Introduction and Engagement
ACC Limited (hereafter ‘ACC’ or ‘the Company’) engaged TUV India Private Limited (TUVI) to conduct the independent Non-Financial assurance of Integrated Report (hereafter ‘the Report’), which includes “Type 2, Moderate Level” of ACC Sustainability information for the applied reporting period, 1st January to 31st December 2021. Remote verification was conducted in February 2022 for the Chanda plant Maharashtra, Damodar Grinding Plant, West Bengal and ACC Limited, Head Office, Mumbai including the RMX business, together with a desk review carried out for all other ACC sites within the reporting boundary.

Scope, Boundary and Limitations of Assurance
The scope of the Sustainability assurance includes following

- Verification of the application of the Report content, and principles as mentioned in the Global Reporting Initiative (GRI) Standards, and the quality of information presented in the Report over the reporting period;
- Review of the policies, initiatives, practices and performance described in the Report;
- Review of the non-financial disclosures made in the Report against the requirements of the GRI Standards
- Verification of the reliability of the GRI Standards Disclosure on environmental and social topics
- Specified information was selected based on the materiality determination and needs to be meaningful to the intended users;
- Confirmation of the fulfilment of the GRI Standards, in accordance with the “Comprehensive” option;

The reporting boundary is based on the internal and external materiality assessment. The reporting aspect boundaries are set out in the Report covering the sustainability performance of the ACC encompassing 11 Integrated Cement Plants and 6 Grinding Units and 80 Ready Mix Concrete (RMX) plants. Our engagement did not include an assessment of the adequacy or the effectiveness of ACC’s strategy or management of sustainability related issues. During the assurance process, TUVI did not come across the limitations to the scope of the agreed assurance engagement. No external stakeholders were interviewed as a part of the Sustainability Verification.

Verification Methodology
The Report was evaluated against the following criteria:

- Adherence to the principles of Stakeholder inclusiveness, Materiality, Responsiveness, Completeness, Neutrality, Relevance, Sustainability context, Accuracy, Reliability, Comparability, Clarity and Timeliness; as prescribed in the GRI Standards and AA1000AS Version 3 along with AA1000 AP (2018);
- Application of the principles and requirements of the GRI Standards, in accordance with the “Comprehensive” option;

During the assurance engagement, TUVI adopted a risk-based approach, concentrating on verification efforts on the issues of high material relevance to ACC business and its stakeholders. TUVI has verified the statements and claims made in the Report and assessed the robustness of the underlying data management system, information flows and controls. In doing so:

- TUVI reviewed the approach adopted by ACC for the stakeholder engagement and materiality determination process. TUVI performed the interviews of internal stakeholder engagement to verify the qualitative statements made in the Report;
- TUVI verified the Sustainability-related statements and claims made in the Report and assessed the robustness of the data management system, information flow and controls;
- TUVI examined and reviewed the documents, data and other information made available by ACC Limited for the reported disclosures including the disclosure on Management Approach and performance disclosures;
- TUVI conducted interviews with key representatives including data owners and decision-makers from different functions of the ACC during the remote assessments;
- TUVI performed sample-based reviews of the mechanisms for implementing the sustainability related policies, as described in ACC Report;
- TUVI verified sample-based checks of the processes for generating, gathering and managing the quantitative data and qualitative information included in the Report for the reporting period.
Opportunities for Improvement

The following is an extract from the observations and opportunities for improvement reported to the management of ACC and are considered in drawing our conclusions on the Report; however, they are generally consistent with the Management’s objectives. Opportunities are as follows:

- Disposal method at recycler end can be tracked to improve the traceability of waste diversion;
- Monitoring of treated water can be strengthening by installation of flow meters
- The existing supplier assessment manual can be calibrated with the contemporary best practices example ISO 20400
- ACC can, further increase waste related disclosures by adopting the GRI disclosure requirements following the GRI 306 - 2020 requirements

Conclusions

In our opinion, based on the scope of this assurance engagement, the disclosures on Sustainability performance reported in the Report along with the referenced information provides a fair representation of the material topics, related strategies, and performance disclosures, and meets the general content and quality requirements of the GRI Standards Comprehensive option.

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the GRI Standards reporting requirements for in accordance with the “Comprehensive” option. ACC refers to general disclosure to report contextual information about ACC while the Management Approach is discussed to report the management approach for each material topic.

