

# Social Accountability, Labour & Human Rights Progress Report 2022-23



## Freedom, Equality and Justice for All

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In accordance with internationally recognised frameworks such as the Social Accountability 8000 International Standard, UN Global Compact principles, ISO26000, ISO20400, UN Women Empowerment Principles (WEPs), National Voluntary Guidelines on Social, Environment & Economic Responsibilities (NVGSEER), and in compliance with all applicable laws and regulations, Gujarat Fluorochemicals Limited is committed to upholding the human rights of its workforce, communities, and those affected by our operations wherever we do business (including our contractors and suppliers). The Company has shown that it is committed to upholding and safeguarding human rights by signing the United Nations Global Compact.

The report is organised in accordance with Annexure 1 of the UN Guiding Principles Reporting Framework. As shown in Annexure 4-Assurance Statement by DQS India, this report has been independently reviewed and verified by DQS India.

### **Report Boundary**

Our Social Accountability & Human Rights Progress Report outlines our impact and, consequently, the parameters for our reporting. The immediate neighbourhood, significant business partners, and the domestic locations (Dahej A, Jolva (Dahej B), Ranjit Nagar, Vadodara, and Noida) as well as the international locations (Germany & USA) make up our reporting limits.

### **Reporting Period**

This Report considers the primary reporting period as April 01, 2022, to March 31, 2023. However, some sections of the report represent facts and figures till November 23 end.

### **Stakeholder Feedback**

We welcome and appreciate any constructive input and feedback from the stakeholders at:  
Email: [subodh.gautam@gfl.co.in](mailto:subodh.gautam@gfl.co.in) & [chandni.mehta@gfl.co.in](mailto:chandni.mehta@gfl.co.in)

### **Mailing address:**

INOX Towers, Plot no: 17, Sector 16 A,  
Noida – 201301 (UP), India

**Website:** [www.gfl.co.in](http://www.gfl.co.in)



# From the Desk of Chief Executive Officer (CEO)



The Universal Declaration of Human Rights will celebrate its 75<sup>th</sup> anniversary in 2023, coinciding with the Office of the High Commissioner for Human Rights' 30<sup>th</sup> anniversary. The main goal of the Declaration has been to instill justice, equality, and fundamental freedoms in countries for the past 75 years. It is a cornerstone of the 2030 Agenda for Sustainable Development, enshrining the rights of every human being and serving as a worldwide model for regional, national, and local laws and regulations.

At GFL, we are steadfast in our dedication to preserving human rights, and we have worked to expand and enhance our awareness of the part we play in promoting respect for these rights. Our strategy for defending human rights is built around four main pillars and is based on the United Nations Guiding Principles on Business and Human Rights:

- Integrating human rights into every step of our value chain.
- Carrying out continuous due diligence on human rights.
- Including our stakeholders and promoting cooperative action.
- Offering efficient grievance procedures and access to remedies.

Although we are happy with our current progress, we acknowledge that it is merely a stop along the way. We are all dedicated to periodically reporting our progress and enhancing transparency in our operations, even though there is still much work to be done to guarantee that human rights are properly protected across our value chain. This report is about identifying our human rights journey, summarising our accomplishments and lessons learned thus far, and outlining the work that still has to be done.

We appreciate your ongoing assistance as we pursue human rights. I urge all of our interested parties to peruse the report, share their opinions, and work with us to protect and promote human rights and social responsibility throughout our value chain and the greater communities we serve.

Regards  
**Bir Kapoor**

# Message from Head Group Corporate Human Resources



Human Rights are the basic rights and freedoms that belong to every person in the world. These are based on important principles like dignity, fairness, respect and equality. As a Company, we follow these principles in every aspect of Human Resource functioning. For us, respect for human right is not just a moral obligation but also a fundamental necessity for all our business endeavors that seeks to operate in a just inclusive and sustainable environment.

When businesses operate having footprints across the globe, we understand that failure to respect and prioritize human rights in our end-to-end supply chain can result in many adverse impacts on our employees, customers and communities.

With this understanding, we have integrated human rights into our organizational policies, culture, and daily operations. Continuous efforts are made to make all stakeholders aware of the human rights across the supply chain. We recognize and understand that respecting human rights is an investment. We realize that businesses are increasingly focused on the impact they have on individuals, community and the environment. For us, it is clear that one of the central measures of our company's social responsibility and accountability is our respect towards human rights. Our commitment to Human Rights is exemplified by becoming a signatory to the UN Global Compact, our systems and

processes getting aligned with the ISO26000 standards, and our locations being SA8000 compliant.

We believe in continuous improvement and monitor and share progress with our stakeholders. I am pleased to release our fourth Social Accountability & Human Rights Progress Report 2022–2023.

I take this opportunity to thank all who have been part of this journey and for their valuable contributions.

Regards  
**Kallol Chakraborty**



# A Glimpse into INOXGFL Group

The INOXGFL Group proudly stands as one of India's most esteemed business conglomerates, with a rich history spanning more than 90 years. Throughout its journey, the Group has exemplified remarkable resilience, transforming into a multibilliondollar enterprise with a diverse and wide-ranging portfolio comprising of Refrigerants, Fluoropolymers, Speciality Chemicals, Wind Energy and Renewables. The Group's success and achievements are highlighted by its four listed entities, collectively commanding a market capitalisation of around USD 5 Billion.

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## Chemical

### Gujarat Fluorochemicals Limited ('GFL')

GFL is a leading chemical company with over 36 years of experience in fluorine chemistry. It is India's largest producer of Fluoropolymers. It also manufactures refrigerants, chemicals and fluorospecialties for its customers worldwide.

### GFCL EV Products Limited ('GFCL EV')

GFCL EV offers a range of solutions for the entire value chain of batteries, battery components and products for electric vehicles and energy storage systems.

### GFCL Solar and Green Hydrogen Products Limited ('GFCL Solar')

GFCL Solar provides fluoropolymer solutions for the entire value chain of solar power systems and green hydrogen production, including proton exchange membranes for electrolyzers and fuel cells.

### Gujarat Fluorochemicals FZE, Dubai ('GFL Dubai')

GFL Dubai is engaged in trading and processing refrigerants and fluoropolymers.

### Gujarat Fluorochemicals Americas LLC ('GFL Americas')

GFL America is engaged in the business of trading and warehousing of fluoropolymers.

### Gujarat Fluorochemicals GmbH ('GFL Germany')

GFL Germany is engaged in the business of trading and warehousing of fluoropolymers.

### Gujarat Fluorochemicals Singapore Pte. Limited ('GFL Singapore')

GFL Singapore was set up for the purpose of investment activities. The company has invested in Morocco for the mining and beneficiation of fluorspar.

### GFL GM Fluorspar SA ('GFL Morocco')

GFL Morocco is engaged in the business of exploration of fluorspar mines, mining and beneficiation of mined ore.

## Renewable Energy

### INOX Wind Limited ('IWL')

IWL is a leader in the wind energy market, with state-of-the-art manufacturing facilities in Gujarat, Himachal Pradesh, and Madhya Pradesh. As a fully integrated player, it manufactures key components of Wind Turbine Generators (WTGs). It offers turnkey solutions for the development of wind power projects, from concept to commissioning, including operation and maintenance. It also has an equipment supply model for maintaining a steady supply of equipment to customers for the erection of wind energy plants.

### INOX Green Energy Services Limited ('IGESL')

IGESL, one of India's premier wind Operation and Maintenance (O&M) services providers, manages over 3.14 GW of assets and stands as the country's sole listed company offering renewable O&M services.

### INOX Wind Energy Limited ('IWEL')

IWEL is the holding company of the Wind Business. It is currently undergoing an amalgamation into IWL.



# Meet our Chairman



Shri Vivek Jain

**Shri Vivek Jain is the chairman** of the Inox GFL group, which he inherited from his father, Devendra Jain after the patriarch divided the family's assets in 2021 between him and his brother, Pavan Jain.

A graduate from St. Stephens and an MBA from the elite Indian Institute of Management, Ahmedabad, Jain started working with his father in 1978 in what a paper trading business was then.

Today, the flagship company of his group is Gujarat Fluorochemicals, a manufacturer of chemicals and industrial gases, which he helped his father set up.

His son, Devansh Jain runs the Renewable Energy Business of the Group which consists of Inox Wind, Inox Green Energy Services Limited, and Inox Wind Energy Limited.



Shri Devansh Jain





# Glancing through the Brilliance of Our Performance



## People

**3,418**

Employees

**24** Hrs.

Average training man hours per employee

**₹ 8.62** Cr.

Invested in CSR

**53,859**

Lives benefitted



## Planet

Recycled

**4,73,975** KL

of water

**3,869** MT

of waste

**2,00,282** GJ

Renewable energy utilised

**39,778** tCO<sub>2</sub>

Reduction in Green House Gas emission

# Who We Are

Gujarat Fluorochemicals Limited (referred to as 'GFL' or 'the Company' or 'our Company' or 'We') holds a prominent position in the fluoropolymers, fluorochemicals, and bulk chemicals, catering to the material requirements of modern world. With more than three decades of experience in the industry, we have developed extensive expertise in fluorine chemistry, establishing ourselves as the market leader in this segment. As one of the leading global producers of fluoropolymers and the sole producer in India, we have emerged as a significant supplier of fluoropolymers to Europe and the USA.

Our commitment to research and development, as well as a comprehensive integration across the value chain, empowers us to efficiently meet the evolving demands of our customers. These efforts have instilled a culture of professionalism and excellence throughout our Company, guiding us on our journey as pioneers in the realm of fluoropolymers and beyond.

GFL has strategically expanded its operations to meet the growing customer demand. We operate from three state-of-the-art manufacturing facilities in India, maintain a captive fluorspar mine in Morocco and have established offices and warehouses in Europe and the USA. Additionally, our robust marketing network spans the globe, ensuring widespread access to our products and services for our customers.



Mr. Vivek Kumar Jain, Managing Director of the Company won the Business Transformation Category Award at EY Entrepreneur of the Year 2022 India. This is a testament

to the hard work and visionary leadership that has transformed our Company into the leading manufacturer of fluorospecialty.



## OUR VISION

- To become preferred global suppliers of fluoropolymers, fluoroelastomers and new generation products and achieve this status through technological, operational and service excellence.
- We shall endeavour to be a global player in our businesses.
- We shall constantly endeavour to delight customers, workforce and all the stakeholders.
- We shall do our business exercising utmost care for the environment and society at large.



## OUR MISSION

We shall endeavour to always be the market leader by providing our customers the latest, the most innovative and the best available technologies, products and services. Through this, we shall provide our customers the best 'Value for Money' by producing best-in-class quality products at the most competitive prices. We shall conduct our operations keeping Safety and Environment in place along with the upgradation of technology.



## OUR CREDO

- **Quality**  
Excellence in quality
- **Excellence**  
Excellence in services & manufacturing practices for our stakeholders
- **Integrity**  
Building trust in dealings with all stakeholders
- **Innovation**  
Enthuse our customers through our innovative approach
- **Customer Value**  
Delight the customer & deliver the value

## OUR PRODUCTS

### Fluoropolymers

1. **Polytetrafluoroethylene (PTFE)**
2. **New Fluoropolymers**
  - Polyvinylidene Fluoride (PVDF)
  - Fluorine Kautschuk Material (FKM)
  - Perfluoroalkoxy alkanes (PFA)
  - Micropowder
  - Fluorinated Ethylene Propylene (FEP)
  - PPA

### Fluorochemicals

1. **Specialty Chemicals**
2. **Refrigerant Gas**

### Bulk Chemicals

1. **Chloromethanes**
2. **Caustic Chlorine**

## OUR BRANDS

**INOFLON®** INOFLON

Represents PTFE, PFA and FEP manufactured and marketed by GFL

**FLUONOX®** FLUONOX

Represents the Fluoroelastomers manufactured and marketed by GFL

**NOFLAR** INOFLAR

Represents PVDF manufactured and marketed by GFL

**Refron®**

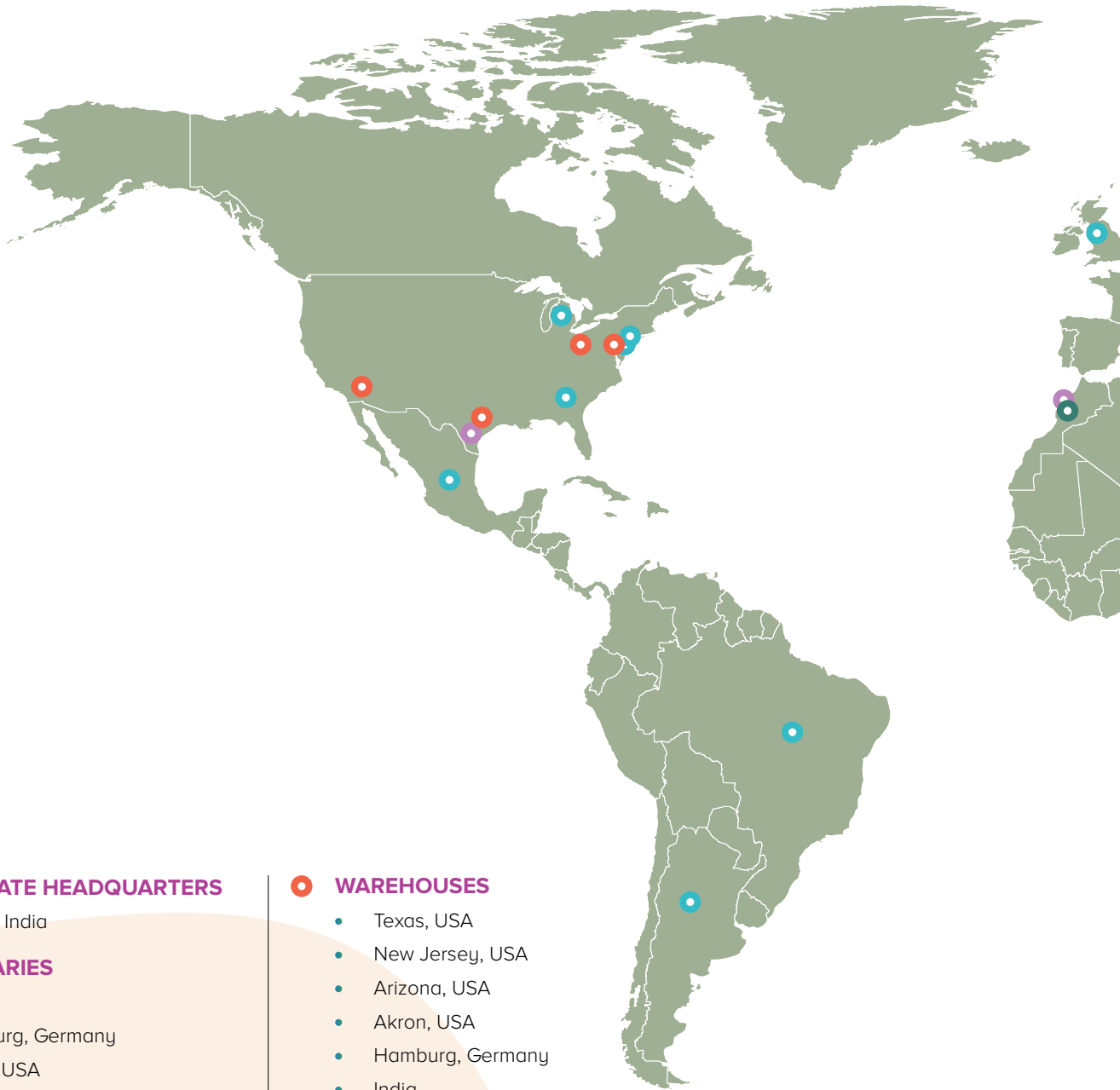
Refron

Represents refrigerants manufactured and marketed by GFL

**INOLUB®**  
Fluoropolymer Additives INOLUB

Represents PTFE additives and PPA manufactured and marketed by GFL

# Our Presence



## CORPORATE HEADQUARTERS

- Noida, India

## SUBSIDIARIES

- India
- Hamburg, Germany
- Texas, USA
- Casablanca, Morocco
- Singapore
- Dubai

## SALES AND DISTRIBUTION

- **USA:** Michigan, Philadelphia, Atlanta, New Jersey, Mexico, Brazil, Argentina
- **EU:** UK, Belgium, Italy, Germany
- **ROW:** South Africa, Thailand, China, Korea, Taiwan, India, Japan

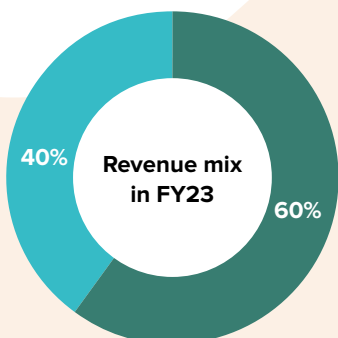
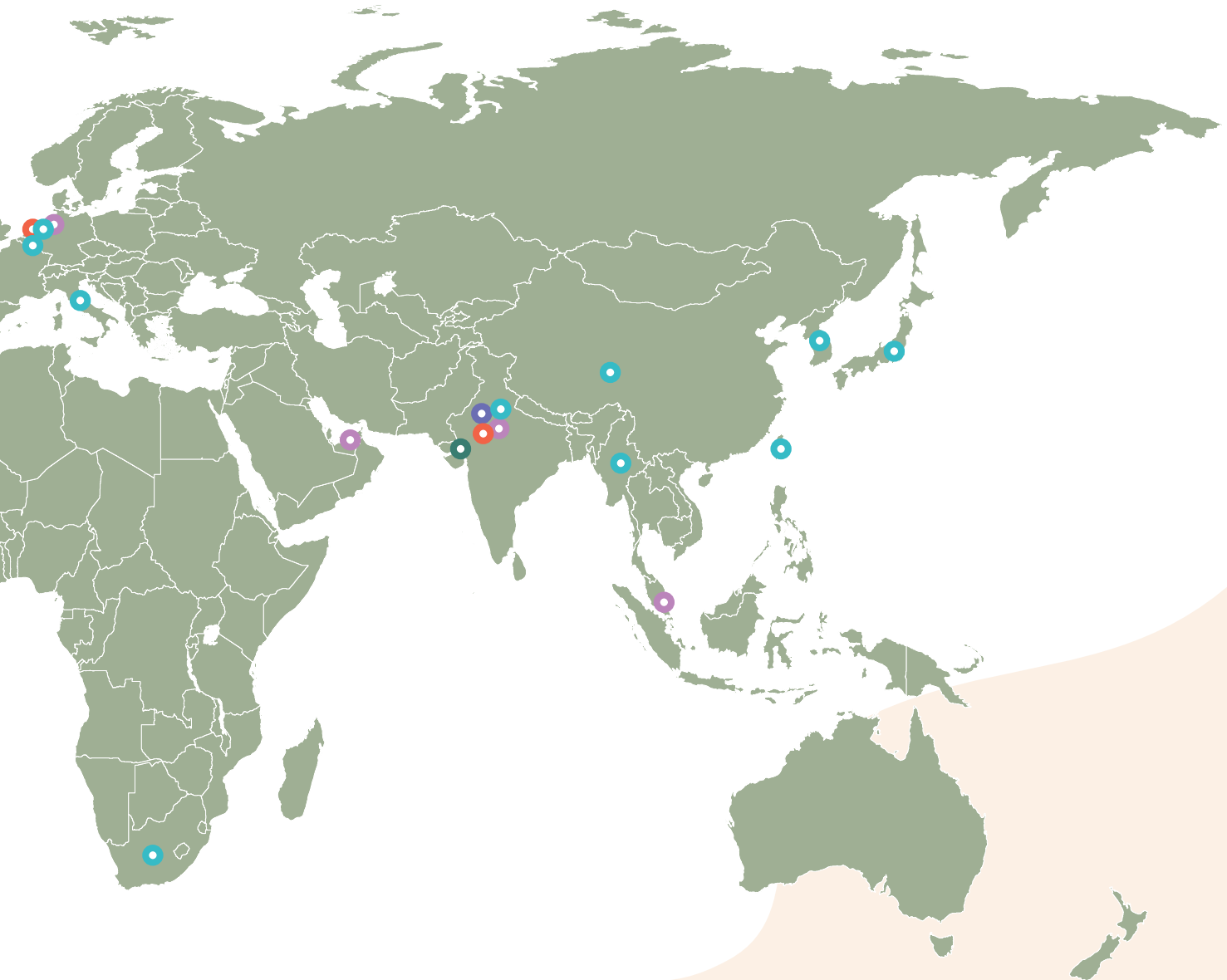
## WAREHOUSES

- Texas, USA
- New Jersey, USA
- Arizona, USA
- Akron, USA
- Hamburg, Germany
- India

## MANUFACTURING UNITS

- Dahej, Gujarat, India
- Jolva, Gujarat, India
- Ranjitnagar, Gujarat, India
- Casablanca, Morocco





- Exports
- Domestic

**3,170+**  
Employees across globe

# Our Manufacturing and R&D Facilities



## Dahej, Gujarat, India

- Fluoropolymers, Specialty and Bulk Chemicals
- Commissioned in 2007
- Largest Fluoropolymer Plant in India
- Vertically Integrated Plant
- ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 certified.



