensures enhanced customer satisfaction.



We aim to forge enduring relationships built on trust, reliability, and mutual respect, solidifying ACC as the preferred partner for all our customers' construction needs. In ACC we have B2B and B2C businesses, however two-third of sales in FY 2023-24 was B2C.

## Customer Grievance Redressal

In our quest to elevate the customer experience, we have instituted a robust customer grievance redressal mechanism. The details of customer care (toll free number and email id) are printed on each bag of cement sold. A dedicated customer support team meticulously investigates and monitors customer concerns and grievances. Each complaint is assigned a predefined turnaround time and follows a structured escalation matrix, facilitating swift resolution. Detailed customer complaints enable a thorough root cause analysis and the implementation of corrective and preventive measures, leading to more efficient resolutions.

To enhance customer satisfaction, we have established transparent protocols and accessible channels for customers to articulate their concerns, ensuring each grievance is acknowledged, investigated and resolved to the customer's satisfaction.

## Customer Engagement

At ACC, our approach to customer engagement transcends mere transactions; it is about building meaningful connections and fostering a sense of community. Our diverse and extensive customer base comprises individual home builders, developers, institutional clients, masons, contractors, and professionals. By soliciting their input, customer feedback is incorporated into the decision-making process, empowering customers to be partners in driving positive change. To ensure a seamless purchasing experience for retail consumers, we have implemented various interventions to guide independent home builders in their construction needs effectively.

We have developed standardised communication channels to assist customers in tasks such as primary material selection and application checks, aiding their decision-making process. Our field experts provide dedicated and personalised guidance during critical construction phases, such as slab casting, facilitating the creation of structurally sound and durable buildings. In the reporting period, we provided technical guidance and supervision for slab casting at more than 7,200 customer sites.

Recognising that individual home builders (IHB) invest a significant amount of their resources to realise their vision, we acknowledge the need for timely delivery of high-quality products. To create a streamlined process, we have developed a comprehensive mobile application platform featuring multiple applications tailored to enhance sales and marketing efforts. These mobile applications help our dealers, warehouse operators, and customers track their orders and shipments in real-time. Additionally, we conducted over 4,100 customer guidance camps for IHBs, promoting visibility in the focused and micro markets. Our initiatives helped us engage with 2.5 lakh IHBs in the reporting period.

We organised the 'Mega Experiential Events for Contractors' to strengthen our relationship with the critical customer segment and expand our market presence. These events serve as a platform for honouring outstanding contractors, sharing knowledge on sustainable construction practices, and showcasing ACC's products and services. The company also uses these events to onboard new contractors into its loyalty programs.

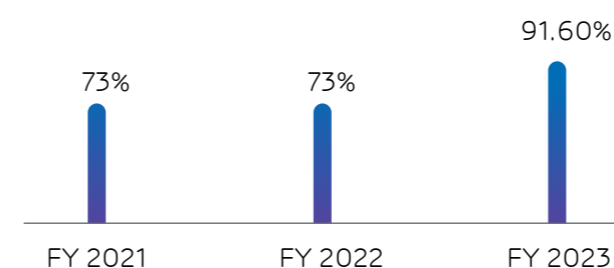
## Digital Sales Platform

We have successfully implemented a cutting-edge digital sales platform, providing a unified view of transactions across various channels, retailers, and influencers. This innovative system enables accurate demand prediction and dynamic pricing strategies, giving us a competitive edge in the market. The platform is seamlessly integrated with ACC's SAP system, ensuring real-time updates on inventory and business transactions from channel partners' accounting systems. This streamlined solution significantly enhances operational efficiency, enabling ACC to make data-driven decisions that strengthen its position in the market.

## Atoot Bandhan 2.0

In January 2023, ACC launched the Atoot Bandhan 2.0 loyalty program, designed to empower contractors in India and address their needs and recognition challenges. This initiative focuses on sustainable construction practices and offers contractors both transactional and transformational benefits. The program has achieved remarkable success within a year, with over 2.4 lakh contractors enrolled, facilitating approximately 7.7 lakh online transactions. The program has also onboarded over 47,000 dealers, with contractors contributing 24% of the total cement trade volume through the app. Additionally, the program has provided Medclaim coverage to over 24,000 contractors and their spouses, while more than 30,000 gifts have been redeemed, totalling over INR 7 crore in value. In the reporting period, we enrolled 1,96,076 new contractors in our loyalty programme.

## Customer Satisfaction Survey



In 2022, post our acquisition by Adani Group, we have changed our reporting cycle from Calendar Year (January to December) to Financial Year (April- March). Hence, the data reported for 2020 and 2021 are on calendar year cycle and for the current reporting year is in Financial Year cycle.

\* We conduct bi-annual surveys and the customer satisfaction score for FY 2022 is derived from the survey taken in FY 2021.



We are dedicated to delivering exceptional customer experiences and building lasting relationships by maintaining a strong customer satisfaction score through continuous improvement initiatives and a customer-centric approach. In FY 2023-24, we conducted a customer satisfaction survey in nine core markets of the business covering 527 customers. We conducted this survey through the internal call centre using standard questionnaire on parameters relevant to customers. Customers were asked to rate each parameter on a scale of 1 to 5 (1 being poor and 5 being excellent). The overall average customer satisfaction score is 4.5 out of 5. Out of the parameters assessed, Availability, Quality and Delivery, and services were rated high by the respondents.

## Transparent Communication

Transparency is the cornerstone of trust, and we are committed to maintaining open and honest communication with our customers. Serving both business-to-business (B2B) and business-to-customer (B2C) segments, we prioritise adherence to the mandated standards across all operations. To uphold our commitment, we provide information

to customers through labels on the health and safety impacts, sourcing of raw materials, environmental impacts of value-added products and proper method of disposal of packaging. During the year, there was no reported incident of non-compliance concerning advertising and marketing communications, information or labelling of products. Our steadfast adherence to regulations and standards highlights our dedication to transparency and accountability, enabling customers to maintain confidence in the company.

### Customer Data Privacy

Respecting and safeguarding our customers' privacy is non-negotiable. We adhere to strict data privacy regulations and best practices to ensure the confidentiality and security of customer information. Our data handling procedures are designed to minimise the risk of unauthorised access, use or disclosure of personal data, and we provide customers with the necessary controls and options regarding their personal information. During the reporting year, we did not receive any complaint on a breach of customer privacy or loss of customer data.

### Channel Finance

To strengthen our relationships with channel partners and empower their growth, we have launched a Channel Financing Facility in collaboration with three prominent banks: SBI Bank, ICICI Bank, and Yes Bank. This specialised financing solution is designed to cater to the unique needs of channel partners, offering attractive terms and flexible financing options to help them manage their working capital effectively.

The Channel Financing Facility offers several benefits to channel partners, including competitive interest rates negotiated by ACC, ensuring that financing remains highly competitive. Additionally, ICICI Bank and Yes Bank do not charge upfront fees, making it a cost-effective approach. SBI Bank's upfront and renewal fees are nominal, making it a financially viable option. The facility also provides ease of working capital management, helping channel partners meet their working capital requirements.

The financing facility also offers unsecured options from ICICI Bank and Yes Bank, which do not require mortgage or hypothecation on the company's assets, providing a hassle-free financing option. The digital application system of these banks minimizes paperwork, enabling quick approval and granting access to funds in reduced time, thereby facilitating maximized benefits in defined timelines. This streamlined process enables channel partners to focus on their business growth while leveraging the financing facility to manage their working capital effectively.

### Branding and Marketing

Our marketing strategy is designed to reinforce our brand identity through impactful and creative communication. By combining on-ground branding with digital campaigns, we effectively reach and engage with target audience, solidifying our reputation as a trusted and reliable brand.

As a pioneer in India's construction industry, we have played a significant role in shaping the country's infrastructure and daily lives for nearly nine decades. The "Bharosa Atoot" campaign showcases our commitment to building trust, going beyond its core business of cement manufacturing to emphasize our importance in shaping India's future. Focusing on this, we, aired advertisements during the ICC Cricket World Cup, reaching over 51 million viewers across 1,300 screens.

Throughout the year, we have launched targeted campaigns and initiatives to connect with our audience. During the festive season, the company promoted its brand at premium locations in Ahmedabad airport and partnered with the Pro Kabaddi League team 'Gujarat Giants' to celebrate its 87th Founder's Day. Additionally, we relaunched a trust-focused campaign in Gujarat and engaged in social media initiatives tied to significant events and festivals. These efforts demonstrate our dedication to building strong relationships with customers and stakeholders, further establishing our position as a leader in the industry.

## Bharosa Atoot Campaign: Building Trust and Reaching New Heights

case study



In a bold move to transcend our identity as a cement manufacturer, we launched the "Bharosa Atoot" campaign, positioning ourselves as a builder of trust for the country and the people. The campaign's core message revolved around the idea that ACC is not just building structures, but also building trust with the people of India. For nearly nine decades, we have been a cornerstone in India's development, leaving an indelible mark on the nation and its people.

To execute this ambitious campaign, we leveraged a multi-channel approach, streaming advertisements across 1,300+ screens in India over six weeks starting from December 1, 2023. We strategically targeted markets based on their profitability, ensuring the most optimum outcome for this thematic communication. Additionally, TV ads were aired during the ICC Cricket World Cup, accompanied by promotional elements like super saves and shorter edits. To capitalise on the high footfall at Ahmedabad airport during the ICC Cricket World Cup and festive season, we rolled out a new thematic campaign at premium display properties.

