SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate Identification 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, 2021 to December 31, 2021
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 and 23942</td>
<td>Manufacture of clinker and 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 Pozollana 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, 78 Ready Mixed Concrete Plants and 26 offices, including Registered Office, Regional Offices and Sales Office

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

SECTION B: FINANCIAL DETAILS OF THE COMPANY (STANDALONE)

1. Paid up capital (INR) : ₹187.79 Crore
2. Total turnover (INR) : ₹15,814.40 Crore
3. Total profit after taxes (INR) : ₹1,820.27 Crore

4. Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)
The Company’s total spending on CSR is 2.03% 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
   Sustainable Livelihood
   a) ACC DISHA: for youth employability
   b) ACC Swavlamban: focusing on women empowerment and livelihood
   c) ACC LEISA: for farmer’s livelihood – Low External Input for Sustainable Agriculture (LEISA)

   Education
   d) ACC Vidya Utkarsh: improving quality of education in government schools
   e) ACC Vidya Saarathi: student scholarships

   Water, Sanitation, Health & Hygiene (WASH)
   f) ACC Arogyam: preventive, promotive and curative healthcare
   g) ACC Sampoorna Swachhata: promoting personal hygiene, open defecation free environment and safe disposal of waste.
Conservation of Environment
h) ACC Sanrakshit Paryavaran: solar, biodiversity and soil & water conservation

Promoting Sports, 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?
The Company has four (4) subsidiaries:
   • ACC Mineral Resources Limited
   • Bulk Cement Corporation (India) Limited
   • Lucky Minmat 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 have been adopted by Bulk Cement Corporation (India) Limited. While Singhania Minerals Private Limited is operational, the remaining two (2) 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%]
Business associates of the Company have helped the Company in reaching people to continue relief work for people affected by COVID-19 pandemic.

SECTION D: BUSINESS RESPONSIBILITY 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): 08699523
   Name: Mr Sridhar Balakrishnan
   Designation: Managing Director and Chief Executive Officer

Details of the BR head

<table>
<thead>
<tr>
<th>Sl. No.</th>
<th>Particulars</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>DIN Number (if applicable)</td>
<td>08699523</td>
</tr>
<tr>
<td>2.</td>
<td>Name</td>
<td>Mr Sridhar Balakrishnan</td>
</tr>
<tr>
<td>3.</td>
<td>Designation</td>
<td>Managing Director and Chief Executive Officer</td>
</tr>
<tr>
<td>4.</td>
<td>Telephone Number</td>
<td>(022) 4159 3321</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 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>Sl. No.</th>
<th>Questions</th>
<th>Business ethics</th>
<th>Product responsibility</th>
<th>Well-being of employees</th>
<th>Stakeholder engagement and 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</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></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</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
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<tr>
<td></td>
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<td></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</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>-</td>
</tr>
<tr>
<td>Sl. No.</td>
<td>Questions</td>
<td>Business ethics</td>
<td>Product responsibility</td>
<td>Well-being of employees</td>
<td>Stakeholder engagement and CSR</td>
<td>Human rights</td>
<td>Environment</td>
<td>Public policy</td>
<td>CSR</td>
<td>Customer relations</td>
</tr>
<tr>
<td>--------</td>
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</tr>
<tr>
<td>6</td>
<td>Indicate the link for the policy to be viewed online?</td>
<td>-</td>
<td>Y</td>
<td>**</td>
<td>***</td>
<td>-</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>Y</td>
<td>-</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>Y</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>The Company has a redressal mechanism to address product related complaints i.e. customer complaint portal</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
<td>Y</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>The implementation of the policy is subject to an Independent Audit by the Statutory Auditors and also has an oversight mechanism from the Parent Company</td>
<td>-</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>-</td>
<td>Y</td>
</tr>
</tbody>
</table>

* www.acclimited.com
3. Governance related to BR

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO assess the business responsibility 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 Sustainability Report? What is the hyper-link for viewing this report? How frequently it is published?

Yes, the Company has been publishing its Sustainability Report annually since 2007 (www.acclimited.com/sustainable). Since the financial year ended December 2019, the sustainability disclosures became a part of the Integrated Annual Report and can be accessed at www.acclimited.com/investor-relations/financial-annual-results.