## Ranjit Nagar, Gujarat, India

- Specialty Chemicals and Refrigerants
- Commissioned in 1989
- Largest Refrigerant capacity in India
- ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 certified



## Jolva, Gujarat, India

- Fluoropolymers, Specialty and New age Chemicals
- Under phased commissioning



## WASH Awareness Campaign at Noida

### Regulatory compliances



RoHS-Restriction of Hazardous Substances



USP Class VI- United States Pharmacopeia



REACH- Registration, Evaluation, Authorization and Restriction of chemicals



SVHC- Substances of very High Concern



3A- Sanitary Standards for design and fabrication of equipment



EC10/2011-European Commission



FDA-Food and Drug Administration



EC1935/2004-European Commission

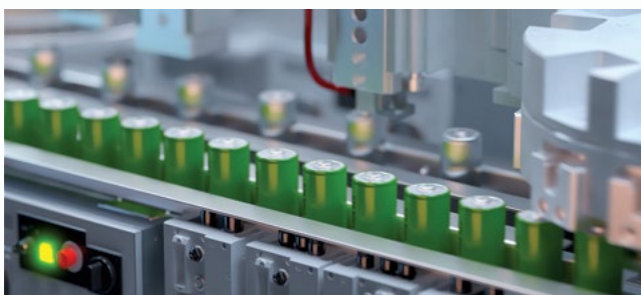


WRAS-Water Regulation Advisory Scheme

# Our Businesses

**Committed to create value through green chemistry.**

GFL holds domain expertise in four major product verticals—Fluoropolymers, Fluorospecialties, Refrigerants and Chemicals. Our steadfast focus and attained expertise in Fluorine Chemistry enable us to develop, manufacture and commercialize Fluorine- based products in record time complying to most regulatory requirements. Our vertically integrated operations and access to key raw material has facilitated leadership in wide range of Fluoropolymers and Specialty chemicals for varied applications in automotive modern architecture, pharmaceuticals, chemical processing energy and telecommunications industry. Committed to greener processes and practices, we constantly strive to make our products sustainable and environment friendly.



## Fluoropolymers

GFL is a leading producer of Fluoropolymers in India with major product lines being PTFE additives and Polymer Processing Aids (PPA).

- PTFE
- PFA
- FEP
- FICM
- PVDF
- ADDITIVES



## Chemicals

GFL manufactures industrial chemicals for end-use industries including Pharma, Agrochemicals and Plastics.

- Caustic Soda
- Carbon Tetrachloride
- Chlorine
- Methylene di Chloride-Hydrochloric Acid
- Sodium HydrogenSulphate
- Hydrogen GasFluorspar
- Anhydrous HydrogenChloride



## Refrigerants

GFL operates one of the single largest and most efficient Refrigerant plants in India manufacturing R22, R32, R125, R407C, R410A.

- R-22
- R-32
- R-410A
- R-407C



## Specialty Chemicals

GFL produces EDFA, TEOF, BTM, DFMS, DCTFMA as Fluorospeciality Chemicals for Wide-ranging industrial applications.

- HF BASED
- TFE BASED
- KF BASED



# We are signatory to



# We adhere to



Network India



# GFL HR Principles

The 'Protect, Respect & Remedy' Framework, which has three separate yet interconnected pillars, serves as the foundation for our Responsible Business Practices, which aim to safeguard human rights. The foundation of our operational procedures to guarantee social accountability and responsibility throughout the value chain is a set of HR Management Principles, upon which our policies pertaining to social accountability and human rights are built. The GFL Automotive Human Resource Management Tenets are as follows: modern architecture, medicines.

## Guiding principles for human resource management in Gujarat Fluorochemicals Limited

At GFL, we recognize that our employees are the key ingredient to Company's success. We view our employees' ongoing growth and involvement as a critical component of our business. In order to fulfil the mission, vision, and objectives of the organization, the human resource department will implement the highest.

### **"10 PRINCIPLES of human resource management of GFL"** and operate all its processes based on the same

- |  |   |
|--|---|
| <ol style="list-style-type: none"> <li>1. Build a safe, healthy, and secure workplace with the involvement of all employees.</li> <li>2. Implement a robust, fair, transparent, and non-discriminatory process to attract, develop and retain the talent needed for business delivery and growth.</li> <li>3. Uphold and respect human dignity, equality, and human rights in the workplace.</li> <li>4. Provide continuous learning opportunities for the growth and development of all employees</li> <li>5. Ensure continuous two-way communication and participation of all employees and respect their views and opinion and involve them in decision making.</li> <li>6. Establish meritocracy without any bias or discrimination in connection to performance evaluation, career progression, rewards, and recognition.</li> <li>7. Pay for performance based on internal and external parity.</li> </ol> | <ol style="list-style-type: none"> <li>8. Encourage creativity and innovation to fuel growth.</li> <li>9. Create an engaged work environment of teamwork and camaraderie with a bias for responsible execution and excellence.</li> <li>10. Drive social accountability and responsibility and ensure ethical governance for responsible execution and excellence.</li> </ol> <p><b>To implement the above principles the human resource function shall:</b></p> <p>Design and establish robust operational policies, processes, and procedures in all aspects of human resource management.</p> <p>Continually improve the same to bring in the right practices to enable growth. Educate all employees on the same for their understanding and appreciation.</p> <p>Follow the rule of the land and all international standards as applicable to labor and social accountability.</p> |
|--|---|

# Our Human Rights Journey

## 2019

### Mar, 2019

GFL signs science based target call to action commitment letter.

### Apr, 2019

GFL announces first sustainable procurement policy and Code of Conduct for Suppliers/Vendors and Service Providers.

### Apr, 2019

GFL launched Guideline on Protection of Human Rights based on the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

### May, 2019

GFL became a signatory to United Nations Global Compact (UNGC).

### Jun, 2019

GFL adopts guiding principles for Human Resource Management which included upholding and respect of Human Dignity, Equality & Human Rights.

### Jul, 2019

GFL initiated Corporate Social Accountability Policy.

### Feb, 2020

GFL gets SA8000 certified.

### Jan, 2020

GFL gets ISO27001 certified.

## 2020

### Nov, 2019

GFL establishes Social Accountability, Regulatory & Sustainability Corporate Steering Committee.

### Nov, 2019

GFL launched Ethics Line Digital Platform for reporting policy violations.

### Sep, 2019

GFL uploaded its first CDP Report.

### Sep, 2019

GFL initiated DQS Supplier Sustainability Audit Management System for supplier sustainability audit and compliance.

### Jul, 2019

GFL developed and launched HR Principles & Social Accountability policy in line with the UN Declaration of Human Rights including all our vendors, contractors and business partners.

### Feb, 2020

GFL became signatory to Principles of Responsible Care under Indian Chemical Council.

### Mar, 2020

GFL launched guideline on Responsible Care.

### Apr, 2020

GFL announced Responsible Sales & Marketing policy.

### Jun, 2020

GFL announced Ethics Committee.

### Jun, 2020

GFL signed the UN Women and UNGC Women's Empowerment Principles exemplifying its commitment to Gender Equality and Women Empowerment.

### Jun, 2020

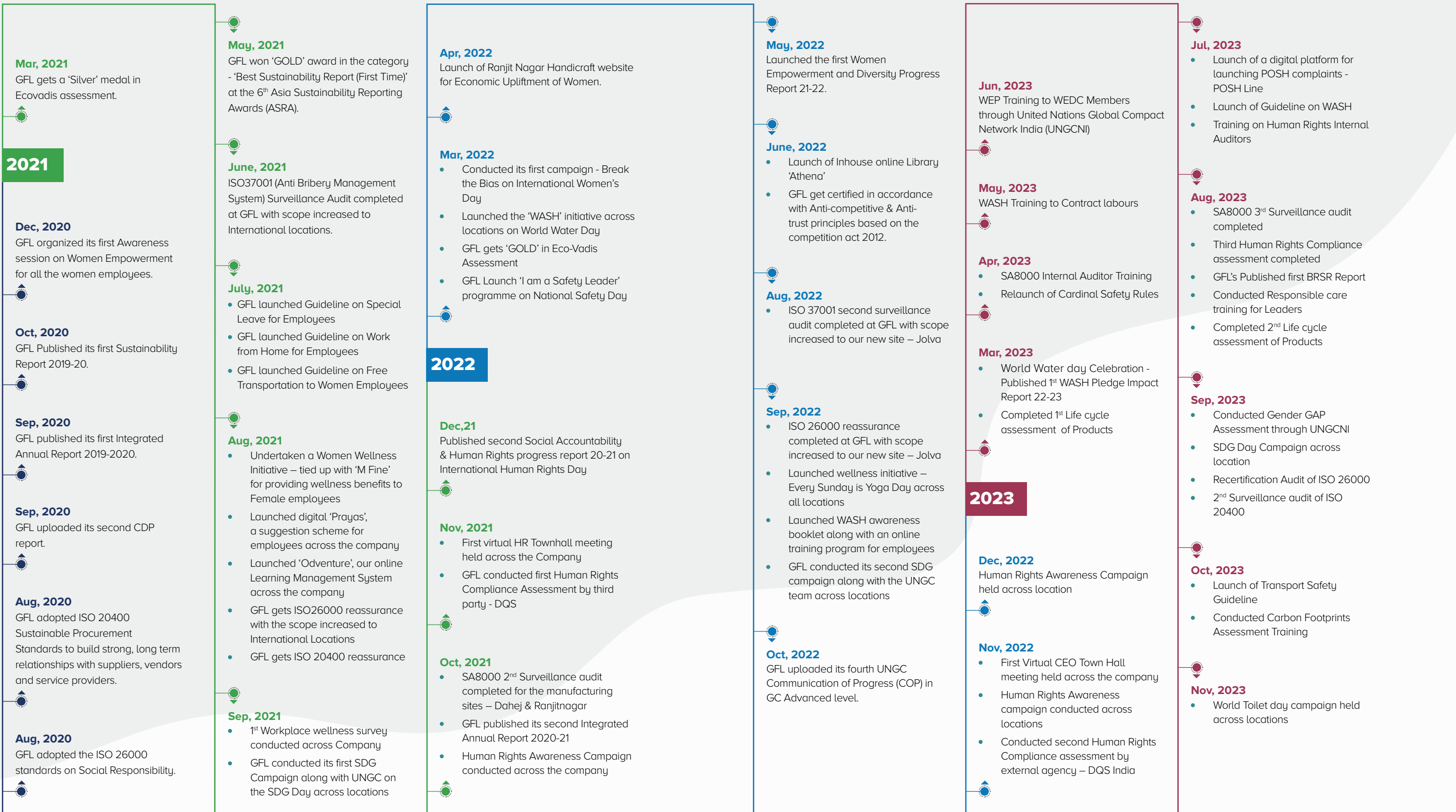
GFL established Corporate Women Empowerment committee and circulated charter.

### Jun, 2020

GFL established Corporate Women Empowerment committee and circulated charter.

### Jul, 2020

GFL gets ISO37001 (Anti Bribery Management System). certified.





# Our Commitment to Human Rights

Our Human Rights Policy embodies our commitment to human rights and represents our belief that everyone is entitled to these rights, regardless of their own free will.

Our Human Rights policy is our public commitment and is available on our website at the link below: <https://www.gfl.co.in/upload/pages/b9e54337554bac5bf2c0049f0def3e83.pdf>

Our business model and strategy do not, by their essential nature, pose significant risks to potential human rights.

The Company is dedicated to upholding the human rights of its employees, local communities, and those impacted by our operations wherever we conduct business (including our suppliers and contractors). We will do this in accordance with internationally recognized frameworks such as the UN Global Compact principles, ISO26000, the SA8000 International Standard, the National Voluntary Guidelines on Social, Environmental, and Economic Responsibilities, and all relevant laws and regulations.



Our commitment to human rights is further augmented through our participation in various international initiatives like the UN Global Compact, UN Women Empowerment Principles (WEPs) & WASH under WBCSD.

The Company, being a signatory to UN Global Compact is committed to:

## 1. Sustaining and upholding the UNGC Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption

The "Protect, Respect & Remedy" Framework's three separate but connected pillars serve as the foundation for our responsible business practices. In addition to encouraging all of our internal and external stakeholders—employees, suppliers, vendors, and service providers—to go above and beyond the requirements of our human rights policy and promote best practices and continuous improvement throughout their operations, our policy reflects our understanding of the aforementioned pillars respecting human rights. Our Social Accountability & Human Rights related policies are based on a set of HR Management Principles, various Sustainability standards & UN Human Rights (Annexure 3) that are the fundamentals of operational practices to ensure social accountability and responsibility across the value chain. More information is under the link SDG Awareness Campaign across locations.





## 2. Support the UN Sustainable Development Goals (SDGs). GFL supports the SDGs and its business actions and community outreach are all aligned to support and contribute to the 17 SDGs.

GFL reaffirms its commitment to assisting in the realization of the SDGs and celebrated Global Day to Act for the SDGs on September 25, 2023, across the Company. Our Labour & Human Resource actions are in support of Human Rights & Sustainable development Goals (SDGs), Please refer to Annexure 2 for the linkage. The Company ran an SDG awareness campaign wherein our employees and the local communities engaged actively. The following approach was adopted for Act4SDGs by carrying out the 3 necessary steps:



### Communicate

#### Raise Awareness of SDG issues & get informed

We had a virtual inaugural session on SDGs addressed by the Senior Management and Partnership & Membership Engagement Officer of UNGC followed by pamphlet distribution across locations in 3 languages – Hindi, English & Gujarati.



### Advocate

#### Raise your voice and hold Leaders to account

An awareness campaign on SDGs was conducted across locations educating employees on SDGs and our role as an individual and as an organization toward creating a sustainable future by 2030.



Human Rights Day Campaign at Dahej



### Activate

#### Organize an event and mobilize your community to take direct action for the Goals

An awareness campaign on SDGs was organized at Government Primary School, Ranjit Nagar, Gujarat to spread awareness among the students and local communities on the 17 SDGs and highlight the progress made in a few areas.

- water resource management, agro-based livelihood, health care, education, women empowerment, infrastructure, vocational training & skill development, animal husbandry, and wildlife protection.

## 3. Ensure reporting to stakeholders

The Company has pledged to publish its Social Accountability & Human Rights Report once in two years as part of its commitment to uphold transparency and accountability through precise and timely measurement and reporting. GFL has been reporting progress on social accountability & human rights for the last two years. The last edition was published in 2022.

# Our Approach

GFL follows all relevant laws and regulations and does business in a way that upholds the rights and dignity of every individual.

The Company is dedicated to upholding the human rights of all employees and local communities in all of its global sites, operating businesses, and commercial endeavors. In addition, we're dedicated to treating people fairly in the workplace regardless of their nationality, color, caste, faith, religion, gender, or other characteristics. In addition to human rights problems like land rights, we do not accept harassment or discrimination based on race, sexual orientation, or any other kind of identity. We adhere to the equal pay for equal work principle, and there is no difference in the salaries of male and female employees.

Our HR/63 Guideline on Human Rights lays out specific requirements for our workers, vendors, and business associates. It also creates a structure that enables us to monitor adherence to our standards.

In order to prevent, identify, and address potential impacts across our value chain in our operations, supply base, and community, we make sure that we gather, store, and handle data fairly and transparently. We have established a global human rights management approach based on the UNGC Principles on Business and Human Rights. We have also put our human rights guidelines into place.

## Operations



Every employee must behave lawfully towards coworkers, clients, business associates, and members of the community. The company's human rights policy and awareness training on social accountability and human rights must be completed by all new and existing workers. The company's human rights policy is covered in the Employee Handbook, which is provided to all staff members. We safeguard personal data under our control with appropriate administrative, technological, and organizational safeguards.

## Supply Base



Our suppliers and customers, as well as all of our business partners, are committed to upholding human rights. This policy, which outlines our commitment to human rights, must be followed by all providers. Information cannot be gathered unless it is deemed necessary for the intended use and has a valid purpose. A person may face disciplinary punishment if they neglect to put acceptable security practices and procedures into place and maintain them. Participation in the social accountability and human rights awareness program is mandatory for all corporate partners.

