Gujarat Fluorochemicals Limited

RESPONSIBLE MARKETING 2019-20

Responsible Marketing

We understand that marketing activities and customer expectations are dynamic. Traditionally, profit maximization has been the primary objective of marketing activities and product price, quality and delivery were the customer expectations. However, as part of our overall sustainability strategy, we have adopted a much broader and more inclusive approach in our marketing activities.

We recognize that in all stages of the product life cycle – from design stage, to product use and final disposal, there is an impact on the society and the environment. Therefore, hawse have adopted Responsible Marketing as a framework for all our sales and marketing activities, thereby creating value not only for the Company and its customers, but also have a larger positive impact on the social and environmental aspects beyond our boundaries of operation.

Business Context, Customer Issues and Responsible Marketing Policy Framework

We operate in a unique business context:

1. Products are technology-driven based on advanced Fluorine Chemistry
2. Our products are sold in a highly competitive market
3. Our products are regulated
4. Most of the market is in high-end industry and in developed markets and economies
5. Our products are environmentally sensitive

In the above context, we address the following issues through Responsible Marketing

- Pricing issues
- Product issues
- Promotion issues
- Distribution issues

For the customers and other stakeholders of the Marketing function, we have identified the material issues across the complete product life cycle and addresses them through the various Responsible Marketing actions.

Product

- Product Safety
- Eco-efficient production
- Product Stewardship
- Effective Material Use
- Reduced Packaging

Information

- Authentic Information
- Truthful Product description
- Labelling
- Use and Disposal Protocol
- Regulatory Protocol

Service

- Technical Support
- Compliant Resolution
- Product Development
- Product information

Storage

- Product Safety
- Social compliance-Labour ethics

Distribution

- Product Handling
- Product Safety
- Spillage Control
- Social Ethics

End Use

- Reuse-Recycle
- Disposal Protocol
- End use treatment

Over the years, we have witnessed an increase in our customer base and have entered into new countries:

Year	Number of Customers -Domestic Region	Number of Customers - US Region	Number of Customers - European Region
2016-2017	351	96	109
2017-2018	326	102	256
2018-2019	400	123	233

GFCL and Responsible Marketing

We have adopted a Responsible Marketing Policy to ensure that consumer, social and environmental issues associated with marketing function are addressed in a responsible manner. The Policy covers various aspects such as:

- Fair Marketing Practices: Anti–Trust and Anti–Competitive Practices
- Product safety and customer health and safety
- Dispute resolution and redressal
- Essential Services
- Data and Privacy Protection

Our Responsible Marketing policy is based on the following International Standards and Resolutions:

1. United Nations Guideline for Consumer Protection
2. UNGC
3. ISO 26000 Standards
4. ICC Advertising and Marketing Communication Code

The following actions have been taken to ensure effective implementation of the Responsible Marketing Policy:

1. Training of Employees of the Sales and Marketing Team: All employees have been extensively trained on Responsible Marketing Policy and they have also given a declaration of adherence to the same. The trainings cover aspects of Anti-Trust and Anti-Competitive Behaviour, Fair Business Practices, Product Communication protocol and authenticity, etc.

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2. All our Sales and Marketing Team members are required to mandatorily sign the declaration of acceptance and adherence to the Responsible Marketing Policy after completion of the training.

3. The Responsible Marketing Policy has been communicated to all our customers and it has also been publicly disclosed on the GFCL website.

4. A systematic audit has been conducted to assess risk associated with the Implementation of Responsible Marketing.

Region	Domestic	Europe	Americas
% of employees given training on Responsible Marketing	100	100	100
% of employees who have signed Responsible Marketing Policy acceptance	95	100	100

Anti-Competitive, Anti-Trust and Monopoly Practices

Our Responsible Marketing Policy covers the Company's philosophy on the matter on Anti-Competitive and Anti-Trust practices. We are committed to engaging in fair and vigorous competition, in compliance with all anti-trust and competition laws and regulations globally. Because the anti-trust and competition laws vary from country to country and are complex, our employees are required to consult their business unit's assigned legal counsel whenever their business activities might be regulated by these laws.

We have no legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violation of anti-trust and monopoly legislations in which the organization has been identified as a participant.

