BUSINESS RESPONSIBILITY REPORT

Section A: General Information about the Company

1. Corporate Identity Number (CIN) : L26940MH1936PLC002515
2. Name of the Company : ACC Limited
3. Registered Address : Cement House
   121, Maharshi Karve Road
   Mumbai 400 020
4. Website : www.acclimited.com
5. E-mail id : brr.info@acclimited.com
6. Financial Year reported : Financial Year ended December 31, 2018
7. Sector(s) that the Company is engaged in (industrial activity code wise):

<table>
<thead>
<tr>
<th>Group</th>
<th>Class</th>
<th>Sub class</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>239</td>
<td>2394</td>
<td>23941</td>
<td>Manufacture of Clinker and Cement</td>
</tr>
</tbody>
</table>

8. List three key products/services that the Company manufactures/provides (as in balance sheet):
The Company manufactures different varieties of cement viz. Ordinary Portland Cement (OPC), Portland Pozzolana Cement (PPC), Portland Slag Cement (PSC), Composite Cement and Ready Mix Concrete (RMX)

9. Total number of locations where business activity is undertaken by the Company:
i. Number of international locations : Nil

ii. Number of national locations : 17 cement plants, 75 Ready Mix Concrete Plants, and 27 offices including Registered Office, Regional Offices and Sales Offices

10. Markets served by the Company : Pan India across all markets.

Section B: Financial Details of the Company

1. Paid up capital (INR) : ₹ 187.79 Crore
2. Total turnover (INR) : ₹ 14,477.47 Crore
3. Total profit after taxes (INR) : ₹ 1,506.63 Crore
4. Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):
The Company’s total spending on CSR is 2.09% of the average profit after taxes in the previous three financial years.

5. List of activities in which expenditure in 4 above has been incurred:
   Livelihood
   a. ACC DISHA - for Youth Employability
   b. ACC Swawlamban - focusing on women empowerment and livelihood
   c. ACC LEISA - for Farmers’ Livelihood (Low External Input Sustainability Agriculture)
Section C: Other Details

1. **Does the Company have any Subsidiary Company / Companies?**

   Yes, the Company has 5 subsidiaries, viz:
   
   a. ACC Mineral Resources Limited
   b. Bulk Cement Corporation (India) Limited
   c. Lucky Minmat Limited
   d. National Limestone Company Private Limited
   e. Singhania Minerals Private Limited

2. **Do the Subsidiary Company / Companies participate in the BR initiatives of the parent Company? If yes, then indicate the number of such subsidiary company(s)?**

   Business Responsibility initiatives of the parent company are applied by Bulk Cement Corporation (India) Limited, the Company’s Subsidiary. While Singhania Minerals Private Limited is operational from the previous year only, the remaining three Subsidiaries are inoperative.

3. **Do any other entity / entities (e.g. suppliers, distributors etc) that the Company does business with participate in the BR initiatives of the Company? If yes then indicate the percentage of such entity / entities? [Less than 30%, 30-60%, More than 60%]**

   CSR initiative “ACC ki Laadli” under the Vidya Utkarsh project is a flagship education initiative of ACCs in Northern and Eastern India. In partnership with a NGO, this initiative has been undertaken to establish learning centres for girl children in the age groups of 6-14 years. ~1,380 girl children, especially those who have dropped out of schools and belong to the marginalized and deprived sections of the society have been enrolled in these schools and provided quality primary education. The aim is to mainstream these girls, and prepare them to take the class V exam at the State level.

   The Project receives contributions from ACC Cement Dealers in the North Region in the form of “Lakshya points” secured by them in appreciation of their achievements of business targets from ACC. The points are then redeemed as financial inputs into this project.