## Community



In accordance with international human rights norms, we protect the rights of the local community as well as individuals who reside and work there. We constantly keep an eye on the environmental effects that our company's operations have on our neighbors, and we work to improve those effects through community involvement and charity endeavors. Human rights and social accountability are made known to all communities, along with how they relate to the Sustainable Development Goals (SDGs).

This strategy expands upon our attention to and ranking of the most important human rights concerns— those that are most imperiled by our commercial dealings and partnerships. We keep a careful eye on new developments, routinely assess our policies, and consider important topics to see if other human rights have gained more importance over time. We also have mechanisms in place to stop and handle any dangers to human rights along our value chain.

# Governance

In order to effectively integrate observance of human rights across our value chain, we think strong governance is crucial. To guarantee the adoption and use of best practices, we periodically actively evaluate and assess our governance structures, practices, and procedures.



An "Ethics Committee" has been established by the Top Management to oversee the development, application, and evaluation of measures to uphold discipline in the areas of Social Accountability, Social Responsibility, Fair Business Practices, Policies, and Guidelines pertaining to Human Rights.

Working in tandem with the Ethics Committee, the Social Accountability & Responsibility Corporate Committee (SARCC) is in charge of implementing human rights. The Chief Executive Officer (CEO) serves as the Committee's Chairman, while the Head of Group Corporate Human Resources serves as the Secretary. In order to oversee, evaluate, and give guidance on all matters pertaining to Human Rights, Women's Empowerment, Gender Equality, WASH, Sustainable Procurement, Responsible Sales & Marketing, Corporate Social Responsibility, and other associated initiatives and interventions, the SARCC Steering Committee was established.

Our Responsible Sales & Marketing Committee makes sure that the rights of our customers are protected.

In addition, among other sustainability criteria in the supply chain, the Sustainable Procurement Committee was formed to guarantee the preservation of human rights. We signed up to integrate water, sanitation, and hygiene throughout the workplace this year under WBSCD.

The above Committees meet at periodic intervals to discuss, monitor, and direct actions in areas of concern related to Social Accountability including Human Rights

Additionally, we have a dedicated Women Empowerment Committee and an Internal Complaints Committee that are in charge of looking into, observing, and keeping an eye on human rights violations such as harassment, violence, torture, and discrimination occurring throughout the Organization. Employees are expected to report any suspicions they may have about a possible human rights guideline violation as soon as possible to the Company Ethics Committee or via [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in).



# Training & Communication

In order to educate and inform its employees, contractors, vendors, and other stakeholders about its human rights policy framework, the company has set up and is offering communication channels and awareness programs.

There is an exclusive clause on the business side of human rights in all contracts. The company's human rights policy is covered in the Employee Handbook, which is provided to all staff members. As part of the joining process, a declaration of acceptance and commitment to the policies of social accountability and social responsibility must be made. Every member of our staff has signed this declaration.

We work hard to stop violations of human rights throughout our supply chain. We regularly conduct awareness campaigns on human rights laws and policies, social accountability, and concerns related to forced labor, discrimination, and contractors/subcontractors as well as business service providers. These programs are followed by the distribution of pamphlets to our workers, contractors/subcontractors, and business service providers. The program on human rights awareness has been completed by both

contract laborers and employees. We make sure that no one violates human rights throughout our whole Company.



Human Rights Campaign at Dahej



WASH Awareness Campaign at Dahej



# Conducting Human Rights Impact Assessment & Due Diligence

The company has demonstrated its support and adherence to human rights through its signature of the UN Global Compact, adherence to ten principles, and adoption of the 'Protect, Respect and Remedy' Framework. It also shows that these mechanisms are implemented globally.

The online Social Accountability & Human Rights training course, which is accessible through our Learning Management System, is mandatory for all workers to complete.

This year, we ran a Human Rights Awareness Campaign across several locations for more than a month in an effort to inform our internal stakeholders about the 30 UN human rights as well as the procedures the company has in place for reporting violations of these rights.

During FY 2022-23, there were no complaints, legal cases, rulings, or fines against the company regarding human rights violations, sexual harassment, and discrimination in employment reported from any site of the Company.

We are SA8000 certified and have adopted and aligned our processes to ISO26000 (Social Responsibility) and ISO20400 (Sustainable Procurement standards) across our supply chain.

We're always looking for methods to make our risk review process better so that we can notice trends, hotspots, and core causes and address problems in an efficient manner. The Company undertakes impact evaluations in these

areas and identifies and addresses areas that have a serious adverse impact on human rights as part of its human rights due diligence strategy. GFL is committed to taking all reasonable and necessary steps to proactively detect and mitigate potential negative human rights implications in its operations and value chain. Various methods of due diligence bolster this.

To ensure compliance with the human rights policy, the company evaluates both internal and external assessment mechanisms, including self-assessment questionnaires, announced and unannounced on-site audits of its independent Suppliers, Vendors and Service Providers audits, Employees, and workplace wellness surveys. Employee interviews and third-party inspections of suppliers, vendors, service providers, facilities, operations, books, records, and lodging provided by suppliers may be part of these audits. If infractions are found, remedial action has to be taken.

It is expected of suppliers and employees to abide by all relevant corporate policies. Discipline up to and including contract termination will be applied for violating our human rights policy or for refusing to cooperate.



# Conducting Human Rights Impact Assessment & Due Diligence

The following series of steps are followed while carrying out the due diligence:

## Step 1

Gaining a thorough grasp of the business and human rights context requires recognizing the limits and engaging with stakeholders. We examine our current policies, practices, and operations to see how each business/function might affect human rights.

The SA8000 Surveillance Audit for the Company's manufacturing operations in Dahej and Ranjit Nagar was completed this year. In accordance with our code of ethics, we completed our second ISO37001 (Anti Bribery Management System) surveillance, with our scope expanded to include international locations. This itself confirms our commitment to upholding the highest ethical, social, and business development standards. The ISO26000 and ISO20400 recertification is completed with the scope expanded to international locations.

Furthermore, DQS India conducted our second Human Rights Compliance Assessment across locations to review our implemented processes and take necessary corrective actions for continuous improvement.

The methodology used for the assessment included both structured and unstructured interviews with key employees, local communities, contractors, and suppliers from various

locations. The HRCA covered the 7 locations- Noida, Dahej, Jolva, Ranjitnagar, Vadodara, Germany, and USA covering the human rights impacts across 3 areas:



## Step 2

The second step is to evaluate our score and identify the most important Salient Human Rights issues for the company so that we can narrow the long list of human rights issues to those that the company can impact and identify hotspots. Our overall Human Rights Impact Assessment score summary is provided below:

Social Accountability & Human Rights Parameters	Location	Score obtained	Maximum score	% Score	Score obtained	Maximum score	% Score
		2022-23			2021-22		
	Dahej A	339	350	97%	337	350	96%
	Dahej B	342	350	98%	318	350	91%
	Ranjitnagar	342	350	98%	313	340	92%

The following table illustrates the few important identified areas of improvement through the assessments of our manufacturing sites and offices:

Sr. No.	Areas of Improvement
1. →	To achieve the organization objectives on carbon neutrality, further investments in Renewable energy and collaboration with carbon sequestration organizations may be prioritized.
2. →	Documents on Roles, responsibilities, authorities, and accountabilities may be reviewed thoroughly for inclusion of social responsibility and ESG areas.
3. →	Mechanism of identifying the discrimination or human violation happens in the stake holder premises needs to defined in the system.

### Step 3

Based on the assessment, the company identified and prioritized the risk by reviewing our salient human rights issues.

### Step 4

The final step entails regularly monitoring other issues to assess potential risks and remediate identified impacts. Our due diligence program's findings are regularly incorporated into our processes to ensure that we have adequate procedures, policies, and management systems in place to identify, address, and prevent potential social accountability and human rights risks across our business and value chain. Furthermore, as part of our comprehensive social responsibility, we engage in continuous dialogue with Community and Local stakeholders to identify any negative human rights impact and a remediation plan. For details, please refer to the Annual report 2022-23, Chapter – Social & Relationship Capital, page number: 62-67.

# Salient Human Rights Issues, Taking Actions & Results

GFL works to better understand the possible and actual effects on human rights throughout its value chain and operations. We also want to enhance our risk assessment process so that we can notice patterns, hotspots, and underlying causes and address problems in an efficient manner.

The Company has engaged professional help to assess our established processes as part of its human rights due diligence approach. The objective is to identify and address areas that have a serious impact on human rights and determine essential corrective steps for continuing improvement in identified areas. The organization now has a better grasp of the impact and the need for additional mitigating and remediating measures thanks to this procedure.

## 1. No Discrimination & Diversity

GFL believes that regardless of any form of discrimination, everyone has the right to the same basic human rights as their birthright. The Company and its affiliates are dedicated to the equal employment policy. This commitment is a crucial component of the company's mission to become an "Employer of Choice."

As a result, all our HR policies and practices reflect non-discriminatory practices and offer all employees the same opportunities.

We do not discriminate on the basis of race, color, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, indigenous peoples affiliation, trade union affiliation, political affiliation, or political or another opinion. Marital or family status, personal relationships, and health status, such as HIV/AIDS status, are all emerging prohibited grounds. As part of this commitment, all employees at all levels are expected to treat their co-workers fairly, with respect, and without harassment. All stakeholders have equal access to employment opportunities. This includes recruitment, selection, and appointment, as well as training, learning and development, promotion, Company activities, and other employment terms and conditions. All personnel is treated with dignity GFL is committed to bringing in, nurturing, and keeping top talent for all of its business verticals. The organization works

hard to advance human rights, diversity and inclusion, employee engagement, and ongoing learning and development to create a values-based culture where workers flourish alongside company expansion.

We are committed to providing equal employment opportunities without any discrimination to all stakeholders and comply with prevailing labor laws and ILO Conventions in all areas of recruitment, selection, appointment, training, learning and development, promotion, Company activities, and other terms and conditions of employment. We however give preference to the sons of the soil and extend preference to the local population by hiring employees from the communities surrounding our manufacturing unit.

The organization has a robust talent acquisition strategy in place to find bright, motivated, and morally-driven young people. The influence of the talent search is widespread among India's best universities and B-schools. Our extensive and methodical training program equips the new talent to lead the organization to new GFL continuously engages with reputed institutes to build long-term relationships with the academia and to ensure young talent is inducted directly from these campuses.

The company's recruitment policy is based on fairness and non-discrimination, as well as compliance with 1958 mandate to end "discrimination in regard to employment and occupation." There are established guidelines in this regard. All the guidelines are included in an employee handbook. Presently, joining requires a declaration of acceptance and adherence to the guidelines. The guidelines are based on the ILO Conventions listed below:

Sr No	Convention/ Recommendation No.	Issue Addressed
1	ILO Convention 100 and 111	Equal Remuneration and Discrimination- Employment and Occupation
2	ILO Convention 131	Minimum Wage Fixing
3	The United Nations Convention to Eliminate All Forms of Discrimination Against Women.	
4	The United Nations Convention on the Elimination of All forms of Racial Discrimination	

In line with the Equal Remuneration Act of 1976, the company is an equal opportunity employer with no sexual discrimination based solely on the category of work performed.

All employees are evaluated for their performance over the course of six months before being confirmed. All of our employees' performance is evaluated using the normal distribution and relative evaluation concepts. Our Performance Management System supports the right to fair treatment, objectivity, transparency, and non-discrimination. Thus, ensuring a performance- driven culture.

#### Number of Employees Promoted/Upgraded

2022-2023	2021-2022	2020-2021
552	667	660

Women Empowerment & Diversity is an integral part of its people strategy at GFL. As a signatory to UN Women and UNGC Women's Empowerment Principles, the Company has demonstrated its commitment to Gender Equality and Women Empowerment.

The women population in our Company has been steadily increasing and we are proud to now have young lady engineers in our workforce. We are an equal-opportunity employer and plan to improve the gender ratio in leadership positions and the inclusion of women employees in all functional roles. Besides equal employment, all employees have equal access to relevant training and skill enhancement programs.



Women's Day Celebration at Vadodara office

#### Number of Women Employees

FY 23	FY 22	FY 21
96	67	51

#### Participation/Inclusion/Representation of women

Particulars	Total	No. and percentage of Females	
	(A)	No. (B)	% (B / A)
Board of Directors	10	1	10%
Key Management Personnel	3	0	0%



# Salient Human Rights Issues, Taking Actions & Results

## PMS Coverage – Level wise

Percentage by gender and by employee category who received a regular performance and career development review during the reporting					Percentage by gender and by employee category who received a regular performance and career development review during the reporting					Percentage by gender and by employee category who received a regular performance and career development review during the reporting				
FY2022-23					FY2021-22					FY2020-21				
Employee Category		Male (%)	Female (%)	Total (%)	Employee Category		Male (%)	Female (%)	Total (%)	Employee Category		Male (%)	Female (%)	Total (%)
Permanent	L2	55.3	0	78	Permanent	L2	76	..	78	Permanent	L2	92.59	..	93
	L3	72	1.5	87		L3	86	1	87		L3	96.47	100	96
	L4	59.8	4.4	92		L4	87	6	92		L4	94	100	94
	L5	46.7	1.7	86		L5	83	4	86		L5	87.44	78.7	87
	L5S	33.5	0	62		L5S	62		62					
	L6	95.5	0	99		L6	99	..	99		L6	94.09	..	94

\*The employees who have joined on or before 30<sup>th</sup> September are eligible to be covered under the PMS for the financial year.

We advocate for and raise awareness of hiring people with disabilities. As of March 31, 2023, there were three permanent employees and four contract employees with disabilities during this fiscal year.

As stated in our HR Operations Manual and Employee Handbook, the Company only considers an employee's performance when hiring, training, promoting, and rewarding them. Every employee, including those who recently joined, goes through an awareness program on the preservation of human rights, and the company's human rights policy is covered in part in the employee handbook, which is given to every employee. Contract workers as well as firm employees have participated in the human rights awareness program.

Location	Total number of hours spent on training on Human Rights 2022-2023	Total number of hours spent on training on Human Rights April 23 to Nov 23	% Employees covered on training on Human Rights 2022-2023
Dahej A	1006	192	83%
Jolva (Dahej B)	308	222	69%
Ranjitnagar	768	180	81%
Noida & Other offices	472	76	84%

Additionally, special training on human rights policies, procedures, and their application in security practices is organized for security personnel across locations.

## Security Data Personnel Training on Human Rights

2022-23					2021-22					2020-21				
Location	Number of Security Personnel			Total Training Compliance %	Location	Number of Security Personnel			Total Training Compliance %	Location	Number of Security Personnel			Total Training Compliance %
	Own	Contractual	Total			Own	Contractual	Total			Own	Contractual	Total	
Noida	0	10	10	79%	Noida	0	9	9	100%	Noida	0	9	9	100%
Dahej	3	55	58	91%	Dahej	1	64	65	71%	Dahej	1	64	65	71%
Ranjit Nagar	1	43	44	78%	Ranjitnagar	1	42	43	98%	Ranjitnagar	1	42	43	98%

Each location has an internal complaints committee to handle accusations related to sexual harassment, and the company has a Protection & Compliance framework in place. All employees receive comprehensive training on how to curb inappropriate behavior and uphold individual dignity.

During FY 2022-23, no complaint was received from any stakeholder regarding a human rights violation- employment discrimination reported from any of the Company's sites.

Details of performance and career development reviews of employees and worker:

Category	FY 2022-23 current Financial Year			FY 2021-22 Previous Financial Year		
	Total (A)	No.(B)	(B/A)	Total (C)	No.(D)	(D/C)
<b>Employees</b>						
Male	1378	282	20%	20%	147	13%
Female	54	14	26%	26%	10	19%
Total	1432	296	21%	21%	157	13%
<b>Workers</b>						
Male	1247	201	16%	957	267	28%
Female	0	0	0%	0	0	0%
Total	1247	201	16%	957	267	28%

## 2. No Child Labor

In accordance with local legislation pertaining to the minimum age of employment, we are dedicated to preventing the use of child labor inside the organization. Our GFL "no child labor" policy reaffirms our adherence to both the United Nations Convention on the Rights of the Child and ILO Convention No. 182. All potential workers must provide their age verification documentation with their job applications as part of our recruitment procedure. All candidates under the age of eighteen are automatically disqualified.

We don't hire anyone under the age of eighteen and follow the same rules for contract laborers. A specific clause mentioning the prevention of child labor is specified in the service contracts/purchase orders, and we also ensure that our suppliers and service providers are adhering to these terms.

None of our operations and suppliers pose the risk of child labor or exposure of young employees to hazardous working conditions.

## 3. No Forced/Compulsory/Bonded Labor, Slavery & Harassment

The Company values labor dignity and does not tolerate forced/bonded/compulsory labor, including prison or debt bondage labor. Our policies and guidelines protect the right to life and provide our employees and contract workers with freedom from torture and inhuman or degrading treatment. The company does not use forced or compulsory labor, such as prison or debt bondage labor.

The business has implemented guidelines in this area. The company's adherence to the ILO convention is reiterated by the policies, which are included in the HR Operations Manual and Employee Handbook and address forced labor and its abolition (ILO Convention 29 and 105).

Following the necessary terms of the Factories Act, 1948, we have eight-hour shifts and a six-day work schedule to provide an ideal number of working hours in a day, a weekly day off, additional pay for overtime, and leave options. We adhere scrupulously to the 1948 Payment of Minimum Wages Act.

A declaration of acceptance and adherence to the policy is part of the joining process. Employees are free to quit at any time after serving the required notice period outlined in their conditions of appointment because we are a free-will employer. Every employee participates in ongoing education and awareness campaigns about the prevention of sexual harassment (POSH) at work. The POSH awareness program has been completed by contract laborers in addition to corporate workers.

# Salient Human Rights Issues, Taking Actions & Results

There is no significant risk of forced/compulsory labor, slavery, or harassment-related issues in any of our operations and suppliers. The company has an established Protection & Compliance framework as well as an Ethics Committee in place that allows employees to raise any issue related to forced/compulsory labor, anti-slavery, and human trafficking violations. It also reiterates the company's no-retaliation policy.

During FY 2022- 23, there was no complaint received from any stakeholder/s regarding human rights violations, forced/compulsory/bonded labor, Slavery, and Sexual Harassment in employment reported from any site of the Company.

