



# GRAPHITE INDIA LIMITED

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WEBSITE : www.graphiteindia.com, CIN : L10101WB1974PLC094602

GIL/SEC/SM/25-26/23

July 7, 2025

BSE Limited  
The Corporate  
Relationship Department,  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Bldg., P.J. Towers,  
Dalal Street, Mumbai 400 001.  
**Scrip Code – 509488**

The Manager  
Listing Department,  
National Stock Exchange  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No –C/1,G Block,  
Bandra-Kurla Complex,  
Bandra (E) Mumbai 400 051  
**Symbol: GRAPHITE**

Dear Sir/Madam,

**Subject: Business Responsibility and Sustainability Report for FY 2024-25**

Pursuant to Regulation 34(2)(f) of SEBI (LODR) Regulations, 2015 enclosed please find herewith the Business Responsibility and Sustainability Report (BRSR) of the Company for the financial year 2024-25, which forms an integral part of the Annual Report 2024-25 submitted to the Exchanges.

This is for your information and record.

Thanking You,

Yours faithfully,  
For Graphite India Limited

S. Marda  
Company Secretary

Encl. : As above.

**Annexure 10****BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT 2024-2025****A Better Tomorrow**

The fight against climate change will require more, better, and cleaner steel and castings.

Wind and solar energy production capacity, both considerably more steel intensive than fossil fuel power stations, are set to grow exponentially.

Wind turbines, electric cars, lighter vehicles, energy-efficient buildings... all require higher performance materials and castings.

The steelmaking process itself will decarbonize thanks to the continuous improvement in the performance of existing assets, the shift from blast furnace to electric arc furnace, and technology breakthrough.

Our main product is graphite electrode which is an essential requirement for electric arc furnaces (EAF). Primarily into steel production from scrap thus **reduces the CO2-emissions of the sector**.

The graphite industry and its raw materials are an integral part of any economy and society. Standing at the beginning of most value chains, the sector is a critical supplier of essential materials and products and therefore generates added value and growth through employment, economic growth, development, innovation and generating trade. As the world shifts to a low-CO2 future, we explore our future contribution to reducing CO2 emissions primarily in metal sectors in particular by supporting the circular economy and saving resources and by providing products for the energy transition. The global population is forecast to reach 9 billion by 2030, including 3 billion new middle-class consumers. This places unprecedented pressure on natural resources to meet future consumer demands. To meet the challenges caused by an increased, continuous demand for sustainably sourced raw materials, a shift towards more resource efficient production, increased recovery and reprocessing along the circular economy and sustainable development objectives is becoming more crucial than ever

Recycling steel is carried out in Electric Arc furnaces (EAF) which are using graphite electrodes to obtain the temperatures to melt the steel scrap and to ensure the steel qualities of the recycled steel. Graphite electrodes are an integral part of the latest steel recycling technology and given the increased use of steel in infrastructure around the world, graphite electrodes will continue to be required to save resources for the future. Compared to Basic Oxygen Furnace (BOF) steelmaking, graphite electrodes used in EAFs contribute to huge saving of carbon emissions around the world.

Further, our principal raw material is a waste from petroleum sector and our product is a great example of **circular economy**. While it is true that production of graphite electrode requires lot of energy, the product saves much more energy while in use by supporting recycling of scraps.

Decarbonization of the steel and casting industries is at the core of our strategy. **At Graphite India, we believe that we can build on our successes and so create even more value for our customers, our shareholders and our employees by embedding sustainability in all aspects of our business and strategy.**

Our long-term success is tightly bound to our sustainability initiative, with its primary focus on helping our customers improve their operational performance to enable them to deliver on their own sustainability agenda. At the same time we seek to benefit the communities in which we operate and develop our people to build diverse, engaged and high-performing teams to promote our work.

In FY 2024-25, our sustainability performance snapshot is,

- (a) Reduction in Energy consumption by 29.1% with respect to that of previous year FY 2023-24.
- (b) Reduction in GHG emissions (Scope 1 and 2) by 23.2% with respect to that of previous year FY 2023-24.
- (c) Reduction in water consumption by 34.4% with respect to that of previous year FY 2023-24.
- (d) Installed Zero Liquid Discharge (ZLD) systems in all our plants. As a result of this we are not discharging any water outside the plants.
- (e) EcoVadis has emerged as a widely used supplier ESG assessment platform and some of the customers are requesting us for EcoVadis score. We participated in EcoVadis assessment during the year and achieved an improvement in EcoVadis percentile score to 58.
- (f) Diversity goals have triggered female workforce increase of 21% over previous year.

- (g) Obtained Environmental Management System certification ISO 14001, Occupational Health & Safety Management System certification ISO 45001 and Energy Management System certification ISO 50001 for all our manufacturing plants.
- (h) Initiated social accountability process as per SA 8000.

We remain committed to our sustainability priorities and move ahead in our chosen path.

**Our Sustainability strategy and objectives**

Creating a better tomorrow for our planet, our customers, our people and our communities.

We create innovative solutions that enable our customers to improve safety and quality performance, reduce their environmental footprint, become more efficient in their processes, and reduce costs.

We aim to deliver sustainable, profitable growth to provide our shareholders with a superior return on their investment, whilst providing our employees with a safe workplace where they are recognised, developed, and properly rewarded.

Our Sustainability initiative embodies this purpose. It sets out our formal objectives and targets for supporting our customers, our employees and our communities, and for protecting our planet for future generations.



## BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity: **L10101WB1974PLC094602**
2. Name of the Listed Entity: **GRAPHITE INDIA LIMITED**
3. Year of incorporation: **1974**
4. Registered office address: **31, Chowringhee Road, Kolkata - 700 016**
5. Corporate address: **31, Chowringhee Road, Kolkata - 700 016**
6. E-mail: **gilrographiteindia.com**
7. Telephone: **033-40029600**
8. Website: **www.graphiteindia.com**
9. Financial year for which reporting is being done: **2024-25**
10. Name of the Stock Exchange(s) where shares are listed: **NSE and BSE**
11. Paid-up Capital: **Rs. 39.08 Crore**
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report: **S Marda, Designation- Company Secretary, Telephone No: 033-40029609, Email Id: smarda@graphiteindia.com**
13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together): **Standalone**
14. Name of assurance provider: **Futurestation Services LLP**
15. Type of assurance obtained: **Reasonable Assurance**

#### II. Products/services

16. Details of business activities (*accounting for 90% of the turnover*):

| S. No. | Description of Main Activity | Description of Business Activity                      | % of Turnover of the entity |
|--------|------------------------------|---|-----------------------------|
| 1      | Manufacturing & Selling      | Graphite Electrodes & Miscellaneous Graphite products | 75.03                       |
| 2      | Manufacturing & Selling      | Calcined Petroleum Coke                               | 5.73                        |
| 3      | Manufacturing & Selling      | Impervious Graphite Equipment & Spares                | 7.09                        |
| 4      | Manufacturing & Selling      | High Speed Steel                                      | 9.21                        |
|        | <b>Total</b>                 |   | <b>97.06</b>                |

17. Products/Services sold by the entity (*accounting for 90% of the entity's Turnover*):

| S. No. | Product/Services   | NIC Code | % of total Turnover Contributed |
|--------|--|----------|---------------------------------|
| 1      | Graphite Electrodes, Miscellaneous Graphite Products, Impervious Graphite Equipment and Spares | 23994    | 82.12                           |
| 2      | Calcined Petroleum Coke  | 19209    | 5.73                            |
| 3      | High Speed Steel   | 24105    | 9.21                            |
|        | <b>Total</b>   |          | <b>97.06</b>                    |

#### III. Operations

18. Number of locations where plants and/or operations/offices of the entity are situated:

| Location             | Number of plants | Number of offices | Total     |
|----------------------|------------------|-------------------|-----------|
| <b>National</b>      | 7                | 3                 | <b>10</b> |
| <b>International</b> | 0                | 0                 | <b>0</b>  |

19. **Markets served by the entity:**

- a. Number of locations

| Location                         | Number |
|----------------------------------|--------|
| National (No. of States)         | 22     |
| International (No. of Countries) | 27     |

- b. What is the contribution of exports as a percentage of the total turnover of the entity?:
- 33.44%**

- c. A brief on types of customers :

The company is engaged in the business of manufacturing graphite electrodes and specialties, calcined petroleum coke, impervious graphite equipment, glass reinforced plastic pipes, steel and generation of renewable energy. Thus, the company caters to a wide range of customers, engaged in manufacturing steel, cutting tool industry, chemicals, fertilizers, polymers, drug intermediaries, metal pressing, effluent treatment, irrigation etc.

**IV. Employees**

20. Details as at the end of Financial Year:

- a. Employees and workers (including differently abled):

| S. No.           | Particulars                    | Total<br>(A) | Male        |              | Female    |             |
|------------------|--------------------------------|--------------|-------------|--------------|-----------|-------------|
|                  |                                |              | No. (B)     | % (B / A)    | No. (C)   | % (C / A)   |
| <b>EMPLOYEES</b> |                                |              |             |              |           |             |
| 1.               | Permanent (D)                  | 795          | 766         | 96.35        | 29        | 3.65        |
| 2.               | Other than Permanent (E)       | 39           | 39          | 100          | 0         | 0           |
| 3.               | <b>Total employees (D + E)</b> | <b>834</b>   | <b>805</b>  | <b>96.52</b> | <b>29</b> | <b>3.48</b> |
| <b>WORKERS</b>   |                                |              |             |              |           |             |
| 4.               | Permanent (F)                  | 883          | 879         | 99.55        | 4         | 0.45        |
| 5.               | Other than Permanent (G)       | 1548         | 1541        | 99.55        | 7         | 0.45        |
| 6.               | <b>Total workers (F + G)</b>   | <b>2431</b>  | <b>2420</b> | <b>99.55</b> | <b>11</b> | <b>0.45</b> |

- b. Differently abled Employees and workers:

| S. No.                             | Particulars                                      | Total<br>(A) | Male     |             | Female   |           |
|------------------------------------|--|--------------|----------|-------------|----------|-----------|
|                                    |  |              | No. (B)  | % (B / A)   | No. (C)  | % (C / A) |
| <b>DIFFERENTLY ABLED EMPLOYEES</b> |  |              |          |             |          |           |
| 1.                                 | Permanent (D)                                    | 2            | 2        | 100%        | 0        | 0%        |
| 2.                                 | Other than Permanent (E)                         | 0            | 0        | 0%          | 0        | 0%        |
| 3.                                 | <b>Total differently Abled employees (D + E)</b> | <b>2</b>     | <b>2</b> | <b>100%</b> | <b>0</b> | <b>0%</b> |
| <b>DIFFERENTLY ABLED WORKERS</b>   |  |              |          |             |          |           |
| 4.                                 | Permanent (F)                                    | 5            | 5        | 100%        | 0        | 0%        |
| 5.                                 | Other than Permanent (G)                         | 2            | 2        | 100%        | 0        | 0%        |
| 6.                                 | <b>Total differently Abled workers (F + G)</b>   | <b>7</b>     | <b>7</b> | <b>100%</b> | <b>0</b> | <b>0%</b> |

- 21.
- Participation/Inclusion/Representation of women**

| Particulars                      | Total<br>(A) | No. and percentage of Females |           |
|----------------------------------|--------------|-------------------------------|-----------|
|                                  |              | No. (B)                       | % (B / A) |
| Board of Directors (BOD) *       | 8            | 1                             | 12.5%     |
| Key Management Personnel (KMP) # | 2            | 0                             | 0%        |

\* Mr. Ashutosh Dixit, Whole-Time Director & Key Management Personnel has been shown under BOD.

# Mr. Shiva Balan retired as Company Secretary w.e.f. 31st May, 2024 and Mr. Sanjeev Marda was appointed as Company Secretary w.e.f. 1st June, 2024.