Universal Standard: ACC followed GRI 101: Reporting Principles for defining report content and quality, GRI 102: General Disclosures were followed when reporting information about an Organization’s profile, strategy, ethics and integrity, governance, stakeholder engagement practices, and reporting process. Furthermore, GRI 103 was selected for Management’s Approach on reporting information about how an organization manages a material topic. TU VI is of the opinion that the reported specific disclosures for each material topic generally meet the GRI Standards reporting requirements in accordance with the “Comprehensive” option.

Topic Specific Standard: 200 series (Economic topics), 300 series (Environmental topics) and 400 series (Social topics); These Topic-specific Standards were used to report information on the organization’s impacts related to environmental and social topics. TU VI is of the opinion that the reported specific disclosures for each material topic generally meet the GRI Standards reporting requirements in accordance with the “Comprehensive” option.

On the basis of the procedures we have performed, nothing has come to our attention that causes us to believe that the information subject to the Type 2 moderate level assurance engagement was not prepared, in all material topics, in accordance with the “Comprehensive” option. Sustainability reporting guidelines, or that the Sustainability information is not reliable in all material respects, with regards to the reporting criteria.

ACC procedures on the prospective information, such as targets, expectations and ambitions, disclosed in the Sustainability Information are at discretion of organization. This assurance statement has been prepared in accordance with the terms of our engagement. Type 2 moderate level assurance engagement with respect to sustainability related data involves performing procedures to obtain evidence about the sustainability information. TU VI has evaluated below requirements in context of GRI Standards along with assurance of the scope 1, 2, 3, GHG emission of ACC.

Evaluation of the adherence to AA1000 AccountAbility Principles

Inclusivity: Stakeholder identification and engagement is carried out by ACC on a periodic basis to bring out key stakeholder concerns as material topics of significant stakeholders. In our view, the Report meets the requirements.

Materiality: The materiality assessment process has been freshly conducted in the current year based on the requirement of GRI standards, considering the topics that are internal and external to the ACC range of businesses. The Report fairly brings out the aspects and topics and its respective boundaries of the diverse operations of ACC. In our view, the Report meets the requirements.

Responsiveness: TU VI believes that the responses to the material aspects are fairly articulated in the report, i.e. disclosures on ACC policies and management systems including governance. In our view, the Report meets the requirements.
Impact: ACC communicates its sustainability performance through regular, transparent internal and external reporting throughout the year, aligned with Holcim Guidelines, GRI, WBCSD Cement Protocol, GCCA and CDP as part of its policy framework that include Environmental Policy, Sustainability Policy, Climate Change Mitigation Policy, Corporate Social Responsibility Policy etc. ACC reports on sustainability performance to Board of Directors, who oversees and monitors the implementation and performance of objectives, as well as progress against goals and targets for addressing sustainability related issues. ACC has established non-financial KPIs aligning with Holcim targets, CDP, GCCA and WBCSD. ACC completed the process of establishing contemporary goals and targets against which performance will be monitored and disclosed periodically.

TUVI expressly disclaims any liability or co-responsibility for any decision a person or entity would make based on this Assurance Statement. The intended users of this assurance statement are the management of ACC. The management of the ACC is responsible for the information provided in the Report as well as the process of collecting, analyzing and reporting the information presented in web-based and printed Reports, including website maintenance and its integrity. TUVI’s responsibility regarding this verification is in accordance with the agreed scope of work which includes non-financial quantitative and qualitative information (Sustainability Performance) disclosed by ACC in the Report. This assurance engagement is based on the assumption that the data and the information provided to TUVI by ACC are complete and true.

TUV’s Competence and Independence
TUVI is an independent, neutral, third-party providing Sustainability services, with qualified environmental and social assurance specialists. TUVI states its independence and impartiality with regard to this assurance engagement. In the reporting year, TUVI did not work with ACC on any engagement that could compromise the independence or impartiality of our findings, conclusions and recommendations. TUVI was not involved in the preparation of any content or data included in the Report, with the exception of this Assurance Statement. TUVI maintains complete impartiality toward any people interviewed during the assurance engagement.

For and on behalf of TUV India Private Limited

Manojkumar Borekar
Project Manager and Reviewer
Head – Sustainability Assurance Service

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Place: Mumbai, India
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