Customer Relations

Meeting customer requirements is essential for the Company's inclusive and sustained growth. In this regard, hawse have implemented Salesforce.com Customer Relationship Management (CRM) software. This gives the Company an effective digital platform to address customer queries in a more efficient manner. We have a very streamlined complaint handling and feedback process. Feedbacks from customers are registered in our CRM software. All the complaints are also raised through the CRM and the Gujarat Fluoropolymer Research Centre (GFRC) team resolves the queries in a timed manner. Our Marketing teams also visit the customers regularly to ensure smooth delivery of products and to ensure that their complaints have been resolved. GFCL has received high ratings from our customers on account of our excellent customer service.

Customer Satisfaction Rating Summary

Customer Satisfaction Rating Summary	The overall quality of products			The overall quality of Technical Support		
Year	2017	2018	2019	2017	2018	2019
Overall Rating (%)	81	92	96.84	90	93	97.8

Customer Satisfaction Rating Summary	Order, Delivery Service & Sales support			Business Out Look		
Year	2017	2018	2019	2017	2018	2019
Overall Rating (%)	88	93	98.14	87	93	97.8

Marketing Communication and Authenticity

The marketing communications function at GFCL is responsible for four major verticals: Product Promotions, Brand Management, Web Assets Management, and Customer-centric Communications. The department's functions are in alignment with the Company's Responsible Sales and Marketing Guidelines.

Being in the B2B space, we strive to reach the influencers, decision makers and thought leaders in Fluoropolymers, Fluorospeciality and Refrigerants industry through a myriad of channels. Organic content and sponsored content are leveraged in combination to attain business goals of demand generation and brand visibility across digital and non-digital platforms. Some of the paid marketing channels used by us are:

a) Digital Platforms: LinkedIn, Emailers, Search Ads, Display Ads, Product web portals (Apps and web)

b) Print Platforms: Industry periodicals, Product magazines (print format)

c) Events: Customer Conferences, Product exhibitions, Leadership Panel discussions and Speaker talks

Content Authenticity

Marketing communications represents our products and services truthfully, fairly, accurately, and professionally across all indirect communication channels. These include advertising, packaging, product literature, labels, packaging, advertising copy, environmental claims, customer surveys, technical datasheets, product selection guides, statement of compliances, Material Safety Data Sheets (MSDS),

Audio-Visual content, corporate, subsidiary and product websites, and social media platforms. In addition, there are direct communication channels such as emails, conversations, contracts and sales presentations. Our product communications take utmost care of representing the claims, as appropriate, are substantiated through testing, based on sound statistical and scientific principles, or approved through the Company business unit's claims approval process with the appropriate statement on the product's performance.

Marketing communication does not publish, advertise or post content that propagates deception or other unfair methods of competition, makes false or deceptive statements about the Company's products, make false or deceptive comparisons of the Company and any competitors' products, criticizes or discredit a competitor or its products, misrepresents the quality/ effectiveness of a product or presents GFCL's products as those of another, such as by simulating a competitor's packaging or trademarks.

We follow stringent internal SOPs for all channels of communications by involving functional heads for review and approval of the content, from Business Teams, R&D, Technical Service, Quality, HR, and Compliance explaining clear process flow, contribution and accountability governed by the Content Editorial Board. Content published on all external platforms, including sales collaterals, websites, social media, and print media goes through rigorous plagiarism tests through plagiarism test tools.

We have not faced any incidents of non-compliance with regulation and /or voluntary codes concerning marketing communication, including advertisement, promotion, and sponsorship in the reporting period. There have been no incidents of non-compliance with regulations resulting in a fine or penalty or warning or non-compliance with any voluntary codes in the reporting period.

Product Health and Stewardship and Product Information/Labelling

All of our products and activities are assessed for health risk and environmental aspects/impacts as per ISO 14001 and ISO 45001 management systems. For health and safety assessment we use HIRA and for environment assessment we use environmental aspect and impact

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evaluation sheet. These assessments are done for all products and covers actions taken to mitigate issues. Our MSDS cover information related to storage and handling, toxicological data, special hazard arising from material or mixture, fire-fighting measures and exposure control/personal protection.