## 22. Turnover rate for permanent employees and workers

|                     | FY 2024-25 (%) |        |       | FY 2023-24 (%) |        |       | FY 2022-23 (%) |        |       |
|---------------------|----------------|--------|-------|----------------|--------|-------|----------------|--------|-------|
|                     | Male           | Female | Total | Male           | Female | Total | Male           | Female | Total |
| Permanent Employees | 7.48           | 4.16   | 7.38  | 10.6           | 0.7    | 11.3  | 6.18           | 0.43   | 6.61  |
| Permanent Workers   | 5.66           | 0      | 5.63  | 4.14           | 0      | 4.14  | 10.53          | 9      | 19.53 |

## V. Holding, Subsidiary and Associate Companies (including joint ventures)

## 23. Names of holding / subsidiary / associate companies / joint ventures

| S. No. | Name of the holding / subsidiary / associate companies / joint ventures(A) | Indicate whether holding / Subsidiary / Associate / Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|--|---|-----------------------------------|--|
| 1      | Emerald Company Private Limited, India                                     | Holding   | 61.33                             | No   |
| 2      | Carbon Finance Limited, India  | Subsidiary  | 100.00                            | No   |
| 3      | Graphite International BV(GIBV)  | Subsidiary  | 100.00                            | No   |
| 4      | Graphite Cova GmbH   | Subsidiary of GIBV  | 100.00                            | No   |
| 5      | Bavaria Electrodes GmbH #  | Subsidiary of GIBV  | 100.00                            | No   |
| 6      | Bavaria Carbon Specialities GmbH   | Subsidiary of GIBV  | 100.00                            | No   |
| 7      | Bavaria Carbon Holdings GmbH   | Subsidiary of GIBV  | 100.00                            | No   |
| 8      | General Graphene Corporation   | Subsidiary of GIBV  | 60.25                             | No   |
| 9      | Godi India Private Limited, India  | Associate of GIL  | 31.00                             | No   |

# In liquidation

## VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**  
(ii) Turnover (in Rs.) : **24,20,00,28,255.05**  
(iii) Net worth (in Rs.) : **55,82,11,38,736.31**

## VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy) | FY 2024-25                                 |  |         | FY 2023-24                                 |  |         |
|---|--|--|--|---------|--|--|---------|
|   |  | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities                                       | YES  | NIL  | NIL  |         | NIL  | NIL  |         |
| Investors (other than shareholders)               | YES  | NIL  | NIL  |         | NIL  | NIL  |         |
| Shareholders                                      | YES  | 11   | NIL  |         | 21   | NIL  |         |
| Employees and workers                             | YES, in HR manual  | NIL  | NIL  |         | NIL  | NIL  |         |

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) (If Yes, then provide web-link for grievance redress policy)                                       | FY 2024-25                                 |  |  | FY 2023-24                                 |  |         |
|---|--|--|--|--|--|--|---------|
|   |  | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks  | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Customers   | YES<br><a href="https://graphiteindia.com/grievance-redressable-mechanisms.php">https://graphiteindia.com/grievance-redressable-mechanisms.php</a> | 14   | 1  | The necessary correction of the material done but affirmative feedback from customer awaited | 15   | 1  |         |
| Value Chain Partners                              | YES<br><a href="https://graphiteindia.com/grievance-redressable-mechanisms.php">https://graphiteindia.com/grievance-redressable-mechanisms.php</a> | NIL  | NIL  |  | NIL  | NIL  |         |

26. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format.

| S. No. | Material issue identified     | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity   | In case of risk, approach to adapt or mitigate   | Financial implications of the risk or opportunity (Indicate positive or negative implications)   |
|--------|-------------------------------|--|--|--|--|
| 1      | Natural Resource availability | Risk and Opportunity                       | Natural resources are relevant part of our product manufacturing process. Minimizing use of natural resources to meet our business needs by developing sustainable products and processes. | <ul style="list-style-type: none"> <li>Reduced energy consumption in absolute terms year on year.</li> <li>Reduced GHG emission in absolute terms year on year by improving renewable component in energy sourcing.</li> <li>In all plants we have significantly reduced water consumption. Rainwater harvesting is being practiced. In all our plants we have achieved ZLD status.</li> </ul> <p>Our main raw materials are wastes (petroleum refinery residue) and our main energy usage is from CBM which is from capture of methane from coal mines that would have been a waste if not used. We have carried our LCA for our main product (Graphite Electrodes) and trying to reduce the negative environmental impact through resource efficiency.</p> | <p><b>Positive :</b><br/>Sustainability of business, cost reduction, growth without negatively impacting the planet.</p> <p><b>Negative :</b><br/>Unavailability or shortage of natural resources can close down business.</p> |

| S. No. | Material issue identified                       | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity   | In case of risk, approach to adapt or mitigate   | Financial implications of the risk or opportunity (Indicate positive or negative implications)  |
|--------|---|--|--|--|---|
| 2      | GHG emission, Energy management                 | Risk                                       | Climate change is the biggest threat to humanity. GHG management can mitigate climate change. Energy management helps in GHG management while reducing operational cost. | <ul style="list-style-type: none"> <li>Replacement of fossil fuel with CBM/ PNG.</li> <li>Monitoring GHG emission and taking corrective measure to reduce carbon foot print.</li> <li>Improving energy efficiency by replacing inefficient motor &amp; pumps, using variable frequency drives, optimizing energy usage by improving load factor and power factor.</li> </ul> | <b>Positive :</b><br>Reduction in carbon foot print and energy consumption / cost reduction.  |
| 3      | Handling hazardous wastes/ non hazardous wastes | Risk and Opportunity                       | Handling hazardous and other wastes with care to avoid any threats posed to the health and wellbeing of our people and to our surrounding environment.                   | <ul style="list-style-type: none"> <li>We continue to monitor quantity of different kind of wastes and implement waste management plans focusing on waste reduction, reuse and recycle. Our waste generation has reduced year on year.</li> <li>All wastes are managed as per applicable regulations.</li> </ul>   | <b>Positive:</b> Cost reduction and better circularity.<br><br><b>Negative :</b> health and environmental hazards, higher costs.  |
| 4      | Climate Change                                  | Risk and Opportunity                       | Climate Risks (both physical and transition) are real. Opportunities are there to develop climate resilience and move ahead of competition.                              | We have carried out study as per TCFD ( <a href="https://graphiteindia.com/tcfd-lca-reports.php">https://graphiteindia.com/tcfd-lca-reports.php</a> ) and identified the risks and opportunities. We have started mitigation / adaptation measures in a structured manner as a part of our Enterprise Risk Management framework.   | There are both positive and negative financial impacts of the identified risks and opportunities, details of which are disclosed in our TCFD report.  |
| 5      | Gender diversity                                | Opportunity                                | This process shall enable the company to access diverse and greater talent pool and bring in an inclusive culture.   | We have set up goals for increase in our gender diversity and bring in diverse and greater talent pool in our organization. With this we are focusing on inclusive hiring practices, foster a safe and inclusive work environment  | <b>Positive :</b><br>1) Accessing wider talent pool shall bring in greater productivity and profits.<br>2) Inclusive culture adds to employee motivation and appreciation from overall eco system which in turn results into reputational dividend. |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity   | In case of risk, approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications)   |
|--------|---------------------------|--|--|---|--|
| 6      | Training                  | Opportunity                                | A structured training schedule improves knowledge, both technical and ethical and adds to better employee performance and innovation efforts.                  | We are focussing on a proactive approach that includes clear communication, and ongoing monitoring  | <b>Positive:</b><br>Training improves productivity of employees, manifold times with consequent uptick in corporate bottom line. In addition it is a catalyst to innovation initiatives, resulting into better/newer products, services, channels of distribution etc all of which sustains long time growth of the company. |
| 7      | Environmental Risk        | Risk                                       | Changes in existing regulations/ Emerging regulations  | <ul style="list-style-type: none"> <li>The company continues to monitor all emerging regulations and plan for compliance</li> <li>Proactively work on emerging regulations and implement ahead of statute</li> <li>All production units are EMS ISO 14001:2015 compliant.</li> </ul>  | <b>Negative:</b><br>Increased expenses in transiting towards meeting new regulations   |
| 8      | Health and Safety risk    | Risk and Opportunity                       | The manufacturing operations of the company requires employees to work with plant, machineries, material handling equipment, all of which carry risk of injury | <ul style="list-style-type: none"> <li>Adherence to safety standards, company's Environment policy and Health and safety policy</li> <li>Continuous training to employees</li> <li>Hazard identification, risk assessment, incident investigation</li> <li>Occupational health and safety management programs in all plants</li> <li>All plants have ISO 45001 certification</li> </ul>             | <b>Positive:</b><br>Adoption of safety related protocols and measures to create a safe work environment.<br><br><b>Negative:</b><br>Impact on health and wellbeing of employees.   |
| 9      | Reputation                | Risk and Opportunity                       | Bad publicity arising out of any act/inaction by company on any platform. Customer complaints not resolved satisfactorily.                                     | <ul style="list-style-type: none"> <li>Actively monitor voices on all platforms and address those positively and timely.</li> <li>Actively and satisfactorily resolving customer complaints</li> <li>Ensuring product delivery in time</li> <li>Strengthening corporate governance norms, including adherence to code of conduct by all</li> <li>Timely compliance with all regulations.</li> </ul> | <b>Positive:</b><br>Opportunity to improve brand presence and reputation.<br><br><b>Negative:</b><br>Negative effect on brand image and company reputation, loss of customers  |

**SECTION B : MANAGEMENT AND PROCESS DISCLOSURES**

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

| Disclosure Questions                        |  | P   | P              | P               | P                | P               | P               | P | P |                |
|---|--|---|----------------|-----------------|------------------|-----------------|-----------------|---|---|----------------|
|   |  | 1   | 2              | 3               | 4                | 5               | 6               | 7 | 8 |                |
| <b>Policy and management processes</b>      |  |   |                |                 |                  |                 |                 |   |   |                |
| 1.  | a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes / No)  | Y   | Y              | Y               | Y                | Y               | Y               | Y | Y | Y              |
|   | b. Has the policy been approved by the Board? (Yes/No)   | <b>Principles 1 &amp; 8 approved by Board / Rest by Management signed by Executive Director</b>   |                |                 |                  |                 |                 |   |   |                |
|   | c. Web Link of the Policies, if available  | <b>Environment Policies are available in the link:</b><br><a href="https://graphiteindia.com/environment-policies.php">https://graphiteindia.com/environment-policies.php</a><br><b>Social Policies are available in the link:</b><br><a href="https://graphiteindia.com/social-policies.php">https://graphiteindia.com/social-policies.php</a><br><b>Governance Policies are available in the link:</b><br><a href="https://graphiteindia.com/governance-policies.php">https://graphiteindia.com/governance-policies.php</a>                 |                |                 |                  |                 |                 |   |   |                |
| 2.  | Whether the entity has translated the policy into procedures. (Yes / No)   | Y   | Y              | Y               | Y                | Y               | Y               | Y | Y | Y              |
| 3.  | Do the enlisted policies extend to your value chain partners? (Yes/No)   | Y   | Y              | Y               | Y                | Y               | Y               | Y | Y | Y              |
| 4.  | Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | -   | ISO 9001: 2015 | ISO 45001: 2018 | ISO 14001: 2015, | ISO 45001: 2018 | ISO 14001: 2015 | - | - | ISO 9001: 2015 |
| 5.  | Specific commitments, goals and targets set by the entity with defined timelines, if any.  | <b>1) Diversity goals are aimed at increasing female workforce in a planned manner in next 5 years</b><br><b>2) GHG reduction goals for near term are in alignment with SBTi</b><br><b>3) Water intake reduction goals for near term</b><br><b>4) SA8000 for largest plant by 2025 and other plants gradually</b>   |                |                 |                  |                 |                 |   |   |                |
| 6.  | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.   | <b>We are making progress in achieving our targets</b><br><b>Progress on diversity:</b> Diversity goals have triggered female workforce increase of 21% in the current year over previous year<br><b>Progress on GHG reduction goals:</b> In last one year, we achieved a 23.2% reduction in our absolute Scope 1 + 2 GHG emissions as detailed in Principle 6 of this document<br><b>Progress on Water intake reduction goal:</b> In the last one year we have reduced our water intake by 34.4% as detailed in Principle 6 of this document |                |                 |                  |                 |                 |   |   |                |
| <b>Governance, leadership and oversight</b> |  |   |                |                 |                  |                 |                 |   |   |                |