Location	Total number of hours spent on training on Human Rights 2022-2023	Total number of hours spent on training on Human Rights April 23 to Nov 23	% Employees covered on training on Human Rights 2022-2023
Dahej A	988	210	85%
Jolva (Dahej B)	336	232	77%
Ranjitnagar	758	154	84%
Noida & Other offices	422	98	86%

It is always our endeavour to safeguard health, safety, and welfare of our employees, contractual partners, and other stakeholders, including the local community through involving them in our various engagement program. We have a top down approach in terms of working towards providing a safe and healthy workplace to all stakeholders. Our governance for EHS is well supported through corporate steering committee which is chaired by CEO and deputy MD along with corporate functional heads and Unit Heads and this committee is governed by a detailed charter which outlines following key attributes

- Leadership & Accountability
- H&S Management System
- Capability Development
- Process Safety
- Work Place Safety



PSM basics (overview) Train-the-trainer program

## 4. Health & Safety

Safety is a core value at GFL and we strive to integrate this in our ecosystem with an objective of ZERO HARM through people engagement across all levels. We understand the importance of safety in all our activities we do, and are committed to implement measures that prioritize the well-being of our employees and stakeholders. We are dedicated to protect the health and safety of our employees, contract employee and nearby communities. All our units are certificated in OHSAS 18001:2007, ISO9001:2015, ISO 14001:2015, and ISO45001. Our main aim is to provide a safer and healthier working environment by providing right resources in line with GFL policies, standard, guideline and applicable regulatory requirements.

The Corporate Steering committee popularly known as "GCHSC" meets once in every month and oversee the strategical implementation of corporate EHS goals. Each of the goals are sponsored by the senior leadership team from corporate and Unit Heads.

At Units we have APEX Committees led by respective Unit Heads with membership from line functions, and each of the Unit APEX member are invariably a Unit level Functional Head (FH) or HoD. These Unit level FH/ senior HoD to take lead following Subcommittees (SC) to drive field level implementations;



**Training on Contractor Safety Management**

- a Safety Observation (SO)
- b Incident Investigation (II)
- c Incident Investigation (III)
- d Standard, Rules & Procedure (SR&P)
- e Capability Development & Communication (CD&C)
- f Product Safety Stewardship (PS)
- g Distribution Stewardship (DS)
- h Process Safety Management (PSM)
- i Emergency Response and Planning (ERP)
- j Pollution Prevention (PP)
- k Security (Physical+Cyber)



**Training for GFL leaders on Leading Safety Efforts**



**Barrier Health Task Force Discussion**

Each of the SC are driven through a charter, work plan and KPI consistent with GFL EHS Policy and Annual EHS goals, this structure works collaboratively across all locations to bring the Oneness of EHS system across GFL.

While aiming the vision of “NO BODY GETS HURT”, Our organization is dedicated to achieving high level of deliveries to drive requirements under various global and national standards and making constant improvements in its EHS performance. As part of its sustainability drive to positively influence the 3Ps—people, planet, and profit—GFL is committed to responsible care. Our shop floor and upper management are connected through a well-organized governance structure that implements the OH&S framework.



**Field Audit with Trained CFSA Auditors**

We collaborate with dss+ to work together to take GFL to next level EHS excellence and transforming the organisation for achieving our goal of **ZERO HARM**. The top management is committed and demonstrates safety by involving through various initiatives and supporting its operations by allocating resources,



# Salient Human Rights Issues, Taking Actions & Results

conducting ongoing reviews, with personnel involvement across the organisation.

Operational discipline plays a very pivotal role for any organisation to be successful in its quest for achieving excellence in EHS cultural transformations. To stimulate the process journey of having Oneness in our approach across GFL, we put up our road map to have standardise systems in our EHS governance includes Leading and Lagging aspects. We have developed various safety standard aligning with EHS policies and also, we monitor all our matrices to ascertain the compliances of our standards on field vs the performance time to time.

For establishing a safe workplace, understanding on associated Hazards and risks arising out of them must be known to each of the stakeholders. For which we have established processes;

- a Pre-JSA (For all non-routine task) before issuance of Permits.
- b JSA based SOP developed through line managers/shopfloor employees
- c Permit to Work for all non-routine activities.
- d Training on the SOP for the shopfloor people.
- e Tool-Box Talk before start up of any activities

Learning from incident is very much essential to get rid of recurrences so we adopt Why-Why Tool to reach to the root cause of any incident and take CAPA based on identified factors.

HAZOP are also being conducted for all operational activities for existing and future setup. For any change in terms of facility, technology and personnel we have established MOC process to address impending risk.

Specially focus is given for reviewing impact of changes in our facility through detailed pre-start-up safety review (PSSR) which is led by a senior leader.

GFL, being pioneer in manufacturing of various hazardous chemicals and which is very close to our R&D and Innovation outcome, so Process Safety Management (PSM) places a very distinguished space in our approach. To support PSM, we have risk-based approach across our operations which enable us to take decisions based on the risks on hand vis-à-vis

the control barriers. We have a established system wherein High Risk Scenarios (HRS) are identified across our Units through Risk Assessment Matrix (RAM) to prioritized the healthiness of the existing barriers. This is popularly known as Barrier Health Management (BHM). To assure healthiness of the barrier we have Risk Owners identified against each of the HRS duly supported by Barrier Owners to assure the preventative and mitigative barriers.

At GFL we believe involvement from grassroot level can only drive consistent improvement of our EHS deliverables. We institutionalise "I Am A Safety Leader" program, that aims to promote safety practices across all our area of influences. The 4E Framework serves as the foundation for the framework of this curriculum, which is carried out using the 5 Essential Steps.

To elevate the level of awareness and encourage participations among employees and other stakeholders, our CD & CSC is working closely with unit APEX committee. Various capability development programs that include TNI, TtT development, mass communication are periodically organised involving all level of employees.

We conduct mock drills and table-top exercises. The topics for the mock drills are excepted from BHM exercise, this gives us an edge to stay prepared for any untoward incident arising out of failure of any of the barriers. We have emergency response team who are trained from time to time through internal and external resources. We also participate during offsite mock drills as warranted by mutual aid agreement and obligations under local authorities.

At GFL, employee wellness is extremely important. We are dedicated to the health and safety of its employees. To engage our employees and partner several events are organised e.g. Safety Day/Week, Road Safety Week, Environment Day, Ozone Day, and International Family Day, are celebrated across our units to raise awareness and motivate employees to take the initiative in all aspects of OH&S.

This World Water Day, we have reaffirmed our commitment to a hygienic and safe workplace by signing the WASH pledge. On November 18, we organized a WASH Awareness Campaign within the company to encourage action to address the worldwide sanitation issue and assist reach Sustainable Development Goal 6 (SDG 6), which



promises sanitation for everyone by 2030. In order to raise awareness among employees and contractors about WASH, its benefits for the workplace, and its connection to the SDGs, a campaign was launched.

Additionally, a Workplace Wellness Survey comprising 70% of the populace was carried out FY 23 in various areas. Based on the findings, over 20 wellness initiatives were implemented throughout the year in various locations. A few of these initiatives included eye camps, BMI checks for male employees, an iron and calcium deficiency camp for women, and a Sunday yoga day.

We consider the people who work for us to be significant players in the business ecosystem. All contract employees are imparted safety induction training by respective Unit EHS department prior to beginning work. We provide our employees with hygienic, appropriate, and safe working conditions. Prior to getting them engaged for routine plant operations, each contract employees receives job specific training program by concern department and training card is provided.

We conduct periodical safety committee meeting to review status of implementation of various EHS initiatives and take stock of each of them. Wherein GFL employees and representative from contract partners participate and contribute towards safe operation of the manufacturing processes. We circulate meeting minutes and update them on status of the minute time to time.

Occupational Health training programs are imparted to our employees and contract employees specific to their area of exposure on a regular basis. Various initiatives have been taken to promote the health of our workmen and contractors. Some of them include:

- Pre-& periodical medical check-ups of own and contract employees
- Organizing dental and health check-up camps Blood donation camps
- First Aid training programs

Digital platform play a crucial role for a success of any EHS initiative to emulate sync and drive sustenance across GFL. Suraksha Setu, EHS based platform is developed at GFL for capturing and tracking all leading & lagging indicators, whereby giving assurance to top management on effective implementation on field and its performance as a whole.

#### Total Hours Spent on Safety Training during the period

Location	Total No. of Hours Spent on Safety Training
Dahej-A	22145
Dahej-B	16571
Ranjitnagar	15919
Noida & Other Offices	871
Total	55506

#### Anti-corruption or Anti-bribery policy

The Company maintains a robust policy on preventing Corruption and Bribery for Employees and Third Parties. It upholds a steadfast commitment to conducting business with integrity, adhering to all relevant laws and regulations, including the Indian Prevention of Corruption Act, 1988, anti-bribery and anti-corruption laws, and aligning with the UN Global Compact principles, ISO26000, and National Voluntary Guidelines on Social, Environment & Economic Responsibilities. Continuous improvement in these practices remains a key focus. For more details, please visit our website at <https://gfl.co.in/upload/pages/7653e03350050ff9e3b2d5f057207d86.pdf>

# Salient Human Rights Issues, Taking Actions & Results

## Well-being of employees

### A. Details of measures for the well-being of employees:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number C	% (C / A)	Number (D)	% (D / A)	Number E	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	1715	1715	100%	1715	100%	NA	NA	Nil	NA	NIL	NA
Female	73	73	100%	73	100%	73	100%	Nil	NA	NIL	NA
Total	1788	1788	100%	1788	100%	73	100%	Nil	NA	NIL	NA
Other than Permanent employees											
Male	99	99	100%	99	100%	NA	NA	Nil	NA	Nil	NA
Female	7	7	100%	7	100%	7	100%	Nil	NA	Nil	NA
Total	106	106	100%	106	100%	7	100%	Nil	NA	Nil	NA

### B. Details of measures for the well-being of workers:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number C	% (C / A)	Number (D)	% (D / A)	Number E	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	1524	1524	100%	1524	100%	NA		Nil	NA	Nil	NA
Female	0	0	NA	0	NA	NA	NA	Nil	NA	Nil	NA
Total	1524	1524	100%	1524	100%	NA	NA	Nil	NA	Nil	NA
Other than Permanent employees											
Male	4824	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA
Female	128	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA
Total	4952	Nil	NA	Nil	NA	Nil	NA	Nil	NA	Nil	NA

## 5. Working Hours & Leisure

Everybody has the right to leisure and rest under the UDHR, which includes the ability to set appropriate limits on working hours and take paid vacations on occasion. At GFL, we promote punctuality and punctuality in attendance while also helping staff members achieve a better work-life balance. GFL provides its office- based staff with two benefits: flexible scheduling and an extended weekend on the other Saturday. In order to support the employees' religious activities, we also give them nine festival holidays. We recently gave our staff the following leaves of absence:

S.No	Leave	Details
1	Time Off	An employee can avail short leave twice a month for 2.5 hrs a day – pre/post lunch
2	Celebration Leave	An employee can avail 1 celebration leave in a year on his/her/spouse/Parent's birthday/anniversary as chosen by the employee
3	Bereavement Leave	An employee can avail 3 bereavement leaves in the unfortunate event of demise of the employee's immediate family member.

We also allow employees to take additional leave and provide work-from-home options in special circumstances, such as personal illness, the illness of a spouse, child, or other family members, a natural disaster, educational needs, and during transfers to other places. Furthermore, all female employees are entitled to take childcare leave under the Maternity Benefit Act. In this sense, the organization has policies in place.

The Factories Act of 1948 governs the working hours, rest breaks, shift rosters, spread overs, compensatory day-offs, and weekly day-offs. The 1948 Factories Act governs the payment of overtime. Double the gross salary is the formula used to compute overtime pay. This policy applies to all technicians and trainee technicians in the technician grade/level, as applicable, in the particular Plant/Sites.

All of these service requirements are extended to all laborers and workers employed by contractors. Plants follow the labor laws, vacation policies, and other national regulations in their own nations. It protects both the right to fulfil one's obligations and the right to the environment.

#### Details of Parental Leave

S.No	Parameter	2021-23		
		Male	Female	Total
1	Total number of employees who were entitled to parental leave (in numbers)	177	4	181
2	Total number of employees who took parental leave (in numbers)	177	4	181
3	Total number of employees that returned to work in the reporting period after parental leave ended (in numbers)	177	4	181
4	Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work (in numbers)	145	4	149
5	Return to work and retention rates of employees that took parental leave (in %)	82	100	82

## 6. Remuneration

The company offers competitive pay to its employees and has adjusted the pay structure to follow the principle of "Equal pay for equal labor." Individual pay levels at GFL not only reflect employee contribution but there is no pay disparity between men and women.

wage surveys through remuneration consultants and specialists to determine standard salary levels in other companies engaged in similar businesses to ensure parity and non-discrimination of salary and wages.

The company's Nomination & Remuneration Policy (NRP) continues to be the guiding light for maintaining remuneration standards in accordance with the provisions of Section 178 of the Companies Act, 2013, and Listing Agreement. The policy is available on the Company's website at the below link: <https://www.gfl.co.in/upload/pages/cb6ba6345d09cb9d816af1bb665c860a.pdf>

The company follows the provisions of the Equal Remuneration Act, 1976, and conducts salary and



# Salient Human Rights Issues, Taking Actions & Results

## Coverage of Group Medical Insurance and Group Personal Accident Insurance/ Social Security Schemes, Bonus and Ex-gratia schemes

Sr. No	Benefit	Coverage	FY 23			FY 22			FY 21		
			Total Number of Employees	Employee Covered	% Coverage	Total Number of Employees	Employee Covered	% Coverage	Total Number of Employees	Employee Covered	% Coverage
1	Group Medical Reimbursement Scheme	Employee, spouse, two Dependent children	3,312	3,312	100	2,486	2,486	100	2,220	2,165	100
2	Group Personal Accident Insurance	Accidental Death irrespective of location of employee	3,532	3,532	100	2,616	2,616	12	2,220	2,220	100

## Details of retirement benefits, for Current FY and Previous Financial Year.

Benefit	FY 2022-23			FY 2021-22		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority(Y/N/N.A)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority(Y/N/N.A)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	NA	100%	100%	NA
ESI	0.20%	0%	Y	0.30%	0%	Y
Others - please specify	-	-	-	-	-	-

Details of minimum wages paid to employees and workers,in the following format:

Category	FY 2022-23					FY 2021-22				
	Total (A)	Equalto Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E ID)	No. (F)	% (FID)
Employees										
Permanent	1,788	Nil	NA	1,788	100%	1,373	Nil	NA	1,373	100%
Male	1,715	Nil	NA	1,715	100%	1,317	Nil	NA	1,317	100%
Female	73	Nil	NA	73	100%	56	Nil	NA	56	100%
Other than	106	Nil	NA	106	100%	61	Nil	NA	61	100%
Permanent	99	Nil	NA	99	100%	54	Nil	NA	54	100%
Male	7	Nil	NA	7	100%	7	Nil	NA	7	100%
Female										
Permanent	1,524	Nil	NA	1,524	100%	1,105	NA	NA	1,105	100%
Male	1,524	Nil	NA	1,524	100%	1,105	NA	NA	1,105	100%
Female	0	Nil	NA	0	NA	0	NA	NA	0	NA
Other than Permanent	4,952	4,952	100%	NA	NA	4,490	4,490	100%	NA	NA
Male	4,824	4,824	100%	NA	NA	4,362	4,362	100%	NA	NA
Female	128	128	100%	NA	NA	128	128	100%	NA	NA

## 7. Indigenous People & Land Rights

We think that the rights of indigenous peoples should be upheld and that the survival of indigenous institutions, cultures, and practices should be promoted. We offer preference to locals by hiring workers from the areas surrounding our production facilities at the General Manager level and up.

Location	Local Community	Total Percentage of Employees - GM and Above	Total Percentage of Employees - GM and Above	Total Percentage of Employees - GM and Above
		FY 23	FY 22	FY 21
Noida	Noida, Ghaziabad, Delhi, Faridabad, Gurgaon	27%	53%	35%
Dahej	Bharuch, Vadodara, Surat, Narmada, Vapi	22%	32%	19%
Ranjit Nagar	Vadodara, Mahi Sagar, Chhota Udaipur	56%	62%	31%
Vadodara	Anand, Panchmahal, Bharuch	82%	70%	15%
Dahej B	Bharuch, Narmada, Surat, Vadodara	42%	-	-

We think it is important to uphold the rights of indigenous people and to support the development of their institutions, cultures, and customs.

We actively take part in the Pancha Mahotsav celebration, which honors the magnificent beauty and splendor of the heritage, architecture, and culture of Champaner and Pavagadh in Gujarat, as part of our commitment to preserving indigenous culture. Additionally, we set up resting areas with enough food and water for pilgrims who walk to Mahakali Pavagadh during the local festival of Chaitri Navratri.

We take care to ensure that neither the territory of indigenous peoples nor any of their property is occupied by our operations. We get the approval of the indigenous people through public hearings and address their concerns before expanding or acquiring territory.

Throughout the reporting period, there have been no instances of indigenous peoples' rights being violated.

2022-23		
Location	Employment	% of total manpower
Ranjitnagar	On roll + Contract Labour	37
Dahej A		75
Dahej B		12

## 8. Standard Of Living & Fair Wages

The living wage idea, which ensures salaries sufficient to provide an acceptable quality of living for the employee and her or his family, is the basis of GFL's compensation structure. A reasonable level of living is determined by having enough food, water, shelter, healthcare, education, transportation, clothes, and other necessities, as well as savings for unforeseen circumstances. Because of this, even at the entry-level, GFL pays more than the legal minimum wage in every region.

In order to guarantee that workers receive their compensation in a rational, equitable, and fair manner, we have set rule(s) with an organized procedure of wage and salary calculation and annual increments. The company offers competitive remuneration that is in line with all relevant legal requirements, motivating, fair, and equitable, and contingent on both employee and company performance.

Year	2022-23	2021-22	2020-21
Average Raise %	3,532	2,616	2,220

Unless permitted by national law or a collective bargaining agreement, the Company/supplier does not withhold or deduct wages for disciplinary reasons. In addition, the company/supplier reimburses employees for overtime at a premium rate set by national law or collective bargaining agreement.

# Salient Human Rights Issues, Taking Actions & Results

## 9. Disciplinary Practices

To make sure that its operations are carried out in compliance with the highest moral and ethical standards as well as all relevant laws and regulations, the company has created a Code of Conduct (CoC). When working on the Company's property, offsite, at the Company's sponsored business and social events, and/or anywhere else they represent the Company, the CoC encourages all Directors and Officers of the Company to act with the highest personal and professional integrity, honesty, and ethical conduct. Our disciplinary process is devoid of prejudice and discrimination since it is based on the "Principle of Natural Justice," and it is free of bias and discrimination.

Additionally, the company has a whistleblower policy that serves as a means of reinforcing the application of the company's code of conduct. This policy encourages all directors and officers to take constructive actions that are both consistent with the company's beliefs and are seen as such by the community. In this sense, the organization has set policies.

All Employees worldwide working with the company are expected to sign an undertaking to comply with all applicable laws, regulations, codes, and sanctions relating to the code of conduct and all applicable company policies. The signing of the undertaking is a part of the joining process of all new employees with immediate effect.