We are one of the largest producers of fluoro-polymers, fluoro-specialities, refrigerants and chemicals. Sustainability is at the core of our process design which ensures manufacturing of environmental-friendly products. We are committed to implement green chemistry principles to reduce or eliminate the use or generation of hazardous substances. Every GFCL product is developed, manufactured, stored and distributed after thorough consideration has been given to reduce environmental and human impact by:

- Proper raw material selection
- Proper product design integrity
- Proper manufacturing and storage issues
- Anticipated use, re-use and disposal

Application of green chemistry principles also enable us to safeguard our employees, assets and communities by finding creative and innovative solutions. Our globally competitive technologies ensure waste reduction, recovery of chemicals, their reuse, energy conservation, and replace hazardous chemicals. The scope of green chemistry is not only to consider hazards from chemical toxicity but also include product life cycle, its design, manufacture, use, and ultimate disposal.

With global environmental regulations becoming more stringent and end consumers' consumption pattern shifting towards commitment to sustainable products, it is imperative to strike a balance between sustainability and performance. We are committed to Green Chemistry and offer environment-friendly products by embracing sustainable technologies for safer products and developing processes that use greener alternatives. We endeavour to align our processes with the Principle 4 of the twelve principles of Green Chemistry – 'Design safer chemicals and products: Design chemical products that are fully effective yet have little or no toxicity'.

Approach

a) Maximize use:

i. Reactions are designed to maximize the incorporation of all materials into the final product and use of recovered materials.

ii. Inorganic solid initiators are used for better conversation & reaction rate.

iii. Design of products & processes ensures no waste generation.

iv. Quantify and minimized the use of utilities.

v. Minimized use of natural resources.

b) Reduce/eliminate hazards:

i. Design ensure all material and energy inputs and outputs are non-hazardous.

ii. Reactions possess little or no toxicity to human health and the environment.

iii. Used processes minimizes the potential for accidents like explosions, fires etc.

iv. Analytical methodologies provide real-time process monitoring and control to minimize hazards.

c) Life cycle thinking:

i. Products are designed to recycle, reuse and safe disposal after end of life.

ii. Process and product analysis to assess environmental impacts.

iii. Use life cycle thinking in all engineering activities.

iv. Design evaluates choices on recycle, reuse or disposition.

v. Continuous improvement and innovations to achieve sustainability.

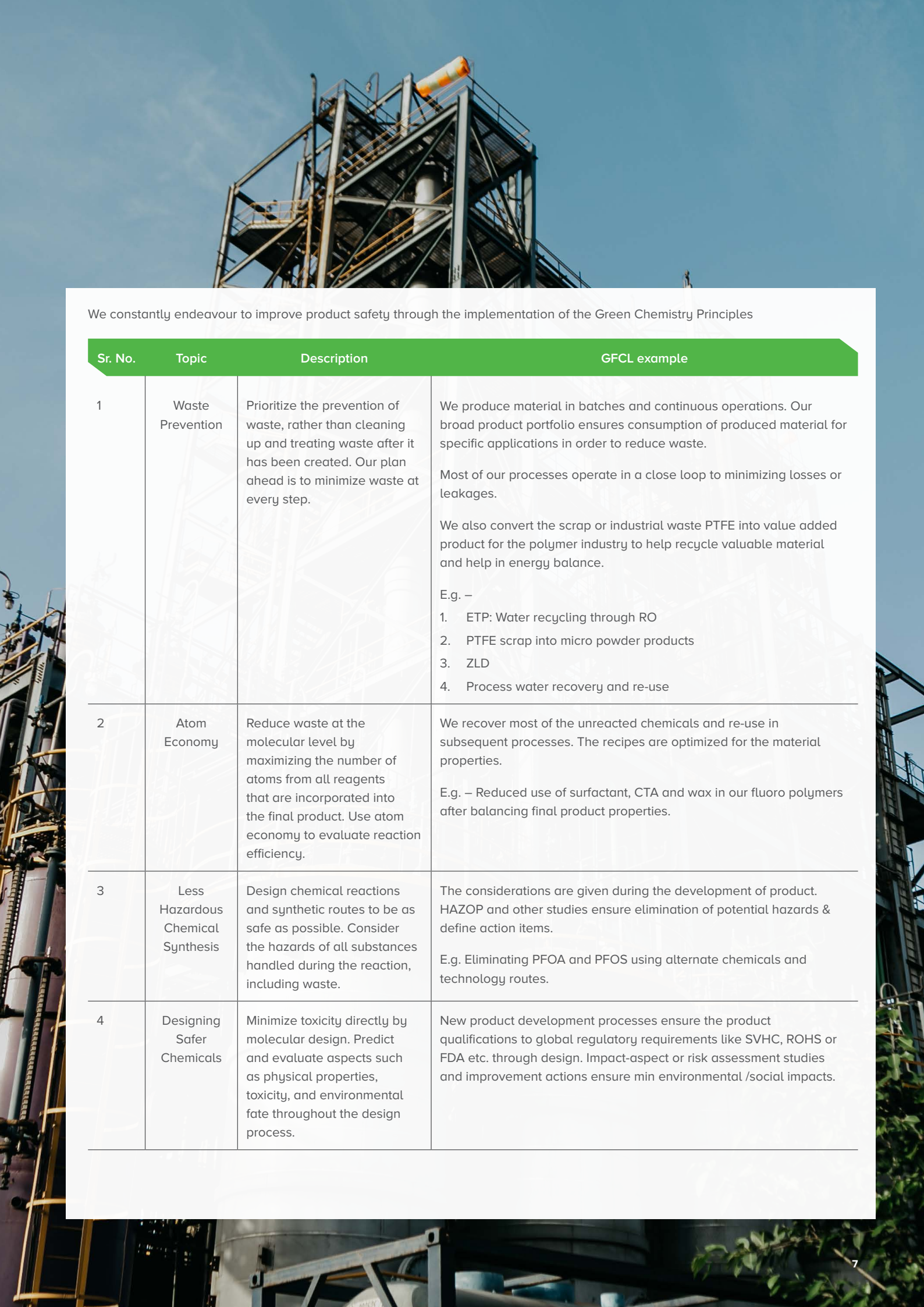
We are doing continuous adaptation of greener technologies to comply with revisions in regulations from global environment protection agencies. We have implemented various innovations and improvements covering green chemistry principles.

