

Business Responsibility and Sustainability Report

Section A: General Disclosures

(Operational & Strategic Information)

Section B: Management & Process Disclosures

(Governance & Stakeholder Engagement)

Section C: Principle Wise Performance Disclosure

SDGs Addressed	Material Topics	Stakeholders Affected
Principle 1: Ethics, Transparency & Accountability Acting honestly, sharing information and being answerable for decisions		
<div></div> <div>Fighting corruption through anti-bribery policies and transparent governance</div>	Business Ethics & Regulatory Compliance – Compliance with Companies Act and SEBI regulations	Investors (trust in financial disclosures) Employees (protected whistleblower policy) Regulators (legal compliance)
Principle 2: Sustainable Products/Services Making products that are safe for people and the planet		
<div></div> <div>GreenPro-certified products</div>	Economic Performance – Revenue from GreenPro-certified specialty oils	Customers (access to eco-friendly products) Suppliers (mandatory sustainability evaluations)
<div></div> <div>Sustainable sourcing practices</div>		
Principle 3: Employee Wellbeing Keeping workers healthy, safe, and happy		
<div></div> <div>ISO 45001-certified safety systems</div>	Occupational Health & Safety – Zero workplace incidents reported	Employees (medical check-ups) Workers (life insurance coverage)
<div></div> <div>Fair wages and insurance coverage</div>		
Principle 4: Stakeholder Responsiveness Listening to and addressing concerns of all affected groups		
<div></div> <div>Collaboration with local communities</div>	Business Ethics & Regulatory Compliance – CSR committee oversight	Community (voice in projects) Investors (quarterly performance updates)
<div></div> <div>Transparent grievance redressal</div>		

SDGs Addressed	Material Topics	Stakeholders Affected
Principle 5: Human Rights Respecting everyone’s rights, regardless of gender or background		
<div><div>5</div><div><div>5</div><div>5</div><div>5</div></div><div><div>5</div><div>5</div><div>5</div></div><div>5</div><div>GENDER EQUALITY</div></div> <div>Anti-harassment policies</div>	Diversity & Inclusion – Zero discrimination complaints	Employees (equal opportunity) Women (dedicated protection committees)
<div><div>10</div><div><div>10</div><div>10</div><div>10</div></div><div><div>10</div><div>10</div><div>10</div></div><div>10</div><div>REDUCED INEQUALITIES</div></div> <div>Inclusive hiring</div>		
Principle 6: Environmental Protection Reducing pollution and protecting natural resources		
<div><div>6</div><div><div>6</div><div>6</div><div>6</div></div><div><div>6</div><div>6</div><div>6</div></div><div>6</div><div>CLEAN WATER AND SANITATION</div></div> <div>Zero Liquid Discharge (ZLD) systems</div>	Climate Change – Compliance with Water/ Air Pollution Acts	Community (cleaner waterways) Regulators (environmental law adherence)
<div><div>13</div><div><div>13</div><div>13</div><div>13</div></div><div><div>13</div><div>13</div><div>13</div></div><div>13</div><div>CLIMATE ACTION</div></div> <div>12.5 lakh kg CO2 reduction</div>		
Principle 7: Responsible Public Policy Engaging fairly with laws and industry standards		
<div><div>16</div><div><div>16</div><div>16</div><div>16</div></div><div><div>16</div><div>16</div><div>16</div></div><div>16</div><div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div></div> <div>Transparent policy advocacy</div>	Business Ethics & Regulatory Compliance – No anti-competitive cases	Government (policy feedback) Industry (shared standards)
<div><div>17</div><div><div>17</div><div>17</div><div>17</div></div><div><div>17</div><div>17</div><div>17</div></div><div>17</div><div>PARTNERSHIPS FOR THE GOALS</div></div> <div>Trade chamber memberships</div>		
Principle 8: Inclusive Growth Supporting education and jobs in underserved areas		
<div><div>1</div><div><div>1</div><div>1</div><div>1</div></div><div><div>1</div><div>1</div><div>1</div></div><div>1</div><div>NO POVERTY</div></div> <div>CSR programs for low-income groups</div>	Economic Performance – ₹ 4.31 Cr CSR spending	Local Communities (skill development) Women (Self-Help Groups)
<div><div>4</div><div><div>4</div><div>4</div><div>4</div></div><div><div>4</div><div>4</div><div>4</div></div><div>4</div><div>QUALITY EDUCATION</div></div> <div>School infrastructure projects</div>		
Principle 9: Consumer Responsibility Ensuring product safety and honest customer communication		
<div><div>12</div><div><div>12</div><div>12</div><div>12</div></div><div><div>12</div><div>12</div><div>12</div></div><div>12</div><div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div></div> <div>Detailed product safety labels</div>	Economic Performance – Zero product recalls	Customers (multiple feedback channels) End Users (clear usage instructions)
<div><div>9</div><div><div>9</div><div>9</div><div>9</div></div><div><div>9</div><div>9</div><div>9</div></div><div>9</div><div>INDUSTRY INNOVATION AND INFRASTRUCTURE</div></div> <div>Cyber security policy</div>		

SECTION A: GENERAL DISCLOSURES



I. Details of listed entity

1.	Corporate Identity Number (CIN) of the Company	L23200MH1992PLC068905
2.	Name of the Company	GANDHAR OIL REFINERY (INDIA) LIMITED
3.	Year of Incorporation	1992
4.	Registered Office Address	18 th FLOOR, DLH PARK, S. V. ROAD, GOREGAON WEST, MUMBAI 400062
5.	Corporate Address	18 th FLOOR, DLH PARK, S. V. ROAD, GOREGAON WEST, MUMBAI 400062
6.	Email Address	mailto:cs@gandharoil.com
7.	Telephone	022 40635600
8.	Website	http://www.gandharoil.com
9.	Financial Year Reported	FY 2024-25
10.	Name of the Stock Exchanges where shares are listed	BSE LIMITED NATIONAL STOCK EXCHANGE OF INDIA LIMITED
11.	Paid-up Capital	₹ 19,57,59,060/-
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Indrajit Bhattacharyya – Chief Financial Officer Tel: 40635600 Email: investor@gandharoil.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 basis
14.	Name of assurance provider	Not Applicable (NA)
15.	Type of assurance obtained	NA

