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: January 1, 2019 to December 31, 2019
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 &amp; Cement</td>
</tr>
</tbody>
</table>

8. List three key product/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) and 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, 90 Ready Mixed concrete Plants and 26 offices including Registered Office, Regional Offices and Sales Offices

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

SECTION B: (STANDALONE) FINANCIAL DETAILS OF THE COMPANY

1. Paid up capital (₹): ₹187.79 Crore
2. Total turnover (₹): ₹15,343.11 Crore
3. Total profit after taxes (₹): ₹1,358.91 Crore
4. Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):
The Company’s total spending on CSR is 2.10% of the average profit after taxes in the previous three (3) 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 Farmer’s Livelihood (Low External Input Sustainability Agriculture)
Education
d) ACC Vidya Utkarsh (Quality of Education in Government Schools)
e) ACC Vidya Sarthi (Scholarship for Students)

WASH (Water, Sanitation and Health)
f) ACC Arogyam (Preventive, Promotive and Curative health care)
g) ACC Sampurna Swachhata (Towards open defecation free villages)

Conservation of Environment
h) ACC Sanrakshit Paryavaran (Solar, Biodiversity and Soil & Water conservation)

Promoting Local Arts and Culture
i) ACC Drona (To promote rural sports and traditional Indian culture)

SECTION C: OTHER DETAILS

1. Does the Company have any Subsidiary Company/Companies?
Yes, the Company has five (5) subsidiaries, viz.:
- ACC Mineral Resources Limited
- Bulk Cement Corporation (India) Limited
- Lucky Minmat Limited
- National Limestone Company Private Limited
- 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 Ltd. is operational, 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 ACC’s CSR in the Northern region of India. Wherein partnering with an NGO, this initiative has been undertaken to establish learning centres for girl in the age group of 6-14 years. About 1380 girl children, especially those out of school and belonging to marginalised and deprived sections of the society are enrolled in these schools and are given quality primary education. The aim is to mainstream these girls, and preparing them to take the class V exam of the State level.

The project implementation started in October 2013 with the support from dealers in North Region. So far 50 learning centres have been set up in different blocks of Uttar Pradesh, Himachal Pradesh, Madhya Pradesh, Punjab, Rajasthan, Haryana, Uttarakhand and Bihar. Educating girls at these centres are in progress since its inception.
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:

   Name: Mr. Neeraj Akhoury
   
   Director Identification Number (DIN): 07419090
   
   Designation: Managing Director and Chief Executive Officer
   (ceased to be MD & CEO w.e.f. February 20, 2020)
   
   Name: Mr. Sridhar Balakrishnan
   
   Director Identification Number (DIN): 08699523
   
   Designation: Managing Director and Chief Executive Officer
   (appointed as MD & CEO w.e.f. February 21, 2020)

**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. Rajiv Choubey</td>
</tr>
<tr>
<td>3</td>
<td>Designation</td>
<td>Chief Legal Officer &amp; Company Secretary</td>
</tr>
<tr>
<td>4</td>
<td>Telephone Number</td>
<td>(022) 4159 3222</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 on Social, Environmental and Economic Responsibilities of Business (NVGs) released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These briefly are 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 marginalised.

**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></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Do you have a policy/policies for...</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The policy is embedded in the Company's quality &amp; environment policies which inter alia relate to safe and sustainable products</td>
<td></td>
<td></td>
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<td></td>
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</tr>
<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>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></td>
<td></td>
<td></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></td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bureau of Indian Standards (BIS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>This policy conforms to Guidelines of 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></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
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</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></td>
<td></td>
<td></td>
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<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>-</td>
<td>Y</td>
<td>-</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>Y**</td>
<td>-</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>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>8</td>
<td>Does the Company have an 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>-</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>-</td>
<td>Y</td>
<td>-</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</td>
<td>-</td>
<td>N</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
</tbody>
</table>

* [http://www.acclimited.com](http://www.acclimited.com)
# [http://www.acclimited.com](http://www.acclimited.com)
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>
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<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>
<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>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<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>
<td>--</td>
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<td>--</td>
<td>--</td>
<td>--</td>
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<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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</tr>
<tr>
<td>6</td>
<td>Any other reason (please specify)</td>
<td>--</td>
<td>--</td>
<td>--</td>
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<td>--</td>
<td>--</td>
<td>--</td>
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</tr>
</tbody>
</table>

The Company has a track record of pioneering achievements, long 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.