Innovation

- Useful product recovered from vents by new technology.
- Recovery of Surfactant from wastewater.

Improvements

- Wind power usage with grid power and CPP
- De- bottlenecking of TFE by process improving efficiency.
- Improvement on COC of cooling water (increased from 6 to 9 COC)



We constantly endeavour to improve product safety through the implementation of the Green Chemistry Principles

Sr. No.	Topic	Description	GFCL example
1	Waste Prevention	Prioritize the prevention of waste, rather than cleaning up and treating waste after it has been created. Our plan ahead is to minimize waste at every step.	We produce material in batches and continuous operations. Our broad product portfolio ensures consumption of produced material for specific applications in order to reduce waste. Most of our processes operate in a close loop to minimizing losses or leakages. We also convert the scrap or industrial waste PTFE into value added product for the polymer industry to help recycle valuable material and help in energy balance. E.g. – 1. ETP: Water recycling through RO 2. PTFE scrap into micro powder products 3. ZLD 4. Process water recovery and re-use
2	Atom Economy	Reduce waste at the molecular level by maximizing the number of atoms from all reagents that are incorporated into the final product. Use atom economy to evaluate reaction efficiency.	We recover most of the unreacted chemicals and re-use in subsequent processes. The recipes are optimized for the material properties. E.g. – Reduced use of surfactant, CTA and wax in our fluoro polymers after balancing final product properties.
3	Less Hazardous Chemical Synthesis	Design chemical reactions and synthetic routes to be as safe as possible. Consider the hazards of all substances handled during the reaction, including waste.	The considerations are given during the development of product. HAZOP and other studies ensure elimination of potential hazards & define action items. E.g. Eliminating PFOA and PFOS using alternate chemicals and technology routes.
4	Designing Safer Chemicals	Minimize toxicity directly by molecular design. Predict and evaluate aspects such as physical properties, toxicity, and environmental fate throughout the design process.	New product development processes ensure the product qualifications to global regulatory requirements like SVHC, ROHS or FDA etc. through design. Impact-aspect or risk assessment studies and improvement actions ensure min environmental /social impacts.