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 responsible management. The Company has a Code of Business Conduct (along with Anti-Bribery and Corruption Directive) and a vigilant mechanism named as EthicalView Reporting Policy (‘EVRP’) 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, including vendors/service providers/customers. The Company as part of JV compliance framework of the Holcim Group, has encouraged JV partners to adopt the best practices with respect to ethics, transparency and governance.


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 128 complaints under the EthicalView Reporting Policy, of which 88 complaints were addressed and the balance 40 complaints are under various stages of investigation and completion. The update on EthicalView is presented to the Audit Committee, who in turn briefs to the Board.
Principle 2: Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.

1. List up to three (3) of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.
   i. Blended cements: Cements, where clinker, an intermediate product, is partially replaced by and blended with industrial wastes like fly ash and slag are called blended cements. Such replacement results in saving natural limestone as well as reduce CO₂ emissions. ACC manufactures three (3) types of blended cements i.e. Portland Pozzolana Cement (PPC), Portland Slag Cement (PSC) and Composite Cements. In 2021, out of the total cement produced, ~90% was blended cements.

   ii. 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 the brand name of ‘Geocycle’, the Company has provided a safe and sustainable solution for safe disposal of 0.8 Million Tonnes of waste in 2021, which otherwise would have been disposed of in landfills and dumpsites. Through the co-processing technology, the Company provides a ‘Zero Landfill’ solution that doesn’t create any additional emission and in addition avoids soil contamination, water and air pollution coming from landfill sites, recovering energy and minerals from the waste materials.

   Two (2) examples examples of projects/services rendered to different stakeholders in different regions
   • Plastic Free Himalayas (Gagal)
     With growing tourism in the Himalayas especially in the famous hill stations like Shimla, Kangra and Kullu and Manali and the increased use of packaged food and beverages in these tourist destinations, the beautiful mountains are becoming dumping yards of plastic wastes. It is very difficult to establish public private partnership models for collection and transportation of plastic waste in these small districts.

     Geocycle through its end to end plastic waste management services through Extended Producer Responsibility (EPR) was able to support Himachal Pradesh Government in cleaning up the state. Geocycle established a mechanism for collection, transportation and co-processing of single use plastics in ACC’s cement plant at Gagal. Through this initiative, Geocycle has cleaned up various districts in Himachal Pradesh namely Shimla, Bilaspur, Hamirpur, Kangra, Baddi and helped the beautiful state come a step closer to becoming plastic free.

   • Leave Behind No Waste (#LbnW)
     ACC had partnered with the Board of Control for Cricket in India (BCCI) to take on the onus of collecting and managing waste, during the T20 series held in November 2021. ACC has encapsulated the entire idea through led by a digital film titled ‘Leave behind No Waste’ depicting the brand teaming up with its waste management arm, Geocycle to collect and co-process all the plastic waste which is left behind in the cricket stadium. The voice in the film has been lent by the renowned veteran actor and voice-over artist, Piyush Mishra.

     In the film, the cricket term of getting ‘OUT’ is used in juxtaposition with the plastic waste that does not get OUT easily from the environment. The brand then takes charge to throw out the single-use plastic from the stadium to be re-purposed and safely managed in its cement kiln. A challenging game environment has been created between ACC and plastic waste, where the former succeeds in stimulating a greener and smarter environment.

   • Supporting Clean Bhopal Mission (Kymore)
     The city of Bhopal generates approximately 800 tonnes per day of municipal solid waste and it is expected that the generation will go up to 2,000 tonnes per day by 2035. Bhopal is one of the top 10 cities in the Swachh Survekshan 2021. Bhopal has taken many steps to manage its municipal solid waste effectively.