|     |   |  |   |   |   |   |   |   |   |   |   |  |   |   |   |   |   |   |   |   |
|-----|---|--|---|---|---|---|---|---|---|---|---|--|---|---|---|---|---|---|---|---|
| 7.  | Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements ( <i>listed entity has flexibility regarding the placement of this disclosure.</i> )<br><b>Graphite India Limited (the Company) is taking efforts to integrate Environmental, Social and Governance (ESG) principles into its businesses which is essential to embed the subject of Sustainability in its system. Consequently, the company adheres to the principles of product stewardship by enhancing health, safety and environmental impacts of products and services across their life-cycles. The environmental criteria impact Climate, Resources (Energy &amp; Water), Waste Management and Nature &amp; Biodiversity. The Company has committed to achieve progress on ESG matters by setting up goals to reduce its carbon emission and work towards a diverse workforce. Consequent results are encouraging. In addition, the Company has ensured conducting beneficial and fair business practices for our people and communities. The Company also strives to inculcate the values of ESG during its constant engagement with Key Stakeholders including Value chain Partners.</b> |  |   |   |   |   |   |   |   |   |   |  |   |   |   |   |   |   |   |   |
| 8.  | Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).  |  |   |   |   |   |   |   |   |   | <b>Ashutosh Dixit</b><br>Executive Director |  |   |   |   |   |   |   |   |   |
| 9.  | Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.   |  |   |   |   |   |   |   |   |   | <b>Ashutosh Dixit</b><br>Executive Director |  |   |   |   |   |   |   |   |   |
| 10. | Details of Review of NGRBCs by the Company:   |  |   |   |   |   |   |   |   |   |   |  |   |   |   |   |   |   |   |   |
|     | <b>Subject for Review</b>   |  | <b>Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee</b>  |   |   |   |   |   |   |   |   | <b>Frequency (Annually / Half yearly / Quarterly / Any other – please specify)</b> |   |   |   |   |   |   |   |   |
|     |   |  | P   | P | P | P | P | P | P | P | P   | P  | P | P | P | P | P | P | P |   |
|     |   |  | 1   | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9   | 1  | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|     | Performance against above policies and follow up action   |  | <b>Monitored by Executive Director every quarter and reported through Operations report on quarterly basis to Board.</b>  |   |   |   |   |   |   |   |   |  |   |   |   |   |   |   |   |   |
|     | Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances   |  | <b>Statutory compliance certificate on applicable laws is provided by Company Secretary (basis compliance certificates received from Plants/Functional heads) to the Board of Directors on quarterly basis.</b> |   |   |   |   |   |   |   |   |  |   |   |   |   |   |   |   |   |
| 11. | Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency  |  |   |   |   |   |   |   |   |   | P   | P  | P | P | P | P | P | P | P | P |
|     |   |  |   |   |   |   |   |   |   |   | 1   | 2  | 3 | 4 | 5 | 6 | 7 | 8 | 9 |   |
|     |   |  |   |   |   |   |   |   |   |   | N   | N  | N | N | N | N | N | N | N | N |
| 12. | If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated: <b>N/A</b>   |  |   |   |   |   |   |   |   |   |   |  |   |   |   |   |   |   |   |   |

### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

**PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.**

#### Essential Indicators

- Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

| Segment            | Total no. of training and awareness programmes held | Topics/principles covered under the training and its impact   | % of persons in respective category covered by the awareness programmes |
|--------------------|---|---|---|
| Board of Directors | 4   | During the year the board was engaged in various updates pertaining to business, regulatory, safety, ESG matters etc. as part of Board Meetings. These topics provided insights on all the 9 principles | 100   |

| Segment                            | Total no. of training and awareness programmes held | Topics/principles covered under the training and its impact  | % of persons in respective category covered by the awareness programmes |
|------------------------------------|---|--|---|
| Key Managerial Personnel           | 1   | ESG involving nine principles enunciated by NGRBC  | 100   |
| Employees other than BoDs and KMPs | 352   | Health, Safety, EMS, QS, OHS, LOTO, General awareness, Effective Communication, Human Rights, Anti bribery, Anti corruption, Supplier Sustainability, Modern Slavery, Energy Management System, SDG goals etc. | 60  |
| Workers                            | 374   | Health, Safety, EMS, QS, OHS, LOTO, General awareness, Discipline, Energy Management System, Skill Upgradation etc.  | 70  |

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website): **No substantial fines or penalties have been levied on GIL in the year 2024-25.**
3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed. **NA**
4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

**The Company has policies like Code of Conduct for Directors and Management Personnel, Vigil Mechanism and Whistle Blower Policy as well as Anti bribery and anticorruption policy for all employees which are in conformity with the legal and statutory framework on anti-bribery and anticorruption legislation prevalent in India. The Policies reflect the commitment of the Company and its management for maintaining highest ethical standards while undertaking open and fair business practices and culture, and implementing and enforcing effective systems to detect, counter and prevent bribery and other corrupt business practices. The policies are available on our website [www.graphiteindia.com](http://www.graphiteindia.com).**

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

|           | FY 2024-25 | FY 2023-24 |
|-----------|------------|------------|
| Directors | NIL        | NIL        |
| KMPs      | NIL        | NIL        |
| Employees | NIL        | NIL        |
| Workers   | NIL        | NIL        |

6. Details of complaints with regard to conflict of interest.

|  | FY 2024-25 |         | FY 2023-24 |         |
|--|------------|---------|------------|---------|
|  | Number     | Remarks | Number     | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | NIL        | NA      | NIL        | NA      |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | NIL        | NA      | NIL        | NA      |

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest: **N/A**
8. Number of days of accounts payables ((Accounts payable \*365) / Cost of goods/services procured) in the following format:

|                                | FY 2024-25 | FY 2023-24 |
|--------------------------------|------------|------------|
| No of days of accounts payable | 26.09      | 29.98      |

## 9. Open-ness of business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

| Parameter                  |    | Metrics   | FY 2024-25 | FY 2023-24 |
|----------------------------|----|---|------------|------------|
| Concentration of Purchases | a. | Purchases from trading Houses as % of total purchases                                 | 14.53      | 19.02      |
|                            | b. | Number of trading houses where purchases are made from                                | 718        | 718        |
|                            | c. | Purchases from top 10 trading houses as % of total purchases from trading houses      | 59.06      | 70.63      |
| Concentration of Sales     | a. | Sales to dealers / distributors as % of total sales                                   | 11.12      | 7.83       |
|                            | b. | Number of dealers / distributors to whom sales are made                               | 90         | 59         |
|                            | c. | Sales to top 10 dealers / distributors as % of total sales to dealers / distributors  | 80.30      | 78.87      |
| Share of RPTs in           | a. | Purchases (Purchases with related parties / Total Purchases)                          | 2.38       | 0.83       |
|                            | b. | Sales (Sales to related parties / Total Sales)  | 0.96       | 2.33       |
|                            | c. | Loans & advances (Loans & advances given to related parties / Total loans & advances) | NIL        | NIL        |
|                            | d. | Investments (Investments in related parties / Total Investments made)                 | 2.35       | 3.66       |

**Leadership Indicators**

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

| Total no of awareness programmes held | Topics/Principles covered under the training              | % age of value chain covered (by value of business done with such partners) under the awareness programmes |
|---------------------------------------|---|--|
| 2                                     | <b>GHG Management, Water Management, Waste Management</b> | <b>90% of suppliers</b>  |

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

**Yes, we have a code of conduct to avoid/manage conflict of interest involving members of the board. This is available in the following link:**

**[https://investors.graphiteindia.com/documents/680497571b3e5660d01bacb1a66428424754ffd081646600\\_1649777196.pdf](https://investors.graphiteindia.com/documents/680497571b3e5660d01bacb1a66428424754ffd081646600_1649777196.pdf)**

**PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe****Essential Indicators**

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

|                | FY 2024-25   | FY 2023-24   | Details of improvements in environmental and social aspects  |
|----------------|--------------|--------------|--|
| <b>R&amp;D</b> | <b>0.27%</b> | <b>0.44%</b> | <b>Purchase of R&amp;D equipment and accessories at Durgapur</b>   |
| <b>Capex</b>   | <b>52.9%</b> | <b>37.5%</b> | <b>Satpur: Solar power plant, wind power plant, dust collection system, silo revamping, RHRB Pitch coke handling system, upgradation of STP plant</b><br><b>Titlagarh: PNG line project, LFM Modernization</b><br><b>Durgapur: Purchase of star rating air conditioner, LOTO system, CO2 system, steam generator, dust collector new installation, BLDC fan installation</b> |

2. a. Does the entity have procedures in place for sustainable sourcing?  
**Yes. We have sustainable sourcing policies and procedures in place. Our supplier code of conduct covers all aspects of the 9 principles of NGRBC and responsible business. All suppliers are contractually bound to honour this code of conduct. We carry out periodic assessments of our suppliers to check compliance / progress. We plan to conduct annual sustainability maturity assessment of our major suppliers from FY 2025-26 to ensure gradual progress in the sustainability related performance of our supply chain.**  
**The nature of our business is such that about 15 to 20 suppliers provide more than 90% of our total supplies of goods and services by value. Further, most of them are global and domestic large companies who have established sustainability practices since long as evident from their sustainability reports.**
- b. If yes, what percentage of inputs were sourced sustainably?  
**We sourced 90% of our inputs by value sustainably.**
3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.  
**We have actively implemented principles of circular economy in our manufacturing plants. Several of our wastes have now been converted in value added products and either used in our processes or sold as by-products to others. Whenever possible, process rejects are treated and recycled back into the production line.**
4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same:  
**Yes, our waste collection plan is in line with the EPR plan submitted at the respective SPCBs.**

#### Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

| NIC Code | Name of product/service            | % of total turnover contributed | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency Yes/No | Results communicated in public domain Yes/No If Yes provide the weblink   |
|----------|------------------------------------|---------------------------------|--|---|---|
| 23994    | Manufacture of graphite electrodes | 75                              | From cradle to gate  | Yes   | Yes in weblink: <a href="https://graphiteindia.com/tcf-d-lca-reports.php">https://graphiteindia.com/tcf-d-lca-reports.php</a> |

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

**There are no significant environmental and social concerns as is evident from the Life Cycle Analysis (<https://graphiteindia.com/tcf-d-lca-reports.php>)**

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

| Indicate input material | Recycled or reused input material to total material |                                    |
|-------------------------|---|------------------------------------|
|                         | FY 2024-25 Current Financial Year                   | FY 2023-24 Previous Financial Year |
| <b>Green Scrap</b>      | <b>10%</b>  | <b>10%</b>                         |

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

**Majority of our products. Graphite Electrodes and related products, are used in EAF process of steel making. During the steel making process, the electrodes get sublimated and oxidized, and do not retain any separate existence. So, the opportunity of reuse, recycle or safe disposal of the products is not there.**

**The packaging materials used for our products is not much. However, we advise our customers the safe disposal procedure of these packaging materials. We take care of the plastic packaging components through our EPR.**

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

| Indicate Product Category | Reclaimed Product and their packaging materials as % of total product sold in respective category |
|---------------------------|---|
| <b>None</b>               | <b>NIL</b>  |

**PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains**

**Essential Indicators**

1. 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) |
| <b>Permanent employees</b>            |                           |                  |            |                    |            |                    |             |                    |           |                     |           |
| Male                                  | 766                       | 766              | 100        | 766                | 100        | 0                  | 0           | 0                  | 0         | 0                   | 0         |
| Female                                | 29                        | 29               | 100        | 29                 | 100        | 29                 | 100         | 0                  | 0         | 0                   | 0         |
| <b>Total</b>                          | <b>795</b>                | <b>795</b>       | <b>100</b> | <b>795</b>         | <b>100</b> | <b>29</b>          | <b>3.65</b> | <b>0</b>           | <b>0</b>  | <b>0</b>            | <b>0</b>  |
| <b>Other than Permanent employees</b> |                           |                  |            |                    |            |                    |             |                    |           |                     |           |
| Male                                  | 39                        | 39               | 100        | 39                 | 100        | 0                  | 0           | 0                  | 0         | 0                   | 0         |
| Female                                | 0                         | 0                | 0          | 0                  | 0          | 0                  | 0           | 0                  | 0         | 0                   | 0         |
| <b>Total</b>                          | <b>39</b>                 | <b>39</b>        | <b>100</b> | <b>39</b>          | <b>100</b> | <b>0</b>           | <b>0</b>    | <b>0</b>           | <b>0</b>  | <b>0</b>            | <b>0</b>  |