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Sr. No.	Topic	Description	GFCL example
5	Safer Solvents and Auxiliaries	Choose the safest solvent available for any given step. Minimize the total amount of solvents and auxiliary substances used as these make up a large percentage of the total waste created.	We reduce, recover and re-use programmes ensure cleaner air and water. This also help us reduce waste to minimum. We use water-based polymerizations which avoids solvents. E.g. 1. Vent Recovery /R-125 – Polymer – Clean Air 2. Thermal Oxidizer – chemical – Clean Air 3. Tergitol Recovery project – Clean Water 4. Recovery of fluoro surfactant – Clean Water 5. Solvent recovery and re-use 6. Waste heat recovery
6	Design for Energy Efficiency	Choose the least energy-intensive chemical route. Avoid heating and cooling, as well as pressurized and vacuum conditions (i.e. ambient temperature and pressure are optimal).	Site has defined goals to reduce and optimize use of energy and natural resources in every process. Most of the process waste are treated, recovered and reused. We developed technologies and producing products with lower pressures than market use. E.g.– 1. Installation of energy efficient membranes for Caustic production 2. Use of energy efficient fans in all cooling waters 3. Zero gap Electrolyzer in CA plant 4. Use of VFDs to save energy
7	Use of Renewable Feedstocks	Use chemicals which are made from renewable (i.e. plant-based) sources, rather than other, equivalent chemicals originating from petrochemical sources.	Not Applicable. PTFE micro powder business is a unique solution, which support environment by recycling the industrial waste PTFE into saleable products. Thus, saving energy by not land filling the valuable scrap material.
8	Reduce Derivatives	Minimize the use of temporary derivatives such as protecting groups. Avoid derivatives to reduce reaction steps, resources required, and waste created.	Our polymers are additive free systems, without any protecting additives. As continuous improvement we are reducing the number of treatments. E.g.– Optimization of initiators, surfactants, wax, CTA to reduce washing step including steam washes.
9	Catalysis	Use catalytic instead of stoichiometric reagents in reactions. Choose catalysts to help increase selectivity, minimize waste, and reduce reaction times and energy demands.	We use solid inorganic catalyst for almost all processes to eliminate formation of by-product, reduce activation energy, lower polymerization temp and relatively lower cycle time. E.g.– 1. PFA, FEP, PVDF, PTFE etc. polymerization 2. To the possible extent used catalysts are regenerated and re-used.

Sr. No.	Topic	Description	GFCL example
10	Design for Degradation	Design chemicals that degrade and can be discarded easily. Ensure that both chemicals and their degradation products are not toxic, bio accumulative, or environmentally persistent.	We ensure that the chemicals are treated and safe to discard. Ex: 1. Development of new generation refrigerant gases such as R407 and R410 2. Reduction of our carbon footprint by special techniques
11	Real-Time Pollution Prevention	Monitor chemical reaction in real-time as the occur to prevent the formation and release of any potentially hazardous and polluting substances.	All the reactions are monitored real time and the unreacted chemicals. We recover these from gases and water to avoid any air or water pollution. Ex – 1. Vent Recovery /R-125 – Polymer – Clean Air 2. Thermal Oxidizer – chemical – Clean Air 3. Tergitol Recovery project – Clean Water 4. Recovery of fluoro surfactant – Clean Water
12	Chemistry For Accident Prevention	Choose and develop chemical procedures that are safer and inherently minimize the risk of accidents. Know the possible risks and assess them beforehand.	HAZOP, Risk Assessment, PSSR, Impact – aspect, SO etc. studies help us identify potential risk opportunities. Also, DCS/PLC control systems, interlocks etc. helps avoid any risk of accidents. Ex - DuPont Safety hand holding – Site Safety Loss of containment study

Case Study on Resolving Customer Issue (PTFE Micropowders)

We transform raw materials and natural resources into the essential chemicals and materials needed to support global population growth and urbanization. We take a holistic approach to reduce waste and are aligned to the UN SDGs. Our stakeholders expect us to reduce environmental hazards and produce products which have no compliance issue.

We have taken considerable efforts to reduce waste and one such example of that is PTFE Micro powders. During the processing of PTFE back in 2016 a considerable amount of waste was produced both at our and the customer end. To curb this problem our GFRC team came up with a solution. Our research team has developed a process where we could turn PTFE waste into PTFE Micro powders. PTFE Micro powders has a broad range of applications and it has a high demand in the market due to its diverse applications which range from plastic, coating and paints, rubbers, inks and lubricants.

We have processed PTFE waste of the processors throughout out the world. It has always been a win-win situation - processors get rid of waste and we turn that waste into a useful product that has a market value. We are committed to promoting a pollution-free environment and maintain safe and healthy working conditions by constantly guiding all our activities through consciously recognized and adopted a set of standards. Our QA and QC teams ensure that product quality, packaging, and labelling of the products are strictly following the customer specifications, applicable international guidelines, and regulatory requirements as applicable.