     ACC is helping the city of Bhopal manage its municipal solid waste by safely co-processing the segregated combustible waste generated from the municipal solid waste safely at its cement plant in Kymore, Katni. With this initiative, ACC supports the city’s endeavour to become cleanest city in India by moving thousands of tonnes of wastes away from dumps and landfills; thereby cleaning the environment and improving the lives of millions of people.

   iii. ACC ECOPact (The Green Concrete): ACC ECOPact is an IGBC certified green product and a Low CO₂ concrete with 30% minimum reduction in embodied carbon, designed for sustainable construction needs. CO₂ reduction ranges from 30% to 100%. This is one
Cementing Relationships through Sustainability, Innovation and Inclusivity

The Company seeks to engage in long-term relationships with the suppliers. It adheres to international standards such as ISO 14001 (Environment Management System) and ensures compliance to the local and national laws and regulations. The Company has a procedure in place for sustainable sourcing of energy, water and transportation. It is also increasing the usage of Alternate Fuel and Raw Materials (AFR) year-on-year to decrease dependency on traditional fuel, i.e. coal.

The Company has engaged Avetta, a leading global consultant in Supplier Qualification. As a result, it has qualified contractors into various counts related to sustainable procurement such as Health and Safety (H&S), Labour, Environment, Bribery and Corruption. The Company prefers to engage with Avetta certified suppliers and supplier performance is ascertained on a periodic basis. Avetta also covers the Company’s primary road transporters operating from plants. Evaluation through Avetta encourages safe transportation in line with the Company’s goal of ZERO HARM.

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?

The Company is currently working with ~2,100 Small and Medium-sized Enterprise (SME) and Micro, Small & Medium Enterprise (MSME) vendors across the country. The services taken from these vendors fall into categories like housekeeping, painting, catering, small repair works, technicians, welders, transportation and stationery, food and vegetable suppliers. Special consideration is always provided for these vendors in line with the Company’s goal of ZERO HARM.

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 topsoil conservation and utilisation of waste materials. ACC has 94 GBCs operational on a PAN-India basis as at the end of December, 2021.

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 2021)</th>
<th>Previous year (January – December 2020)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electrical Energy (kWh/ Tonnes of cement)</td>
<td>78.55</td>
<td>80.65</td>
</tr>
<tr>
<td>Thermal Energy (K Cal/ kg of clinker)</td>
<td>743</td>
<td>742</td>
</tr>
<tr>
<td>CO₂ Emissions (kg CO₂/ Tonnes of cementitious material)</td>
<td>488</td>
<td>493</td>
</tr>
</tbody>
</table>

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

While the Company does not collect information from the customers on energy and water, it manufactures many sustainable products which help the customers in reducing energy and water consumption during the use/ construction phase. The Company’s ACC Gold cement with water repellent property requires a comparatively lower water for curing post construction phase, which helps to conserve water. The Company’s product such as Insulocrete is a thermal insulating concrete which helps maintain inner temperatures of buildings thereby reducing cooling/heating costs during the use phase of buildings. Some of the Company’s concrete products like permacrete is a pervious concrete which allows easy percolation of water through it into the soil below, hence recharging ground water and avoiding wastage through storm water runoffs. The Company’s concrete products like insulating concrete/ thermocrete and fly ash/ slag based Green Building Centre products will reduce energy intensity in the use phase of the built environment.
terms payment for their goods and services made on priority. The vendors are trained on various aspects like safety inside and outside the plant. The employees of vendors also undergo periodic health checks. The Company has always worked on overall development of these vendors and support their employees in areas like education, employment etc. Some of these vendors have expanded their operations to other locations of the Company as well and indeed other corporate and social entities in the country.

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 wastes. However, there are ancillary activities like maintenance, housekeeping etc. that generate waste materials like oil-soaked cotton waste, steel scrap, used oil, used filter bags, electrical waste like used bulbs, batteries and others. Sometimes wastes like oil-soaked cotton, used oil, used filter bags are co-processed in the kilns (where the Company has permissions), remaining quantum of these waste and other wastes like electrical, electronic waste and steel scrap are sold to the authorised recyclers. For hazardous waste, the relevant returns are filed to the respective regulatory authorities from time to time. Apart from this, the Company also co-processes waste materials generated by other industries or municipalities (segregated municipal waste) and its kiln. In the year 2021, the Company has co-processed 0.51 Million Tonnes of waste materials in its cement kilns. It uses flyash, a waste from thermal power stations and slag, a waste from the steel industry as a substitution to coal/pet coke 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>Sl. No.</th>
<th>Category of Employees</th>
<th>Number of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Management staff</td>
<td>3,647</td>
</tr>
<tr>
<td>2.</td>
<td>Shop floor associates</td>
<td>2,435</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>6,082</strong></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Sl. No.</th>
<th>Category of Employees</th>
<th>Number of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Third-party Full-time Employees</td>
<td>6,940</td>
</tr>
<tr>
<td>2.</td>
<td>Casual employees</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>6,940</strong></td>
</tr>
</tbody>
</table>