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, ACC Limited has been publishing its Sustainability Report annually since 2007 (https://www.acclimited.com/sustainable). This year onwards the sustainability disclosures will be a part of the Integrated Annual report.

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 vigilant 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 Company as part of JV compliance framework of the LH Group, has encouraged JV partners to adopt the best practices with respect to Ethics, Transparency and Governance. 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 117 complaints under the EthicalView Reporting Policy, out of which (60%) were resolved and the balance 46 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.

   a. Blended cements: Blended Cement is produced by blending clinker with solid wastes, fly ash and slag. This results in partial replacement of virgin limestone and reduced CO₂ emissions. ACC manufactures 3 types of blended cements i.e. Portland Pozzolana Cement (PPC), Portland Slag Cement (PSC) and Composite cements. In 2019, out of the total cement produced, 89% was blended cements.

   b. Co-processing services: For more than a decade now the Company is on the forefront of providing waste management solutions to stakeholders, communities and industries. Under a separate division called ‘Geocycle’, the Company has provided a safe and sustainable solution for usage of 4,51,263 tonnes of waste in 2019, which otherwise would have been disposed on landfills and dumpsites. Through our co-processing technology we provide a “Zero Landfill” solution, that doesn’t create any additional emission and in addition avoids the soil contamination, water and air pollution coming from landfill sites.

   Three examples of projects/services rendered to different stakeholders in different regions:

   Gagal/Himachal Pradesh (HP):

   Geocycle has made a collaboration to dispose all segregated combustible fraction (plastics) from 14 Urban Local Bodies (ULBs) in three district (Bilaspur, Mandi & Kullu) until October 2020 and shall be extended if successful, contributing to the Zero Plastic Initiative of HP Government. Since October 2019 we have co-processed 234 tonnes of plastic waste and expect to cross 1,000 tonnes in the year 2020, contributing to a Clean and Green HP.

   Jamul/Chhattisgarh:

   After years of unsuccessful trials by the steel industry, Geocycle came up with an installation to dispose Acid Tar Sludge (ATS), a material that otherwise has to be disposed in ponds which causes great harm to the environment. ATS is extremely difficult to handle in logistics and processing. The Company designed an installation to enable the feed into the kiln in Jamul and this paved the way to start co-processing ATS. The efforts are highly appreciated by the customer and also by the Chhattisgarh Environment Conservation Board (CECB), who supported both customer and Geocycle to realise this solution.

   Madukkarai/Tamil Nadu

   ACC Madukkarai signed an agreement with Thuvar Gram Panchayat, Kerala, for the disposal of segregated household waste through co-processing in our cement kiln. This was a stepping stone in gaining the trust of the Kerala Government for the disposal of waste from the state and lead to an MoU being signed between ACC Madukkarai and Clean Kerala Company (Kerala Government appointed and operated organisation for waste management) for waste disposal from various districts in Kerala. ACC
Madukkarai is now the only cement plant who is working with the Kerala Government as a partner to help them achieve their goal of Clean and Green Kerala.

c. **Green Building Centres:** This is an initiative to facilitate low-cost housing development in India, by promoting sustainable building materials, building techniques and locally trained workforce. Local entrepreneurs, set up these centres by entering into a Franchisee arrangement with ACC to make these sustainable products and services. The Green Building Centres 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 utilisation of waste materials. As of end of 2019, ACC has 93 GBCs operational on a pan India basis as of end of December 2019.