The results were impressive: 141 million views garnered through digital initiatives across 35+ cities where an outdoor campaign was launched, and 220+ display units were put up during the national campaign. The "Bharosa Atoot" campaign successfully repositioned ACC as a trusted and reliable brand, reinforcing its commitment to building trust with customers and stakeholders. This case study serves as a testament to the power of innovative marketing strategies in redefining brand identity and reaching new heights of success.



# Sustainable Supply Chain

At ACC, our business strategy is based on developing long-term beneficial partnerships with suppliers and contractors. We consistently deliver in accordance with market demand and product quality expectations whilst upholding the highest standards of integrity. Our supply chain management encompasses a systematic approach to overseeing procurement, production, logistics and distribution processes.

Currently, we have been focused on transforming our supply chain by integrating innovative technologies and AI to enable effective tracking and monitoring of the supply chain processes. This will enable us to respond to changing market dynamics and customer demand whilst ensuring a smooth flow of production and distribution.

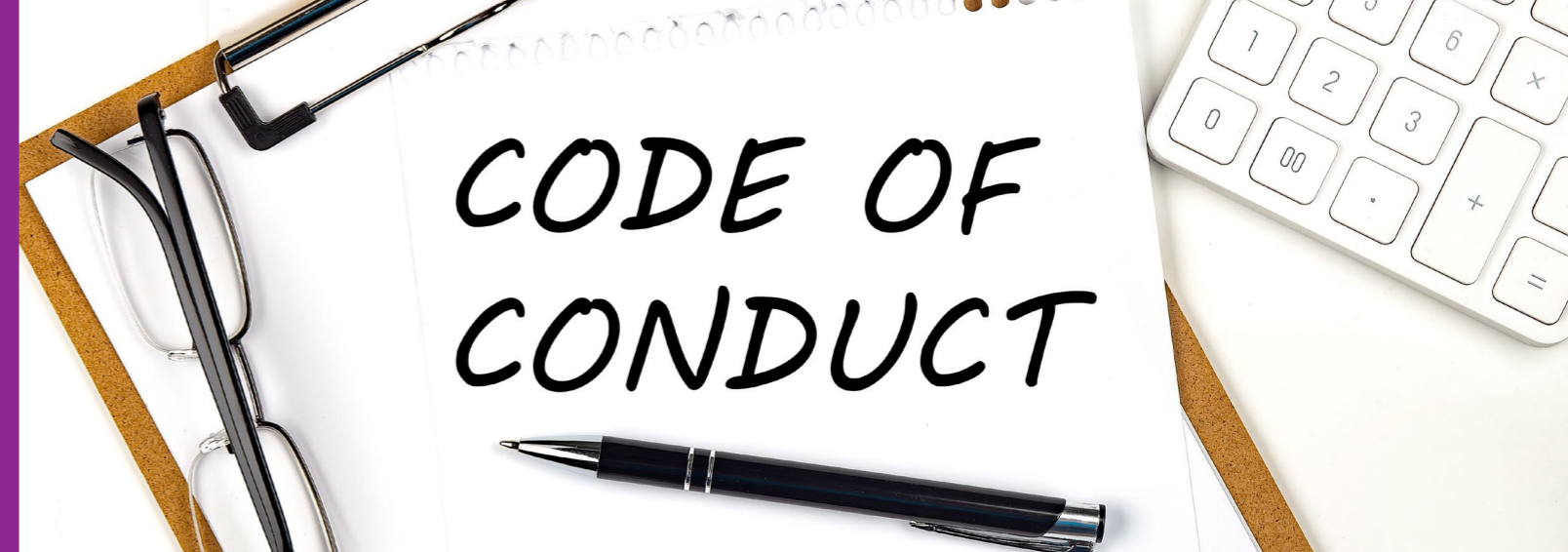


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We recognise how important it is to establish a sustainable value chain in order to ensure efficient operations supported by our business partners and contractor . As we are increasing our capacity, it's crucial to source all direct & indirect materials and services responsibly and sustainably. Our company has a well-defined Supplier Code of Conduct that helps us incorporate ESG factors into our procurement process.. As part of our sustainable sourcing efforts, the majority of our input materials are procured locally, specifically within India, and a significant portion of these materials consist of recycled waste from industrial, municipal, corporations and agricultural sources. The strategic initiatives have brought about a new era of efficiency and sustainability in our procurement practices.”



**Sanjay Kumar Gupta**  
Chief Procurement Officer



## Supplier Code of Conduct

Our [Supplier Code of Conduct](#) is the cornerstone of our supply chain philosophy, a beacon of ethical integrity and mutual respect that guides our relationships with our suppliers. The supplier code of conduct is more than a set of guidelines, it is a guiding approach for our engagements with suppliers. We require all our suppliers to adhere to stringent ethical standards, encompassing fair labour practices, conducive working conditions, environmental stewardship and human rights protection. This code ensures that our supply chain is not only efficient but also ethically sound and socially responsible. Through the code, suppliers are also informed about our compliance requirements and processes including ESG parameters.

## Supplier Screening

By carefully screening our suppliers, we ensure the integrity and sustainability of our operations from a sustainable supply chain perspective. The supplier screening involves various parameters such as supplier legal compliance, financial performance, geographical risk and ESG factors among others. Each of these, including ESG criteria are given a certain weightage and suppliers with highest scores are onboarded. The ESG related indicators are included in the Terms and

Conditions which the supplier needs to agree and sign. The ESG conditions are described in detail in the Purchase Order (PO) which the contractors as well as sub-contractors need to adhere to. Some of these conditions are:

- Abide by all environmental law
- Promote diversity
- Enhancement of skills, empowerment of women, protection of human rights and development of local community
- Reduction of pollution, preservation of biodiversity and water resource
- Supporting efforts to combat climate change
- Avoiding use of plastics
- Workforce not to include forced or bonded and child labour
- No discrimination and harassment

## Significant Suppliers

Our operations consist of several suppliers including high volume suppliers, suppliers of essential components and non-substitutable suppliers. We assess our suppliers regularly in order to mitigate any potential risks in the supply chain. We have a total of 7271 Tier I suppliers. 98.27% of the total suppliers constitute Indian suppliers and 1% constitute foreign suppliers.

Supplier Screening	FY 2023-24
Total Number of Tier 1 suppliers	7,630
Total Number of Significant Supplier in Tier 1	25
Percentage of total spend on significant suppliers in Tier 1	80%

Supplier ESG Assessment

We have devised an organisation wide supplier ESG programme incorporating various elements such as supplier assessment and supplier development programmes. The techno-commercial team and procurement team ensures implementation of the programme with oversight by Chief Procurement officer at the executive level. The procurement practices are continuously monitored to ensure adherence with the supplier Code of Conduct.

We employ a robust supplier assessment framework to screen potential and existing suppliers. This framework encompasses a range of criteria including compliance with our Supplier Code of Conduct and adherence to environmental and social standards. This rigorous vetting process ensures that our suppliers not only meet our quality and performance standards but also contribute positively to our sustainability

goals. Assessments of existing suppliers are conducted through on-site audits or self-assessment questionnaires as determined by the procurement function. The internal stakeholders (procurement and techno-commercial functions) are regularly apprised on supplier assessment and ESG parameters.

Supplier Improvement Plan and Corrective Actions

Based on the assessment, areas of improvement are identified. We engage with our suppliers to improve their sustainability performance. Corrective actions are provided for select suppliers are the progress is monitored continuously. Suppliers with improvement plans and corrective actions are supported in implementation of action plans. Actions are taken against suppliers who have not implemented/complied with the corrective actions provided. In the reporting period, action was taken against two of the suppliers who were earlier found to be non-compliant.

Supplier Assessment	FY 2023-24
Total number of supplier assessed via desk assessment/on-site assessment	71
Number of Supplier Assessed with substantial actual potential negative impacts	7
% of supplier with agreed corrective action plan	10%
Supplier terminated	1

Procurement Practice

We meticulously manage our supply chain expenditure to ensure the optimal allocation of resources. Our investments are directed towards procuring high quality raw materials, enhancing supply capabilities and implementing sustainable practices. By leveraging economies of scale and fostering strategic partnerships we achieve cost efficiencies while upholding our commitment to sustainability and ethical sourcing. We strongly believe in uplifting local suppliers and economies.