- b. Details of measures for the well-being of workers:

| Category                            | % of workers 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) |
| <b>Permanent workers</b>            |                         |                  |            |                    |            |                    |             |                    |           |                     |           |
| Male                                | 879                     | 879              | 100        | 879                | 100        | 0                  | 0           | 0                  | 0         | 0                   | 0         |
| Female                              | 4                       | 4                | 100        | 4                  | 100        | 4                  | 100         | 0                  | 0         | 0                   | 0         |
| <b>Total</b>                        | <b>883</b>              | <b>883</b>       | <b>100</b> | <b>883</b>         | <b>100</b> | <b>4</b>           | <b>0.45</b> | <b>0</b>           | <b>0</b>  | <b>0</b>            | <b>0</b>  |
| <b>Other than Permanent workers</b> |                         |                  |            |                    |            |                    |             |                    |           |                     |           |
| Male                                | 1541                    | 1541             | 100        | 1541               | 100        | 0                  | 0           | 0                  | 0         | 0                   | 0         |
| Female                              | 7                       | 7                | 100        | 7                  | 100        | 7                  | 100         | 0                  | 0         | 0                   | 0         |
| <b>Total</b>                        | <b>1548</b>             | <b>1548</b>      | <b>100</b> | <b>1548</b>        | <b>100</b> | <b>7</b>           | <b>0.45</b> | <b>0</b>           | <b>0</b>  | <b>0</b>            | <b>0</b>  |

- c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format –

|  | FY 2024-25  | FY 2023-24  |
|--|-------------|-------------|
| Cost incurred on well- being measures as a % of total revenue of the company | <b>0.22</b> | <b>0.08</b> |

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

| Benefits | FY 2024-25   |  |  | FY 2023-24   |  |  |
|----------|--|--|--|--|--|--|
|          | 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%   | Yes  | 100%   | 100%   | Yes  |
| Gratuity | 100%   | 100%   | Yes  | 100%   | 100%   | Yes  |
| ESI      | 100%   | 100%   | Yes  | 100%   | 100%   | Yes  |

## 3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

**The company is engaged in this issue and wherever possible, the management is aiming to make the infrastructure disabled person friendly.**

## 4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

**YES (web link <https://graphiteindia.com/social-policies.php>)**

5. Return to work and Retention rates of permanent employees and workers that took parental leave. **N/A**

## 6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

|                                | <b>Yes/No</b><br><i>(If Yes, then give details of the mechanism in brief)</i>  |
|--------------------------------|--|
| Permanent Workers              | <b>Yes.</b><br><b>The company has a robust grievance redressal mechanism for employees, as a part of corporate human resource manual and all processes detailed therein are followed to resolve genuine grievances of our employees. The processes caters to evaluation of grievances by a designated grievance redressal committee, where both parties present their viewpoints and a fair judgement by the said committee within a determined timeline. A second layer of appeal is available for serious cases.</b> |
| Other than Permanent Workers   |  |
| Permanent Employees            |  |
| Other than Permanent Employees |  |

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

| Category                         | FY 2024-25  |   |       | FY 2023-24  |   |       |
|----------------------------------|---|---|-------|---|---|-------|
|                                  | Total employees/workers n respective category (A) | No of workers in respective category who are part of association/ union (B) | % B/A | Total employees/workers n respective category (A) | No of workers in respective category who are part of association/ union (B) | % B/A |
| <b>Total Permanent Employees</b> | 795   | 0   | 0     | 797   | 0   | 0     |
| Male                             | 766   | 0   | 0     | 775   | 0   | 0     |
| Female                           | 29  | 0   | 0     | 22  | 0   | 0     |
| <b>Total Permanent Workers</b>   | 883   | 883   | 100   | 906   | 889   | 98    |
| Male                             | 879   | 879   | 100   | 901   | 884   | 98    |
| Female                           | 4   | 4   | 100   | 5   | 5   | 100   |

## 8. Details of training given to employees and workers:

| Category         | FY 2024-25 |                               |       |                      |       | FY 2023-24 |                               |       |                      |       |
|------------------|------------|-------------------------------|-------|----------------------|-------|------------|-------------------------------|-------|----------------------|-------|
|                  | Total (A)  | On Health and safety measures |       | On Skill upgradation |       | Total (A)  | On Health and safety measures |       | On Skill upgradation |       |
|                  |            | No. (B)                       | % B/A | No. (C)              | % C/A |            | No. (B)                       | % B/A | No. (C)              | % C/A |
| <b>Employees</b> |            |                               |       |                      |       |            |                               |       |                      |       |
| Male             | 805        | 612                           | 76    | 610                  | 76    | 815        | 608                           | 75    | 613                  | 75    |
| Female           | 29         | 15                            | 52    | 15                   | 52    | 24         | 13                            | 54    | 12                   | 50    |
| <b>Total</b>     | 834        | 627                           | 75    | 625                  | 75    | 839        | 621                           | 74    | 625                  | 74    |
| <b>Workers</b>   |            |                               |       |                      |       |            |                               |       |                      |       |
| Male             | 2420       | 883                           | 36    | 883                  | 36    | 2254       | 901                           | 40    | 901                  | 40    |
| Female           | 11         | 4                             | 36    | 0                    | 0     | 9          | 5                             | 55    | 0                    | 0     |
| <b>Total</b>     | 2431       | 887                           | 36    | 883                  | 36    | 2263       | 906                           | 40    | 901                  | 40    |

## 9. Details of performance and career development reviews of employees and workers:

| Category         | FY 2024-25  |             |            | FY 2023-24  |             |            |
|------------------|-------------|-------------|------------|-------------|-------------|------------|
|                  | Total (A)   | No. (B)     | % B/A      | Total (C)   | No. (D)     | % D/C      |
| <b>Employees</b> |             |             |            |             |             |            |
| Male             | 805         | 805         | 100        | 815         | 815         | 100        |
| Female           | 29          | 29          | 100        | 24          | 24          | 100        |
| <b>Total</b>     | <b>834</b>  | <b>834</b>  | <b>100</b> | <b>839</b>  | <b>839</b>  | <b>100</b> |
| <b>Workers</b>   |             |             |            |             |             |            |
| Male             | 2420        | 1597        | 66         | 2254        | 1442        | 64         |
| Female           | 11          | 11          | 100        | 9           | 9           | 100        |
| <b>Total</b>     | <b>2431</b> | <b>1608</b> | <b>66</b>  | <b>2263</b> | <b>1451</b> | <b>64</b>  |

## 10. Health and safety management system:

- a. Whether an occupational health and safety management system has been implemented by the entity? **(Yes/ No)**. If yes, the coverage such system?

**Yes, we have implemented Occupational Health & Safety Management System and all our manufacturing plants are ISO 45001 certified. Our strategic ambition is to provide a safe working environment for all our people and to deliver value to them by providing development opportunities. Occupational Health & Safety is our top priority and our overriding commitment to health and safety is embedded throughout the organization. Our approach is to identify, eliminate, reduce or control all workplace risks, and an ongoing system of training, assessment and improvement is in place to focus on achieving this. We remain fundamentally committed protecting the health and safety of employees, contractors, visitors, customers and any other persons affected by our activities. We want to become a zero-accident company and are striving to become a best-in-class organization for safety performance and leadership.**

**Our beliefs**

- **Good Health and Safety is Good Business.**
- **Safety is everybody's responsibility.**
- **Working safely is a condition of employment.**
- **All work-related injuries and work-related ill-health are preventable.**

**Our aims**

- **No Accidents.**
- **No Repeat Injuries.**
- **No Harm to People.**

- b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

**Hazard identification and risk assessment (HIRA) is carried out in all our manufacturing plants on a regular basis and the process of identifying work related hazards and risks is continuous.**

- c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N) **Yes**

- d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? **(Yes/ No)**  
**Yes**

## 11. Details of safety related incidents, in the following format:

| Safety Incident/Number  | Category* | FY 2024-25 | FY 2023-24 |
|---|-----------|------------|------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 0          | 0.99       |
|   | Workers   | 1.37       | 1.66       |
| Total recordable work-related injuries  | Employees | 0          | 2          |
|   | Workers   | 8          | 9          |
| No. of Fatalities   | Employees | 0          | 0          |
|   | Workers   | 1          | 1          |
| High consequences work-related injury or ill-health (excluding fatalities)    | Employees | 0          | 0          |
|   | Workers   | 1          | 1          |

\*Including the contract workforce

**The incident reporting system in all our plants is not uniformly mature. While trainings on incident reporting are imparted on a regular basis, the system will take some more time to be mature. So, the numbers stated above may be read under these conditions. These numbers are from the actual reported records of incidents.**

12. Describe the measures taken by the entity to ensure a safe and healthy workplace:

**The company ensures a safe and healthy workplace as per the health and safety policy of the company and compliance of legal requirements. The ISO 45001 certification requires periodic audits on the health and safety system by external certification body and this helps us to ensure that weaknesses in the system are identified and acted upon on priority.**

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

|                    | FY 2024-25            |                                       |         | FY 2023-24            |                                       |         |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
|                    | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | 0                     | 0                                     | 0       | 0                     | 0                                     | 0       |
| Health & Safety    | 0                     | 0                                     | 0       | 0                     | 0                                     | 0       |

14. Assessments for the year:

|                             | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Health and safety practices | 100 %   |
| Working Conditions          | 100 %   |

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks/concerns arising from assessments of health & safety practices and working conditions.

**For safety related incidents, root cause analysis is done by a team which is monitored and reviewed by the safety committee. Corrective measures in various forms based on the root causes are taken (like elimination of man machine interaction, adequate guarding, providing safety tools and tackles, training substitution, engineering control, administrative control and PPE etc.).**

#### Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (B) Workers  
**Yes as per our policy**
2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.
3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

|                  | Total no of affected employees/workers |                                    | No of employees/workers that are rehabilitated and placed in suitable employment or those family members have been placed in suitable employment |                                    |
|------------------|--|------------------------------------|--|------------------------------------|
|                  | FY-2024-25 Current Financial Year      | FY 2023-24 Previous Financial Year | FY-2024-25 Current Financial Year  | FY 2023-24 Previous Financial Year |
| <b>Employees</b> | <b>NIL</b>                             | <b>NIL</b>                         | <b>NA</b>  | <b>NA</b>                          |
| <b>Workers</b>   | <b>1</b>                               | <b>1</b>                           | <b>1</b>   | <b>1</b>                           |

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

**No we do not have such provisions as of now, but may consider such assistance in future.**

## 5. Details on assessment of value chain partners:

**Graphite India Limited has carried out such assessment for major suppliers but not customers. It may be carried out in a planned manner in the future. The result of coverage of suppliers is provided here.**

|                                    | % of value chain partners (by value of business done with such partners) that were assessed |
|------------------------------------|---|
| <b>Health and Safety Practices</b> | <b>90% of suppliers</b>   |
| <b>Working Conditions</b>          | <b>90% of suppliers</b>   |

## 6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

**Our major suppliers are in the process of managing health and safety/working condition risks. There is no significant concern as of now. We plan to use a SAS Platform soon to annually assess the maturity of our suppliers' environmental and safety practices and performances.**

**PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders****Essential Indicators**

## 1. Describe the processes for identifying key stakeholder groups of the entity.

**Stakeholders play an integral role in our journey and we recognise the need to partner with them and understand their concerns to deliver the targets which we have set for ourselves. Our process of stakeholder engagement involves identifying key internal and external stakeholders followed by analysing the impact of each stakeholder groups on our business and vice versa.**