   The project implementation started in October 2013. So far 50 learning centres have been set up in different parts of Uttar Pradesh, Himachal Pradesh, Madhya Pradesh, Punjab, Rajasthan, Haryana, Uttarakhand and Bihar. Educating needy girls at these centres has been in progress since inception of the project.
Section D: BR Information

1. Details of Director / Directors responsible for BR:

Details of the Director / Directors responsible for implementation of the BR policy / policies:

Director Identification Number (DIN): 07419090

Name: Mr Neeraj Akhoury

Designation: Managing Director and Chief Executive Officer

Details of the BR head:

<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Particulars</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>DIN Number (if applicable)</td>
<td>NA</td>
</tr>
<tr>
<td>2</td>
<td>Name</td>
<td>Mr Ramaswami Kalidas</td>
</tr>
<tr>
<td>3</td>
<td>Designation</td>
<td>Company Secretary and Head Compliance</td>
</tr>
<tr>
<td>4</td>
<td>Telephone Number</td>
<td>(022) 3302 4321 / 3302 4255</td>
</tr>
<tr>
<td>5</td>
<td>E mail Id</td>
<td><a href="mailto:brr.info@acclimited.com">brr.info@acclimited.com</a></td>
</tr>
</tbody>
</table>

Principle-wise (as per NVGs) BR Policy / policies (Reply in Y/N):

The National Voluntary Guidelines (NVGs) on Social, Environmental and Economic Responsibilities of Business released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These are briefly as under:

P1 - Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.

P2 - Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

P3 - Businesses should promote the well-being of all employees

P4 - Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

P5 - Businesses should respect and promote human rights

P6 - Businesses should respect, protect and make efforts to restore the environment.

P7 - Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.

P8 - Businesses should support inclusive growth and equitable development

P9 - Businesses should engage with and provide value to their customers and consumers in a responsible manner.
<table>
<thead>
<tr>
<th>Sr No</th>
<th>Questions</th>
<th>Business Ethics</th>
<th>Product Responsibility</th>
<th>Well being of Employees</th>
<th>Stakeholder Engagement &amp; CSR</th>
<th>Human Rights</th>
<th>Environment</th>
<th>Public Policy</th>
<th>CSR</th>
<th>Customer Relations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Do you have a policy / policies for....</td>
<td>Y</td>
<td>Y. The policy is embedded in the Company’s quality &amp; environment policies which inter-alia relate to manufacture of safe and sustainable products</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>2</td>
<td>Has the policy been formulated in consultation with the relevant stakeholders?</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>3</td>
<td>Does the policy conform to any national / international standards? If yes, specify?</td>
<td>Y</td>
<td>Y. Bureau of Indian Standards (BIS)</td>
<td>Y</td>
<td>Y. This policy conforms to the provisions of the Companies Act, 2013. In addition, the Policy is also in conformity with the Sustainability Development Goals (SDGs). All our projects are mapped to concerned SDGs and its related targets</td>
<td>-</td>
<td>Y. This policy conforms to the MoEF guidelines of Corporate Environment Responsibility under EIA Notification, 2006</td>
<td>-</td>
<td>Y. Policy conforms to provisions of the Companies Act, 2013. In addition, the Policy is also in conformity with the Sustainability Development Goals (SDGs). All our projects are mapped to concerned SDGs and its related targets</td>
<td>-</td>
</tr>
<tr>
<td>Sr No</td>
<td>Questions</td>
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<tr>
<td></td>
<td></td>
<td>P1</td>
<td>P2</td>
<td>P3</td>
<td>P4</td>
<td>P5</td>
<td>P6</td>
<td>P7</td>
<td>P8</td>
<td>P9</td>
</tr>
<tr>
<td>4</td>
<td>Has the policy been approved by the Board? If yes, has it been signed by MD/owner/CEO/appropriate Board Director?</td>
<td>Y</td>
<td>-</td>
<td>N</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>5</td>
<td>Does the Company have a specified committee of the Board / Director / Official to oversee the implementation of the policy?</td>
<td>Y</td>
<td>Y, At Executive Committee Meetings</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>6</td>
<td>Indicate the link for the policy to be viewed online?</td>
<td>*</td>
<td>-</td>
<td>-</td>
<td>***</td>
<td>-</td>
<td>Y,**</td>
<td>-</td>
<td>***</td>
<td>-</td>
</tr>
<tr>
<td>7</td>
<td>Has the policy been formally communicated to all relevant internal and external stakeholders?</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>Sr No</td>
<td>Questions</td>
<td>Business Ethics</td>
<td>Product Responsibility</td>
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<td>Customer Relations</td>
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</tr>
<tr>
<td>8</td>
<td>Does the Company have in-house structure to implement the policy/policies?</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>9</td>
<td>Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders’ grievances related to the policy/policies?</td>
<td>Y</td>
<td>The Company has a redressal mechanism to address product related complaints through customer complaint portal</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>10</td>
<td>Has the Company carried out independent audit/evaluation of the working of this policy by an internal or external agency?</td>
<td>Y, The implementation of the policy is subject to an Independent review by the Statutory Auditors and also has an oversight mechanism from the ultimate parent Company</td>
<td>-</td>
<td>N</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
</tbody>
</table>