Spending on MSME and Local Suppliers

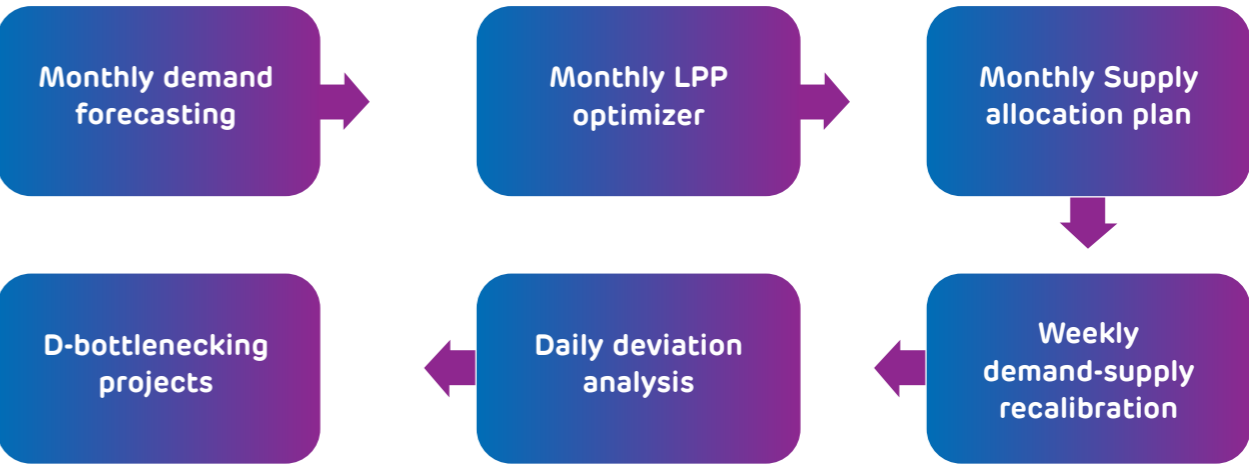
Parameter	Procurement %
Directly Sourced from MSME/ Small Producer	1.66%
Locally Sourced (Within India)	98.97%

Supply Chain Efficiency



In our endeavour to transform our supply chain, we have implemented innovative technologies and IT infrastructure to automate our logistics and optimise our extensive network of supply chains. We have deployed advanced hardware and software solutions integrated with SAP and ERP. We have additionally implemented a real-time AI-enabled tracking platform to provide us with actionable insights from track and trace data. Current efforts are focused

on enhancing GPS accuracy, reducing vehicle diversions and optimising logistics costs, achieving an impressive 95% coverage. This initiative has improved shipment distance accuracy, enhanced customer visibility and reduced freight leakages. The platform enables customers to easily track their shipments and receive estimated arrival times via our mobile app and SMS alerts.



Simultaneously, we are systematically automating implant logistics to optimise the dispatch process and reduce loading time.

We have executed a comprehensive sales and operations framework to enhance the efficiency of our supply chain operations. The framework utilises a linear programming model that incorporates daily tracking, weekly adjustments and monthly planning to manage the complexities of an extensive supply chain. Recognising the importance of gaining real-time insights into costs and availability for effective source selection, we have been developing an improved sales and operations planning model. This model features a real-

time and dynamic order allocation system that considers various factors such as order size, delivery status, total cost, inventory levels, vehicle availability, transit stop, committed delivery time and the potential for order consolidation. This approach will boost our agility, optimising our costs and service levels for a more efficient supply chain.

Modal Change in Logistics

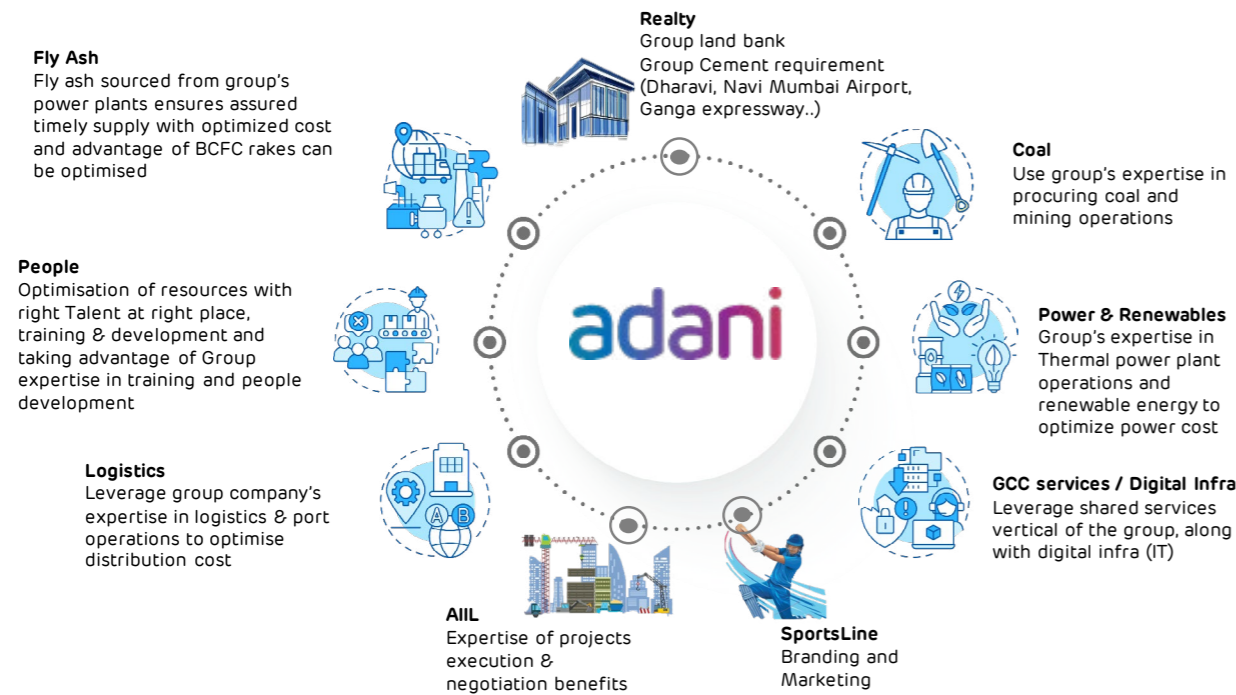
We have been focusing on shifting from roads to rail and ship logistics. Our expenditure on this modal change is already budgeted for next two years. The synergy with our port business and our own jetties will improve shifting of goods movement to sea route.

Procurement Practices

Our procurement practices are anchored around principles of transparency, fairness and sustainability. We employ a strategic sourcing approach, leveraging data analytics and market insights to identify the best suppliers and negotiate favourable terms. Our Techno-commercial team is responsible for overseeing procurement within the organisation. The

team has undergone a transformation with implementation of strategic initiatives which cover the following areas: adoption of technology, supplier relationship management, risk mitigation, cost efficiency, and process design. The synergies with group companies have added advantage in multiple terms and have been pivotal in optimising cost, reducing carbon footprint and improving stakeholder value.

Group Synergies



“



Praveen Kumar Garg  
Chief Logistics Officer

The company has effectively executed numerous strategies to optimise costs and lessen our carbon footprint. These strategies have included enhancing efficiency, refining direct dispatch operations, optimizing warehouse utilization, reducing transit lengths, and expanding the use of maritime and rail transport. Looking ahead, we are dedicated to further consolidating our logistics operations by deploying state-of-the-art EV trucks for cement & raw material movement and network optimization solutions to reduce emissions.”



## Beyond Business: Commitment to Society

### Key Highlights

**1.4 Million**

Beneficiaries till FY 2024

**₹ 37.49 Crores**

CSR Spent in FY2024

**12 States**

where CSR activities are executed

We believe that our success is intrinsically linked to the prosperity and well-being of our communities. Driven by this belief, our Corporate Social Responsibility initiatives are guided by a comprehensive policy and strategy aimed at uplifting these communities. Our Corporate Social Responsibility (CSR) policy, approved by the board provides a framework for our community programs, ensuring they are strategically aligned with the mandates of section 135 of the Companies Act, 2013 and the United Nations Sustainable Development Goals (UNSDGs).



CSR Governance

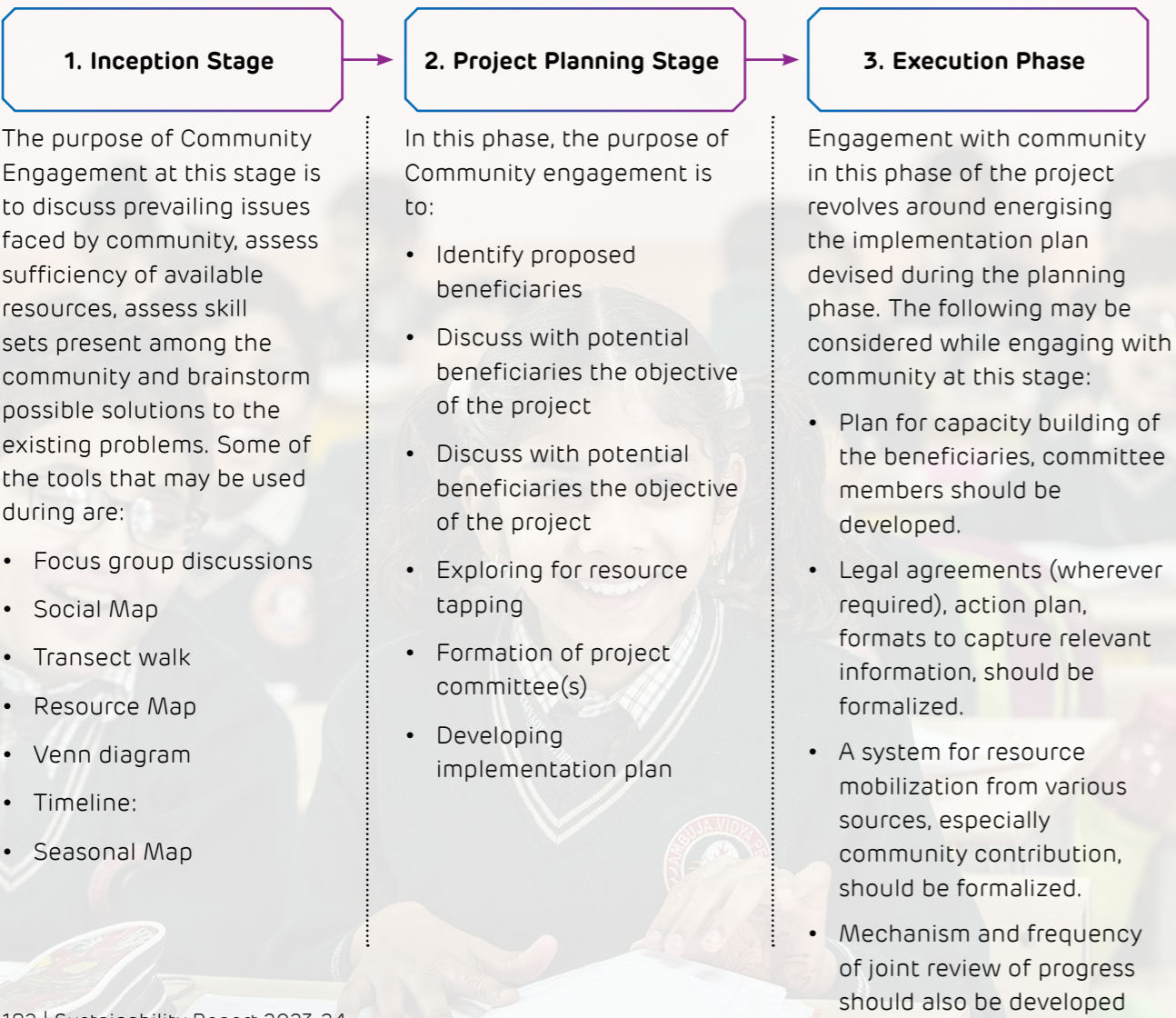
The Corporate Social Responsibility (CSR) Committee at the Board level is responsible for oversight and guidance for several activities right from the planning stage to the execution stage including continuous tracking and monitoring of the CSR programmes. The committee also oversees the annual action plan, budget allocation, and overall execution of the CSR initiatives.