The company has also adopted a Statement of Fair Business Practices and Responsible Care Marketing & Sales. Our processes comply with ISO37001 standards and the company conducts surveillance audits periodically.

Our policies against bribery, corruption, and unfair business practices are also communicated within the organization via banners, posters, and flyers. 100% of governance body members, employees, business partners, and other stakeholders communicated and trained on the anti-corruption policy adopted by us.

We give our employees a voice when they see violations of our fair business practices policy. We urge staff members to participate in the "Spot on – Value Champion" spontaneous recognition process by

identifying and reporting cases of corruption, bribery, fraud, etc. Employees can use the online "Ethics Line" portal to report infractions or issues. Only the Ethics Officer receives reports of concerns in order to uphold absolute secrecy. The Ethics Officer has a responsibility to look into this and get back to the whistleblower. Employees and other stakeholders can also report any occurrence anonymously.

We forbid taking any kind of retribution against someone who, in good faith, reports a business behavior concern, even if the internal inquiry determines that the complaint is without validity. In addition, if a superior's instruction or direction goes against the policies of fair business practices and human rights, any employee has the right to refuse it. Through frequent employee education and training, strict vigilance, system implementation, and ongoing communication of fair business practices, processes, and policies, we have ingrained the values of ethics and integrity throughout the entire organization.

Three complaints about the Code of Conduct, whistleblower rights, and equal employment opportunity were received from our stakeholders in FY22–23; all three complaints were settled by year's end. An impartial panel looked at each issue and found a solution. Most of the time, the allegations were unsubstantiated, and the complainant received a satisfactory response.



Cardinal Safety Rules Training at Dahej

## 10. Talent Development & Training

GFL offers a clear procedure for its workers' career advancement and development. The applicants' merit is the only consideration throughout the process. The Talent Review Committees at the Unit and Corporate levels oversee talent development within GFL.

The Talent Development process is monitored by our Unit and Corporate level Talent Review Committees. We use a variety of development methods, such as the Individual Development Plan, 360-degree Feedback, Assessment growth Centre, and 9 Box Matrix to fairly identify potential and create individualized growth plans. Every one of the recognized A reputable external organizations offers a one-year high-potential program for leadership development that is attended by employees of the player. Over 80% of workers holding positions as general managers and higher have had their 360-degree feedback reviewed

Number of High Potentials identified across the company FY2021-22	
Average Raise %	70

A few of the high potentials have also been sponsored by our company for the Executive Development Program through IIM. High Skilled Technicians, who are consistently high performers, are taken through a higher education scheme for career progression.

Great organizations focus on achieving sustained superior performance while supporting an engaging society where exceptionally talented individuals are involved and appreciated. In light of this, we have chosen and created two flagship programs that will speak to and instill in all employees at the AGM and above the virtual leadership that the organization expects from its executives. To help us through the shift, we have teamed up with an outside organization. We are happy to report that the first batch of this program, which focused on the Four Disciplines of Execution (4DX), had already taken place last year. The 4DX program has been renamed as "Get Results".

The expansion of the company is closely tied to the growth of its employees. In order to create an adaptable and future-ready company, we launched an in-house digital training platform this year called "ODventure," or the Learning Management System. The goal is to enable flexibility in accessing the training course at any time and from any location, while also making learning accessible to all. Employees have complete control over their learning, including built-in exams, thanks to the LMS. All of our workers, even contract laborers, have the right to an education, and this is ensured via our training and development.



We believe that while all members of the organisation, such as business executives, people managers, and so on, are responsible for attracting and retaining talent, it is the HR function that plays a critical role in building exceptional workplace practices that contribute to superior employee experience.

As such, we began with a transformation journey by launching the 'GROW' Programme for the entire HR team, across the company. The programme is based on Stephen Covey's framework from his 1989 classic "The 7 Habits of Highly Effective People" which would serve as the beginning of a transformative journey toward the development of one's self and interpersonal relationships. The first session was conducted in June 2023 by Mr. Kallol Chakraborty (Head- GCHR) at Vadodara for the HR Team, across locations.



 **Grow Programme -The HR Learning Workshop at Vadodara**



# Salient Human Rights Issues, Taking Actions & Results



While streamlining all HR processes and digitising them to make them more user-friendly, we are happy to announce that we have added a virtual learning platform to our employee portal this year – Movie Bioscope. This was created to engage in learning while having fun, ensuring flexibility and personalised learning experience.

It is a platform to make learning easy and leisurely. It is a One-Click Movie Platform for all employees wherein anyone can find a cache of movies to watch to increase their knowledge and learnings in various aspects of leadership. Till date, 5 leadership-based movies have been made available on the platform.

## Employee Training Details

Year	Training Man-Hours		
	2022-2023	2021-2022	2020-2021
Total	71561	69497	26756

## Training Man-hours

Training Categories	Total Training Manhours		
	FY 23	FY 22	FY 21
Behavioral	14011	11850	10740
Technical	6686	7607	7020
Occupational Health & Safety	20570	6182	3663
Management System Topics	11938	16602	1003.7
Social Accountability & Social Responsibility	1236	4834	1395
Prevention of Sexual Harassment (POSH)	2504	3157	889
Fair Business Practices	7146	8631	1491
Cyber Security	2452	3068	597
Human Rights	2554	3928	-
Gender Sensitivity	2404	3638	NA
Environment Management	60	-	-

Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2022-23 current Financial Year			FY 2021-22 Previous Financial Year		
	Total (A)	NO. of employees / workers 'IB'	% (B / A)	Total (C)	NO. of employees / workers 'ID'	% (D / C)
<b>Employees</b>						
Permanent	1,788	1,193	67%	1,373	1,007	73%
Other than permanent	106	0	0%	61	21	34%
Total Employees	1,894	1,193	63%	1,434	1,028	72%
<b>Workers</b>						
Permanent	1,524	1	0%	1,105	19	2%
Other than permanent	4,952	1,793	36%	4,490	718	16%
Total Workers	6,476	1,794	28%	5,595	737	13%

## 11. Engagement, Participation, Recognition, Freedom Of Speech & Association

GFL places a high value on employee engagement. We make certain that all events are celebrated with our employees. Regular employee engagement programs such as Connectalkavity, HR Connect, Townhall, Skip meetings, Let's Talk, Newsletters, PHRRO, Prayas, festival celebrations, family day, sports tournaments, and so on are held across locations with the goal of strengthening the bond between employees and the company. All our employee engagement and participation initiatives and the guidelines thereof are in line with the tenets of human rights.



**Women's Day Celebration of Dahej & Jolva Site**

Our Company believes in motivating and retaining talent by identifying and recognizing the employees for the good work done. This is done through a digitalized platform – 'SPOT ON'. Apart from rewarding performance, GFL also rewards employees for long service to the Organization.



**Garba Night at Vadodara**

## Launch of a New Employee Appreciation Platform

**PAT ON THE BACK**- Appreciating efforts builds a more engaged and productive workforce. This enhances employee satisfaction, build greater loyalty, and increased organisational success. With this conviction, we launched a new digital platform for Employee Appreciation- 'PAT ON THE BACK', this year.

**GAURAV AWARD**- GFL acknowledges that organizational success is the result of a concerted effort of the whole team. While all teams across all locations work in collaboration, some teams deliver significantly at a higher level through seamless synergy. The Company in its endeavor to recognize these outstanding teams and to inspire excellence in performance is instituting the "GAURAV AWARD".

**SMALL WINS**- Celebrating small wins is a crucial aspect of personal & organizational growth. It represents the incremental achievements successes of individual or team efforts. Recognizing these small victories can profoundly impact motivation, confidence, and self-perception. Small victories serve as the foundation for progress & continual improvement



## Quarterly Recognition Scheme

To encourage employees to engage in PRAYAS for sharing acceptable and implementable suggestions and to encourage supervisors to use the SpotOn platform to promote a culture of appreciation throughout the

Company, the company launched the quarterly 'Corporate Recognition Scheme – Recognising the Champions - Unit wise'. The felicitation ceremony is then organised for recognising the best 5 employees Prayas,

# Salient Human Rights Issues, Taking Actions & Results

top 5 employees receiving highest number of SpotOn and the top 5 AGM giving the maximum number of SpotOn at the units for the quarter.

## Number of Spot-On Recognition

FY 2022-23	FY 2021-22	FY 2020-21
5,048	2,020	2,021



Star Achievers' Award at Vadodara



Star Achievers Award

As part of the annual recognition program, the "Star Achiever Award" was introduced last year to honor and recognize staff members who have gone above and beyond the call of duty in demonstrating excellent

leadership in growing the company steadily and sustainably. In accordance with the Star Achievers Program, Senior Management recognized and awarded Star Performers from each site, representing 5% of the overall population.

Our employees are encouraged to provide workplace improvement suggestions through the 'Prayas' platform, an employee suggestion platform available to all GFL employees.

## Number of Suggestions received (Prayas)

2022-2023	2021-22	2020-21
989	593	362

The company conducts an Employee Effectiveness and Employee Satisfaction Survey twice a year to gather employee feedback and ideas that can be used to continuously innovate and improve its processes.

Employee Effectiveness (EE2) Survey is conducted to determine employee enablement and employee engagement score based on 12 elements related to Employee Engagement & Employee Enablement. This survey is conducted for the employees of the level Engineer/Executive & above.

An Employee Satisfaction (E-SAT) survey is conducted based on 6 elements – Team Management, Human Resource Functions & Policies, Employee Development, Employee Welfare, Safety & PPEs & Reward & Recognition. This is conducted for technician-level employees.

Based on the survey results, the company implemented flexi timing, extended weekends, Parent's medical policy and other employee- friendly initiatives.

## Employee Effectiveness Survey score FY2022-23

Location	Participation%	Survey Score
Dahej A	78.00	4.23
Dahej B	78.00	3.88
Ranjitnagar	77.00	4.20
Vadodara	83.33	4.14
Noida	73.20	4.16

## Employee Satisfaction Survey score FY2022-23

Location	Participation%	Survey Score
Dahej A	79.00	3.87
Dahej B	80.00	3.72
Ranjitnagar	80.00	3.93

We feel proud to announce that our team (Team Safety Guards) from Ranjitnagar won the prestigious 'Gold Award' of Quality Circle of India (QCFI) in a Safety Convention at Vadodara organised in March this year. The theme of the convention was 'Life and Limbs are precious'. A total of 27 companies participated in the contest across Gujarat. This award is a reflection of our commitment to safety as a value of the organisation. Three members from Human Resources and Corporate Social Responsibility made up the cross-functional team.

Five teams from Dahej A & B participated in Quality Circle Forum of India – Vadodara Chapter on 30<sup>th</sup> September 2023. We are proud that Dahej B FKM team won the 'Gold Award'. Our Team at Dahej B (CPP team) also competed in the national-level Quality Circle competition held at Aurangabad and won a trophy in the 'Excellence Category' which is a proud moment for all of us.

We are pleased to announce that the Ranjitnagar team (Team 'Product Champion') has won an award in the 'Silver Category' for a project on "Excellence in process optimization and customer delivery" at the 33<sup>rd</sup> annual convention on quality / allied concepts' organized by Quality Circle Forum of India (QCFI) at Vadodara.

We feel proud to announce that our team from Dahej-B (CPP Function) competed in the national-level Quality Circle competition which was held at Aurangabad. Our team received a trophy in the 'Excellence Category' which is a proud moment for all of us.

We acknowledge that employees are inherently entitled to engage in collective bargaining. We uphold each employee's right to organize into associations in compliance with the regulations that are relevant to preserving workplace democracy. GFL protects this right for every employee under HR/43- GUIDELINE ON

EMPLOYEE RELATION. The company reiterates its commitment to upholding the principles of ILO conventions 87, 98, and 135 with the aforementioned guideline.

Under the Industrial Disputes Act of 1947, we have Work Committees at each location that represent the workers. These committees meet with management on a regular basis to discuss and settle concerns pertaining to working conditions. We have also formed a number of other committees to ensure that workers

are continuously involved in many aspects of their work lives. Among them are:



These committees regularly meet and discuss issues relating to respective areas with management representatives. All employees, contract labor and subcontractors are made aware of their right to exercise Freedom of Association, and the right to peaceful meetings as part of the Social



# Salient Human Rights Issues, Taking Actions & Results

Accountability Workshop. Not only our direct workmen, the company recognizes the right of association and collective bargaining by the Contract Labors and also participates in bargaining meetings.

The Contract Labors are represented by the Panchmahal Kamdar Union, which represents around 300 contract labors. No employees of the Company are covered under collective bargaining agreements.

We adhere to the provisions of section 9A of the Industrial Dispute Act, 1947, for any significant changes to the terms of employment. We recognize that the right to exercise freedom of association and collective bargaining may be at risk in the operations of our suppliers and contractors. As such, under the Sustainable Procurement Governance structure of GFL, all suppliers/vendors must provide the Company a declaration that such rights are protected for their workmen.

There are no operations where the right to exercise freedom of association and collective bargaining is found to be at significant risk.

## Equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016

Gujarat Fluorochemicals Limited is committed to the policy of Equal Employment. This commitment is an integral part of the Company's mission to become an "Employer of Choice" – therefore all HR Policies and Procedures of the company reflect non-discriminatory practices and provide equal opportunity for all employees. As part of this commitment, all employees are expected to treat their colleagues fairly, with mutual respect, and without harassment at all levels. At present, the policy has not been made available in the public domain.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	95%	100%	91%
Female	100%	100%	NA	NA
<b>Total</b>	100%	95%	100%	91%

## Membership of employees and worker in association(s) or Unions recognised by the listed entity:

Category	FY 2022-23			FY 2021-22		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employee	1788	Nil	NA	1373	Nil	NA
Male	1715	Nil	NA	1317	Nil	NA
Female	73	Nil	NA	56	Nil	NA
Total Permanent Workers	1524	Nil	NA	1105	Nil	NA
Male	1524	Nil	NA	1105	Nil	NA
Female	0	Nil	NA	0	Nil	NA

## Grievance Mechanism

Our organization provides a number of avenues for employees to provide comments and suggestions as well as to report legal and policy infractions.

The digital platform—ethics line, feedback surveys, employee associations, etc.—is used for this. If a stakeholder encounters such a violation, they can also report the issue to [ethicsline@gfl.co.in](mailto:ethicsline@gfl.co.in). Employees can also use our online tool, HR Buddy, to voice issues and offer solutions. Our websites have suggestion boxes where workers and employees can anonymously file complaints.

### Details of Grievance Handling Platform

Sr. No.	Grievance Handling Platform	No. of Complain Received	No. of Complain Resolved	No. of Complain Received	No. of Complain Resolved	No. of Complain Received	No. of Complain Resolved
		FY 23	FY 23	FY 22	FY 22	FY 21	FY 21
1	HR Buddy	95	37	77	50	104	101
2	Ethics Line	3	3	5	5	5	5
3	Complain Box	4	4	25	21	12	12
4	POSH Line	0	0	-	-	-	-

\*POSH Line was launched in the month of July 2023

The Company launched the POSH LINE- a digital platform for our women employees to raise concerns/ issues/ complaints in connection to the Prevention of Sexual Harassment at the workplace and intimate any violation of the Guidelines on Prevention, Prohibition, and Redressal of Sexual Harassment Of Women In the Workplace (HR/49) ensuring strict confidentiality.

Suggestions and grievance boxes are installed in various locations where our employees can register complaints in this regard.

During FY 2022-23, 3 complaints were received from stakeholders regarding the Code of Conduct, Whistleblower & Equal Employment Opportunity in employment (as mentioned in point 8 – Disciplinary practices), and the complaints were resolved by the end of the year.

### Grievances redress mechanism

Particulars	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Grievance Handling Platform: <ol style="list-style-type: none"> <li>HR Buddy</li> <li>Ethics Line</li> <li>Suggestion Box</li> <li>PHRRO</li> <li>Guideline HR/42 – Grievance Procedure for Employees/Contractors</li> </ol>
Other than Permanent Workers	Grievance Handling Platform: <ol style="list-style-type: none"> <li>Suggestion Box</li> <li>Works Committee</li> <li>SPT Committee</li> <li>Guideline HR/42 – Grievance Procedure for Employees/Contractors</li> </ol>

# Salient Human Rights Issues, Taking Actions & Results

Particulars	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Employees	Grievance Handling Platform: 1. HR Buddy 2. Ethics Line 3. Suggestion Box 4. PHRRO 5. Guideline HR/42 – Grievance Procedure for Employees/Contractors
Other than Permanent Employees	Grievance Handling Platform: 1. Suggestion Box 2. SPT Committee 3. Works Committee 4. Guideline HR/42 – Grievance Procedure for Employees/Contractors

Number of Complaints on the following made by employees and workers :

Category	FY 2022-23			FY 2021-22		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	Nil	Nil		Nil	Nil	
Discrimination at workplace	3	Nil		3	Nil	
Child labour	Nil	Nil		Nil	Nil	
Forced Labour/Involuntary Labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil		Nil	Nil	-
Other human rights related issues	Nil	Nil	-	Nil	Nil	-

Assessments for the year:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Childlabour	100% Internally Assessed
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others -please specify	

# WEP Principles

GFL recognizes Women Empowerment & Diversity as an integral part of its people strategy which shall benefit not only an individual but also the society at large, contributing to economic and social development. As a signatory to UN Women and UNGC Women's Empowerment Principles, the Company has demonstrated its commitment to Gender Equality and Women Empowerment. Achieving gender equality and empowering women is the fifth Sustainable Development Goal.

At GFL, we realize that empowering women is a great responsibility and is necessary for gender equality. We strive to instill a culture of equality across the organization by planning to improve the gender ratio in leadership positions and the inclusion of women employees in all functional roles and at all levels. Annual Action Plan taken up by the Company for Fiscal Year 2023-24 is stated as under:



## WEP Action Plan 2023-24

Sr. No	KRA	Index	Target
1	Conduct Gender Gap Assessment of the organization to improve Score%. Base line assessment to be done in July and Final assessment in December	% improvement	25%
2	Achieve the targeted number of Women employees in GFL Business	Number	120
3	Achieve number of mandays of training of women employees	Mandays	5
4	Promote women entrepreneurs while engaging suppliers and vendors.	Number	2 in each site
5	Conduct women empowerment sensitivity training for all HOD'S	% coverage	90%



# WEP Principles

The Women's Empowerment Principles (WEPs) provide a holistic framework for companies to promote and integrate gender equality into their value chains for positive outcomes in business and society. Launched in 2010 by UN Women and UN Global Compact, the WEPs are informed by international labour and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality in the workplace, marketplace, and community, regardless of their size, sector or geography. On 8<sup>th</sup> June 2023, the Committee Members were given a detailed training on the 7 WEP Principles by faculty of UN GCNI.