3. Please indicate the number of permanent women employees

Number of permanent women employees: 247

4. Please indicate the number of permanent employees with disabilities

Number of permanent employees with disabilities: 13

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. The Company’s shop floor associates are members of their respective unions.

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

Approximately 40% 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>Sl. No.</th>
<th>Category</th>
<th>Number of complaints filed during the financial year</th>
<th>Number 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>0</td>
<td>0</td>
</tr>
<tr>
<td>3.</td>
<td>Discriminatory employment</td>
<td>0</td>
<td>0</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 : 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 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 Company’s education projects are largely focused on government schools situated in remote rural pockets of India. The scholarship initiative of the Company named Vidya Saarathi targeted disadvantaged students who needed financial support to pursue their dreams of higher education.

   The Company continues to run an Anti-Retroviral Therapy (ART) centre to support people affected by HIV/AIDS through medical treatment and counseling.

   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 supporting national missions on Skills development and 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 input for Sustainable Agriculture projects, institutionalising women SHG into registered federations and supporting vulnerable community during COVID-19 pandemic are some of the accomplishment during the year 2021.

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/ Non-Governmental Organisations (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. The Company has a separate policy on Human Rights as well.

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.
   Climate change is among the most pressing issues facing humanity, with all nations being urged to meet the goals of UN SDG 13 Climate Action. As a leading building materials Company, the Company is committed to meeting the rising demands for sustainable cities, while conforming to a low-carbon circular economy. While ACC has already validated its Science Based Targets initiative (SBTi) in 2021 and committed to Net Zero pledge, the Company focuses on following levers for reduction of CO₂ Emissions:
   • 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
   • Exploring futuristic technologies like Carbon Capture, Utilisation and Storage

   This information is available in the Company’s webpage: https://www.acclimited.com/sustainable/climate-and-energy
3. Does the Company identify and assess potential environmental risks? Y/N
Yes, the Company has a process to identify and assess potential environmental risks at plant level as well as corporate level. Potential environmental risks also form a part of Enterprise 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 the Business Risks and Opportunities 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 (3) registered projects under the Clean Development Mechanism (CDM) and Environmental Compliance Report (Validation and Verification Reports) have been filed and Certified Emission Reductions Reports were issued. Due to the prevailing market mechanisms of CDM, the Company has not pursued this mechanism during 2021 and has not filed any environmental compliance report (validation and verification reports).

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, the Company has made significant strides in attaining energy efficiency in its cement plants/captive power plants by following initiatives:
• Three wind farms – one (1) 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 pre-processing and co-processing in cement plants
• Solar photovoltaic plant of 5.35 MW at Jamul Cement Works, Chhattisgarh and 380 KW Solar PV at Kymore mines
• Various energy efficiency improvement initiatives in operations
Details on the above initiatives can be seen at the link: https://www.acclimited.com/sustainable/climate-and-energy

6. Are the emissions/ waste generated by the Company within the permissible limits given by Central Pollution Control Board (CPCB)/ State Pollution Control Board (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 the Company’s plants received notices from the SPCB. However, all notices were addressed accordingly by the end of the year 2021.

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 (CMA)
2. Confederation of Indian Industries (CII)
3. Federation of Indian Chambers of Commerce and Industry (FICCI)
4. National Safety Council (NSC)
5. Swiss India Chamber of Commerce (SICC)
6. Global Cement and Concrete Association India (GCCA)
7. Indian Merchant Chamber (IMC)
8. Bombay Chamber of Commerce and Industry (BCCI)
9. Indian Green Buildings Council (IGBC)

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 and industrial hazardous and non-hazardous wastes
5. Use of recycled waste materials (construction and 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
8. Green energy status for WHRS
10. Environment product declaration and green pro-label of products
11. Green buildings
12. Flyash-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 specific programmes/initiatives/projects in pursuance of its CSR policy (Reference: [https://acclimited.com/assets/new/new_pdf/CSR-Policy.pdf](https://acclimited.com/assets/new/new_pdf/CSR-Policy.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 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 and 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 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 education
   c) Water, Sanitation, Health 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?**

   After conducting social audit of CSR projects for five (5) consecutive years, the Company has decided to do it every alternate year to provide enough room for necessary actions on ground. Impact assessment is on-going.