CSR Contribution and Beneficiaries

During the reporting period, our total CSR spent amounted to ₹ 37.49 Crores. 0.3 million beneficiaries were added, making the total beneficiaries till date as 1.4 million.

Community Engagement During Project Life cycle

Community engagement is a continuous process though it may assume various forms at different stages during a project life cycle. Community engagement programmes are present across all our operational locations.



Community Need Assessment

To identify and implement CSR programmes around our operating units, we conduct a need assessment in the identified Thrust areas. The comprehensive need assessment is conducted by engaging with community, local community leaders and elected representatives. Based on the assessment, a Baseline Study Report is prepared. ACC Foundation believe in a bottom to top participatory approach to CSR and plays the role of a facilitator and help bridge the gap between the needs of people Post identification of CSR programmes, we implement the programmes through our foundation or an external agency.

Our CSR Thrust Areas

At ACC, we carry out our community-based programmes in alignment with our identified Thrust areas. These thrust areas are as follows:



Our CSR activities are undertaken near our manufacturing plants across India.

Community Health

We strongly believe that a healthy community forms the foundation for prosperity and development to achieve this goal we initiated various health programs including health checkups and infrastructure facilities. To improve access to healthcare facilities, we deploy Mobile Health Care Units (MHCUs) for doorstep delivery of healthcare and organising health camps and awareness sessions. The MHCUs are equipped with doctor and paramedic providing OPD services, test facilities and medicines. Through our initiatives, our aim is for every individual to lead a healthy life. Following are some of the initiatives we undertook in the current year.



Healthcare Outreach in Amethi

A large section of the Indian population lives in rural areas, where access to basic healthcare is hindered by numerous obstacles such as inadequate infrastructure, distance, and lack of awareness. To address these issues, the Uttar Pradesh government, with support from the Adani Foundation, introduced Health ATMs, particularly in the Amethi district. These touchscreen kiosks offer personal health information and comprehensive body checkups in minutes, including tests like HB analyser, pulse

oximeter, and lipid profile. We deployed two units in rural areas, which benefited about 128 patients whose pathology tests were conducted locally, thereby eliminating the need for separate visits to pathology centres.

Strengthening the Public Healthcare system

To enhance public access to advanced clinical diagnostic services, through the Adani Foundation, we facilitated the installation of a CT-scan facility at the district hospital in Anakapalli, Andhra Pradesh. This hospital, situated in an industrial town, serves 1,000-1,200 individuals daily and manages over 1,500 in-patient cases monthly, including cases related to road traffic accidents, spinal diseases, chronic abdominal conditions, and cerebrovascular accidents resulting in hemiplegia. This CT scan facility is projected to serve 25-40 patients each day, providing accurate diagnoses and significantly improving healthcare services for the community.

Education

Our organisation is deeply committed to enhancing education in the communities we serve. Through our initiatives, our goal is to foster a culture of learning and development, ensuring that education remains a key driver for social and economic progress. Some key initiatives we undertook in the current year.



• **Project Kalika Siri**

To enhance the academic performance of 10th grade students, through the Adani Foundation we collaborated with the Zila Parishad CEO and Director of Primary Education in Chikkaballapura district, Karnataka. We initiated a programme to support the slow learners in the 10th grade by providing study materials to nearly 6,800 students, reaching over 15,991 students across the entire district.

• **Coaching for competitive exams**

We strongly believe that education must be accessible to all irrespective of their socio-economic background. To support academically gifted rural students who face socio-economic obstacles in obtaining quality education we, through the Adani Foundation have established the Adani Competitive Coaching Centre (ACCC). This centre focuses on bolstering foundational knowledge and providing detailed guidance through structured classes and regular assessments. Additionally, Adani Evening Coaching Centres are located in Jamul, Kudithini, Bargarh, and Sindri benefitting a total of 257 students, in helping them transition into mainstream education.

• **Schools Supported**

To support and enhance educational development, we established 16 schools across different locations for children from host communities. With the support of the Adani Foundation, these schools benefit a total of 11,819 students. Notably, the ACC Higher Secondary School in Kymore, Madhya Pradesh, celebrated its 100th anniversary in December 2023. From its humble beginnings with just two rooms in 1923, the school has grown significantly, leaving a lasting impact on the educational landscape of the state. Many distinguished alumni of the school have gone on to become eminent personalities contributing to the nation's development.

**Sustainable Livelihood Development**

Our livelihood programmes are aimed at supporting communities around our sites through the promotion of sustainable farming practices and livelihood development through agricultural activities. Sustainable livelihood development programmes are linked to water conservation and infrastructure development for improving the overall quality of life of the communities. Following are some of the initiatives we undertook in the current financial year:

**57,620**  
Beneficiaries

**₹ 10.38 Crore**  
Funds allocated

**Livestock and Dairy Development**

• **Cattle Breed improvement**

We initiated a livestock development programme through the Adani Foundation to financially empower cattle owners through a range of technological interventions. These included the promotion of artificial insemination, preventive vaccination, and deworming to ensure the health and well-being of the cattle. Additionally, training sessions were provided on fodder cultivation, the feeding of mineral mixtures, and best practices to enhance milk production.

This initiative was implemented across six sites, encompassing 75 villages, and benefitted 10,064 households with nearly 16,000 cattle. Since April 2023, the project has achieved remarkable success in facilitating 1,065 artificial inseminations and resulting in the birth of 368 calves of improved breeds.

• **Dairy development**

The Adani Foundation is leading a dairy enterprise development initiative at two sites, Jamul and Tikaria, covering 14 villages and benefiting 95 cattle owners. As part of this program, three milk collection centres have been established, collectively averaging a daily milk collection of 450 litres. This initiative has demonstrated financial benefits, with each beneficiary earning an average annual income of ₹ 27,000.

**On-farm and Allied Livelihoods**

• **Lift irrigation**

Our lift irrigation program aims to expand cultivable land under irrigation across three sites: Lakheri, Chanda, and Chaibasa. This initiative has successfully brought approximately 610 acres of land under irrigation, benefiting 280 farmers across four

villages. By providing additional irrigated land, the program enabled farmers to cultivate multiple crops annually, resulting in increased income levels and enhanced agricultural productivity within the communities.

**Hira Prasad Sahu's Experience with Solar Lift Irrigation**

Hira Prasad Sahu, a marginal farmer from Bohardhi village in Bilaspur, struggled to sustain his family of seven due to limited income from Kharif farming. In 2023, with support from the Adani Foundation, he installed a 20 HP solar lift irrigation system that covered 55-60 acres of his land. This system ensured water availability even during the dry seasons, allowing Hira to diversify his crops to include wheat, pea, sunflower, and vegetables, thereby increasing his annual income by 30-40 thousand rupees.



• **Promotion of Climate resilient farming practices**

The Adani Foundation has introduced a innovative modular low-cost shed net model, designed to promote sustainable agriculture practices among small-scale farmers. The model is centered around community participation, where 2-3 interested farmers collaborate and contribute to erecting a shed net covering 240 square meters for vegetable farming or nursery raising. The project has successfully erected 63 shed nets across 7 locations, benefiting approximately 180 women farmers. The total area covered by the shed nets is 240 square meters, which is expected to uplift the average annual income of 50,000 from a 240 square meter area. The initiative aims to enhance income levels by adopting improved agricultural practices, which will lead to better crop quality, reduced water usage, and pest attack reduction.