**Gender equality is intrinsically linked to sustainable development and is vital to the realization of human rights for all.** Gender impact assessment has been defined as an ex-ante evaluation, analysis or assessment of a law, policy or programme that makes it possible to identify, in a preventative way, the likelihood of a given decision having negative consequences for the state of equality between women and men.

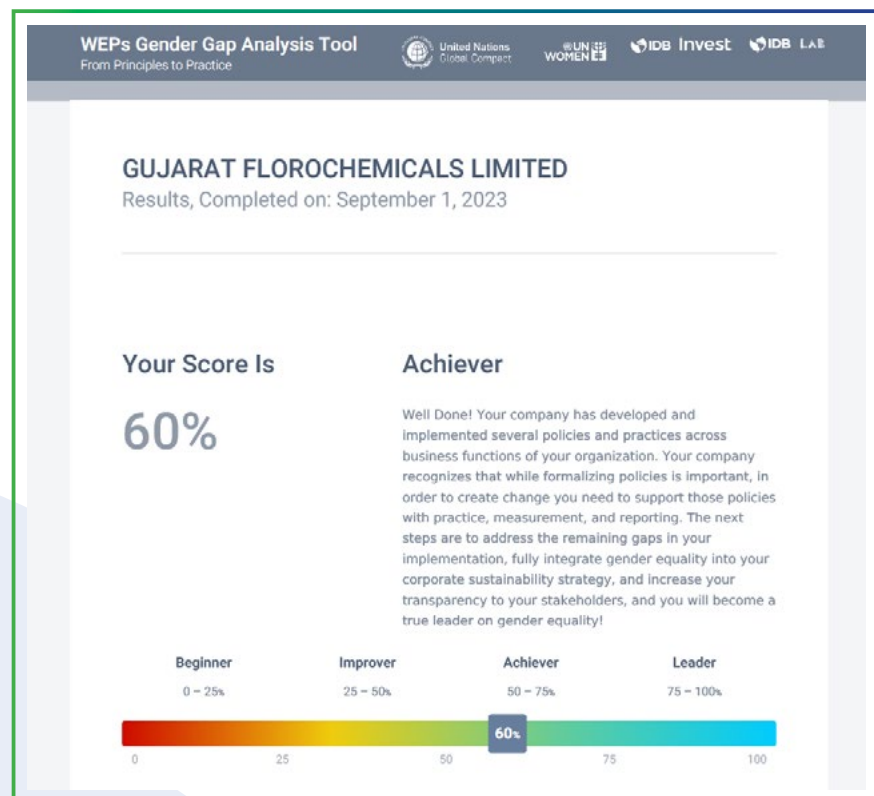
## Total Manhours of Training to Women Employee

Year	Manhours
2022-23	3053.5



## WEPs Training of WEDC Members at Vadodara

GFL took the Gender Gap Assessment on 1<sup>st</sup> September 2023 and its result is as under:



# WASH

Access to Safe water, sanitation and hygiene is the most basic human need for health and well-being. Water is needed for all life on Earth. It is the driving force of all nature. Demand for water is increasing over the past century. And the main reason for that is rapid population growth, urbanization and increasing water needs for agriculture, industry and energy sectors. Today over 1 billion people are unable to access clean drinking water, which affects all aspects of life. Meeting drinking water, sanitation and hygiene targets by 2030 requires 4 times increase in pace of progress.

We at GFL, are generating awareness of the issue and turning them into action which will lead to win-win results and increased sustainability and integrity for both human and ecological systems. To address the Menstrual Hygiene, Sanitary Napkin vending Machine & incinerators were installed in Women's Restrooms. We had also prepared a short training module for all the employees of the Company on WASH. Committee Members were assigned for separate detailed training on the topic.

WASH at the Workplace Pledge has recorded significant improvements in the access of water, sanitation and hygiene at our workplace, but this is not enough. We need to turn WASH at the workplace into a movement with a wider adoption by all our Units & Employees.

GFL signed the WASH Pledge on 22<sup>nd</sup> March 2022 and by signing the **WASH at the workplace Pledge**, a company **commits to providing access to clean water, safe sanitation and hygiene to their employees in operations under direct company control within three years of signature.**

During the year two separate training modules were introduced to educate the employees and WASH Committee members. WASH forms a part of the mandatory training module list which each employee has to undergo.

## Total Training Manhours

Year	2022-23
Total	1952

## Location wise Training Manhours

Location	Manhours (FY 2022-23)
Dahej A	828
Ranjitnagar	704
Vadodara	158
Noida & ROI	262

## Location wise Training Compliance %

Location	Compliance % (FY 2022-23)
Dahej A	79%
Ranjitnagar	83%
Vadodara	93%
Noida & ROI	86%





# WASH



The Company had decided to conduct Internal and External WASH Audit once in quarter. TO conduct Internal Audit across location a cross audit team was formed and WASH Committee members were nominated to conduct the Internal Audit. The comparative External Audit score is as below:

Particulars	Ranjitnagar	Dahej A	Dahej B	Noida	Vadodara
Q1 Audit Score	1.5	1.6	1.3	1.7	1.4
Q2 Audit Score	1.5	1.8	1.6	1.9	1.7

Category	Ranjitnagar		Dahej A		Dahej B		Noida		Vadodara	
General	70%	80%	78%	890%	60%	90%	78%	90%	63%	88%
Workplace Water Supply	92%	92%	100%	100%	92%	92%	100%	100%	67%	83%
Workplace sanitization	64%	57%	100%	100%	75%	79%	100%	100%	92%	92%
Workplace Hygiene	75%	56%	56%	81%	50%	63%	81%	88%	63%	75%
Value/Supply Chain WASH	50%	100%	75%	100%	50%	100%	75%	100%	75%	100%
Community WASH	83%	83%	67%	67%	50%	67%	67%	100%	67%	83%
Total	80%	73%	80%	90%	65%	79%	86%	95%	71%	84%
<b>Score</b>	<b>1.5</b>	<b>1.5</b>	<b>1.6</b>	<b>1.8</b>	<b>1.3</b>	<b>1.6</b>	<b>1.7</b>	<b>1.9</b>	<b>1.4</b>	<b>1.7</b>



The Company conducts quarter Water potability tests across locations to check on the quality of Water. Below given are the tests result:

### Water Potability Test Report - Ranjithnagar

Client Name	Parameter	Limit		Location																
		Acceptable	Permissible	HR& Admin Building- Roof Top (RO)	DPTFE 2nd Floor (RO)	DI Plant (RO)	CMS-1 (RO)	CPP Plant (RO)	ETP (RO)	CA/ Flaker (RO with water cooler)	Material Gate (RO with water Cooler)	VIP Gate (RO with Water Cooler)	FI/CAC L2 (RO with Water Cooler)	PTFE (RO with Water Cooler)	FKM (RO with Water Cooler)	GRFC (RO with Water Cooler)	Coal Gate (RO with Water Cooler)	CES Office (RO with Water Cooler)	Labour Gate (RO with Water Cooler)	
GFL Limited, 12/A Dahej, GIDC, Estate, Dahej, Industrial Daheja, Gujarat 392130	pH at 25°C	6.5-8.5	No relaxation	6.57	6.74	6.89	6.96	6.96	6.98	7	7.8	7.05	6.81	7.11	6.73	7.13	6.89	6.84	6.96	
	Total Dissolved Solids	500	2000	147	134	76.8	128	166	134	147	140	140	147	102	134	172	140	140	102	
	Turbidity	1	5	0.05	0.04	0.03	0.03	0.05	0.03	0.04	0.04	0.02	0.04	0.04	0.03	0.04	0.04	0.04	0.04	
	Electrical Conductivity at 25°C	-	-	0.23	0.21	0.12	0.2	0.26	0.21	0.23	0.22	0.22	0.23	0.23	0.21	0.27	0.22	0.22	0.16	
	Chloride as Cl	250	1000	43.9	15.9	17.9	17.9	65.9	61.9	49.9	43.9	39.9	15.9	15.9	19.9	9.9	21.9	21.9	23.9	
	Calcium as Ca	75	200	12.8	12.8	8	16	8	14.4	19.2	19.2	17.6	16	16	12.8	1.6	16	16	14.4	
	Total Hardness as CaCO <sub>3</sub>	200	600	56	64	32	72	32	64	48	84	80	60	60	52	4	68	68	64	
	Magnesium as Mg	30	100	5.8	7.7	2.9	7.7	2.9	6.8	9.7	8.7	1.4	4.8	4.8	4.8	ND	6.8	6.8	6.8	
	Fluoride as F	1	15	0.31	0.44	0.23	0.43	0.85	0.36	0.33	0.42	0.46	0.29	0.29	0.19	0.02	0.25	0.25	0.28	
	Total Alkalinity as CoCO3	200	600	60	84	40	80	48	80	88	52	76	68	68	60	4	68	68	68	
	Nitrate as NO3	45	No relaxation	1	1.2	0.55	0.82	8.7	6.4	6.26	6	5.8	1	1	1	1	0.01	1.1	1.1	68
	Sulphate as SO4	200	400	217	ND	ND	ND	6.6	ND	ND	ND	ND	1.9	1.9	2.6	1.6	7	7	0.9	
	Sodium as Na	-	-	477	50.2	31.4	56.1	117.7	57	64.4	64.7	61.9	0.6	70.8	79	37.8	23.5	23.5	1.5	
	Potassium as K	-	-	0	0	0	0	0	0	0	0	0	0	0.6	0	0	0	0	571	
	Comments:		As per IS 10500 suitable for drinking																	



## Water Potability Test Report – Vadodara

Client Name	Parameter	Limit		Location	
		Acceptable	Permissible	2 nd Floor (cooler)	4 th Floor (cooler)
GFL Limited, ABS Tower, Old Padra Road, Vadodara, Gujarat	pH at 25°C	6.5-8.5	No relaxation	6.89	7.05
	Total Dissolved Solids	500	2000	256	115.2
	Turbidity	1	5	0.06	0.04
	Electrical Conductivity at 25°C	--	--	0.4	0.18
	Chloride as Cl	250	1000	49.9	27.9
	Calcium as Ca	75	200	32	12.8
	Total Hardness as CaCO <sub>3</sub>	200	600	144	48
	Magnesium as Mg	30	100	15.5	3.88
	Fluoride as F	1	1.5	0.18	BDL
	Total Alkalinity as CaCO <sub>3</sub>	200	600	148	48
	Nitrate as NO <sub>3</sub>	45	No relaxation	1.5	BDL
	Sulphate as SO <sub>4</sub>	200	400	BDL	BDL
	Sodium as Na	--	--	148.8	56.7
	Potassium as K	--	--	0.3	0
	Comments :	As per IS10500 suitable for drinking			

## Water Potability Test Report - Jolva

Client Name	Parameter	Limit		Location		
		Acceptable	Permissible	Main Office	FKM Plant	Micro Powder Plant
Plot No D-2/ CH/173 & 222, Village – Jolva, GIDC Industrial Estate, Dahej II, Dahej, Distt - Bharuch, Gujarat, India	pH at 25°C	6.5-8.5	No relaxation	7.11	7.11	7.36
	Total Dissolved Solids	500	2000	64	121	57
	Turbidity	1	5	0.04	0.03	0.04
	Electrical Conductivity at 25°C	--	--	0.10	0.19	0.09
	Chloride as Cl	250	1000	11.9	15.9	9.9
	Calcium as Ca	75	200	8	27.2	14.4
	Total Hardness as CaCO <sub>3</sub>	200	600	32	128	60
	Magnesium as Mg	30	100	2.9	14.5	5.8
	Fluoride as F	1	1.5	0.08	0.02	ND
	Total Alkalinity as CaCO <sub>3</sub>	200	600	48	100	32
	Nitrate as NO <sub>3</sub>	45	No relaxation	0.4	0.6	ND
	Sulphate as SO <sub>4</sub>	200	400	ND	0.6	ND
	Sodium as Na	--	--	30.3	63.5	28.6
	Potassium as K	--	--	0	1.2	0
	Comments :	As per IS10500 suitable for drinking				



## Water Potability Test Report – Dahej A

Client Name	Parameter	Limit		ADM(RO)	GUEST HOUSE(RO)	CENTRAL OFFICE(RO)	PE OFFICE(RO)	STORE(RO)	MPP-2(RO)	MODULE OFFICE(RO)	FSB MPP-3 SECOND FLOOR(RO)	MPP-1(RO)	MPP-5(RO)	MPP-5 THIRD FLOOR(COOLER)	HR OFFICE (RO)	WORKSHOP(RO)	WORKSHOP(COOLER)	CENTRAL OFFICE(COOLER)	GATE NO.2(COOLER)	NEW CANTEEN WORKER(COOLER)	MPP-2(COOLER)	MPP-5(COOLER)	NEW CANTEEN STAFF (COOLER)	MPP-3 (COOLER)	CENTRAL OFFICE (DISPENSER)
		Acceptable	Permissible																						
GFL Limited, survey 163, Gujarat Frerochemicals Ltd, 26-27 tal, ghoghamba, Rannnagar, Gujarat 389380	pH at 25°C	6.5-8.5	No	7.1	7.04	7.22	7.34	7.94	7.16	7.83	7.41	7.24	7.36	7.38	7.15	6.5	7.12	7.37	7.48	7.6	7.15	7.41	7.59	7.1	7.46
	Total Dissolved Solids	500	2000	70	76	89	268	83	288	76	83	96	108	115	160	51	160	275	192	166	281	288	166	243	44
	Turbidity	1	5	0.05	0.05	0.06	0.05	0.09	0.06	0.05	0.09	0.05	0.06	0.06	0.05	0.09	0.08	0.06	0.06	0.06	0.05	0.06	0.05	0.04	0.04
	Electrical Conductivity at 25°C	-	-	0.11	0.12	0.14	0.42	0.13	0.45	0.12	0.13	0.15	0.17	0.18	0.25	0.08	0.25	0.43	0.3	0.26	0.44	0.45	0.26	0.38	0.07
	Chloride as CL	250	1000	7.9	49.9	39.9	39.9	25.9	49.9	55.9	39.9	29.9	25.9	25.9	160	9.9	11.9	37.9	19.9	17.9	45.9	39.9	13.9	25.9	7.9
	Calcium as Ca	75	200	4.8	4.8	3.2	38.4	ND	44.8	ND	ND	9.6	6.4	6.4	24	ND	30.4	38.4	27.2	27.2	46.4	43.2	30.4	41.6	1.6
	Total Hardness as CaCO <sub>2</sub>	200	600	12	16	8	180	ND	216	ND	ND	32	24	24	108	ND	144	184	124	128	204	216	128	200	12
	Magnesium as Mg	30	100	ND	0.9	ND	20.4	ND	25.2	ND	ND	1.94	1.9	1.9	11.6	ND	16.5	21.3	13.6	14.5	21.4	26.2	12.6	23.3	1.9
	Fluoride as F	1	1.5	ND	ND	0.01	0.17	ND	0.15	ND	ND	0.02	0.01	0.01	0.1	ND	0.12	0.17	0.09	0.09	0.17	0.12	0.06	0.16	0.03
	Total Alkalinity as CaCO <sub>3</sub>	200	600	16	28	16	176	12	224	4	12	44	52	56	116	ND	100	184	132	112	216	212	112	172	12
	Nitrate as NO <sub>2</sub>	45	No Relaxation	2.37	1.26	1.43	4.5	0.75	4.5	0.4	13	0.84	0.86	0.85	2.88	0.34	3.02	4.17	3.1	3.01	4.42	4.17	3.46	3.89	1.28
	Sulphate as SO <sub>4</sub>	200	400	0.88	ND	0.35	5.92	0.29	5.29	0.4	ND	ND	ND	ND	0.35	1.88	2.17	6.76	1.88	2.17	0.17	9.8	2.17	2.29	2.05
	Sodium as Na	-	-	24.4	37.6	27.1	94.3	15.4	105.5	15.8	41.7	52.9	53.8	53.8	60	11.4	38.1	11.2	49.8	40.9	41.5	86.8	43.5	69.4	36.2
	Potassium as K	-	-	8.1	0.2	11.4	8.2	7.9	11.4	0.8	5.7	3.9	4.2	4.2	5.8	0	0	0	0	0	3.7	0.5	0.5	0.5	0.6
	Comments:	As per IS10500 suitable for drinking																							

# Materiality & Stakeholder Engagement

With our dynamic progress and set ESG strategies for the future, our initiatives in sustainability face new challenges and opportunities at every step. To ensure our growth trajectory remains on course, we promptly reassess material issues central to our business, environment and stakeholders.

The sustainability materiality assessment aims to drive strategic focus, improve sustainability performance, enhance stakeholder relationships and contribute to long-term value creation in a responsible and sustainable manner.