## 2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

| <b>Stakeholder group</b> | <b>Whether identified as vulnerable &amp; marginalised group (Yes/No)</b> | <b>Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisements, Community meetings, Notice Board, Website) Others</b>  | <b>Frequency of engagement (Annually / Half yearly/ Quarterly/ others-Pls specify)</b> | <b>Purpose and scope of engagement including key topics and concerns raised during such engagements</b>  |
|--------------------------|---|--|--|--|
| Communities              | Yes   | Community visits and project work as planned   | Ongoing  | CSR projects providing benefits in terms of Water, sanitation, Housing, Education, Grievance Redressal   |
| Shareholders             | No  | Annual General Meeting/ Annual Reports/Stock Exchange Disclosures/ Half yearly Results Publication/Quarterly Results Publication/ Complaints and Resolutions, Website Notifications and Emails   | Quarterly  | Financial Results, Dividends, Share price appreciation, Induction of Board members, Significant changes in shareholding, Inculcation of ESG practices and Growth prospects   |
| Employees and workers    | No  | Senior leaders' communication/ talk, training goal setting and performance appraisal meetings/ review, exit interviews, arbitration / union meetings, wellness initiatives, Grievance Mechanism Functioning, email, intranet, websites, poster campaigns | Ongoing  | Performance analysis and career path setting, innovation, operational efficiencies, improvement areas, long-term strategy plans, training and awareness, alignment with human rights initiatives, health and safety measures and environment friendly work initiatives |

| Stakeholder group | Whether identified as vulnerable & marginalised group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisements, Community meetings, Notice Board, Website) Others  | Frequency of engagement (Annually / Half yearly/ Quarterly/ others-Pls specify) | Purpose and scope of engagement including key topics and concerns raised during such engagements  |
|-------------------|--|---|---|---|
| Customers         | No   | Website information, distributor / direct customer / achievers' meets, senior leader customer meets / visits, customer plant visits, focus group discussion, trade body membership, complaint management, information on changes through mails and visits | Ongoing   | Product quality and availability, Responsiveness to needs, Increase of sales targets, Technical and Commercial discussions, Business Responsibility Guidelines                  |
| Suppliers         | No   | Prequalification / vetting, communication and partnership meets, plant visits, MoU and framework agreements, trade association meet product workshops / on site presentations   | Ongoing   | Quality, timely delivery and payments, ESG consideration (sustainability, safety checks, compliances, ethical behaviour, human rights issues), Innovations, Grievance Redressal |

#### Leadership Indicators

- Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

**We are considering robust stakeholder engagement process during Materiality Assessment which will be available in the Sustainability Report for the year 2025-26.**

- Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

**Yes, we are considering stakeholder consultation is a key step in identification and management of environmental and social topics. The Sustainability Report for the year 2025-26 will be capturing the same.**

- Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

**Engagement with vulnerable/marginal stakeholder group is not done. We may do so in the future.**

#### PRINCIPLE 5: Businesses should respect and promote human rights

##### Essential Indicators

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

| Category               | FY 2024-25 |                                       |         | FY 2023-24 |                                       |         |
|------------------------|------------|---------------------------------------|---------|------------|---------------------------------------|---------|
|                        | Total (A)  | No. of employees/ workers covered (B) | % (B/A) | Total (C)  | No. of employees/ workers covered (D) | % (D/C) |
| <b>Employees</b>       |            |                                       |         |            |                                       |         |
| Permanent              | 795        | 366                                   | 46      | 797        | 423                                   | 53      |
| Other than permanent   | 39         | 5                                     | 13      | 42         | 6                                     | 14      |
| <b>Total Employees</b> | 834        | 371                                   | 44      | 839        | 429                                   | 51      |
| <b>Workers</b>         |            |                                       |         |            |                                       |         |
| Permanent              | 883        | 95                                    | 11      | 906        | 65                                    | 7       |
| Other than permanent   | 1548       | 195                                   | 13      | 1357       | 242                                   | 18      |
| <b>Total Workers</b>   | 2431       | 290                                   | 12      | 2263       | 307                                   | 14      |

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

| Category                    | FY 2024-25   |                          |            |                           |            | FY 2023-24   |                          |            |                           |            |
|-----------------------------|--------------|--------------------------|------------|---------------------------|------------|--------------|--------------------------|------------|---------------------------|------------|
|                             | Total<br>(A) | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            | Total<br>(D) | Equal to<br>Minimum Wage |            | More than<br>Minimum Wage |            |
|                             |              | No.<br>(B)               | %<br>(B/A) | No.<br>(C)                | %<br>(C/A) |              | No.<br>(E)               | %<br>(E/D) | No.<br>(F)                | %<br>(F/D) |
| <b>Employees</b>            |              |                          |            |                           |            |              |                          |            |                           |            |
| <b>Permanent</b>            |              |                          |            |                           |            |              |                          |            |                           |            |
| Male                        | 766          | 0                        | 0          | 766                       | 100        | 775          | 0                        | 0          | 775                       | 100        |
| Female                      | 29           | 0                        | 0          | 29                        | 100        | 22           | 0                        | 0          | 22                        | 100        |
| <b>Other than Permanent</b> |              |                          |            |                           |            |              |                          |            |                           |            |
| Male                        | 39           | 0                        | 0          | 39                        | 100        | 40           | 0                        | 0          | 40                        | 100        |
| Female                      | 0            | 0                        | 0          | 0                         | 0          | 2            | 0                        | 0          | 2                         | 0          |
| <b>Workers</b>              |              |                          |            |                           |            |              |                          |            |                           |            |
| <b>Permanent</b>            |              |                          |            |                           |            |              |                          |            |                           |            |
| Male                        | 879          | 0                        | 0          | 879                       | 100        | 901          | 0                        | 0          | 901                       | 100        |
| Female                      | 4            | 0                        | 0          | 4                         | 100        | 5            | 0                        | 0          | 5                         | 100        |
| <b>Other than Permanent</b> |              |                          |            |                           |            |              |                          |            |                           |            |
| Male                        | 1541         | 83                       | 5          | 1458                      | 95         | 1357         | 512                      | 38         | 841                       | 62         |
| Female                      | 7            | 0                        | 0          | 7                         | 100        | 4            | 0                        | 0          | 4                         | 100        |

## 3. Details of remuneration/salary/wages

## a. Median remuneration/wages

|                                  | Male   |   | Female |   |
|----------------------------------|--------|---|--------|---|
|                                  | Number | Median remuneration/<br>salary/ wages of<br>respective category | Number | Median remuneration/<br>salary/ wages of<br>respective category |
| Board of Directors (BoD)*        | 7      | INR 14,50,000   | 1      | INR 16,50,000   |
| Key Managerial Personnel #       | 3      | INR 37,03,502   | 0      |   |
| Employees other than BoD and KMP | 763    | INR 9,76,925  | 29     | INR 5,64,925  |
| Workers                          | 879    | INR 11,13,732   | 4      | INR 3,60,570  |

\* Mr. Ashutosh Dixit, Whole-Time Director & Key Management Personnel has been shown under BOD.

# Mr. Shiva Balan retired as Company Secretary w.e.f. 31st May, 2024 and Mr. Sanjeev Marda appointed as Company Secretary w.e.f. 1st June, 2024.

## b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

|   | FY 2024-25 | FY 2023-24 |
|---|------------|------------|
| Gross wages paid to females as % of total wages | 1.45       | 1.20       |

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? **Yes**

## 5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

**Procedure as detailed out in Grievance Redressal Policy and Whistle blower Policy are in place to address grievance pertaining to human rights and are attended to by respective executive levels as and when they occur.**

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

|                                    | FY 2024-25            |                                       |         | FY 2023-24            |                                       |         |
|------------------------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
|                                    | 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                   | NIL                                   | NIL     |
| Discrimination at workplace        | NIL                   | NIL                                   | NIL     | NIL                   | NIL                                   | NIL     |
| Child Labour                       | NIL                   | NIL                                   | NIL     | NIL                   | NIL                                   | NIL     |
| Forced Labour / Involuntary Labour | NIL                   | NIL                                   | NIL     | NIL                   | NIL                                   | NIL     |
| Wages                              | NIL                   | NIL                                   | NIL     | NIL                   | NIL                                   | NIL     |
| Other human rights related issues  | NIL                   | NIL                                   | NIL     | NIL                   | NIL                                   | NIL     |

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

|   | FY 2024-25 | FY 2023-24 |
|---|------------|------------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | NIL        | NIL        |
| Complaints on POSH as a % of female employees / workers   | NIL        | NIL        |
| Complaints on POSH upheld   | NIL        | NIL        |

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.  
**The Company has a Human Rights Policy, an Equal Employment Opportunity Policy, a Grievance Redressal Policy for employees and a Whistle Blower Policy which all lays down strictures to prevents any adverse consequence to any complainant for articulating genuine grievances relating to discrimination and harassment.**
9. Do human rights requirements form part of your business agreements and contracts? **(Yes/No)** Yes, with suppliers
10. Assessments for the year:

|                             | Percent of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Child labour                | 100%  |
| Forced/involuntary labour   | 100%  |
| Sexual harassment           | 100%  |
| Discrimination at workplace | 100%  |
| Wages                       | 100%  |

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.  
**No significant risks / concerns arising from the assessments.**

#### Leadership Indicators

- Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.  
**No human rights violation occurred in the year 2024-25**
- Details of the scope and coverage of any Human rights due diligence conducted.  
**Presently we are not doing due diligence on human rights. But the same will be done in future**
- Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?  
**Presently majority of our premises/offices are accessible to differently abled visitor. However the company is making more improvements to the current system.**

## 4. Details on assessment of value chain partners:

**GIL has carried out assessment of major suppliers but not customers. It will be carried out in a planned manner in the future.**

|                                  | <b>% of value chain partners (by value of business done with such partners) that were assessed</b> |
|----------------------------------|--|
| Sexual Harassment                | 90% of suppliers   |
| Discrimination at workplace      | 90% of suppliers   |
| Child Labour                     | 90% of suppliers   |
| Forced Labour/Involuntary Labour | 90% of suppliers   |
| Wages                            | 90% of suppliers   |

## 5. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 4 above.

**No such significant risk/concern demanding corrective action.**

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment****Essential Indicators**

## 1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

| <b>Parameter</b>   | <b>FY 2024-25</b> | <b>FY 2023-24</b> |
|--|-------------------|-------------------|
| <b>From renewable sources</b>  |                   |                   |
| Total electricity consumption (A) in MJ  | 425306542         | Nil               |
| Total fuel consumption (B) in MJ   | Nil               | Nil               |
| Energy consumption through Other sources (C) in MJ   | Nil               | Nil               |
| <b>Total energy consumed from renewable sources (A+B+C) in MJ</b>  | <b>425306542</b>  | <b>Nil</b>        |
| <b>From non-renewable sources</b>  |                   |                   |
| Total electricity consumption (D) in MJ  | 879415085         | 1287271508        |
| Total fuel consumption (E) in MJ   | 644132605         | 1463733004        |
| Energy consumption through Other sources (F) in MJ   | Nil               | Nil               |
| <b>Total energy consumed from non-renewable sources (D+E+F) in MJ</b>  | <b>1523547690</b> | <b>2751004512</b> |
| <b>Total energy consumed (A+B+C+D+E+F) in MJ</b>   | <b>1948854231</b> | <b>2751004512</b> |
| <b>Energy intensity per rupee of turnover in MJ/INR</b><br>(Total energy consumed/Revenue from operations)   | <b>0.08</b>       | <b>0.10</b>       |
| <b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) in MJ/INR</b><br>PPP conversion rate is 20.66 for FY 2024-25 (ref <a href="https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND">https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND</a> ) | <b>1.65</b>       | <b>2.07</b>       |
| <b>Energy intensity in terms of physical output in MJ/MT</b>   | <b>18578</b>      | <b>22335</b>      |

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

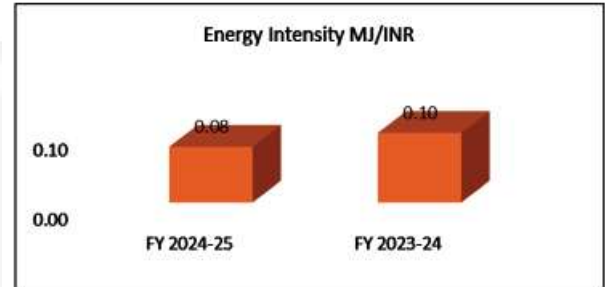
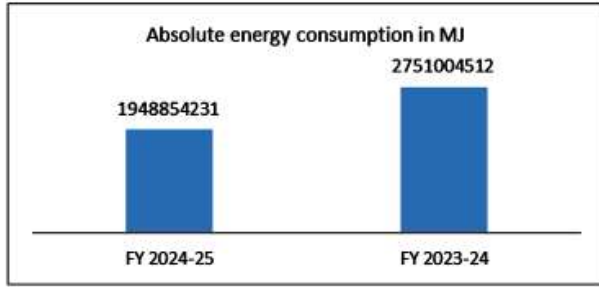
**Yes, reasonable assurance has been provided by Futurestation Services LLP for BRSR Core FY 2024-25 data. Please refer to their reasonable assurance statement for details. During the assurance process undertaken by the external agency, we realized that certain incorrectness existed in the data of FY 2023-24 that was disclosed last year. Corrections have been made and the data have been restated. We have used same PPP conversion rate for both the years to ensure comparability of performance**

**While we have continued to implement several demand side energy management initiatives in all our six manufacturing plants in India, our single biggest achievement in energy management during the year has been the substitution of conventional electrical energy with renewable energy in two of our largest plants. In Durgapur, 28.1% of the total electrical energy consumed during FY 2024-25 was from renewable sources and in Satpur, 52.7%**

of the total electrical energy consumed during FY 2024-25 was from renewable sources. This share of renewable energy will go up further during the FY 2025-26. With the success in these two plants, we have initiated feasibility studies for taking similar initiatives in our remaining plants.