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 2019)</th>
<th>Previous Year (January – December 2018)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electrical Energy (kWh/Tonnes of Cement)</td>
<td>79.64</td>
<td>81.10</td>
</tr>
<tr>
<td>Thermal Energy (K Cal/kg of Clinker)</td>
<td>748</td>
<td>741</td>
</tr>
<tr>
<td>CO₂ Emissions (kg CO₂/Tonnes of Cement)</td>
<td>505.36</td>
<td>504.55</td>
</tr>
</tbody>
</table>

ii. **Reduction during usage by consumers (energy, water) has been achieved since the previous year?**

   There is broad based positive impact on energy and water in the products manufacturing, construction and use phase of the built environment with all our blended cements, concrete and GBC products. 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. Our ACC Gold cement with water repellent characteristics requires less water consumption during construction phase. Our concrete products like insulating concrete/thermocrete and fly ash/slag based GBC products will reduce energy intensity in the use phase of the built environment. Some of our concrete products reduces the water consumption in the construction phase of the built environment and some of our concrete products like permicreate will assist in water harvesting.

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.

   The Company seeks to engage in long-term relationships with the suppliers committed to their social responsibility, adhere to international standards such as ISO 14001 (Environment Management System) and have systems in place to comply with the local and national laws and regulations. The Company has a procedure in place for sustainable sourcing of energy, water including transportation. Almost all the inputs are sourced on a sustainable basis. The Company is increasing the usage of Alternate Fuel and Raw Materials (AFR) year on year to decrease dependency on traditional fuel i.e. coal.

   From the year 2017, Company had engaged Avetta, leading Global Consultant in Supplier Qualification, who helped the Company in qualifying High Risk- High Spend Suppliers and Contractors by screening them on the various counts related to Sustainable Procurement such as H&S, Labour, Environment and Bribery & Corruption. Training was conducted for more than 100 such suppliers. The Company prefers to engage with Avetta certified suppliers for new orders and supplier performance is evaluated based on sustainability criteria. Avetta also covers ACC’s primary road transporters operating from plants. Evaluation through Avetta encourages safe transportation, compliance (regarding alcohol, drugs, incident occurrence, first aid policy, etc.), traffic control, vehical conditioning, code of conduct inside plant, use of PPEs, fire protection, roles and responsibility etc.
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?

ACC is currently working with nearly 2300 SME and MSME vendors across all the locations. The services taken from these vendors are spread over various categories like housekeeping, painting, catering, small repair works, technicians, welders, transportation & stationary, food and vegetable suppliers. ACC has been associated with these vendors for many years. Special consideration is always provided for these vendors in terms of payment for their goods and services made on priority basis.

ACC has taken special consideration for these vendors and have been working on their overall development from the day they were associated with the Company. They are educated on various aspects like safety measures to be taken within the plant and outside of the plant; the employees of the vendors have been subjected to periodic health checks as well, that has led to the overall wellbeing of the people. The Company has always worked on overall development of these vendors and support their employees on all possible fronts viz. education & employment leading to social security. This has led to higher job creation in the local areas around the plant and the local vendors are important partners of the business of ACC. Some of the vendors have actually grown to move to other plants of ACC as well and are now established vendors of large businesses for other companies as well.

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.

Cement manufacturing process does not generate any process related waste as material collected through Air Pollution Control equipment will be used as an input material for the next process. However ancillary activities like maintenance etc., will generate some waste materials like oil soaked cotton waste, steel scrap, used oil, used filter bags, electrical waste like used bulbs, batteries and some electronic waste. Most of wastes mentioned above will be sold/disposed through authorized recyclers as stipulated in the respective regulations and the relevant returns will be filed to the respective regulatory authorities from time to time. However, sometimes at few locations, waste materials like oil soaked cotton, used oil, used filter bags etc. will also be co-processed in Kilns with due permission from regulatory authorities. Apart from this we also co-process waste materials like industrial waste as alternative fuels and raw materials in our kiln and use fly ash a waste from thermal power stations and Slag from Steel Industry as a substitution of Clinker in Cement manufacturing.