**32**  
Issues assessed

**08**  
Stakeholder categories

**85**  
Responses analysed



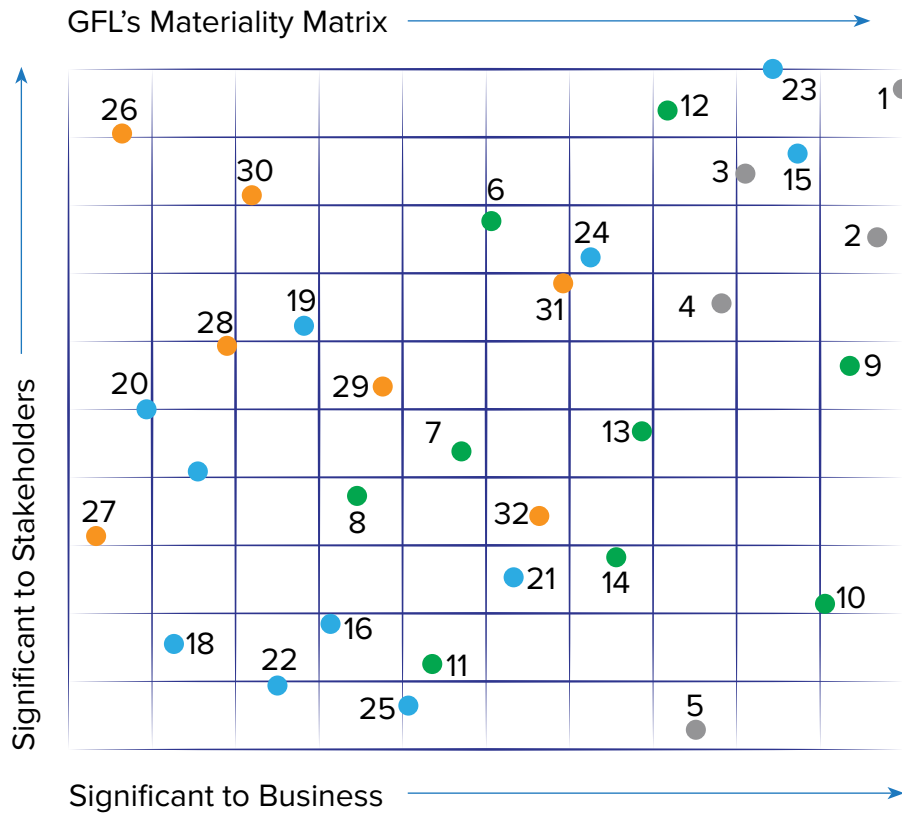
## Objectives of Materiality Assessment

- Assessing key sustainability focus areas
- Value creation and risk management
- Alignment of strategies
- Strengthening compliance
- Holistic decision-making
- Stakeholder engagement and trustbuilding
- Opportunity capitalisation and enhanced performance
- Transparency and accountability



## Our Materiality Assessment Process

- Defining objective and plan of action
- Benchmarking sustainability reporting frameworks, principles and sectoral issues
- Identifying stakeholders and enlisting issues based on internal risks and opportunities
- Developing objective questionnaires and stakeholder engagement through surveys
- Analysis of collected data
- Identification and prioritisation of material issues



### ECONOMIC

1. Growth and continuity
2. Profitability and shareholder value
3. Product development
4. Cost optimisation
5. Geographical presence



### ENVIRONMENTAL

6. Emissions and climate change
7. Water effluents and waste management
8. Chemical spills
9. Materials
10. Energy efficiency
11. Biodiversity
12. Product safety and stewardship
13. Product design for use-phase efficiency
14. Opportunities in clean technology



### SOCIAL

15. Occupational health and safety
16. Employee diversity
17. Fair and transparent people process
18. Talent attraction and retention
19. Human rights
20. Talent development and training
21. Employee well-being and engagement
22. Supplier assessments
23. Customer satisfaction
24. Customer privacy
25. Local community involvement and development



### GOVERNANCE

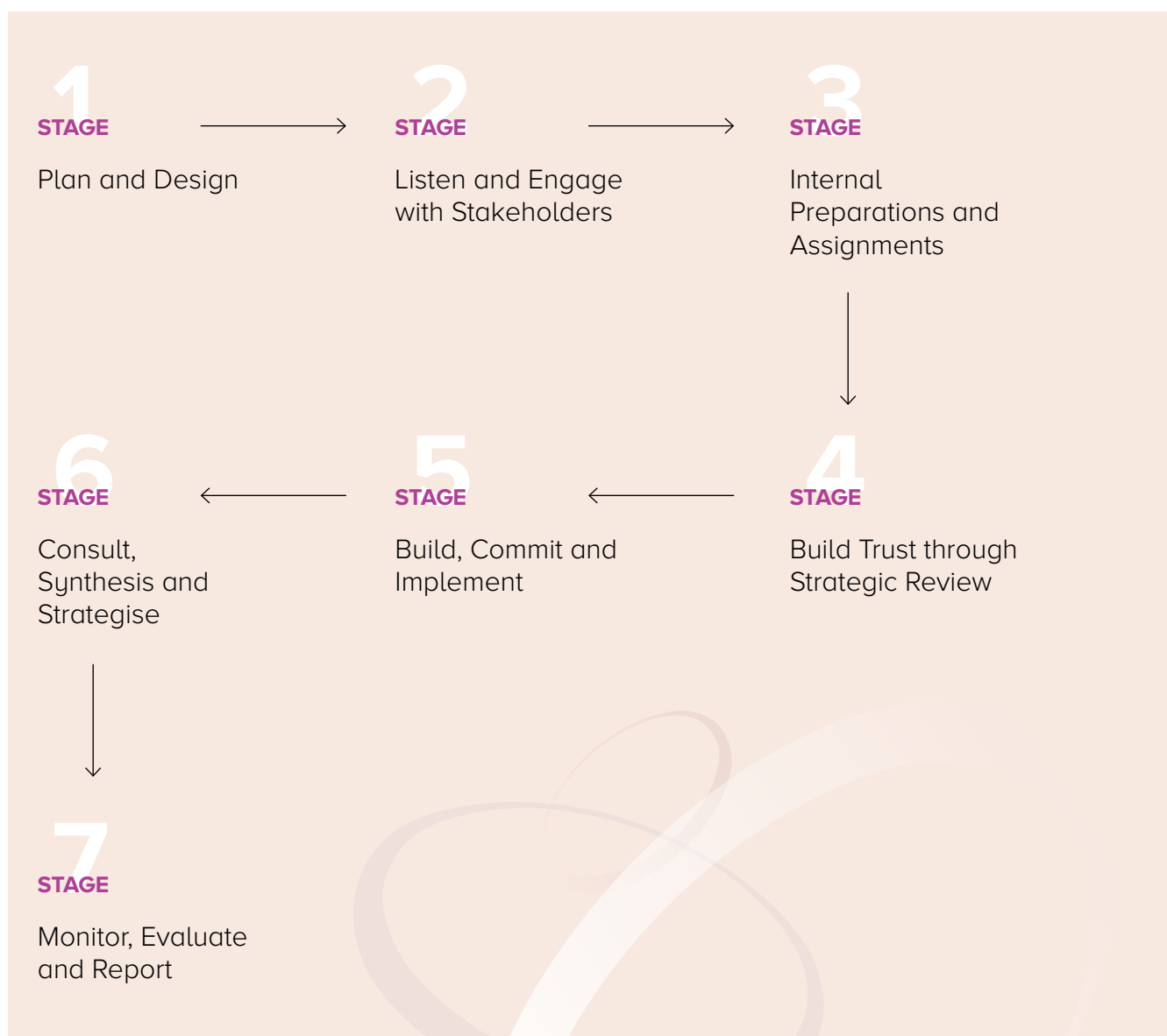
26. Anti-corruption
27. Anti-competitive behaviour
28. Business risk mitigation
29. Good governance practices
30. Business ethics and transparency
31. Regulatory compliance
32. Cyber security



Our enduring presence in the chemical industry for almost a century is a testament to the trust our stakeholders have placed in us over the long term. We place utmost emphasis on cultivating transparent and inclusive channels of communication with our esteemed key stakeholders. We acknowledge the paramount importance of keeping them well-informed and updated while continuously seeking to grasp how we can further enhance value creation for them in the future. Their invaluable feedback and expectations play a pivotal role in shaping our strategic direction and decision-making as we continuously strive to create greater value for them in the future.

Through our structured and inclusive stakeholder engagement process, we strive to ensure that our stakeholders' diverse perspectives, concerns and expectations are heard, understood and integrated into our decision-making and business practices.

**Our engagement process encompasses seven stages that ensure comprehensive communication is delivered to the respective stakeholders. These include:**



## Stakeholders



### Shareholders\Investors

It is crucial to maintain the confidence of our shareholders\investors by generating sustainable financial returns responsibly. Our commitment to responsible practices is vital in preserving trust and securing the long-term success of our growth trajectory.

#### Expectations

- Sustainable value creation
- Our Company's operational, commercial and financial performance management
- Corporate governance

#### Our Company's Response

- Consistently given returns to the investors
- Enhanced disclosures provided through our Company's documents like investor presentations, integrated annual report, audited financial results

#### Engagement Mode

- Annual General Meeting (AGM)
- Press conferences
- Updates on our Company's website
- Investor/analyst meetings
- Stock exchanges announcements

#### SDGS LINKED



#### Material Topics Linked

1. Growth and continuity
2. Profitability and shareholders' value



### Customers

It is important to ensure our customers' satisfaction as it is a fundamental responsibility that drives our business growth. To deliver exceptional value-added products, it is imperative that we deeply understand their expectations, thereby fostering customer loyalty.

#### Expectations

- Safety and data privacy
- Ethical business practices
- Eco-friendly products and solutions
- Superior quality products and services

#### Our Company's Response

- Delivering the top-notch quality products
- Timely resolution of customer complaints
- Constantly innovating new products to deliver the best-in-class customer experience

#### Engagement Mode

- Website
- Periodic market research
- Customer meets
- Customer visits
- Conferences
- Trade fair

#### SDGS LINKED



#### Material Topics Linked

3. Cost optimisation
4. Geographical presence
5. Customer satisfaction
24. Customer privacy
12. Product safety and stewardship



## Suppliers

The support we receive from our suppliers and vendors is integral to our ability to deliver products and services of exceptional quality, thereby enabling us to create value through our offerings. Recognising the mutual benefit of this relationship, we are committed to providing our suppliers with the necessary support to thrive in the market and contribute to our shared success.

### Expectations

- Access to new markets
- Fair margins
- Revenue growth
- Long-term partnerships
- Resource efficiency

### Our Company's Response

- Established a vendor voice portal for interactive feedback
- Ensured no discrimination against any supplier
- Installed cutting-edge virtual communication tools like Polycom, Cisco Webex, Zoom and Microsoft Teams for seamless communication

### Engagement Mode

- Supplier development initiatives
- Online/offline workshops
- Annual suppliers' meet (online/offline)
- Supplier feedback surveys On-boarding process

#### SDGs LINKED



### Material Topics Linked

- 22. Supplier assessment
- 30. Business ethics and transparency
- 31. Regulatory Compliance
- 19. Human Rights



## Employees

Fostering a robust and harmonious relationship with our employees is of utmost importance to our business. We are dedicated to perpetually enhancing our employee value proposition, cultivating higher levels of engagement and fostering improved productivity across our Company.

### Expectations

- Health, safety and environment
- Capability building, development and enhancement of skills
- Career growth opportunity
- Well-being and mental health
- Work-life balance
- Human rights

### Our Company's Response

- Adhering to robust talent management practices
- Providing necessary training and learning opportunities
- Providing competitive remuneration, reward and recognitions
- Maintaining the utmost operational health and safety measures
- Adhering to labour and human rights

### Engagement Mode

- Training and performance management
- HR forums
- Focussed group discussions
- Employee engagement events
- Regular updates through email communication
- Employee satisfaction surveys

#### SDGs LINKED



### Material Topics Linked

- 15. Occupational health and safety
- 16. Employee diversity
- 17. Fair and transparent people process
- 18. Talent attraction and retention
- 19. Human rights
- 20. Talent development and training
- 21. Employee well-being and engagement



## Community

The sustainability of our business hinges upon the relationships we establish with the communities and societies in which we operate, as well as the positive impact we strive to make in uplifting society as a whole.

### Expectations

- Livelihood opportunities
- New technologies and smart solutions
- Reduced environmental footprint
- Community development

### Our Company's Response

- Allocating funds for areas such as education, skill development, social upliftment, fostering health, women empowerment, environmental sustainability, impactful community development projects and the promotion of sustainable livelihoods
- 8.62 Crores CSR activity expenditure

### Engagement Mode

- Interactions during the implementation of CSR projects
- Interviews with local community representatives
- Public hearing
- CSR cell engagement with community
- Community development newsletter

### SDGs LINKED



### Material Topics Linked

6. Emissions and climate change
7. Water effluents and waste management
8. Chemical spills
25. Local community involvement and development



## Regulatory, Government and Industry Bodies

Establishing and upholding a relationship based on transparency and trust with governments and regulators serves as the bedrock for collaboration. This foundation not only ensures our operating credibility but also facilitates the advancement of mutually beneficial commercial objectives and enables us to contribute to policy formulation actively.

### Expectations

- Timely compliance with laws and regulations
- Transparent and open operations
- Adherence to environmental laws
- Timely payment of taxes
- Support to various schemes of central and state governments

### Our Company's Response

- Active membership in various industry bodies
- Timely tax payments, CSR activities, and support for government initiatives and vision

### Engagement Mode

- Meetings, presentations and networking in different forums
- Regular visits
- Annual and quarterly compliance reports
- Press conferences and media events
- Published articles and newsletters
- Online meetings and interviews

### SDGs LINKED



### Material Topics Linked

29. Good governance practices
30. Business ethics and transparency
31. Regulatory compliances



# Supply Chain & Our Operations

As a responsible corporate entity, we actively support the United Nations Sustainable Development Goals (SDGs). We engage and collaborate with our supply chain partners to reduce emissions, promote human rights practices and contribute to community development, fostering inclusive growth. Our commitment to environmental protection is evident in our efforts to reduce dependencies and produce green products that drive sustainable growth and benefits throughout the supply chain. As we progress in reducing our carbon footprint, we will establish more stringent sustainability targets to support the global agenda in combating climate change.

## Sustainable Supply Chain

Our Sustainable Procurement Policy and Code of Conduct extend to all product and service purchases, establishing guidelines for our interactions with suppliers, vendors and third parties. We conduct regular audits of vendors to maintain product quality, focusing on high-risk category vendors. Vendor evaluation, including sustainability assessments, is carried out using the DQS NXT platform and SAP. Local procurement forms the foundation of our supplier initiative, and we have a dedicated policy to ensure its implementation. We prioritise local communities by giving them preferences in goods and services procurement as well as employment opportunities. We actively engage with local communities through various means, such as direct and indirect employment, supplying goods & services and ancillary services.

Our strong and long-standing relationships with suppliers and partners ensure smooth operations. We support local vendors and contribute to national economic development. Suppliers are categorised based on risk and value and we

engage regularly to address concerns. Our vendor voice portal allows for interactive feedback. Anti-corruption measures are included in our Supplier's Code of Conduct and high-risk suppliers are audited annually.

Business ethics and anti-fraud policies are in place to prevent corruption.

## Supply chain engagement

**Vendor Audits-** QA department evaluates critical suppliers through vendor qualification process (online / offline)

**Customer audits-** Pharma customers visit GFL site regularly for evaluation of quality system and they are satisfied

**Customer relations-** QA department conducts customer education programme to make aware on product handling and hazards associated with it. This is helping us to improve customer relations.



## Communication Platform

To ensure seamless communication with our suppliers, vendors and consumers, we leverage cutting-edge virtual communication tools. Polycom, Cisco Webex, Zoom and Microsoft Teams are among the platforms we use to facilitate audio-visual collaboration across various verticals within our Company.



## Supplier Assessment

The Company has taken measures in order to ensure that the activities of its value chain do not cause any significant harm to the environment. During the current financial year there were no significant adverse impact to the environment, arising from the value chain of the entity and hence no mitigation or adaption measures were required to be taken. The Company has assessed 26% of its value chain partners for environmental and social impacts.



## Supply Chain Awareness session on Human Rights

During the period the Company has conducted awareness session on Human Rights and 100 vendors in Supply chain had attended the session. After the session 8 vendors had implemented and drafted Human Rights Policy of their Company.

### Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programmes held	Topics/principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
2	SA8000 and Sustainable Procurement.	41%

### Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	26%
Working Conditions	26%

### Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	26%
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others-please specify	

# Responsible Sales & Marketing

Being a 'Responsible Organisation requires focused efforts across various aspects of our business, including sales and marketing. For us, Responsible Sales & Marketing (RSM) encompasses how our customers, competitors and employees perceive us as a company when it comes to fair business practices. With this conviction in mind, we have defined a roadmap that identifies areas for improvement and paves the way for the future of RSM at GFL. We are committed to continuously enhancing our practices to ensure that our sales and marketing efforts align with the highest standards of responsibility and integrity.

## Delivering Customer Excellence and Global Market Leadership

Our relentless pursuit is to become the preferred partner of our customers by offering cutting-edge technologies, innovative products and top-notch services. At GFL, we prioritise global excellence in quality, service and manufacturing practices, fostering integrity with all stakeholders and inspiring customers through continuous innovation. Our integrated operations, built on years of trust, have positioned us as the most reliable and established leader in the Indian market, while our strong dealers network, efficient supply chain and warehousing capabilities make us the preferred supplier for global markets.

## Customer centric mindset, with focus on first time right and on time deliveries

- Samples are developed, produced and tested on time and submitted to customer for qualification
- Routine production- Document submission (COA etc) and product deliveries (through dispatch allocation) are made on time.
- Customer complaint resolution through 8D problem solving approach- acknowledgement within 2 hours, problem definition & containment action within 2 days, 8D report (with RCA & CAPA plan) within 2 weeks, Complaint closure & Horizontal deployment within 2 months and CAPA sustenance audit for 2 years



Menstrual Hygiene Awareness at Badva Anganvadi



Menstrual Hygiene Awareness at Nathkuva Anganvadi

## Our Commitment: Ten-point Agenda

GFL's sales and marketing initiatives, aligned with responsible practices, are guided by a ten-point agenda that underscores our commitment to integrating our Company's fundamental principles of Responsible Sales and Marketing (RSM).

- We are committed to portraying product performance and service delivery truthfully to all customers.
- We will only make claims that have been approved and appropriately substantiated.
- We will represent the Company truthfully, fairly and accurately at all events, trade fairs and conferences.
- We protect customer data and customer's Right to Privacy.
- We will collect, use and store customer data in an ethical manner.
- We will not sell or share Customer's data with third parties without the customer's consent.
- We only publish, advertise and post content that propagates authenticity and fair methods of competition.
- We will make true and honest comparisons between our Company and competitors.
- We will not engage in false or misleading advertising.
- We inform and educate customers on the safe handling and storage of products.
- We will provide clear and concise instructions on how to use our products safely.
- We will warn customers of any potential hazards associated with our products.
- We refrain from discussing price, profit and margin with the competitors.
- We will not engage in price collusion or other anticompetitive practices.
- We are committed to engaging in fair supply and distribution.
- We will not discriminate against any customer or supplier.
- We will ensure that our products are distributed fairly and equitably.

## Human Rights & Community Development

Our goal is to support the social and economic advancement of the areas where we do business. Our areas of concentration for corporate social responsibility are centered on the SDGs and guarantee the advancement and defense of human rights. Please refer to pages 191-192 of our Annual Report, which can be accessed via the following link on our website, for more information.

<https://www.gfl.co.in/upload/pages/c1c6dc1d169ff36db55f31335cb15e2f.pdf>

### Menstrual Hygiene awareness program in Community



### AV WASH Awareness at VAV Village





# Upholding Human Dignity Through Data Privacy Advocacy

In the rapidly advancing landscape of technology, the protection of human rights extends beyond traditional realms into the digital sphere. At INOXGFL, we recognize that safeguarding human dignity requires a steadfast commitment to data privacy.



## A Foundation of Trust:

In the age of information, trust is our currency. Our commitment to data privacy serves as the bedrock upon which this trust is built. We understand that each piece of personal information entrusted to us represents an individual's identity, and we are dedicated to ensuring its protection.



## Legal Compliance and Global Standards:

Adhering to international data protection laws and standards is not just a requirement but a conscious decision to uphold the rights of individuals universally. We align our practices with the General Data Protection Regulation (GDPR) and other relevant legislations, setting a standard for responsible data management.



## Transparency as a Guiding Light:

Our commitment to transparency is unwavering. We believe in empowering individuals with knowledge about how their data is collected, processed, and utilized. Transparent communication fosters informed consent, enabling individuals to make choices about their data with confidence.