2a. If answer to Sr. No. 1 against any principle, is ‘No’, please explain why: (Tick up to 2 options)

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Questions</th>
<th>P1</th>
<th>P2</th>
<th>P3</th>
<th>P4</th>
<th>P5</th>
<th>P6</th>
<th>P7</th>
<th>P8</th>
<th>P9</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The Company has not understood the principles</td>
<td>--</td>
<td>--</td>
<td>--</td>
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<td>--</td>
<td>--</td>
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</tr>
<tr>
<td>2</td>
<td>The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles</td>
<td>--</td>
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</tr>
<tr>
<td>3</td>
<td>The Company does not have financial or manpower resources available for the task</td>
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<td>--</td>
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<td>--</td>
</tr>
<tr>
<td>4</td>
<td>It is planned to be done within next six months</td>
<td>--</td>
<td>--</td>
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<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>5</td>
<td>It is planned to be done within next one year</td>
<td>--</td>
<td>--</td>
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<td>--</td>
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<td>--</td>
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</tr>
<tr>
<td>6</td>
<td>Any other reason (please specify)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>The Company has a track record of pioneering achievements, sustained experience and leadership position which has benefitted the cement industry at large in initiating dialogue with Government. However, no need for a formal policy has been felt.</td>
</tr>
</tbody>
</table>

3. Governance related to BR:

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year.

3 to 6 months

Does the Company publish a BR or a Sustainability Report? What is the hyper-link for viewing this report? How frequently it is published?:

Yes, the Company publishes its Sustainability Report annually. An electronic version of the report is also uploaded on the Company’s website to serve as a web version. This report constitutes the Company’s seventh Business Responsibility Report. The hyperlink for viewing the Sustainability Report of the Company is as under:

**Section E: Principle-wise Performance**

**Principle 1: Business should conduct and govern themselves with Ethics, Transparency and Accountability.**

1. **Does the policy relating to ethics, bribery and corruption cover only the Company? Yes/No. Does it extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?**

   The Company considers Corporate Governance as an integral part of good management. The Company has a Code of Business Conduct (along with Anti-Bribery and Corruption Directive) and a vigil mechanism named EthicalView Reporting Policy that has been approved by the Board of Directors. These are applicable to all Directors and employees of the Company and all its subsidiaries, and an annual affirmation is taken from the designated employees. The Anti-Bribery and Corruption Directive and the EthicalView Reporting Policy also extend to the Company’s business partners viz. vendors/service providers/customers. The Code is available on the Company’s website at this web address http://www.acclimited.com/assets/new/pdf/ACC-Code-of-Conduct-Final-signed-18-04-2017.pdf

2. **How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.**

   The Company received 67 complaints under the EthicalView Reporting Policy, out of which 33 were resolved and the balance 34 complaints are under various stages of investigation and completion.

**Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.**

1. **List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.**

   1. **Blended cements:** The Company manufactures Blended cements viz. Portland Pozzolana Cement (PPC) and Portland Slag Cement (PSC) which are environmentally more friendly than the conventional OPC. Industrial wastes such as fly ash and slag, which are otherwise not environmental friendly are suitably used in the manufacture of PPC and PSC which result in partial replacement of virgin limestone and reduction of associated CO₂ emissions. ACC has started manufacturing environment friendly composite cements which use both slag and fly ash in 2018 in Bargarh, Jamul, Sindri, Damodar and Kudithini plants.

   2. **Co-processing services:** The Company provides waste management solutions, under the brand name of ‘Geocycle’, to waste generating industries and organizations in the country through co-processing of wastes in cement kilns. This not only ensures a safe and environmentally sustainable solution for the disposal of hazardous and non-hazardous wastes but it also results in creating environmental and social benefits such as resource conservation, reduction of Green House Gas (GHG) emissions, local employment, etc.

   3. **Green Building Centers:** “Green Building Centers” is the Company’s initiative to facilitate low-cost housing development in India, by promoting sustainable materials, building techniques and locally trained workforce. The production of green building materials is carried out in a modern production environment with main emphasis on Quality and Service. The Green Building Centers have positively impacted the climate, water and nature as well as the communities at large. The impact on the environment can be easily measured by reduction in CO₂ emission, fertile top soil conservation and utilization of waste materials.

2. **For each such product, provide the following details in respect of resource use (energy, water, raw material etc) per unit of product (optional):**

   i. **Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain**

<table>
<thead>
<tr>
<th>Consumption per unit of production</th>
<th>Current Year (January – December 2018)</th>
<th>Previous Year (January – December 2017)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electrical Energy (kWh/Tonne of Cement)</td>
<td>81.10</td>
<td>84.33</td>
</tr>
<tr>
<td>Thermal Energy (K Cal/kg of Clinker)</td>
<td>741</td>
<td>742</td>
</tr>
<tr>
<td>CO₂ Emissions (kg CO₂/Tonne of Cement)</td>
<td>505</td>
<td>525</td>
</tr>
</tbody>
</table>
ii. Reduction during usage by consumers (energy, water) has been achieved since the previous year?

The Company’s products do not have any broad based impact on energy during usage phase. However, as the cement manufacturing process is energy intensive, the Company takes several measures to reduce thermal and electrical energy consumption in its manufacturing process.

3. Does the Company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

Yes, the Company has all its manufacturing plants close to limestone mines which helps minimize transportation of the primary raw material. The Company deploys sustainable mining practices. Most bulk materials are transported inward by rail. Blended Cements are manufactured using flyash / slag which are by-products / wastes of other industries. Fly ash and slag are not environmental friendly and need to be disposed off in a careful manner. In the manufacture of clinker, the Company utilizes Alternative Fuel and Raw Materials (AFR) which help it to conserve natural resources. The Company encourages procurement through vendors who adopt sustainable practices.

4. Has the Company undertaken any steps to procure goods and services from local and small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve the capacity and capability of local and small vendors?

Yes, the Company has a policy of procuring goods and availing services like horticulture, housekeeping etc. from nearby suitable sources of supply.

5. Does the Company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste? (Separately as < 5%, 5-10%, >10%) Also, provide details thereof, in about 50 words or so.

The cement manufacturing process does not directly discharge any significant effluent or waste. ACC has the facility of consuming used and torn cement bags as Alternate Fuel in some of the manufacturing units. As the location of cement plants are far away from markets, a very low percentage of used bags get recycled at the Plants. About 85% of cement manufactured by the Company comprises blended cement which is produced using slag and fly ash which are wastes from other industrial processes. Recognizing the urgent need to address global problems of increasing paucity of fossil fuels and rampant practices of unsustainable waste disposal, the Company has pioneered the use of industrial, municipal and agricultural wastes as Alternative Fuels and Raw Materials (AFR) in India.