We continuously update the product health and safety information in the form of MSDS available on the Company's website. We regularly share technical datasheets, material safety data sheets, and processing guides on regular basis. Also, our technical manager regularly visits customers and share product-related information.

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Our product labels are prepared as per the applicable regulations of the region. The products are packed with proper labelling and barcoding wherever required. We follow the CLP (Classification, Labelling, and Packaging) system for all customers. Labels are also continuously updated as per the changes and updates in the required regulation. Labelling on the Fluorospeciality chemical / intermediates finished product follows the six elements of Globally Harmonized System (GHS) chemical labelling requirements system:

100

% of Fluoropolymer Products following GHS labelling processes

All our products are supplied to different countries strictly as per the Product Safety Standards and post such certification:

Region	Product Certification	Number of grades certified
Europe	REACH - SVHC	50
	RoHS	62
	EC 10/11	38
	WRAS	12
	W270	18
	BAM	3
	ELV 2000/53/EC	16
America	US FDA 21CFR 177.1550	56
	NSF HX1	2
	USP class VI	31
	3A	15
China	(FDA) GB 4806.10.2016	1
Rest of the world (Global)	UL	18

Responsible Marketing and Sustainable Consumption

We endorse Sustainable Consumption as part of Responsible Marketing approach. To contribute to sustainable consumption, we ensure to:

a. Promote effective education empowering consumers to understand the impacts of their choice of products and services on their well-being and on the environment. Practical guidance is provided on how to modify consumption patterns and to make necessary changes.

b. Design products and packaging so that they can be easily used, reused, repaired, or recycled and, if possible, offering or suggesting recycling and disposal service.

We have not faced any incidents of any non-compliance with regulations and/ or voluntary codes concerning product and service information and labelling in the reporting period. There has not been any incident of non-compliance with regulations resulting in a fine or penalty or warning or any incident of non-compliance with any voluntary code in the reporting period.

Customer Privacy and Data Protection

Our Responsible Marketing Policy protects customer data and protects the customer's right to privacy by limiting the type of information gathered and the ways in which such information in obtained, used and secured. Our corporate website is integrated with Google Analytics tracking code, which enables the company to get important user analytics to make specific performance analysis for the website. Google Analytics reports do not provide

any IP information in these reports and hence we cannot access any such data.

We use cookies and similar technologies to give the user a better user experience and to help collect data. The text in a cookie often consists of a string of numbers and letters that uniquely identifies your computer, but it can contain other information as well. We ensure personal data protection through our Cookie Policy (https://gfl.co.in/cookies-policy.php)

We have not faced any substantiated complaints received concerning breaches of customer privacy be it received from outside parties and substantiated by the organization or any complaint from regulatory bodies.

Our Security server is ISO 27001 certified. There were no identified leaks, thefts, or losses of customer data in the reporting period.

Customer Education and other services

We are the pioneer in the manufacturing and sale of Anhydrous Hydrochloric Acid in India. Our trained representatives regularly visit customers locations to train on how to use AHCl cylinders, safety measures related to GAS, etc. We also guide and hand hold customers for PESO approvals, especially the pharma Industry companies who are our customers.

Social Accountability in Warehouse

We protect property right of service providers who rent the warehouse to the Company by entering into a transparent and non-exploitative rental agreement which has no attachment to property of the owners. All warehouse owners where the warehouse operations is part of the rental agreement is communicated the Company's Responsible Marketing policy and has to accept and declare that they will follow the same so far as fair, safe and socially responsible behaviour is concerned, especially on protection of human rights, no child labour, etc.

Region	Domestic	Europe	Americas
% of warehouse operations with Declaration of Social Accountability and Responsibility	100	100	100

Way Forward

- Most of our licensing and distribution agreements have anti-competitive and anti-trust clauses as found in internal audit. In the coming years, we would be ensuring that all the agreements have this clause to comply with the competition laws. To ensure this, our respective product managers are working to introduce this clause in their licensing agreements, if not already included.
- We plan to conduct the LCA for all our products. Our research team is working toward attaining this goal.
- We plan to cover all the warehouses under Social Accountability and Responsibility audit.
- We protect the data of our customers and we have not witnessed any case of breach of customer data. We aim to maintain this in the future also.
- We aim to impart training to all our customers on the safe handling and storage of products.

GUJARAT FLUOROCHEMICALS
VALUE THROUGH GREEN CHEMISTRY

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