**Energy Management Performance snapshot:**

|                                   | FY 2024-25 | FY 2023-24 | Improvement % |
|-----------------------------------|------------|------------|---------------|
| Absolute energy consumption in MJ | 1948854231 | 2751004512 | 29.16%        |
| Energy Intensity MJ/INR           | 0.08       | 0.10       | 15.27%        |
| Energy Intensity MJ/MT            | 18578      | 22336      | 16.82%        |
| Renewable energy share %          | 22%        | 0          | 22%           |



2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

**No, none of our sites/facilities are identified as designated customers (DCs)**

3. Provide details of the following disclosures related to water, in the following format:

| Parameter   | FY 2024-25     | FY 2023-24     |
|---|----------------|----------------|
| <b>Water withdrawal by source (in kilolitres)</b>   |                |                |
| (i) Surface water in KL   | 150142         | 190602         |
| (ii) Groundwater in KL  | 37025          | 51769          |
| (iii) Third party water   | 0              | 0              |
| (iv) Seawater / desalinated water   | 0              | 0              |
| (v) Others  | 0              | 0              |
| <b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>   | <b>187167</b>  | <b>242371</b>  |
| <b>Total volume of water consumption (in KL)</b>  | <b>187167</b>  | <b>242371</b>  |
| <b>Water intensity in KL per crore rupee of turnover</b><br>(Total water consumption / Revenue from operations)   | <b>77.34</b>   | <b>83.74</b>   |
| <b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) in KL/ Cr Rupee.</b><br>PPP conversion rate is 20.66 for FY 2024-25<br>(ref <a href="https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND">https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND</a> ) | <b>1597.89</b> | <b>1730.07</b> |
| <b>Water intensity in terms of physical output in KL/MT</b>   | <b>1.52</b>    | <b>1.97</b>    |

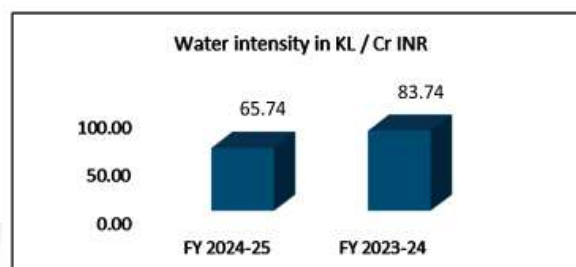
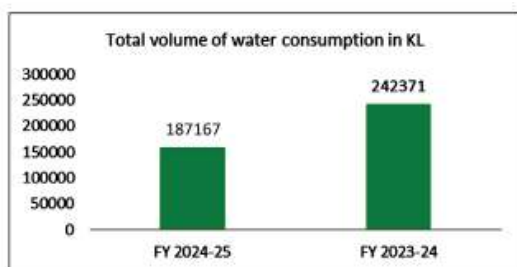
**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

**Yes, reasonable assurance has been provided by Futurestation Services LLP for BRSR Core FY 2024-25 data. Please refer to their reasonable assurance statement for details. We have used same PPP conversion rate for both the years to ensure comparability of performance.**

**During the year we have successfully implemented several water management projects across all our manufacturing plants. Today all our plants have zero liquid discharge.**

**Water Management Performance snapshot:**

|   | <b>FY 2024-25</b> | <b>FY 2023-24</b> | <b>Improvement %</b> |
|---|-------------------|-------------------|----------------------|
| Total volume of water consumption in KL | 187167            | 242371            | 22.77%               |
| Water intensity in KL / Cr INR          | 77.34             | 83.74             | 7.64%                |
| Water intensity in KL / MT              | 1.52              | 1.97              | 22.93%               |



4. Provide the following details related to water discharged:

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. **No**

**We have Zero Liquid Discharge (ZLD) in all factory locations. Hence water discharge is zero.**

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

**Yes, all our manufacturing plants have ZLD**

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

| <b>Parameter</b>                    | <b>Unit</b> | <b>FY 2024-25</b> | <b>FY 2023-24</b> |
|-------------------------------------|-------------|-------------------|-------------------|
| NOx                                 | Kg/year     | 42505             | 230420            |
| SOx                                 | Kg/year     | 25742             | 234009            |
| Particulate matter (PM)             | Kg/year     | 45556             | 377808            |
| Persistent organic pollutants (POP) | Kg/year     | NIL               | NIL               |
| Volatile organic compounds (VOC)    | Kg/year     | NIL               | NIL               |
| Hazardous air pollutants (HAP)      | Kg/year     | 43                | 39.6              |

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

**Yes, the data have been independently verified by SPCB approved agencies as per regulatory requirements.**

**Testing agencies :**

**Ambad: Green Envirosafe, Pune**

**Barauni: Shiva Test House, Patna**

**Durgapur: indicative Consultants, Durgapur, EnviroCheck, Kolkata**

**Gonde: Green Envirosafe, Pune**

**Titlagarh: Earth & Environment Lab, Bhubaneswar**

**Satpur: Accurate Analyser, Nasik**

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

| <b>Parameter</b>   | <b>Unit</b>                     | <b>FY (2024-25)</b> | <b>FY (2023-24)</b> |
|--|---------------------------------|---------------------|---------------------|
| <b>Total Scope 1 emissions</b><br>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 89,350              | 96,999              |
| <b>Total Scope 2 emissions</b><br>(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | 1,81,590            | 2,56,024            |
| <b>Total Scope 1 and Scope 2 emission intensity</b>  | tCO2e/ Cr Rs of turnover        | 111.96              | 121.97              |

| Parameter  | Unit                                  | FY (2024-25) | FY (2023-24) |
|--|---------------------------------------|--------------|--------------|
| <b>Total Scope 1 and Scope 2 emission intensity adjusted for PPP.</b> PPP conversion rate is 20.66 for FY 2024-25 (ref <a href="https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND">https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND</a> ) | tCO <sub>2</sub> e/ Cr Rs of turnover | 2313.09      | 2519.90      |
| <b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>  | tCO <sub>2</sub> e/MT                 | 2.58         | 2.86         |

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

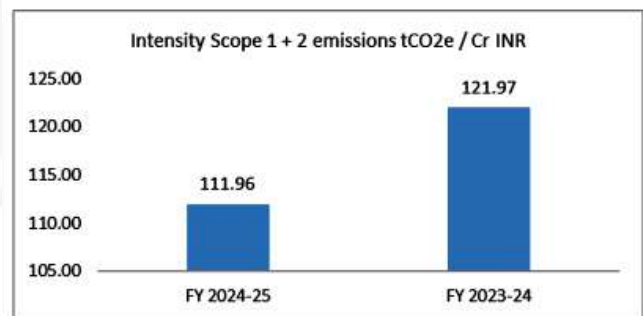
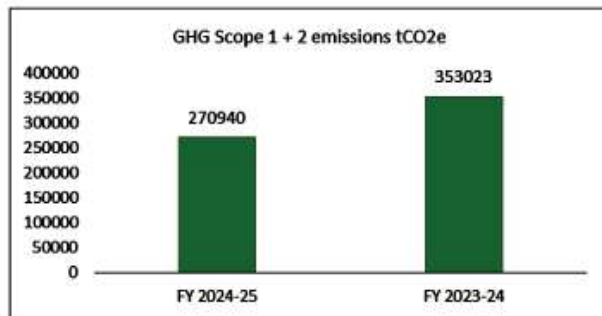
**Yes, reasonable assurance has been provided by FutureStation Services LLP for BRSR Core FY 2024-25 data. Please refer to their reasonable assurance statement for details. We have used same PPP conversion rate for both the years to ensure comparability of performance.**

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

**We have continued in our journey towards our net zero ambition during the year. Several identified projects for GHG emission reduction have been implemented, some under implementation and some to be initiated. We focus on energy efficiency as a continual endeavour. We have started getting benefits of these initiatives and the results mentioned above justify our efforts. We have replaced our electricity consumption from grid with renewable electrical energy significantly during the year, both at Durgapur (28.1% electricity from renewable sources during the year) and at Satpur (52.7% electricity from renewable sources during the year). While the renewable percentage in these two plants will go up gradually, we are exploring this possibility for our other plants also. We, anyway, use CBM and PNG as our principal fuel and as such our GHG intensity is reasonable low. We have carried out LCA for our main product Graphite Electrode and the results are very encouraging. Our scope 3 emissions are also quite reasonable. Further, since our principal product Graphite Electrode supports use of scrap in EAF to produce steel, our scope 4 emissions (avoided emissions) is also significant because our product replaces steel production using virgin natural resources in blast furnace route.**

**GHG Management Performance snapshot:**

|   | FY 2024-25 | FY 2023-24 | Improvement % |
|---|------------|------------|---------------|
| GHG Scope 1 emissions tCO <sub>2</sub> e                    | 89350      | 96999      | 7.89%         |
| GHG Scope 2 emissions tCO <sub>2</sub> e                    | 181590     | 256024     | 29.07%        |
| GHG Scope 1 + 2 emissions tCO <sub>2</sub> e                | 270940     | 353023     | 23.25%        |
| Intensity Scope 1 + 2 emissions tCO <sub>2</sub> e / Cr INR | 111.96     | 121.97     | 8.21%         |
| Intensity Scope 1 + 2 emissions tCO <sub>2</sub> e / MT     | 2.58       | 2.87       | 9.89%         |



9. Provide details related to waste management by the entity, in the following format:

| Parameter   | FY 2024-25       | FY 2023-24       |
|---|------------------|------------------|
| <b>Total Waste generated (in metric tonnes)</b>   |                  |                  |
| Plastic waste (A)   | 313.2            | 214.096          |
| E-waste (B)   | 4.6              | 0.48             |
| Bio-medical waste (C)   | 0.10             | 0.21             |
| Construction and demolition waste (D)   | 0                | 3.25             |
| Battery waste (E)   | 1.6              | 4.584            |
| Radioactive waste (F)   | Nil              | Nil              |
| Other Hazardous waste. (G)<br>(Used oil or waste oil, ESP tar, ETP Sludge,<br>Paint sludge etc.)  | 1176.7           | 1193.075         |
| Other Non-hazardous waste generated (H).<br>Please specify, if any. (Mainly carbonaceous material,<br>Graphite powder and broken pcs, scrap wood,<br>steel scrap, etc.)   | 31982.706        | 31084.703        |
| <b>Total (A+B + C + D + E + F + G + H)</b>  | <b>33478.906</b> | <b>32500.398</b> |
| <b>Waste intensity per rupee of turnover in MT/ Cr INR</b>  | <b>13.83</b>     | <b>11.23</b>     |
| <b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) MT/Cr INR.</b> PPP conversion rate is 20.66 for FY 2024-25 (ref <a href="https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND">https://www.imf.org/external/datamapper/PPPEX@WEO/OEMDC/IND</a> ) | <b>285.73</b>    | <b>232.01</b>    |
| <b>Waste intensity in terms of physical output in MT/MT</b>   | <b>0.32</b>      | <b>0.26</b>      |
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>  |                  |                  |
| <b>Category of waste</b>  |                  |                  |
| (i) Recycled  | 526.5            | 2904.561         |
| (ii) Re-used  | 12.9             | 8.92             |
| (iii) Other recovery operations   | -                | -                |
| <b>Total</b>  | <b>539.4</b>     | <b>2913.481</b>  |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>   |                  |                  |
| <b>Category of waste</b>  |                  |                  |
| (i) Incineration  | 470.3            | 5141.6           |
| (ii) Landfilling  | 11.4             | 48.53            |
| (iii) Other disposal operations   | 32457.8          | 29878.713        |
| <b>Total</b>  | <b>32939.5</b>   | <b>35068.843</b> |