Principle 3: Businesses should promote the well-being of all employees

1. Please indicate total number of employees:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Category of Employees</th>
<th>No. of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Management Staff</td>
<td>3829</td>
</tr>
<tr>
<td>2.</td>
<td>Shop Floor Associates</td>
<td>2888</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>6717</td>
</tr>
</tbody>
</table>

2. Please indicate total number of employees hired on temporary/contractual/casual basis:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Category of Employees</th>
<th>No. of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Third Party FTE</td>
<td>8312</td>
</tr>
<tr>
<td>2.</td>
<td>Casual Employees</td>
<td>14</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>8326</td>
</tr>
</tbody>
</table>

3. Please indicate the number of permanent women employees:

Number of permanent women employees: 262
4. Please indicate the number of permanent employees with disabilities.

Number of permanent employees with disabilities: 15

5. Do you have an employee association that is recognized by the Management?

Yes, there are recognized trade unions which are affiliated to various central trade union bodies. Company’s Shop Floor Associates and Office Associates are members of their respective unions.

6. What percentage of permanent employees are members of this recognized employee association?

Approximately 43% of permanent employees are members of recognized employee associations.

7. Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and those pending as on the end of the financial year.

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Category</th>
<th>No of complaints filed during the financial year</th>
<th>No of complaints pending as on end of the financial year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Child labour / forced labour / involuntary labour</td>
<td>Nil</td>
<td>Nil</td>
</tr>
<tr>
<td>2</td>
<td>Sexual Harassment</td>
<td>Nil</td>
<td>Nil</td>
</tr>
<tr>
<td>3</td>
<td>Discriminatory employment</td>
<td>Nil</td>
<td>Nil</td>
</tr>
</tbody>
</table>

8. What Percentage of under mentioned employees were given safety and skill up-gradation training in the last year?

A. Permanent employees : 65%
B. Permanent women employees : 65%
C. Casual/Temporary/Contractual employees : 100%
D. Employees with disabilities : NIL

Principle 4: Businesses should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

1. Has the Company mapped its internal and external stakeholders? Yes/No

Yes, the Company has mapped its stakeholders through materiality matrix as a part of its stakeholder engagement strategy development process.

2. Out of the above, has the Company identified the disadvantaged, vulnerable and marginalized stakeholders?

Yes, the Company has identified the disadvantaged, vulnerable and marginalized stakeholders with the help of Participatory Rural Appraisal tool based on village micro plan and secondary socio-demographic data of the community.

3. Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders? If so, provide details thereof, in about 50 words or so.

Yes, all CSR interventions of the Company are intended to target the disadvantaged, vulnerable and marginalized stakeholders. For instance the education projects of Company are largely focused on government schools situated in remote rural pockets of India. The scholarship initiative of the Company named VidyaSaarathi which has been rolled out in 14 districts in 11 States of India, across the Company operations for disadvantaged students who need financial support to pursue their dreams of higher education.

The Company continues to run two Anti-Retroviral Therapy (ART) centers to support people affected by HIV/ AIDS through medical treatment and counselling. The Company has also supported patients by organizing them in Self Help Groups and through life skills development programmes and providing nutrition support to HIV infected as well as affected family members. Moreover, quality education is also being provided to school going children from the affected families.
The Company has enhanced access to healthcare for the community through health camps and mobile health clinics. The Company also jointly works with the local district administration for promoting national campaigns on Open Defecation Free, Skilling and Water Conservation measures.

The Company continues to engage with the vulnerable and marginalized stakeholders for their sustainable livelihood. Skills training to youth, low external sustainable agriculture projects for farmers, institutionalizing women SHG registered federations and achieving open defecation free villages are some of the accomplishments during the year 2018.