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>3844</td>
</tr>
<tr>
<td>2</td>
<td>Shop Floor Associates</td>
<td>2799</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>6643</strong></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>7378</td>
</tr>
<tr>
<td>2</td>
<td>Casual Employees</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>7378</strong></td>
</tr>
</tbody>
</table>

3. Please indicate the number of permanent women employees:

Number of permanent women employees: 266
4. Please indicate the number of permanent employees with disabilities.
Number of permanent employees with disabilities: 12

5. Do you have an employee association that is recognised by the Management?
Yes, there are recognised trade unions affiliated to various central trade union bodies. Company’s Shop Floor Associates are members of their respective unions.

6. What percentage of permanent employees is members of this recognised employee association?
Approximately 42% of permanent employees are members of recognised 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>0</td>
<td>0</td>
</tr>
<tr>
<td>2</td>
<td>Sexual Harassment</td>
<td>4</td>
<td>4*</td>
</tr>
<tr>
<td>3</td>
<td>Discriminatory employment</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

* These 4 cases were resolved as on the date of this report.

8. What Percentage of under mentioned employees were given safety and skill up-gradation training in the last year?
A. Permanent employees : 100%
B. Permanent women employees : 100%
C. Casual/Temporary/Contractual employee : 100%
D. Employees with disabilities : 100%

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

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 marginalised stakeholders?
Yes, the Company has identified the disadvantaged, vulnerable and marginalised stakeholders with the help of Participatory Rural Appraisal tool based 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 marginalised stakeholders? If so, provide details thereof, in about 50 words or so.
Yes, all CSR interventions of the Company are purposed to target the disadvantaged, vulnerable and marginalised stakeholders. For instance the education projects of the Company are largely focused on Government schools situated in remote rural pockets of India. The scholarship initiative of the Company named VidyaSaarathi that had been rolled out in 14 districts of Company operations situated in 12 states of India, targeted disadvantaged students who needed financial support to pursue their dreams of higher education.

The Company continues to run two Anti-Retroviral Therapy (ART) centres to support people affected by HIV/AIDS through medical treatment and counseling. The Company has also supported patients by organising 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 (ODF), Skilling & Water conservation measures.

The Company continues to engage with the vulnerable and marginalised stakeholders for their sustainable livelihood. Skills training to youth, farmers benefitted through Low external Sustainable Agriculture projects, institutionalising women SHG registered federations and facilitate for achieving 31 open defecation free villages are some of the accomplishment during 2019.

**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 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, pertaining to Principle 6, 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 Green House Gas (GHG) 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
   - Waste heat recovery System (WHRS)
   - Newer technologies and renewable energy through own assets as well as Open Access
   This information is available in our webpage at: [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 and Materiality analysis where all business related risks are identified and their mitigation strategies and plans are worked upon. For details, please refer to MDA Report and Integrated report 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:
   - Three wind farms – one each in Maharashtra, Tamil Nadu and Rajasthan with total capacity of 19 MW
   - Solar power procurement through open access
   - Waste Heat Recovery System (WHRS) at Gagal Cement Works
   - Waste Co-processing in cement plants.
   - Solar photovoltaic plant of 5.35 MW at Jamul Cement Works, Chhattisgarh
   - Various energy efficiency improvement initiatives in operations
   Details on the above initiatives can be found in this report at relevant sections.

6. **Are the Emissions/Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?**
   Yes, the emissions/waste generated by the Company was all within the permissible limits given by CPCB/SPCB with occasional exceedances.

7. **Number of show cause/legal notices received from CPCB/SPCB 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 2019.

**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.**
   Yes, The Company is a Member of:
   1. Cement Manufacturing Association
   2. Confederation of Indian Industries (CII)
   3. Federation of Indian Chambers of Commerce and Industry (FICCI)
   4. Federation of Indian Mineral Industries (FIMI)
   5. National Safety Council (NSC)
   6. Swiss India Chamber of Commerce
   7. Indian Merchants' Chambers
   8. Association of Business Communicators of India
   9. Global Cement and Concrete Association (GCCA) India.