**Note:** Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency?

**Yes, reasonable assurance has been provided by Futurestation Services LLP for BRSR Core FY 2024-25 data. Please refer to their reasonable assurance statement for details. Waste is measured only at the point of dispatch from the plant premises. We have used same PPP conversion rate for both the years to ensure comparability of performance.**

**During the year we have made our waste data measurement process more robust. We have continued using SAP gate module in the weighbridges so that data on material entry and waste exit from our factories are directly entered into our SAP system from the weighbridges thus reducing possibility of error. Due to this improvement in measurement process, there is apparent increase in waste quantity. This anomaly will get corrected over time.**

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

**Hazardous and non-hazardous wastes are segregated and kept at designated place/bins. Hazardous wastes are sent to SPCB approved authorized agency for further disposal and non-hazardous waste is sold. We are consistently trying to reduce the waste generation in our processes by converting wastes to by-products (that is, by finding useful utilisation of the wastes in other industries and thus selling the wastes at higher prices).**

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

**Not applicable**

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

**Not applicable**

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

**Yes, we are compliant with all relevant regulations.**

#### Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): For each facility / plant located in areas of water stress, provide the following information:

- (i) Name of the area: Titilagarh, Bolangir District, Odisha  
(ii) Nature of operations: High-Speed Steel and Alloy Tool Steel for the cutting tool industry are manufactured by GIL in its Powmex Steels Division, Located at Titilagarh, in Bolangir, Odisha  
(iii) Water withdrawal, consumption and discharge in the following format:

| Parameter  | FY 2024-25<br>(Current Financial Year) | FY 2023-24<br>(Previous Financial Year) |
|--|--|---|
| <b>Water withdrawal by source (in kilolitres)</b>                              |  |   |
| (i) Surface Water  | <b>NIL</b>                             | <b>NIL</b>                              |
| (ii) Ground Water  | <b>20745</b>                           | <b>35909</b>                            |
| (iii) Third Party Water  | <b>NIL</b>                             | <b>NIL</b>                              |
| (iv) Sea Water/Desalinated water   | <b>NIL</b>                             | <b>NIL</b>                              |
| (v) Others   | <b>NIL</b>                             | <b>NIL</b>                              |
| <b>Total volume of water withdrawal (in kilolitres)</b>                        | <b>20745</b>                           | <b>35909</b>                            |
| <b>Total volume of water consumption (in kilolitres)</b>                       | <b>20745</b>                           | <b>35909</b>                            |
| <b>Water intensity per rupee of turnover</b><br>(water consumed/turnover)      | <b>0.000009</b>                        | <b>0.000012</b>                         |
| Water intensity (optional) – the relevant metric may be selected by the entity |  |   |
| <b>Water discharge by destination and level of treatment (in kilolitres)</b>   |  |   |
| (i) Into Surface water   | <b>NIL</b>                             | <b>NIL</b>                              |
| - No treatment   |  |   |
| - With treatment – please specify level of treatment                           |  |   |
| (ii) Into Groundwater  | <b>NIL</b>                             | <b>NIL</b>                              |
| - No treatment   |  |   |
| - With treatment – please specify level of treatment                           |  |   |
| (iii) Into Seawater  | <b>NIL</b>                             | <b>NIL</b>                              |
| - No treatment   |  |   |
| - With treatment – please specify level of treatment                           |  |   |
| (iv) Sent to third-parties   | <b>NIL</b>                             | <b>NIL</b>                              |
| - No treatment   |  |   |
| - With treatment – please specify level of treatment                           |  |   |
| v) Others  | <b>NIL</b>                             | <b>NIL</b>                              |
| - No treatment   |  |   |
| - With treatment – please specify level of treatment                           |  |   |
| <b>Total water discharged (in kilolitres)</b>                                  | <b>NIL</b>                             | <b>NIL</b>                              |

**Note:** Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, reasonable assurance has been provided by Futurestation Services LLP for BRSR Core FY 2024-25 data.

2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

| Parameter   |               | Current FY 2024-25 | Previous FY 2023-24 |
|---|---------------|--------------------|---------------------|
| <b>Total Scope 3 Emissions in tCO<sub>2</sub>e/MT</b> | <b>Cat-1</b>  | <b>155395</b>      | <b>159460</b>       |
|   | <b>Cat-3</b>  | <b>67041</b>       | <b>82916</b>        |
|   | <b>Cat-4</b>  | <b>45481</b>       | <b>33465</b>        |
|   | <b>Cat-6</b>  | <b>89</b>          | <b>260</b>          |
|   | <b>Cat-7</b>  | <b>499</b>         | <b>357</b>          |
|   | <b>Cat-9</b>  | <b>51448</b>       | <b>40378</b>        |
|   | <b>Cat-11</b> | <b>330020</b>      | <b>494253</b>       |
|   | <b>Total</b>  | <b>649973</b>      | <b>811089</b>       |
| <b>Total Scope 3 emissions per rupee of turnover</b>  |               | <b>0.000027</b>    | <b>0.000028</b>     |

**Note:** Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. **No**

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

**Not applicable as we do not have plant in eco sensitive areas. However proactively we have started a mangrove plantation project in Sunderban during the year. Mangroves help in supporting biodiversity in addition to other environmental and social benefits.**

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

| S. No. | Initiative Undertaken   | Details of the initiative (Web-link, if any, may be provided along-with summary)                         | Outcome of the initiative  |
|--------|---|--|--|
| 1.     | Usage of green power at Durgapur  | From June-24, 25% of the power used was from green sources, which was later increased to 50% from Dec-24 | Percentage of green power consumed in 2024-25 = 28%                  |
| 2.     | Commissioning of all 9 WTG's (18.90 MW) and 8.80 MW SOLAR   | Commissioning and generation started   | Replaced 52% of total Electricity consumption with renewable energy. |
| 3.     | At GE Div Durgapur Incorporation of 120KA booster Rectifier to run with LWG#4 & LWG#5A rectifiers in auto operation | Power optimization & energy savings  | Reduction in specific power consumption                              |
| 4.     | At GE Div Satpur, effective use of available LWG furnaces through Interconnection of RectoFormer on both sides      | Better Rectoformer utilization & Energy Consumption in peak generation time                              | Reduction in specific power consumption                              |
| 5.     | At IGE Division, Ambad PTFE impregnation cycle is modified (BY development in process)                              | Reducing the cycle time from 36 hours to 20 hours  | Reduction in power consumption and improved cycle time.              |

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

**We have carried out climate change risk identification and management study, which is available in the website in the link: <https://graphiteindia.com/tcf-d-lca-reports.php>. The on-site emergency preparedness and response plan is available for all locations. We have a robust IT system with business continuity plan and disaster recovery plan.**

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

**There is no significant impact**

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

**90% of suppliers were assessed.**

8. How many Green Credits have been generated or procured:
- By the listed entity
  - By top ten (in terms of value of purchase and sales respectively) value chain partners

**We are yet to carry out such a study.**

**PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**

**Essential Indicators**

- Number of affiliations with trade and industry chambers/ associations. 10
  - List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to :

| Sl. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|---------|---|---|
| 1.      | CAPEXIL   | National  |
| 2.      | EEPC India  | National  |
| 3.      | Indian Chamber of Commerce                            | National  |
| 4.      | FICCI   | National  |
| 5.      | Indo German Chamber of Commerce                       | National  |
| 6.      | Indian Carbon Society                                 | National  |
| 7.      | Bombay Chamber of Commerce                            | State   |
| 8.      | Confederation of Indian Industries                    | National  |
| 9.      | FIEO  | National  |
| 10.     | Delhi Chamber of Commerce                             | State   |

- Provide details of corrective action taken or underway on any issues related to anti- competitive conduct by the entity, based on adverse orders from regulatory authorities. **N/A**

**Leadership Indicators**

- Details of public policy positions advocated by the entity:

**This is currently not applicable for us**

**PRINCIPLE 8: Businesses should promote inclusive growth and equitable development**

**Essential Indicators**

- Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

**Social Impact assessment Impact of CSR Projects are done internally. During the year, Impact assessment done by external agency in respect of projects as was required to be done under CSR rules.**

| Name and brief details of project | SIA Notification No. | Date of notification | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|-----------------------------------|----------------------|----------------------|---|--|-------------------|
| NA                                | NA                   | NA                   | NA  | NA   | NA                |

- Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

| S. No. | Name of Project for which R&R is ongoing | State | District | No. of Project Affected Families (PAFs) | % of PAFs covered by R&R | Amounts paid to PAFs in the FY (In INR) |
|--------|--|-------|----------|---|--------------------------|---|
| NIL    | NIL                                      | NIL   | NIL      | NIL                                     | NIL                      | NIL                                     |

- Describe the mechanisms to receive and redress grievances of the community.

**The company has a Grievance Redressal Mechanism for Communities and due process embedded therein is followed to resolve grievances.**

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

|  | <b>FY 2024-25</b> | <b>FY 2023-24</b> |
|--|-------------------|-------------------|
| <b>Directly sourced from MSMEs/small producers</b> | 22.15             | 22.57             |
| <b>Directly from within India</b>                  | 81.67             | 81.12             |

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost.

| <b>Location</b> | <b>FY 2024-25</b> | <b>FY 2023-24</b> |
|-----------------|-------------------|-------------------|
| Rural           | 3.89              | 1.72              |
| Semi Urban      | 0                 | 0                 |
| Urban           | 89.86             | 91.72             |
| Metropolitan    | 6.25              | 6.56              |

#### Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

**No negative impacts identified.**

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

**The organization has not taken any CSR projects in designated aspirational districts as identified by government bodies.**

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)  
 (b) From which marginalized /vulnerable groups do you procure?  
 (c) What percentage of total procurement (by value) does it constitute?

**Currently Graphite India Limited does not engage with marginalized/vulnerable groups.**

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

**Not Applicable**

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

**Not Applicable**

6. Details of beneficiaries of CSR Projects:

| <b>S. No.</b> | <b>CSR Project</b>                     | <b>No of persons benefitted from CSR projects</b> | <b>% of beneficiaries from vulnerable and marginalised group</b> |
|---------------|--|---|--|
| 1.            | <b>Sustainable Housing</b>             | <b>650</b>  | <b>100%</b>  |
| 2.            | <b>Education</b>                       | <b>600</b>  | <b>100%</b>  |
| 3.            | <b>Livelihoods (Skill Development)</b> | <b>300</b>  | <b>100%</b>  |
| 4.            | <b>Drinking Water (Water ATM) *</b>    | <b>9,38,594 (approx)</b>                          | <b>22.47%</b>  |

\* Since the Water ATM's are set up in various public locations, the exact number of beneficiaries and their belonging to vulnerable and marginalised groups cannot be determined.

**PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner****Essential Indicators**

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

**Complaints are handled by customer service department. Once an email or phone call is received from a customer about any complaint, customer service engineer gets in touch with customer to get more information. Complaint is investigated either by site visit or collection of data from the site and equipment are set right at customer's site or brought back to our works for rectification depending on the quantum of work involved. Action may also include call-back of the product already shipped / free replacement and/or monetary compensation as the case may demand. Corrective actions are taken to prevent the recurrence of the problem in future. Feedback received from the Customer is discussed internally and translated into action wherever necessary. Customer satisfaction surveys are carried out on an annual basis.**

2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

|   | As a percentage (approximately) of total turnover |
|---|---|
| Environmental and social parameters relevant to the product | 100   |
| Safe & responsible usage                                    | 100   |
| Recycling and/or safe disposal                              | 100   |

3. Number of consumer complaints in respect of the following: **NIL**

4. Details of instances of product recalls on account of safety issues:

|                   | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | 0      | 0                  |
| Forced recalls    | 0      | 0                  |

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? **(Yes/No)** If available, provide a web-link of the policy.

**Yes. [www.graphiteindia.com](http://www.graphiteindia.com)**

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services. **N/A**

7. Provide the following information relating to data breaches:

- Number of instances of data breaches. **NIL**
- Percentage of data breaches involving personally identifiable information of customers. **NIL**
- Impact, if any, of the data breaches. **NIL**

**Leadership Indicators**

1. Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available).

**Information regarding products of the company are available in the website: [www.graphiteindia.com](http://www.graphiteindia.com)**

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

**Following are done by the organization to consumers for educating them about safe and responsible usage of products and services:**

- a. The Company informs its customers on how to use its products efficiently and promotes the optimal use of energy.**
- b. The material safety data sheet provided by the company provides guidelines for the safe handling of the product**
- c. The Company conveys information about its products through product marking**
- d. Handling & packing instructions provided conveys the safe methods recommended by the Company for handling, packing, and unpacking the product.**

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

**Graphite India Limited, has a business continuity plan in place to manage potential disruptions and ensure operational resilience. The company's ESG reports and other investor materials highlight proactive measures and strategic thinking aimed at minimizing risks and maximizing operational efficiency.**

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/ Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No).

**Yes, every product is labelled with a unique identification number to ensure traceability up to its end use. The packaging includes sufficient information regarding safe handling and proper usage.**

**Yes, we conduct surveys to evaluate customer satisfaction with our products. We take regular feedback from customers regarding customer satisfaction index, which is a part of our MRM reports. These surveys help us gain a thorough understanding of customer expectations and needs, and they serve as a valuable input for making investment decisions.**



**Annexure 10.1****ASSURANCE STATEMENT****To The Management and Board of Directors,  
Graphite India Limited**

Futurestation Services LLP (also referred as "Futurestation" or "we" or "us") was engaged by Graphite India Limited (also referred as "GIL") to conduct a reasonable assurance procedure on the BRSR Core attributes FY 2024-25 as reported by GIL for the period stated below. This Assurance Statement applies to the procedure conducted by us as per the engagement agreement dated 19th March 2025 signed between GIL and Futurestation. The determination of the BRSR Core attributes is the sole responsibility of GIL. Futurestation's responsibility was to conduct reasonable assurance procedure based on applicable standards as per the engagement agreement referred above.

**Reporting Period**

1st of April 2024 to 31st of March 2025.

**Level of Assurance**

Reasonable Assurance. A reasonable assurance procedure involves assessing the risk of material mis-statement of the agreed attributes whether due to fraud or error, responding to the assessed risk as necessary under the circumstances. We conducted our reasonable assurance procedure in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. These standards require that we plan and perform this engagement to obtain reasonable assurance about whether the reported BRSR Core attributes are prepared, in all material respects, in accordance with the reporting criteria.

The procedures we performed were based on our professional judgement and included inquiries, observation of processes performed, inspection of data recording procedures on sample basis particularly for operational attributes (like energy, water and waste), inspection of data collating and recording procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above, we:

- Made GIL's management and process owners aware of the procedures to be performed by us.
- Understood and evaluated the design of the key structures, systems, processes and controls for managing, recording and reporting on the identified attributes.
- Checked consolidation for various plants and corporate offices for ensuring the completeness of data being reported.
- Based on that understanding and the risks that the reported data may be materially misstated, determined the nature, timing and extent of further procedures
- Performed substantive testing on a selective basis of the identified attributes at the corporate head office in Kolkata and visited sample representative plants to check that data had been appropriately measured, recorded, collated and reported;
- Reviewed records and performed testing including recalculation of sample data to establish an assurance trail.
- Reviewed the level of adherence to the reporting criteria and the reporting framework followed by GIL in preparing the BRSR Core data.
- Reviewed the level of risk involved in material incorrectness in recording, collating and reporting of the data.

**BRSR Core Attributes**

The BRSR Core attributes are mentioned in page 3 of this statement.

**Observations**

Our observations after conducting the reasonable assurance procedure are:

1. The data on GHG, Energy, Water, Waste and Safety include only those pertaining to the plants at Durgapur, Satpur, Ambad, Gonde, Barauni, Titlagarh, hydel power project at Chunchanakatte and head office at Kolkata.

2. GIL followed the Equity Share approach in determining the Organisational Boundary while accounting for GHG for the FY 2024-25. The GHG emissions of the subsidiaries / associates collectively is quite low as compared to that of GIL, not material enough and hence not found to be relevant for inclusion in the GHG emissions account.
3. The Scope 2 GHG emissions is location based
4. The data recording, collation and reporting process for GHG, energy, water and waste is fair. However, there is scope to improve its robustness to reduce risk of misstatement.
5. The waste segregation, measurement and storage facilities have scope of improvement. Waste, excepting when reused or recycled, is measured at the point of disposal from the plants. So 'waste generation' data is expected have some inaccuracy as opening stock and closing stock reconciliation is not done.
6. The safety data is based on records maintained and verification is limited to review of records and discussion with employees and workers.

#### **Inherent Limitations**

The absence of a significant body of established practice on which to draw to evaluate and measure non- financial information allows for different, but acceptable, measures and measurement techniques and can affect comparability between entities. In addition, GHG quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emission factors and availability of updated credible values.

#### **Assurance Opinion:**

Based on the procedures we have performed and the evidence we have obtained, the BRSR Core attributes for the financial year ended 31 March 2025 are prepared in all material respects.

#### **Statement of independence, impartiality and competence**

Futurestation Services LLP is an independent professional services company that specializes in sustainability advisory and assurance services. No member of the reasonable assurance procedure performing team has a business relationship with GIL, its directors or managers beyond that required of this assignment. We conducted this procedure independently and to our knowledge there has been no conflict of interest. The team has extensive experience in conducting assurance over environmental, social, ethical, governance, health and safety information, systems and processes, has over 30 years combined experience in this field and an excellent understanding of the subject matter.

Sd/-

**Sudipta Das**

Partner

**Futurestation Services LLP**

7 May, 2025

This assurance statement, including the opinion expressed herein, is provided to Graphite India Limited and is solely for the benefit of Graphite India Limited in accordance with the terms of our agreement. We consent to the release of this statement by you in order to satisfy the requirements of SEBI but without accepting or assuming any responsibility or liability on our part to SEBI or to any other party who may have access to this statement.

## BRSR Core FY 2024-25

| Sr. No.           | Attribute   | Parameter  | Measurement   | Data       |      |
|-------------------|---|--|---|------------|------|
| 1                 | Green-house gas (GHG) footprint   | Total Scope 1 emissions  | tCO2e   | 89350      |      |
|                   |   | Total Scope 2 emissions  | tCO2e   | 181590     |      |
|                   |   | GHG Emission Intensity (Scope 1 +2)  | Total Scope 1 and Scope 2 emissions tCO2e / Total Revenue from Operations adjusted for PPP (tCO2e/Cr INR) | 2313.09    |      |
|                   |   |  | Total Scope 1 and Scope 2 emissions tCO2e / MT of Product   | 2.58       |      |
| 2                 | Water footprint   | Total water consumption  | KL  | 187167     |      |
|                   |   | Water consumption intensity  | KL / Cr INR adjusted for PPP  | 1358.19    |      |
|                   |   |  | KL / MT of Product  | 1.52       |      |
|                   | Water Discharge by destination and levels of Treatment                    |  | 0   |            |      |
| 3                 | Energy footprint  | Total energy consumed  | Mega Joules   | 1948854231 |      |
|                   |   | Total energy consumed % of energy consumed from renewable sources  | In % terms  | 22         |      |
|                   |   | Energy intensity   | Mega Joules per INR/ adjusted for PPP   | 1.65       |      |
|                   |   |  | Mega Joules / MT of Product   | 18578      |      |
| 4                 | Embracing circularity - details related to waste management by the entity | Plastic waste (A)  | MT  | 313.2      |      |
|                   |   | E-waste (B)  | MT  | 4.6        |      |
|                   |   | Bio-medical waste (C)  | MT  | 0.1        |      |
|                   |   | Construction and demolition waste (D)  | MT  | 0          |      |
|                   |   | Battery waste (E)  | MT  | 1.6        |      |
|                   |   | Radioactive waste (F)  | MT  | 0          |      |
|                   |   | Other Hazardous waste. (G)   | MT  | 1176.7     |      |
|                   |   | Other Non-hazardous waste generated (H).   | MT  | 31982.7    |      |
|                   |   | Total waste generated (A+B + C + D + E + F + G + H)  | MT  | 33478.9    |      |
|                   |   | Waste intensity  | MT / Cr INR adjusted for PPP  | 285.73     |      |
|                   |   |  | MT / MT of Product  | 0.32       |      |
|                   |   | Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations                                   | MT  | 539.4      |      |
|                   |   |  | Intensity %   | 1.6        |      |
|                   |   | For each category of waste generated, total waste disposed by nature of disposal   | MT  | 32939.5    |      |
| Intensity %       | 98.4  |  |   |            |      |
| 5                 | Enhancing Employee Wellbeing and Safety                                   | Spending on measures towards well- being of employees and workers – cost incurred as a % of total revenue of the company                           | In % terms  | 0.22       |      |
|                   |   | Details of safety related incidents for employees and workers (including contract-workforce)   | Number of Permanent Disabilities  | 1          |      |
|                   |   |  | Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)                             | E          | 0    |
|                   |   |  |   | W          | 1.37 |
| No. of fatalities | 1   |  |   |            |      |
| 6                 | Enabling Gender Diversity in Business                                     | Gross wages paid to females as % of wages paid   | In % terms  | 1.45       |      |
|                   |   | Complaints on POSH   | Total Complaints on Sexual Harassment (POSH) reported   | 0          |      |
|                   |   |  | Complaints on POSH as a % of female employees / workers   | 0          |      |
|                   |   |  | Complaints on POSH upheld   | 0          |      |
| 7                 | Enabling Inclusive Development  | Input material sourced from following sources as % of total purchases – <i>Directly sourced from MSMEs/ small producers and from within India</i>  | In % terms – As % of total purchases by value   | 22.15      |      |
|                   |   | Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non- permanent /on contract) as % of total wage cost | In % terms – As % of total wage cost  | 3.89       |      |

| Sr. No.            | Attribute   | Parameter  | Measurement  | Data  |
|--------------------|---|--|--|-------|
| 8                  | Fairness in Engaging with Customers and Suppliers | Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events                             | In % terms   | 0     |
|                    |   | Number of days of accounts payable   | (Accounts payable *365) / Cost of goods/ services procured                         | 26.09 |
| 9                  | Open-ness of business                             | Concentration of purchases & sales done with trading houses, dealers, and related parties<br>Loans and advances & investments with related parties | • Purchases from trading houses as % of total purchases                            | 14.53 |
|                    |   |  | • Number of trading houses where purchases are made from                           | 718   |
|                    |   |  | • Purchases from top 10 trading houses as % of total purchases from trading houses | 59.06 |
|                    |   |  | • Sales to dealers / distributors as % of total sales                              | 11.12 |
|                    |   |  | • Number of dealers / distributors to whom sales are made                          | 90    |
|                    |   |  | • Sales to top 10 dealers/distributors as % of total sales to dealers/distributors | 80.30 |
|                    |   |  | Share of RPTs (as respective %age) in -  |       |
|                    |   |  | • Purchases  | 2.38  |
| • Sales            | 0.96  |  |  |       |
| • Loans & advances | 0   |  |  |       |
| • Investments      | 2.35  |  |  |       |