**Principle 5: Businesses should respect and promote human rights**

1. **Does the policy of the Company on human rights cover only the Company or extend to the Group / Joint Ventures / Suppliers / Contractors / NGOs / Others?**

   All aspects of the human rights are in-built and covered under the Code of Business Conduct as well as in various human resource practices/policies.

2. **How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the Management?**

   Nil

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

1. **Does the policy pertaining to Principle 6 cover only the Company or extends to the Group / Joint Ventures / Suppliers / Contractors / NGOs / others?**

   The Company’s Corporate Environment Policy extends to cover the Company and its subsidiaries.

2. **Does the Company have strategies / initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyper-link for webpage etc.**

   Yes, the Company is committed to reduce GHGs emissions and has identified five key levers to achieve the reduction of GHGs:
   - Clinker substitution by making Blended Cements
   - Alternative Fuel and Raw Materials (AFR);
   - Thermal and electrical energy efficiency;
   - Increased renewable energy utilization
   - Waste heat recovery (WHR) and
   - Newer technologies and renewable energy through own assets as well as Open Access

   This information is available in our webpage: [http://www.acclimited.com/sustainable/environment-and-energy](http://www.acclimited.com/sustainable/environment-and-energy)

3. **Does the Company identify and assess potential environmental risks? Y/N**

   Yes, the Company has a mechanism to identify and assess potential environmental risks at plant level as well as corporate level. Potential Environmental risks also form a part of Business Risk Management Model, where all business related risks are identified and their mitigation strategies and plans are worked upon. For details, please refer to BRM section of the Annual Report.

4. **Does the Company have any project related to Clean Development Mechanism (CDM)? If so, provide details thereof, in about 50 words or so. Also, if yes, whether any environmental compliance report is filed?**

   Yes, the Company has three registered projects under the Clean Development Mechanism (CDM) and Environmental Compliance Report (Validation & Verification Reports) have been filed and Certified Emission Reductions Reports were issued.
5. Has the Company undertaken any other initiatives on - clean technology, energy efficiency, renewable energy etc? Y/N. If yes, provide hyper-link to web page etc.

Yes, we have made significant strides in attaining energy efficiency in our cement plants/ captive power plants by following initiatives:

1. Three wind farms – one each in Maharashtra, Tamil Nadu and Rajasthan with total capacity of 19 MW
2. Solar power procurement through open access
3. Waste Heat Recovery System (WHRS) at Gagal Cement Works
5. Various energy efficiency improvement initiatives in operations

Details on the above initiatives can be seen at the link: [http://www.acclimited.com/sustainable/environment-and-energy](http://www.acclimited.com/sustainable/environment-and-energy)

6. Are the Emissions / Waste generated by the Company within the permissible limits given by CPCB / SPCC for the financial year being reported?

Yes, the emissions/waste generated by the Company were all within the permissible limits given by CPCB/SPCB.

7. Number of show cause / legal notices received from CPCB / SPCC which are pending (i.e. not resolved to satisfaction) as of end of financial year.

Few of our plants received show cause notices from CPCB / SPCB. However all notices were addressed to the satisfaction of respective regulatory authorities and no cases were pending as at the end of FY 2018.

Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

1. Is your Company a member of any trade and chambers of association? If yes, name only those major ones that your business deals with.

The Company is a Member of:

1. Confederation of Indian Industries (CII)
2. Federation of Indian Chambers of Commerce and Industry (FICCI)
3. IMC Chamber of Commerce and Industry
4. Federation of Indian Mineral Industries (FIMI)
5. National Safety Council (NSC)
6. Swiss India Chamber of Commerce.