**1,71,851**  
Beneficiaries

**₹ 7.56 Crore**  
Funds allocated

**Community Infrastructure Development**

We firmly believe in uplifting communities and contributing positively to the local economies. Through our initiatives, we aim to build essential infrastructure and foster economic growth.

• **Water Conservation**

Aligned with our commitment to achieving water positivity, the Adani Foundation has actively promoted water conservation within communities through a range of initiatives. These efforts included deepening ponds and constructing larger water conservation structures such as check dams. Since April 2023, the Foundation has enabled the creation of 156 small and large structures, collectively adding 460 thousand cubic meters (TCM) of water storage capacity. This initiative has facilitated the irrigation of 997 hectares of land, thereby benefiting over 6,408 individuals within the community.

## Enhancing Dhakori Village's Water Landscape

case study



In the Dhakori village of Yavatmal District, where the average rainfall is approximately 911mm, traditional irrigation methods were insufficient to support farming due to water scarcity and irregular precipitation.

To address this issue, a lift irrigation scheme was implemented. This scheme aimed to provide a reliable water supply for both drinking and irrigation purposes, particularly during non-monsoon seasons. A detailed baseline survey and stakeholder interviews, including the village Sarpanch and members of the farmers' group, laid the groundwork for the project. The community was educated on the benefits of lift irrigation, and a farmers' group was formed and registered. The lift irrigation project utilized advanced technology, including GPS surveys to determine optimal pipeline paths and protection valves for efficient water distribution. As a result, more than 100 acres of land are now irrigated, benefiting over 10 farming families. The project also serves the village community during emergencies. Farmers have been able to diversify their crops, adding gram and vegetables to their traditional crops like cotton and soybean, and are now using sprinklers to enhance productivity. This has led to significant increases in income, with some farmers earning up to 70-80 thousand rupees annually. The project has reduced water loss, minimized manpower requirements, and resolved land acquisition issues, thereby demonstrating the impactful transformation brought about by effective water management and community collaboration.

### Rural Infrastructure

#### • Roads/Village Pathways

We have implemented initiatives to support the development of roads and thus improved the accessibility to the remote villages. Since April 2023, we have constructed 3,736 meters of roads which has resulted in numerous opportunities for economic growth and development within rural communities

#### • School / AWC Infrastructure

We have focused our initiatives towards elevating the standard of education in the communities. We worked closely with government departments to strengthen

infrastructure and provided essential resources to government schools and Anganwadi centres. This collaborative effort has positively impacted 35 schools and Anganwadi centres, benefiting a total of 4,261 enrolled students

#### • Drinking Water Facilities

We have implemented several initiatives through our CSR arm Adani Foundation to ensure safe drinking water for the community. Our efforts included the installation of community water dispensing units and supported supplying water tankers during the peak summer season. Through these initiatives, we impacted 14,037 people who successfully received our assistance.

## From Scarcity to Abundance: The journey to reliable water supply

case study



Biryahi aillage, a part of Jamthal Gram Panchayat in Himachal Pradesh has been grappling with the challenges of drinking water security for its residents. The village is situated in close proximity to a mining area, which has led to a significant increase in the population from 32 families to 23 families. The existing water supply scheme, initially designed for 32 families, was no longer sufficient to cater to the growing needs of the community. The situation was further exacerbated by the inadequate supply of water by the Irrigation and Public Health Department.

In an effort to address this issue, Adani Foundation, partnered with the community to provide a reliable source of drinking water. We organised a series of meetings with the community, where we discussed the challenges faced by the residents and planned a solution. The community came together to clean the area where the pipeline would be laid, ensuring that the work could be completed effectively. We laid down a 1000-meter pipeline, which was installed with eight T points. Each T point services 2-3 families, providing them with a reliable source of drinking water. The project aimed to ensure that every household in the village had access to clean drinking water within a radius of 5-10 meters.

The impact of the project has been significant. All 23 families and approximately 150 people are now able to access clean drinking water within their immediate vicinity. The community has reported a significant improvement in their health and hygiene status, which is expected to continue as long as the water supply remains reliable. The project has also saved time and effort for the residents, who no longer have to venture out to distant sources to collect water. This development has also encouraged people to develop nutrition gardens, which will help them fulfill their household nutrition needs.

The ward member, Nirmala Devi, expressed gratitude towards Adani Foundation for addressing the long-pending demand of the community. She praised the foundation's efforts in providing clean drinking water to every household in the village, which has significantly improved their living conditions. The project's success can be attributed to the collaborative approach adopted by the Foundation and the community. The foundation recognised the importance of community involvement in the project and worked closely with them to ensure its success. The community's willingness to clean up their area before the pipeline was laid down demonstrated their commitment to making the project a success.

The project's impact on the community's well-being is expected to be long-term. The reliable source of drinking water will continue to improve their health and hygiene status, while also providing them with more time and energy to pursue other activities. The development of nutrition gardens is also expected to have a positive impact on their overall well-being.

In conclusion, the Adani Foundation's project in Village Biryahi is a testament to the importance of community-led initiatives in addressing social and environmental challenges. By working closely with the community and recognizing their needs and concerns, organisations can make a significant impact on improving living conditions and promoting sustainable development.

Skill Development

2,424

Beneficiaries

₹ 4.3 Crore

Funds allocated

In alignment with the Government of India's Skill India Mission, we launched an upskilling program for youth through the 'Adani Skill Development Centre', registered as a Section 8 Company under 'Saksham'. This initiative aims to empower Indian youth by imparting essential skills that enable them to achieve their life goals. There are certain skill development programmes designed specifically for women.

The Adani Skill Development Centre is operational at 12 sites of ACC and the programme enrolled 2,869 youths in certification programs since April 2023. Among them, 1,968 have successfully completed their training and received certificates, while 1,254 have been placed in relevant industries. The programme has facilitated an average monthly income of 12,600 for the placed students. The training covered the following sectors: construction, information technology, retail sales, apparel, healthcare, and electronics.

This initiative underscores our commitment to enhancing employability and socio-economic growth by equipping the youth with industry-relevant skills.

Anisha's journey of perseverance



Anisha, an 18-year-old girl from Lakkur, faced financial difficulties as the sole breadwinner in her family was her father, Abdul Zhabir, a contractual labourer. Despite these challenges, she completed her 12th standard and sought employment to support her family. However, finding a job with only a high school education proved difficult.

She learned about the Assistant Electrician course at the Adani Skill Development Center (ASDC) one day. With the guidance and support from ASDC counsellors, Anisha decided to enrol in this course, recognising its potential to provide her with the necessary skills for employment. During the three-month training, Anisha was diligent and learned both technical and soft skills, which bolstered her self-confidence and communication abilities. Upon completing the course, she secured an assembly line operator position at Renew Power Private Ltd., Jaipur, which manufactures solar panels. Her dedication and hard work quickly earned her a promotion to Quality Checker within just two months. Anisha now earns Rs. 13,000 per month, significantly improving her family's financial situation. She is grateful to the Adani Foundation for this life-changing opportunity and remains committed to furthering her skills and career.

Women Empowerment

Women empowerment programmes designed with a special focus on supporting women in our community. Women are encouraged to get into livelihood generation through Self Help Groups (SHGs) and Farmer Produce organisation (FPOs). A number of SHGs and FPOs are supported under our CSR activities.

Some of the activities in which SHGs are engaged are agarbatti making, dairy, bakery etc. In the reporting period, 2077 women benefitted through micro enterprises from 306 SHGs. There are specific skill development programmes also which designed especially for women to empower them to earn livelihood.

A Story of Resilience



Prema Kashyap, from Medesara village, faced significant hardships after her mother's death in 2002. As the elder daughter, she took on multiple responsibilities after her mother's death, eventually dropping out of school before her 10th examination due to the overwhelming burden and her disability. In 2013, she joined the SHG group, Sodhavana Swayam Sahayata Samuh, where she gradually built her confidence by engaging in activities such as pickle and papad making. Her involvement with the SHG group marked the beginning of a transformative journey.

In early 2022, Prema was encouraged by the Adani Foundation to join the milk collection centre started by the SHG. She received training on managing the centre and maintaining its accounts, which empowered her to take on a leadership role. Prema's efforts not only improved her socio-economic condition but also inspired other villagers to participate in the dairy project. Her resilience and determination have made her a respected figure in her community, demonstrating that physical limitations do not define one's capabilities. Prema's success story is a testament to the power of community support and self-belief in overcoming adversity. With each step forward, she has overcome her personal struggles and emerged as a beacon of hope for others.

Other Programmes

**Government Schemes facilitation**

We strongly believe in uplifting communities and our initiatives have been focussed on facilitating the adoption of various social welfare schemes among community members. Since April 2023, our efforts have facilitated 7,091 applications, resulting in the

realization of 4,422 applications. These efforts have unlocked access to benefits totalling 83 crore for the common people. This initiative underscores our commitment to enhancing the welfare and livelihoods of communities by bridging gaps and ensuring equitable access to government schemes and resources. In FY 2023-24, eligible beneficiaries were

linked to social protection schemes by the government in different states unlocking a value of ₹ 98.18 crores. In the comparison to the value unlocked, realisation is 4.07 crore i.e., money received in the beneficiary's bank account.