## Ethical Data Handling:

Respecting the autonomy and privacy of individuals is at the heart of our data practices. We adhere to ethical standards that transcend mere compliance, ensuring that our data-handling processes reflect our unwavering dedication to human rights principles.



## Data Minimization and Purpose Limitation:

We recognize that collecting only the data necessary for a specific purpose is paramount. Our commitment to data minimization and purpose limitation ensures that we handle personal information with precision, mitigating risks and protecting the privacy of individuals.



## Empowering Individuals:

Our dedication to human rights extends beyond protection; it includes empowerment. We champion the rights of individuals to access, rectify, and, when necessary, erase their personal data. By providing control over their information, we empower individuals to assert their digital rights.



## Continuous Vigilance and Adaptation:

In the ever-evolving landscape of technology and data, our commitment to privacy is not static. We embrace continuous vigilance, adapting our practices to meet emerging challenges and technological advancements, ensuring that our commitment to human rights remains resilient.

**As we prepare to unveil our Human Rights Annual Report, our dedication to data privacy stands as a testament to our broader mission. By weaving the principles of transparency, ethical data handling, and legal compliance into the fabric of our organization, we contribute to a world where technology coexists harmoniously with the fundamental rights and dignity of every individual**

# Annexure – 1

## UNGC Principles Reporting Framework Index

Section of the Framework	Location in this report
<b>PART A – GOVERNANCE OF RESPECT FOR HUMAN RIGHTS</b>	
A1 What does the company say publicly about its commitment to respect human rights?	Page 18-20
A1.1 How has the public commitment been developed?	Page 18-20
A1.2 Whose Human Rights does the commitment address?	Page 54-59
A1.3 How is the public commitment disseminated?	Page 22
Embedding Respect for Human Rights	
A.2 How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?	Page 18-20
A2.1 How is day-to-day responsibility for human rights performance organized within the company, and why?	Page 21
A2.2 What kinds of human rights issues are discussed by senior management and by the Board, and why?	Page 21, 54-59
A2.3 How are employees and contract workers made aware of the ways in which respect of human rights should inform their decisions and actions?	Page 20,22, 39-40
A2.4 How does the company make clear in its business relationships the importance it places on respect for human rights?	Page 20, 60-63
A2.5 What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	Page 23-25
<b>PART B – DEFINING THE FOCUS OF REPORTING</b>	
B1 Statement of Salient Issues	Page 54-59
B2 Determination of Salient Issues	Page 22-23
B3 Choice of Focal Geographies	-
B4 Additional Severe Impacts	Page 23-25
<b>PART C – MANAGEMENT OF SALIENT HUMAN RIGHTS ISSUES</b>	
C1 Does the company have any specific policies that address its salient human rights issues and, if so, what are they?	Page 15, 20,26-46
C1.1 How does the company make clear the relevance and significance of such policies to those who need to implement them?	Page 20,22 60-63
C2 What is the company's approach to stakeholders' engagement in relation to salient human rights issues?	Page 54-59
C2.1 How does the company identify which stakeholders to engage with in relation to salient issues, and when and how to do so?	Page 20;54-59
C2.2 Which stakeholders has the company engaged with regarding each salient issue, and why?	Page 26-46
C2.3 How have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	Page 23-25; 40-42; 54-59
C3 How does the company identify any changes in the nature of each salient human rights issue over time?	Page 23-25
C3.1 Were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	Page 23-25
C3.2 Did any severe impacts occur that were related to a salient issue and if, so what were they?	Page 23-25
C4 How does the company integrate its findings of each salient human rights issue into its decision-making processes and actions?	Page 23-25
C4.1 How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in findings and implementing solutions?	Page 26-46
C4.2 When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	Page 54-59
C4.3 What action has the company taken to prevent or mitigate potential impacts related to each salient issue?	Page 26-46
C5 How does the company know if efforts to address each salient human rights issue are effective in practice?	Page 23-25
C5.1 What specific examples from the reporting period illustrate if each salient issue is being managed effectively?	N/A
C6 How does the company enable effective remedy if people are harmed by its actions or decisions in relation to the salient human rights issues?	Page 45-46
C6.1 Through what means can the company receive complaints or concerns related to each salient issue?	Page 21, 45-46
C6.2 How does the company know if people feel able and empowered to raise complaints or concerns?	Page 26-46
C6.3 How does the company process complaints and assess the effectiveness of outcomes?	Page 21,45-46
C6.4 What were the trends and patterns in the complaints or concerns and their outcomes regarding the salient issues, and what lessons have the company learned?	Page 23-25, 38, 45-46
C6.5 Did the company provide or enable remedy for any actual related to a salient issue and, if so, what are typical or significant examples?	Page 34-35, 40-42

# Annexure – 2

## Mapping Our Labour & Human Resource Actions in support of Human Rights & SDG

Category	Sub Category	Reference to Social Accountability & Human Rights Progress Report 2022-23	Our Actions in support of Human Rights & SDG																														
			Equality	Non Discrimination	Social Security	Work	Health	Family Life	Cultural Life	Rest & Leisure	Freedom From Slavery	From Forced Labour	Just & Favourable condition of Work	Peaceful Assembly	Freedom of Association	Adequate Standard of Living	Education	Opinion & Information	Minorities	Protection of Child	Self Determination	Own Property	Fair Public Hearing	Privacy	Freedom from Torture & Degrading Treatment	Freedom of Movement	Nationality	Religion or Belief	Participate in Government & In Free Elections	To do one's duty	Remedy	Recognition	
Labour	Talent Acquisition and Retention		✓	✓																													
	Terms of Employment			✓	✓																										✓		
	Work Life Balance					✓																								✓			
	Details of Leaves Available to Employees							✓																						✓			
	Working Hours									✓																							
	Remuneration		✓	✓								✓																					
	Performance Management		✓	✓								✓																					✓
	Training and Education & Talent Development		✓									✓					✓																
	Employee Engagement & Participation								✓																								
	Employee Communication																✓																
Diversity & Women Empowerment	Diversity & Women Empowerment		✓	✓																													
	Non-Discrimination Practices		✓	✓															✓													✓	
	Prevention of Child Labour																			✓													✓
	Prevention of Forced /Bonded/ Compulsory Labour									✓																							
	Security Practices						✓			✓																							
	Local Hiring		✓	✓													✓																
	Rights of Indigenous People		✓	✓																✓													✓
	Social Accountability in Supply Chain		✓	✓																✓													



## SDG connection to Human Rights

# Annexure – 3

## Mapping of GFL's HR Principles with various Sustainability Standards & UN Human Rights

No	GFL's Human Resource Principles	UNGC Principles	ISO 26000 Standards	SA 8000 Standards	NVG Principles	Sustainable Development Goals (SDGs)	Human Rights
1	Building safe, Healthy and Secure workplace with the involvement of all employees.		Health and Safety at work -6.4.6	3. Health and Safety	Principle 3-Businesses Should promote the well-Being of all employees	3, 8	Right to Adequate Standard of Living
2	Implement robust, fair, transparent and non-discriminatory process to attract, develop and retain Talent needed for business delivery and growth.	Principle 6-elimination discrimination in respect of employment and occupation	Condition of work and social Protection-6.4.4	5.Discrimination	Principle 3-Businesses should promote the well-Being of all employees	1,5,10	Right to be Free & Equal and Freedom from Discrimination
3	Uphold and respect Human Dignity, Equality and Human Rights at the workplace.	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence; Principle 2: make sure they are non-complicit in human rights abuse, Principle 4: the elimination of all forms of forced and compulsory labor; Principle 5: the effective abolition of child labor	Human Right-6.3 Due Diligence-6.3.3 Human Rights risk situation-6.3.4 Avoidance of complicity-6.3.5 Discrimination and vulnerable groups-6.3.7 Civil and Political Rights-6.3.8 Economic, Social and cultural Rights-6.3.8	1.Child labor 2.Forced or compulsory labor 3.Disciplinary Practices	Principle 5-Businesses should respect and promote human rights	5,10	Right to be Free & Equal and Freedom from Discrimination
4	Provide Continuous learning opportunities for the growth and development of all employees	Principle 6-elimination discrimination in respect of employment and occupation	Human Development training in the workplace-6.4.7	5. Discrimination	Principle 3-Businesses Should promote the well-being of all employees	4	Right to Education
5	Ensure continuous two-way communication and participation of employees and respect their views and opinion and involve them in decision making	Principle 3- Businesses should uphold the freedom of association and effective recognition bargaining of the right to collective bargaining	Employment and Employment Relation-6.4.3 Social Dialogue-6.4.5	9. Management System 4-Freedom of Association and Rights to Collective Bargaining	Principle 3-Businesses Should promote the well-being of all employees	10	Right to Freedom of Opinion & Expression
6	Establish meritocracy without any bias or discrimination in connection to performance evaluation, career progression, rewards and recognition.	Principle 6-elimination discrimination in respect of employment and occupation	Employment and Employment Relation-6.4.3 Social Dialogue-6.4.5		Employment and Employment Relation-6.4.3 Social Dialogue-6.4.5	5,10	Right to be Free & Equal and Freedom from Discrimination; Right to Recognition as a Person before the Law

# Annexure – 3

## Mapping of GFL's HR Principles with various Sustainability Standards & UN Human Rights

No	GFL's Human Resource Principles	UNGC Principles	ISO 26000 Standards	SA 8000 Standards	NVG Principles	Sustainable Development Goals (SDGs)	Human Rights
7	Pay for Performance based on internal and external parity.	Principle 6-elimination discrimination in respect of employment and occupation	Condition of work and social Protection	8.Remuneration	Principle 3-Businesses Should promote the well-Being of all employees	5,10	Right to be Free & Equal and Freedom from Discrimination Right to Recognition as a Person before the Law
8	Encourage creativity and innovation to fuel growth.		Social Dialogue-6.4.5		Principle 3-Businesses Should promote the well-Being of all employees	4,10	Right to Education, Right to Freedom of Opinion & Expression
9	Create and engaged work environment of teamwork and camaraderie with a bias for responsible execution and excellence.	Principle 4: the elimination of all forms of forced and compulsory labor, Principle 6-elimination discrimination in respect of employment and occupation	Human development and training in the workplace-6.4.7	5.Discrimination	Principle 3-Businesses Should promote the well-Being of all employees	4,5,8	Right to Freedom from Slavery; Freedom from Torture & Degrading Treatment
10	Drive social accountability and responsibility and ensure ethical governance for responsible execution and excellence	Business should work against all forms of corruption, including extortion and bribery	Anti-corruption-6.6.3 Responsible Political involvement -6.6.4 Community involvement and development-6.8	9.Management System	Principle 1- Business should conduct and govern with ethics, transparency and accountability	1-17	Right to Human Rights

# Annexure – 4

## Assurance Statement 2023



### DQS India Assurance Statement 2023

#### To the Management and Stakeholders of Gujarat Fluorochemicals Limited (GFL)

DQS has been engaged by Gujarat Fluorochemicals Limited (GFL) to provide independent assurance over Human Rights Progress Report - 2023 based on UNGC Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption. The engagement took place from 29<sup>th</sup> September 2023 to 13<sup>th</sup> Oct 2023 through virtual assessment.

Lead Auditor: Mr. V. Kandasamy

Co-Auditor: Mr. Ajay Kumar

#### Objectives

The objective of this assurance engagement was to independently express conclusions on underlying reporting processes and validate qualitative and quantitative claims, to limit misinterpretation by stakeholders and increase the overall credibility of the reported information and data.

The objectives also include the assessment of the extent to which the employees are aware of the organization's Human Rights policies and how those are being executed on ground. This was done in two ways.

1. Interviewing cross-section of people from all business sites, functions, and levels.
2. Randomly selecting samples from the given data of employees and contractor labourer's and verifying implementation of Human Rights policies regarding the applicable labour laws.

#### Scope of Assurance

The assurance encompassed the entire report and focused on all figures, statements and claims related to Human Rights during the reporting period Jan 2023 to Oct 2023. More specifically, this included:

- Statements, information, and performance data contained within the Human Rights Progress report.
- GFL's management approach of Human Rights related material issues; and
- GFL's reported data and information as per the requirements of the UN Guiding Principles on Business and Human Rights (UNGPR)

The assurance engagement was performed in accordance DQS framework on Human Rights based on Guiding Principles on Business and Human Rights as specified by the United Nations and United Nations Global Compact, a set of ten guiding principles regarding human rights, labour, environment, and anti-corruption, including the following:

- Evaluating the company's Human Rights framework and processes using the Protect, Respect & Remedy criteria and effectiveness criteria for grievance mechanisms from UNGP (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, Source of Continuous Learning. Based on Engagement and Dialogue)
- Evaluating the quality of the reported Human Rights performance information



# Annexure – 4

## Assurance Statement 2023



The report has been self-declared to comply with the in accordance - United Nations Global Compact, a set of ten guiding principles regarding human rights, labour, environment, and anti-corruption".

### Operational Boundary

Verification of Gujarat Fluorochemicals Limited (GFL) along with specific production sites in India - Dahej Plant, Jolva plant, Ranjit Nagar Plant, Regional Office at Vadodara (India) and Subsidiary offices in Texas (USA) and Hamburg (Germany).

### Level of Assurance and Limitations

A moderate level of assurance under DQS framework on Human Rights was provided for this engagement. Information and performance data subject to assurance is limited to the content of the Human Rights Progress report. The assurance did not cover financial data, technical descriptions of buildings, equipment, and production processes, on shop safety practices or other information not related to Human Rights or already supported by existing documents, such as third-party audits or certifications and previous GFL annual reports.

### Independence and Competences of the Assurance Provider

The DQS Group is an independent professional services firm that provides assurance on sustainability disclosures under the Global Reporting Initiative (GRI), Human Rights, CDP and other specialized management and reporting mechanisms.

Independent verifiers have not been involved in the development of the report nor have they been associated with GFL's sustainability program, data collection or strategic processes.

DQS Group ensures that the assurance team possesses the required competencies, maintained neutrality, and performed ethically throughout the engagement. Further information, including a statement of impartiality, can be found at: [www.dqs-cfs.com](http://www.dqs-cfs.com). The management of GFL was responsible for the preparation of the sustainability part of the Corporate Report and all statements and figures contained within it.

### Assurance Methodology

The assurance procedures and principles used for this engagement were drawn from the International Standards and methodology for data verification developed by DQS as below:

1. Based on Human Rights Progress Report on UNGC Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption, GFL have identified selected corporate KPIs and data sets, which are classified according to the relevant data owners and the type of evidence required for the verification process.
2. Carry out interviews with key functional managers and data owners at GFL.
3. Data quality verification included the following:
  - a. Enquiring about the quantitative and qualitative aspects of the KPI disclosures, including performance information, policies, procedures, and underlying management systems.
  - b. Requesting evidence of the data sources and explanation of relevant collection and calculation methods to substantiate the figures and claims.



- c. Effectiveness of grievance mechanisms based on UNGP criteria (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, Source of Continuous Learning. Based on Engagement and Dialogue)
4. Challenging the KPI claims, where possible, confirming the presented evidence, including calculation methods, criteria, and assumptions, with multiple data owners and other documentation from internal and external sources.
5. Assess the collected information and provide recommendations for immediate correction wherever required or for future improvement of the non-financial indicators' verification within the scope.

## Key Observations and Recommendations

### Strengths:

1. Strong management commitment & Team Involvement is noted towards sustaining and upholding the UNGC Ten principles in the focus areas of Labor and Human Rights, Environment, and Anti-Corruption.
2. Good CSR project for FY 22-23
  - Construction of Aawas at Jolva Village
  - Sustainable Livelihood – Ranjitnagar Handicraft Centre
  - International Woman's Day Celebration
  - Various initiatives for enhancing quality learning on Educations, Community Wash Program,
  - Efforts are made to shift the people involved in the animal husbandry business towards the ideal and profitable animal husbandry.
  - Swasthyam – Mobile Health Unit
  - Cleaner environment through planted more than 6500 forestry plants in 3- acre land in Ranjitnagar Village.
  - Community Engagement Program
  - Water Management: Water scarcity in the area around Ranjitnagar plant various initiatives.
3. Initiatives and structured plan for grievance mechanism to address Human Rights is highly appreciable. E.g., Social Performance teams and Ethics committees.
4. Good system exists for contractor safety management.
5. No discrimination activities involved in this group.

### Opportunities for Improvement:

To achieve the organization objectives on carbon neutrality, further investments in Renewable energy and collaboration with carbon sequestration organizations may be prioritized.

Documents on Roles, responsibilities, authorities, and accountabilities may be reviewed thoroughly for inclusion of social responsibility and ESG areas.

Mechanism of identifying the discrimination or human violation happens in the stake holder premises needs to be defined in the system.

# Annexure – 4

## Assurance Statement 2023



### Evaluation of the Adherence to DQS Framework on Human Rights

**Inclusivity** - How the organization engages with stakeholders and enables their participation in identifying issues and finding solutions related to Human Rights.

The stakeholder identification and engagement process are well documented and implemented through GFL Stakeholder engagement program and the Report brings out key stakeholder concerns as material aspects of significant stakeholders.

In our view, the level at which the Report adheres to this principle is all inclusive and quite good. Therefore, it is recommended that GFL should continue with the planned process of direct dialogue with the stakeholders at determined intervals.

**Materiality** - How the organization recognizes issues that are relevant and significant to itself and its stakeholders.

**Responsiveness** - How the organization responds to stakeholder issues and feedback through decisions, actions, performance, and communication.

**Impact** - How the organization monitors, measures, and ensures accountability for how its actions affect their broader ecosystems.

### Conclusion

Based on a moderate assurance engagement according to the above-listed criteria, nothing has come to our attention that causes us to believe that the Human Rights related strategies of GFL, and its Human Rights related key performance indicators defined in the 2023 Human Rights Progress Report are materially misstated.

The GFL Human Rights Progress Report of 2023 is in line with the UNGC Ten principles in the areas of Labor and Human Rights, Environment, and Anti-Corruption. The material aspects and their boundaries within and outside of the organization are properly defined in accordance with DQS Human Rights framework.

GFL has made significant strides to introduce innovative solutions toward mitigating Human Rights related impacts and influence supply chain partners in the process. Continued alignment of risk assessments, stakeholder engagement processes, materiality and strategy will further strengthen the Human Rights Progress of GFL.

On behalf of the assurance team

13<sup>th</sup> October 2023



**Dr. Murugan Kandasamy**

CEO & Managing Director

Deutsch Quality Systems (India) Private Limited

**Deutsch Quality Systems (India) Private Limited**

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## Gujarat Fluorochemicals Limited

Social Accountability, Labour & Human Rights  
Progress Report 2022-23

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