2. Have you advocated / lobbied through above associations for the advancement or improvement of public good? Yes/No; If yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy Security, Water, Food Security, Sustainable Business Principles, Others)

Yes, the Company advocates through the above associations on the following broad areas which impact the Cement Industry:

i. Sustainable Mining Practices
ii. Co-processing of municipal & industrial hazardous & non hazardous wastes
iii. Sustainable Construction
iv. Use of recycled waste materials (construction & demolition waste) in cement and concrete
v. New environmental regulations
vi. RPO-REC regulations for cement and power plants

vii. PAT and Ecerts regulations

viii. Development of new product standards for low carbon cement and concrete products

ix. Green Buildings

x. Flyash based pre-fab building materials

xi. Manufactured Sand and aggregate from industrial waste

xii. Promotion of Concrete Roads

Principle 8: Businesses should support inclusive growth and equitable development

1. Does the Company have specified programmes / initiatives / projects in pursuit of the policy related to Principle 8? If yes details thereof.

Yes, the Company has specific programs / initiatives / projects pursuant to its CSR policy (Ref. http://www.acclimited.com/source/new/csr/CSR-Policy-finalised-after-28-Nov-2016-Board-CSR-Committee-meeting.pdf)

All sections in the host communities are engaged by the Company for developing their village micro plans through Participatory methods of planning. Individual projects are thereafter designed to address the various needs of the host communities as per the priority expressed by the communities. Conscious efforts were made to prioritize women headed, landless, small & marginal land holding families. Special drive for exclusive skilling of women and ensuring that half of the scholarships for higher education are granted to girls has been ensured. HIV+ and differently abled beneficiaries are specially tracked to be brought within the ambit of all social and business measures.

Implementation of these projects are thereafter monitored by the representatives of the villagers at all locations and course corrections measures are suggested by them, if needed. A Community Advisory Panel (CAP) has been set up to help at all stages of CSR Interventions i.e. planning of CSR projects and process monitoring. The Company has also organised third party social audit committee by taking people from different sectors to spearhead annual evaluations through rigorous field visits and secondary data analysis. The CSR project participants include the disadvantaged, vulnerable and marginalized sections of the society.

The Company has carried out CSR projects in pursuance of inclusive development, primarily focusing on:

a. Sustainable Livelihood

b. Quality of elementary Education

c. Water, Sanitation and Hygiene (WASH)

2. Are the programmes/projects undertaken through in-house team / own foundation / external NGO/ Govt. structure /any other organization?

The Company’s CSR projects are implemented through its in-house CSR Department, the ACC Trust and through engagement with other Corporates, Academic and Government Institutions.

3. Have you done any impact assessment of your initiative?

Yes, the Company has conducted impact assessments of its CSR initiatives. A third party Social Audit of 100% CSR expenses was done for the fifth year in a row.

Social Audit Committee, constituted with renowned experts from social sector and academic institutions assisted by a team of social sector professionals, has conducted the social audit of CSR work at all ACC plant sites and based on field findings on parameters of Compliance, Relevance, Effectiveness, Efficiency, Rigor of Implementation and Sustainability. Each Plant location was provided a performance score for the year 2018. As a measure of good governance practice this score was imbibed in the ACC’s Performance Management System. The social audit at ACC takes about 30 days of field assessment and reporting.
4. What is the Company’s direct contribution to community development projects – Amount in INR and details of the projects undertaken?

The Company spent an amount of ₹20.45 Crore on development projects as mentioned below:

<table>
<thead>
<tr>
<th>S. No.</th>
<th>Focus Areas</th>
<th>Expenditure (₹ in Crore)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ACC DISHA - for Youth Employability</td>
<td>3.93</td>
</tr>
<tr>
<td>2</td>
<td>ACC Swawlamban - focusing on women empowerment and livelihood</td>
<td>1.77</td>
</tr>
<tr>
<td>3</td>
<td>ACC LEISA - for Farmer’s Livelihood (Low External Input Sustainability Agriculture)</td>
<td>2.09</td>
</tr>
<tr>
<td>4</td>
<td>ACC VidyaUtkarsh (Quality of Education in Government Schools)</td>
<td>5.46</td>
</tr>
<tr>
<td>5</td>
<td>ACC VidyaSarthi (Scholarship for Students)</td>
<td>0.73</td>
</tr>
<tr>
<td>6</td>
<td>ACC Arogyam (Preventive, Promotive and Curative health care)</td>
<td>2.00</td>
</tr>
<tr>
<td>7</td>
<td>ACC SampurnaSwachhata (Towards open defecation free villages)</td>
<td>2.28</td>
</tr>
<tr>
<td>8</td>
<td>ACC SanrakshitParyavaran (Solar, Biodiversity and Soil&amp;water conservation)</td>
<td>1.17</td>
</tr>
<tr>
<td>9</td>
<td>ACC Drona (To promote rural sports and traditional Indian culture)</td>
<td>1.02</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>20.45</strong></td>
</tr>
</tbody>
</table>