• **Rural BPO**

Two years ago, our CSR arm, Adani Foundation established a business process outsourcing unit in Kymore, Madhya Pradesh, aimed at fostering financial self-reliance among women and empowering them to make independent decisions. Initially launched with 19 seats, the unit has since expanded to accommodate 46 seats. This initiative has not only bolstered economic growth but also transformed societal norms by offering women equal opportunities to earn income and participate actively in household decision-making processes.

• **Sports Promotion**

Across our plant sites, we actively engage with youth in rural areas, channelling their energies positively through the promotion of various sports including football, cricket, volleyball, Kabaddi, and more. These initiatives have successfully benefited 3,150 youths across our CSR sites.

• **Adani Van -Tree Plantation Drive**

The Adani Foundation has been actively promoting tree plantations across ACC sites, aligning with the Adani Group's ambitious pledge of planting 100 million trees. Since April 2023, the Foundation has made significant progress in this endeavour, with over 52,171 saplings planted across the sites. This concerted effort has led to the transformation of 256 acres of land into lush green spaces, providing a picturesque and environmentally friendly landscape.

The planting of these saplings has not only contributed to the beautification of the surrounding areas but also has numerous environmental benefits. The trees are known to lower the ambient temperature, provide cleaner air and water, and create a natural habitat for various species. Furthermore, the initiative has also generated employment opportunities and income for local communities, thereby contributing to their socio-economic development. The successful completion of this project is a significant step towards achieving the Adani Group's goal of planting 100 million trees and leaving a lasting legacy for future generations.

**Community Grievance Redressal Mechanism**

We consider communities as an integral part of our ecosystem. We actively seek to engage with the local communities to capture any concerns or grievances of the community.

We have a systematic grievance redressal mechanism that is communicated to all our stakeholders. Clear communication channels are established for communities and other local stakeholders to communicate with the organisation. Our approach includes the deployment of a CSR in charge at each site to whom the community members may communicate to record their grievances. These grievances are recorded in a Grievance Redressal Register (GRR) maintained by the CSR in charge at the site. In cases where the grievances are recorded with the local district administration, they share it with respective BU heads at ACC which is duly recorded in the GRR.

Once the grievance is registered, the CSR in charge at the site shall regularly monitor the register and will aim to resolve the issue amicably. Apart from the grievance redressal mechanism, we regularly engage with local stakeholders to identify emerging concerns

and their feedbacks are collected on the engagement mechanisms and programmes. We encourage the community members to voice out their expectations and concerns and occupy them with skills and programmes to facilitate familiarisation and regular communication.

**Employee Volunteering Programme**

Social responsibility is one of the core values of ACC-Adani Foundation. Employees are encouraged to contribute personal time, attention and efforts towards community development and social causes. Living to our value of social responsibility, employees are involved in several community development activities. Some of the activities where employees volunteer are the following:

- Tree plantation drives
- Capacity building session for youth involved at skill development centres.
- Site civil engineers supporting site CSR team for execution of community infrastructure development work.
- Regular interaction with business leaders of the company.

A Story of Resilience

case study

Sarojamma from Budagajangama colony in Kudithini village, Karnataka, improved her family's diet and livelihood through the Adani Foundation's SHG kitchen garden program. Before joining, her family's diet lacked diversity, relying mainly on grains and seasonal vegetables. The program provided seeds and guidance to create a diverse kitchen garden, including chilli, radish, ladyfinger, beans, coriander, and tomatoes. This intervention significantly enhanced her family's food security and reduced their reliance on market-bought vegetables, demonstrating the impact of community-led agricultural initiatives.



# Pine Needle Collection for Forest Fire Prevention, Biodiversity Conservation, and Income Generation for Community at Gagal

case study

In the state of Himachal Pradesh, India, forest fires have been a recurring problem, causing significant damage to the environment, wildlife, and local communities. The main culprit behind these fires is the accumulation of pine needles, which is highly flammable and can be easily ignited by sparks or human carelessness. To address this issue, we, in collaboration with the HP Forest Department and local communities, launched a project to collect pine needles from the forest floor.

The project aimed to protect biodiversity, prevent forest fires, and generate income for local communities. The initiative involved engaging local communities in pine needle collection, which would be used as an alternative fuel source by ACC Gagal Cement Works. We paid local villagers a fixed rate of

₹ 165 per quintal for collecting pine needles, which was later increased to ₹ 200 per quintal. The economic benefit from this project not only provided a supplemental income source for the community but also motivated them to take ownership of forest protection.

The project's success was evident in the first 20 days, where the community earned ₹ 1,15,000 and around 20 women earned an average of ₹ 5,000 each. This initiative also provided employment opportunities for local youths as tractor and truck operators. Since its inception, the project has co-processed over 1000 tons of pine needles, replacing similar quantities of coal as fuel in cement kilns. This has not only reduced the risk of forest fires but also contributed to a reduction in greenhouse gases.

The project's success has also led to a reduction in poverty and improvement in livelihoods in local communities. In 2020, the project helped to reduce poverty by 15% in the project area, with over 75% of participants reporting an increase in their income.

The project's impact on biodiversity conservation is significant. By removing pine needles from the forest floor, the habitat for many species of plants and animals is protected. This also helps to reduce the risk of forest fires, which can be devastating to wildlife habitats and ecosystems. Moreover, the project's focus on community engagement and income generation has helped to reduce poverty and improve livelihoods in local communities.

The project's success has been recognised by the Forest Department, which has praised ACC Gagal's efforts in promoting sustainable forestry practices. The project's impact on reducing forest fires has also led to a reduction in the budget and staff required for fire fighting operations. The funds saved can now be allocated for afforestation and further forest improvement activities.

In conclusion, the ACC Gagal's Pine Needle Collection Project is a remarkable example of how a community-centric approach can lead to environmental sustainability and social benefits. By engaging local communities in pine needle collection and providing them with an economic benefit, the project has motivated them to take ownership of forest protection. This initiative not only contributes to biodiversity conservation but also helps to reduce greenhouse gases and promote sustainable forestry practices.



# GRI Content Index

Statement of Use		ACC Limited has reported in accordance with the GRI Standards for the period 01 April 2022 to 31 March 2023				
GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
GRI 1 Used	GRI 1: Foundation 2021					
General Disclosures						
GRI 2: General Disclosures	Disclosure 2-1 Organisational Details	24	–	–	–	–
	Disclosure 2-2 Entities included in the organization's sustainability reporting	08	–	–	–	–
	Disclosure 2-3 Reporting period, frequency and contact point	08	–	–	–	–
	Disclosure 2-4 Restatements of information	08	–	–	–	–
	Disclosure 2-5 External assurance	08	–	–	–	–
	Disclosure 2-6 Activities, value chain and other business relationships	24-31				
	Disclosure 2-7 Employees	137	–	–	–	–
	Disclosure 2-8 Workers who are not employees	137	–	–	–	–
	Disclosure 2-9 Governance structure and composition	50-53	–	–	–	–
	Disclosure 2-10 Nomination and selection of the highest governance body	53	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 2-11 Chair of the highest governance body	50	–	–	–	–
	Disclosure 2-12 Role of the highest governance body in overseeing the management of impacts	58	–	–	–	–
	Disclosure 2-13 Delegation of responsibility for managing impacts	58	–	–	–	–
	Disclosure 2-14 Role of the highest governance body in sustainability reporting	08	–	–	–	–
	Disclosure 2-15 Conflicts of interest	58	–	–	–	–
	Disclosure 2-16 Communication of critical concerns	52	–	–	–	–
	Disclosure 2-17 Collective knowledge of the highest governance body	54-55	–	–	–	–
	Disclosure 2-18 Evaluation of the performance of the highest governance body	56	–	–	–	–
	Disclosure 2-19 Remuneration policies	53	–	–	–	–
	Disclosure 2-20 Process to determine remuneration	53	–	–	–	–
	Disclosure 2-21 Annual total compensation ratio	56	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 2-22 Statement on sustainable development strategy	10-13	–	–	–	–
	Disclosure 2-23 Policy commitments	60-63	–	–	–	–
	Disclosure 2-24 Embedding policy commitments	60-63	–	–	–	–
	Disclosure 2-25 Processes to remediate negative impacts	58	–	–	–	–
	Disclosure 2-26 Mechanisms for seeking advice and raising concerns	58	–	–	–	–
	Disclosure 2-27 Compliance with laws and regulations	79	–	–	–	–
	Disclosure 2-28 Membership associations	63	–	–	–	–
	Disclosure 2-29 Approach to stakeholder engagement	38-40	–	–	–	–
	Disclosure 2-30 Collective bargaining agreements	152-154	–	–	–	–
Material Topics						
GRI 3: Material Topics 2021	3-1 Process to determine material topics	41-42	–	–	–	–
	3-2 List of material topics	43-45	–	–	–	–
Circular Economy						
GRI 306: Waste 2016	Disclosure 306-1 Waste generation and significant waste-related impacts	107	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 306-2 Management of significant waste-related impacts	107-108	–	–	–	–
	Disclosure 306-3 Waste generated	107	–	–	–	–
	Disclosure 306-4 Waste diverted from disposal	108	–	–	–	–
	Disclosure 306-5 Waste directed to disposal	108	–	–	–	–
Water Management						
GRI 303: Water and Effluents	Disclosure 303-1 Interactions with water as a shared resource	112	–	–	–	–
	Disclosure 303-2 Management of water discharge related impacts	112	–	–	–	–
	Disclosure 303-3 Water withdrawal	113	–	–	–	–
	Disclosure 303-4 Water discharge	114	–	–	–	–
	Disclosure 303-5 Water consumption	113	–	–	–	–
Climate and Energy						
GRI 3: Material Topics 2021	3-3 Management of material topics	82	–	–	–	–
GRI 302: Energy	Disclosure 302-1 Energy consumption within the organization	97	–	–	–	–
	Disclosure 302-2 Energy consumption outside of the organization	97	–	–	–	–
	Disclosure 302-3 Energy intensity	98	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 302-4 Reduction of energy consumption	98	–	–	–	–
	Disclosure 302-5 Reductions in energy requirements of products and services		–	–	Not Applicable	–
<b>GRI 305: Emissions</b>	Disclosure 305-1 Direct (Scope 1) GHG emissions	101	–	–	–	–
	Disclosure 305-2 Energy indirect (Scope 2) GHG emissions	101	–	–	–	–
	Disclosure 305-3 Other indirect (Scope 3) GHG emissions	101	–	–	–	–
	Disclosure 305-4 GHG emissions intensity	102	–	–	–	–
	Disclosure 305-5 Reduction of GHG emissions	102	–	–	–	–
<b>Biodiversity</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	122	–	–	–	–
<b>GRI 304: Biodiversity</b>	Disclosure 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	128	–	–	–	–
	Disclosure 304-2 Significant impacts of activities, products and services on biodiversity	129	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 304-3 Habitats protected or restored	132-133	–	–	–	–
	Disclosure 304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	128-129	–	–	–	–
<b>Sustainable construction</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	116	–	–	–	–
<b>Air Quality</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	99	–	–	–	–
	Disclosure 305-6 Emissions of ozone-depleting substances (ODS)	99	–	–	–	–
	Disclosure 305-7 Nitrogen oxides (NOx), Sulphur oxides (SOx), and other significant air emissions	99	–	–	–	–
<b>Occupational Health and Safety</b>						
<b>GRI 403: Occupational Health and Safety</b>	Disclosure 403-1 Occupational health and safety management system	159	–	–	–	–
	Disclosure 403-2 Hazard identification, risk assessment, and incident investigation	160	–	–	–	–
	Disclosure 403-3 Occupational health services	163	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 403-4 Worker participation, consultation, and communication on occupational health and safety	160	-	-	-	-
	Disclosure 403-5 Worker training on occupational health and safety	161	-	-	-	-
	Disclosure 403-6 Promotion of worker health	163	-	-	-	-
	Disclosure 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	160-161	-	-	-	-
	Disclosure 403-8 Workers covered by an occupational health and safety management system	159	-	-	-	-
	Disclosure 403-9 Work-related injuries	162	-	-	-	-
	Disclosure 403-10 Work-related ill health		-	-	Not Applicable	-
Human Capital Development						
GRI 3: Material Topics 2021	3-3 Management of material topics		-	-	-	-
GRI 404: Training and Development 2016	Disclosure 404-1 Average hours of training per year per employee	142-144	-	-	-	-
	Disclosure 404-2 Programs for upgrading employee skills and transition assistance programs	145	-	-	-	-