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 ₹35.95 Crore on development projects as mentioned below:

<table>
<thead>
<tr>
<th>Sl. 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>3.47</td>
</tr>
<tr>
<td>2.</td>
<td>ACC Swavlamban: focusing on women empowerment and livelihood</td>
<td>2.27</td>
</tr>
<tr>
<td>3.</td>
<td>ACC LEISA: for farmer’s livelihood – Low External Input for Sustainable Agriculture (LEISA)</td>
<td>4.56</td>
</tr>
<tr>
<td>4.</td>
<td>ACC Vidya Utkarsh: quality of education in government schools</td>
<td>4.49</td>
</tr>
<tr>
<td>5.</td>
<td>ACC Vidya Saarathi: student scholarships</td>
<td>1.81</td>
</tr>
<tr>
<td>6.</td>
<td>ACC Arogyam: preventive, promote and curative healthcare</td>
<td>12.19</td>
</tr>
<tr>
<td>7.</td>
<td>ACC Sampoorna Swachhata: towards open defecation free villages</td>
<td>3.10</td>
</tr>
<tr>
<td>8.</td>
<td>ACC Sanrakshit Paryavaran: solar, biodiversity and soil and water conservation</td>
<td>1.41</td>
</tr>
<tr>
<td>9.</td>
<td>ACC Drona: to promote rural sports and traditional Indian culture</td>
<td>0.95</td>
</tr>
<tr>
<td>10.</td>
<td>Impact Assessment</td>
<td>0.14</td>
</tr>
<tr>
<td>11.</td>
<td>Overheads</td>
<td>1.56</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>35.95</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 participatory approach. The portfolio of CSR projects is drawn from need assessments done by third parties through participatory rural appraisal method based micro plan. A Community Advisory Panel (CAP), comprising 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
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 2021?**
   A total of 4,189 complaints were received from different stakeholders (consumers, channel partners, contractors and engineers) in 2021, out of which 155 (accounting for 3.7%) were pending as on December 31, 2021.

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. The Company follows the guidelines shared by the respective authorities.

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.**
   a) The Builders Association of India (BAI) had filed a complaint in July 2010 before the Competition Commission of India (CCI) alleging anti-competitive behaviour on the part of major cement manufacturers including the Company. The CCI investigated the matter and post which an order was passed against the cement manufacturers and a penalty of ₹1,147.59 Crore was levied on the Company. The CCI order was challenged by the Company before the National Company Law Tribunal (NCLAT), who vide its judgement dated July 25, 2018, dismissed the appeal of the Company. The Company preferred an appeal before the Hon’ble Supreme Court of India against the NCLAT Order/ judgement. 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 same interim orders passed by NCLAT towards stay on the demand subject to continuance of deposit of 10% of the penalty amount.
   b) On a complaint filed by the Director General (Supply & Distribution), Department of Civil Supplies, Government of Haryana, CCI registered a case of alleged anti-competitive behaviour (allegations of bid rigging) against cement companies including the Company. The CCI vide order dated January 19, 2017 imposed a penalty of ₹35.32 Crore. The Company has filed an appeal in NCLAT against the above order and the appeal is pending before NCLAT.
   c) On complaints received from BAI and other persons, the CCI vide order dated July 1, 2019 has ordered an investigation against the cement companies and has asked the office of Director General (DG) to submit its report. The Company received the intimation for the first time in December 2020 and has duly furnished the information as sought by the office of the DG CCI and no order has been passed.

4. **Did the Company carry out any consumer survey/consumer satisfaction trends?**
   Multiple surveys were carried out for contractors and IHBs to understand market trends and customer feedback.