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words.

Yes, all the community development initiatives of the Company are implemented through a participatory approach. The portfolio of CSR projects is drawn up from need assessments done by third parties through participatory rural appraisal method based micro plan. A Community Advisory Panel (CAP), comprising of different stakeholders from community representatives and opinion leaders of the community i.e. functional at ACC plant locations, regularly monitors the implementation of CSR initiatives and suggests measures for course corrections. The community ownership and sustainability are the criteria that are built in CSR initiatives from the beginning by creating community managed organizations. Community contribution is always a priority as it ensures continuance of the project through the self-governance model.

Community management principles are inbuilt in all the CSR projects from need assessment stage till the project graduation stage. Capacity building and institutional sustainability are integral part of all CSR projects. Stakeholder Engagement Surveys (SES) during Social Audit are conducted annually to collect written feedbacks of the community. Required modifications are carried out to ongoing initiatives and project outcomes are assessed. This helps in fostering ownership amongst local communities.

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

1. What Percentage of customer complaints / consumer cases are pending as on the end of financial year 2018?

A total of 1,096 complaints were received from customers in 2018, out of which 36 (accounting for 3.3%) were pending as of 31st December, 2018.

2. Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)

No, the Company only displays information as mandated by local laws. No additional information is being provided on the cement bags. However, we have obtained Environment Product Declaration (EPD) for all our Cement and Concrete Products. Cement EPD can be viewed at [https://www.environdec.com/Detail/?Epd=13228](https://www.environdec.com/Detail/?Epd=13228) and Concrete EPD can be viewed at [https://www.environdec.com/Detail/epd1116](https://www.environdec.com/Detail/epd1116). All our Cement Products are CII Greenpro certified. The above certifications are the first of its kind in the Indian Cement Industry.
3. **Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years and pending as on end of financial year? If so, provide details thereof, in about 50 words or so.**

The Builders Association of India (BAI) had in July 2010 filed a complaint before the Competition Commission of India (CCI) alleging anti-competitive practices on the part of major cement manufacturers including the Company, which was investigated. The CCI has thereafter passed an Order against the cement manufacturers and a penalty of ₹ 1,147.59 Crore was levied on the Company.

This Order has been challenged by the cement manufacturers including your Company before the Competition Appellate Tribunal (COMPAT), which granted the Stay subject to the Company depositing 10% of the penalty the matter has since been transferred to National Company Law Appellate Tribunal (NCLAT). Vide its judgment dated 25th July 2018, the NCLAT has dismissed the appeal of the Company. The Company has preferred an appeal before the Hon'ble Supreme Court against the above Order of NCLAT. The Hon'ble Supreme Court vide its Order dated 5th October 2018, has admitted the Company's civil appeal and ordered for continuance of the interim orders passed by NCLAT towards stay on the demand subject to continuance of the deposit of 10% of the penalty amount.

All matters before the COMPAT (including Complaint filed by the Director General (Supply & Distribution), Department of Civil Supplies, Government of Haryana) have been transferred to the NCLAT and the appeal is pending.

4. **Did your Company carry out any consumer survey / consumer satisfaction trends?**

Yes, a Customer Satisfaction Survey is carried out by the Company every year.