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
	Disclosure 404-3 Percentage of employees receiving regular performance and career development reviews	145	-	-	-	-
Diversity and Inclusion						
GRI 3: Material Topics 2021	3-3 Management of material topics	149-150	-	-	-	-
GRI 406: Non-Discrimination 2016	Disclosure 406-1 Incidents of discrimination and corrective actions taken	150	-	-	-	-
Community Relations						
GRI 3: Material Topics 2021	3-3 Management of material topics	180-181	-	-	-	-
GRI 413: Local communities 2016	Disclosure 413-1 Operations with local community engagement, impact assessments, and development programs	180-181	-	-	-	-
	Disclosure 413-2 Operations with significant actual and potential negative impacts on local communities	180-181	-	-	-	-
Human Rights						
GRI 3: Material Topics 2021	3-3 Management of material topics	152	-	-	-	-
GRI 405: Diversity and Equal Opportunity 2016	Disclosure 405-1 Diversity of governance bodies and employees	53	-	-	-	-
	Disclosure 405-2 Ratio of basic salary and remuneration of women to men	155	-	-	-	-

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
<b>GRI 406: Non-Discrimination 2016</b>	Disclosure 406-1 Incidents of discrimination and corrective actions taken	152-153	–	–	–	–
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>	Disclosure 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	152-153	–	–	–	–
<b>GR 408: Child Labour 2016</b>	Disclosure 408-1 Operations and suppliers at significant risk for incidents of child labour	152-153	–	–	–	–
<b>GRI 409: Forced or compulsory Labour 2016</b>	Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	152-153	–	–	–	–
<b>Customer Relationship Management</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	166-167	–	–	–	–
<b>Corporate Governance and Business Ethics</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	48-51	–	–	–	–
<b>GRI 205: Anti-corruption 2016</b>	Disclosure 205-1 Operations assessed for risks related to corruption	57	–	–	–	–
	Disclosure 205-2 Communication and training about anti-corruption policies and procedures	57-58	–	–	–	–
	Disclosure 205-3 Confirmed incidents of corruption and actions taken	57-58	–	–	–	–

GRI Standard	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement(s) Omitted)	Reason	Explanation	
<b>GRI 206: Anti-competitive Behaviour 2016</b>	Disclosure 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	57-58	–	–	–	–
<b>Cyber Security</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	72	–	–	–	–
<b>Sustainable Supply Chain</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	172-175	–	–	–	–
<b>GRI 204: Procurement Practices 2016</b>	Disclosure 204-1 Proportion of spending on local suppliers	176	–	–	–	–
<b>GRI 308: Supplier Environmental Assessment 2016</b>	Disclosure 308-1 New suppliers that were screened using environmental criteria	175-176	–	–	–	–
	Disclosure 308-2 Negative environmental impacts in the supply chain and actions	175-176	–	–	–	–
<b>GRI 414: Supplier Social Assessment 2016</b>	Disclosure 414-1 New suppliers that were screened using social criteria	175-176	–	–	–	–
	Disclosure 414-2 Negative social impacts in the supply chain and actions taken	175-176	–	–	–	–

### Alignment with UNGC Principles

Principle No.	UNGC Principle	Page Number
1	Business should support and respect the protection of internationally proclaimed human rights	152
2	Make sure that they are not complicit in human right abuses	152-154
3	Business should uphold the freedom of association and the effective recognition of the right to collective bargaining	61, 152-154
4	Elimination of all forms of forced and compulsory labour	152-154, 175
5	Effective abolition of child labour	152-154, 175
6	Elimination of discrimination in respect of employment and occupation	58, 62, 150, 154, 175
7	Business should support a precautionary approach to environmental challenge	76-95
8	Undertake initiatives to promote greater environmental responsibility x	76-95
9	Encourage the development and diffusion of environmentally friendly technologies	12, 109, 116-120
10	Business should work against corruption in all its forms including extortion and bribery	57-58, 63

### Alignment with GCCA Charter




	GCCA Principle	Page Number
Health and Safety	Apply the good safety guidelines	156-163
	Promote the sharing of good health practices	138-140
Climate Change and Energy	Develop a climate change mitigation strategy, and publish targets and processes	78-83
Social Responsibility	Publish a code of conduct incorporating the principles of internationally proclaimed human rights	57, 152
	Apply the Social Impact Assessment guidelines	41, 180-182
	Establish a systematic dialogue process with stakeholders	38-40
Environment and Nature	Apply the Environment and Nature guidelines	78-83
	Set emission targets and report publicly on progress	35, 80-82, 96-105
Circular Economy	Promote the principles of circular economy across the value chain	106-109
	Apply the guidelines developed for fuel and raw material use in cement production	106-109

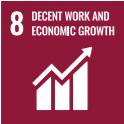
### GCCA Key Performance Parameters

Parameter	Units	Value
Total direct CO2 emissions – gross	[t CO2/yr]	15132085
Total direct CO2 emissions – net	[t CO2/yr]	14800767
Specific CO2 emissions per tonne of cementitious material – gross	kg CO2/t cementitious Material]	524
Specific CO2 emissions per tonne of cementitious material – net	kg CO2/t cementitious Material]	513
Overall coverage rate	%	100
Coverage rate of continuous measurement	%	100
Alternative Fuel Rate (kiln fuels)	%	8.06
Biomass Fuel Rate (kiln fuels)	%	1.09
Specific heat consumption for clinker production	GJ / t clinker	3.13
Clinker Factor	%	55.6
Alternative Raw Materials rate (% ARM)	%	44.01
Water consumption	KL	14,336,135.48
Amount of Water consumption per unit of product	KL / T of cement	0.49
Number of quarries	Nos.	23
Quarries where biodiversity plan / rehabilitation plan is implemented	Nos.	23
Number of fatalities for directly employed	Nos.	0
Number of fatalities for contractors/ subcontractors	Nos.	0
Number of fatalities for third parties	Nos.	0
Fatality rate for directly employed	Rate	0
LTI Frequency Rate (FR) for directly employed	Rate	0.38
LTI Frequency Rate (FR) for contractors / subcontractors (on-site)	Rate	0.62
LTI Severity Rate (SR) for directly employed	Rate	17.3