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 actively works with above associations and advocate in the following broad areas which impact the Cement Industry:
1. Sustainable Mining Practices
2. Extended Producers Responsibility and safe management of plastic waste
3. New environmental regulations
4. Co-processing of municipal & industrial hazardous & non-hazardous wastes
5. Use of recycled waste materials (construction & demolition waste) in cement and concrete
6. Manufactured Sand and aggregate from industrial waste
7. RPO-REC regulations for cement and power plants, PAT regulations
10. Environment Product Declaration and Green pro-label of Products
11. Green Buildings
12. Fly ash based pre-fab building materials
13. 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 the specific programmes/initiatives/projects in pursuance of its CSR policy (Ref. [https://www.acclimited.com/assets/new/new_pdf/ACC-CSR-Policy-sd-by-MD-CEO-Neeraj-Akhoury.pdf](https://www.acclimited.com/assets/new/new_pdf/ACC-CSR-Policy-sd-by-MD-CEO-Neeraj-Akhoury.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 prioritising women headed, landless and small & marginal land holding families. Special drive for exclusive skilling of women and ensuring half of the scholarship of higher education goes to girls has been ensured. HIV+ and differently able beneficiaries are specially tracked within all social and business measures.

   Implementations 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 also organised third party social audit committee by taking people from different sector to spear head annual evaluations through rigorous field visit and secondary data analysis. The CSR project participants include the disadvantaged, vulnerable and marginalised sections of the society.

   The Company 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/Government structure/any other organisation?**

   The Company’s CSR projects are implemented through in-house CSR Department, ACC Trust, 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 through third party at its 9 plant locations.

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 ₹25.07 Crore on development projects as mentioned below:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Focus Areas</th>
<th>Expenditure (₹ Crore)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ACC DISHA - for Youth Employability</td>
<td>4.50</td>
</tr>
<tr>
<td>2</td>
<td>ACC Swavlamban - focusing on women empowerment and livelihood</td>
<td>1.81</td>
</tr>
<tr>
<td>3</td>
<td>ACC LEISA - for Farmer’s Livelihood (Low External Input Sustainability Agriculture)</td>
<td>4.02</td>
</tr>
<tr>
<td>4</td>
<td>ACC Vidya Utkarsh (Quality of Education in Government Schools)</td>
<td>5.09</td>
</tr>
<tr>
<td>5</td>
<td>ACC Vidya Sarthi (Scholarship for Students)</td>
<td>0.68</td>
</tr>
<tr>
<td>6</td>
<td>ACC Arogyam (Preventive, Promotive and Curative health care)</td>
<td>2.73</td>
</tr>
<tr>
<td>7</td>
<td>ACC Sampurna Swachhata (Towards open defecation free villages)</td>
<td>2.71</td>
</tr>
<tr>
<td>8</td>
<td>ACC Sanrakshit Paryavaran (Solar, Biodiversity and Soil &amp; Water conservation)</td>
<td>1.57</td>
</tr>
<tr>
<td>9</td>
<td>ACC Drona (To promote rural sports and traditional Indian culture)</td>
<td>0.76</td>
</tr>
<tr>
<td>10</td>
<td>Overhead</td>
<td>1.20</td>
</tr>
</tbody>
</table>

   **Total** 25.07

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 participatory approach. The portfolio of CSR projects are drawn 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 start by creating community managed organisations. Community contribution is always a priority as that ensures continuance of the project through self governance model.

   Community management principles are inbuilt in all the CSR projects from need assessment stage to project graduation stage. Capacity building and institutional sustainability are integral part of all CSR projects.

**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 2019?**
   A total of 576 complaints were received from customers in 2019, out of which 14 (accounting for 2.4%) were pending as of December 31, 2019.

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 on [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 behaviour 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 was challenged by the Company including other cement companies before the Competition Appellate Tribunal (COMPAT) [now National Company Law Appellate Tribunal (NCLAT)], which granted the Stay subject to the Company depositing 10% of the penalty. Vide its judgement dated July 25, 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 & Judgment of NCLAT. The Hon’ble Supreme Court vide its Order dated October 5, 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?

The Company carries out consumer survey and satisfaction survey from time to time based on commercial needs.