# Contribution to SDGs

Goal	Target	Target Description	Page Number
	1.5	Build the resilience of the poor and those in vulnerable situations and reduce their exposure and vulnerability to climate-related extreme events and other economic, social and environmental shocks and disasters	185
	2.3	Double the agricultural productivity and incomes of small-scale food producers, in particular women, indigenous peoples, family farmers, pastoralists and fishers.	184-185
	2.4	Ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation to climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality	57-58
	3.8	Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all	183
	4.1	Ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes	183
	4.4	Substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship	184
	5.1	End all forms of discrimination against all women and girls everywhere	189-190
	5.5	Ensure women's full and effective participation and equal opportunities for leadership at all levels of decisionmaking in political, economic and public life	189-190
	5.C	Adopt and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women and girls at all levels	189-190

Goal	Target	Target Description	Page Number
	6.1	Achieve universal and equitable access to safe and affordable drinking water for all	186-187
	6.3	Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally	114
	6.4	Substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity	114
	6.6	Protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes	114
	6.a	Expand international cooperation and capacity-building support to developing countries in waterand sanitation-related activities and programmes, including water harvesting, desalination, water efficiency, wastewater treatment, recycling and reuse technologies	113-114
	6.b	Support and strengthen the participation of local communities in improving water and sanitation management	186-187
	7.2	Increase substantially the share of renewable energy in the global energy mix	97
	7.3	Double the global rate of improvement in energy efficiency	97
	7.b	Expand infrastructure and upgrade technology for supplying modern and sustainable energy services for all	97
	8.1	Sustain per capita economic growth in accordance with national circumstances and, in particular, at least 7 per cent gross domestic product growth per annum in the least developed countries	24

Goal	Target	Target Description	Page Number
	8.2	Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high value added and labour-intensive sectors	116
	8.4	Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-Year Framework of Programmes on Sustainable Consumption and Production, with developed countries taking the lead	116
	8.5	Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value	155
	8.6	By 2020, substantially reduce the proportion of youth not in employment, education or training	188
	8.7	Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms	152
	8.8	Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment	152
	9.1	Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all	186
	9.2	Promote inclusive and sustainable industrialization and, by 2030, significantly raise industry's share of employment and gross domestic product, in line with national circumstances, and double its share in least developed countries	186
	9.4	Upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities	186

Goal	Target	Target Description	Page Number
	9.5	Enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries, in particular developing countries, including, by 2030, encouraging innovation and substantially increasing the number of research and development workers per 1 million people and public and private research and development spending	103-104
	10.2	Empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status	148-150
	10.3	Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard	148-150
	10.4	Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality	148-150
	11.6	Reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management	106
	12.2	Achieve the sustainable management and efficient use of natural resources	78
	12.4	Achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment	106
	12.5	Substantially reduce waste generation through prevention, reduction, recycling and reuse	106
	12.6	Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle	106
	12.7	Promote public procurement practices that are sustainable, in accordance with national policies and priorities	176-178

Goal	Target	Target Description	Page Number
	13.1	Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries	82-85
	13.2	Integrate climate change measures into national policies, strategies and planning	82-85
	13.3	Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	82-85
	14.1	Prevent and significantly reduce marine pollution of all kinds, in particular from land-based activities, including marine debris and nutrient pollution	114
	15.1	Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements	125
	15.2	Promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally <sup>1</sup>	125
	15.5	Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species	125
	15.9	Integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts	124-125
	16.5	Substantially reduce corruption and bribery in all their forms	57
	16.7	Ensure responsive, inclusive, participatory and representative decision-making at all levels	53
	16.8	Broaden and strengthen the participation of developing countries in the institutions of global governance <sup>1</sup>	50-55
	16.b	Promote and enforce non-discriminatory laws and policies for sustainable development	148-151

Goal	Target	Target Description	Page Number
	17.9	Enhance international support for implementing effective and targeted capacity-building in developing countries to support national plans to implement all the Sustainable Development Goals, including through NorthSouth, South-South and triangular cooperation	63-64
	17.13	Enhance global macroeconomic stability, including through policy coordination and policy coherence	82-85
	17.14	Enhance policy coherence for sustainable development	82-85
	17.16	Enhance the Global Partnership for Sustainable Development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the Sustainable Development Goals in all countries, in particular developing countries	82-85
	17.17	Encourage and promote effective public, publicprivate and civil society partnerships, building on the experience and resourcing strategies of partnerships	82-85

SASB Performance Indicators

Topics	Metric	Unit of Measure	Code	Page Numbers
Greenhouse Gas Emissions	Gross global Scope 1 emissions, percentage covered under emissions limiting regulations	Metric tonnes (t) CO2-e, Percentage (%)	EM-CM-110a.1	100-103
Air Quality	Air emissions of the following pollutants: (1) NOx (excluding N2O), (2) SOx, (3) particulate matter (PM10), (4) dioxins/furans, (5) volatile organic compounds (VOCs), (6) polycyclic aromatic hydrocarbons (PAHs) and (7) heavy metals	Metric tonnes (t)	EM-CM-120a.1	99
Energy Management	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage alternative and (4) percentage renewable	Gigajoules (GJ), Percentage (%)	EM-CM-130a.1	96-98
Water Management	(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	Thousand cubic metres (m³), Percentage (%)	EM-CM-140a.1	112-113
Waste Management	Amount of waste generated, percentage hazardous and percentage recycled	Metric tonnes (t), Percentage (%)	EM-CM-150a.1	106-109
Biodiversity Impacts	Terrestrial land area disturbed, percentage of impacted area restored	Hectares (ha), Percentage (%)	EM-CM-160a.2	122-131
Workforce Health & Safety	1) Total recordable incident rate (TRIR) and (2) near miss frequency rate (NMFR) for (a) full-time employees and (b) contract employees	Rate	EM-CM-320a.1	

Acronyms

Acronym	Expansion
AFR	Alternative Fuels and Raw Materials
AI	Artificial Intelligence
BCM	Business Continuity Management
BEE	Bureau of Energy Efficiency
BIS	Bureau of Indian Standards
BRSR	Business Responsibility and Sustainability Report
CCUS	Carbon Capture, Usage And Storage
CDP	Carbon Disclosure Project
CEO	Chief Executive Officer
CER	Certified Emission Reductions
CII	Confederation of Indian Industry
CoC	Code of Conduct
CPCB	Central Pollution Control Board
CRM	Customer Relationship Management
CSR	Corporate Social Responsibility
EBITDA	Earnings Before Interest, Taxes, Depreciation, And Amortisation
EIA	Environmental Impact Assessment
EMS	Environmental Management System
EPFS	Employees' Provident Fund Scheme
EPR	Extended Product Responsibility
EPS	Employees' Pension Scheme
ERM	Enterprise Risk Management
ESG	Environmental, Social, Governance
GCCA	Global Cement and Concrete Association
GHG	Green House Gases
GPS	Global Positioning System
GRI	Global Reporting Initiative
HIRA	Hazard Identification and Risk Assessment
ISAE	International Standard on Assurance Engagements
IT	Information Technology
IUCN	International Union for Conservation of Nature
KMP	Key Managerial Personnel
KPI	Key Performance Indicator
LTIFR	Lost Time Injury Frequency Rate
MSME	Micro, Small and Medium Enterprises
MSW	Municipal Solid Waste
MTPA	Metric Tons Per Annum
NRC	Nomination cum Remuneration Committee
O&M	Operations and Maintenance
ODS	Ozone Depleting Substance

Acronym	Expansion
<b>OHS</b>	Occupational Health and Safety
<b>OPC</b>	Ordinary Portland Cement
<b>PAT</b>	Perform, Achieve & Trade
<b>POSH</b>	Prevention of Sexual Harassment
<b>PPC</b>	Portland Pozzolana Cement
<b>PSA</b>	Particle Size Analyser
<b>PM</b>	Particulate Matter
<b>POP</b>	Persistent Organic Pollutant
<b>QA</b>	Quality Analysis
<b>QC</b>	Quality Check
<b>R&amp;D</b>	Research and Development
<b>RDF</b>	Refuse Derived Fuel
<b>RMX</b>	Ready Mix Concrete
<b>RMC</b>	Risk Management Committee
<b>RoE</b>	Return on Equity
<b>RoCE</b>	Return on average Capital Employed
<b>SASB</b>	Sustainability Accounting Standards Board
<b>SBTi</b>	Science Based Target Initiative
<b>SEBI</b>	Securities and Exchanges Board of India
<b>SHGs</b>	Self-Help Groups
<b>SIA</b>	Social Impact Assessment
<b>SMART</b>	Specific, Measurable, Achievable, Relevant and Timebound
<b>SOP</b>	Standard Operating Procedure
<b>TSR</b>	Thermal Substitution Rate
<b>TRIFR</b>	Total Recordable Injury Frequency Rate
<b>TJ</b>	Terajoule
<b>UNFCC</b>	United Nations Framework Convention on Climate
<b>UNGC</b>	United Nations Global Compact
<b>UNSDG</b>	United Nations Sustainable Development Goals
<b>VAPT</b>	Vulnerability Assessment and Penetration Testing
<b>VOC</b>	Volatile Organic Compound
<b>WBCSD</b>	World Business Council for Sustainable Development
<b>WCP</b>	Wildlife Conservation Plans
<b>WEF</b>	World Economic Forum
<b>WHR</b>	Waste Heat Recovery
<b>WMC</b>	Wellness Management Centers





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