II. Products/Services

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

Sl. No.	Description of Main Activity	Description of Business Activity	% of turnover of the Company
1.	Manufacturing of Specialty Oil & Lubricants	The Company specialize in the manufacturing of a wide range of specialty oils, lubricants, mineral oils, and consumer and healthcare products. Diverse portfolio includes premium offerings such as white oils, waxes, jellies, automotive oils, industrial oils, transformer oils, and rubber processing oils, all marketed under our renowned brand, Divyol.	100

17. Products/Services sold by the Company (accounting for 90% of the turnover)

Sl. No.	Product/Service	NIC Code	% of total turnover contributed
1	White Oil/Paraffin/Mineral Oil	1920	49.89%
2	Industrial Oil	1920	19.04%
3	Transformer Oil	1920	8.56%
4	Automotive Oils	1920	4.10%
5	Petroleum Jelly/Waxes	1920	6.16%
6	Rubber Processing Oils	1920	5.12%

III. Operations

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

Location	Number of plants	Number of offices	Total
National	2	30	32
International	0	0	0

19. Markets served by the Company

a. Number of locations

Locations	Number
National (No. of States)	25*
International (No. of Countries)	100

*Includes 17 states and 8 Union Territories

b. What is the contribution of exports as a percentage of the total turnover of the Company?

The Company has been focusing on increasing its market reach. The Company has been undertaking several initiatives to grow its exports and to fulfil the market needs across the globe. At present 26.25% of total turnover is contributed by exporting the products.

c. Types of customers

The Company serves customers across a wide range of industries worldwide, including pharmaceuticals, healthcare, performance oil (PHPO), process insulating oil (PIO), and lubricants, encompassing both automotive and industrial oils. Its clientele includes major international and Indian corporations, as well as individual retail customers.

IV. Employees

20. Details as at the end of Financial Year

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	329	293	89.06%	36	10.94%
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	329	293	89.06%	36	10.94%
WORKERS						
4.	Permanent (F)	81	81	100%	0	0%
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total workers (F + G)	81	81	100%	0	0%

b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
EMPLOYEES						
1.	Permanent (D)	0	0	0	0	0
2.	Other than Permanent (E)	0	0	0	0	0
3.	Total employees (D + E)	0	0	0	0	0
WORKERS						
4.	Permanent (F)	0	0	0	0	0
5.	Other than Permanent (G)	0	0	0	0	0
6.	Total workers (F + G)	0	0	0	0	0

21. Participation/Inclusion/Representation of Women

	Total (A)	No. and percentage of Females	
		No. (B)	% (B/A)
Board of Directors	6	2	33.33%
Key Management Personnel	5	1	20.00%

22. Turnover rate for permanent employees and workers (disclose trends for the past 3 years)

	FY'2024-25			FY'2023-24			FY'2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	12%	3%	15%	10.39%	0.6%	16.42%	8.37%	0.21%	11.4%
Permanent Workers	10%	0	10%	0	0	0	0.24%	0	0.24%

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

23. Name of holding/subsidiary/associate companies/joint ventures

Sl. No.	Name of the holding/ subsidiary/ associate companies/joint ventures (A)	Indicate whether Holding/ Subsidiary/Associate/Joint Venture	% of shares held by the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company (Yes/No)
1	Gandhar Shipping & Logistics Pvt. Ltd.	Wholly Owned Subsidiary Company	100%	No
2	Gandhar Lifesciences Pvt. Ltd.	Wholly Owned Subsidiary Company	100%	No
3	Gandhar Foundation	Wholly Owned Subsidiary Company	100%	No
4	Texol Lubritech FZC	Subsidiary Company	50.10%	No
5	Texol Oils FZC	Joint Venture Company	50%	No

VI. CSR Details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: **Yes**
- (ii) Turnover (in ₹ Mn.): **31602.58**
- (iii) Net worth (in ₹ Mn.): **11735.09**

VII. Transparency and Disclosure Compliances

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

Stakeholder group from whom compliant is received	Grievance Redressal Mechanism in place (Yes/No) (If yes, then provide web link for grievance redressal policy)	FY'2024-25			FY'2023-24		
		No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks	No. of complaints filed during the year	No. of complaints pending resolution at close of the year	Remarks
Communities	Yes, The Company does have grievance redress policy.	0	-	-	0	-	-
Investors (other than shareholders)		0	-	-	0	-	-
Shareholders		0	-	-	0	-	-
Employees and workers		0	-	-	0	-	-
Customers		0	-	-	0	-	-
Value Chain Partners		0	-	-	0	-	-
Others		0	-	-	0	-	-

26. Overview of the Company's material responsible business conduct and sustainability issues pertaining to environment and social matters that present a risk or an opportunity to the business of the Company, rationale for identifying the same approach to adapt or mitigate the risk along with its financial implications, as per the following format:

Sl. 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	Climate Change	Risk	The Company is committed to ensuring transparency in its policies and disclosures related to climate action and sustainability practices.	The Company uphold stringent corporate governance standards and adheres to a comprehensive Code of Business Ethics to maintain openness and accountability in all climate-related initiatives and activities	Negative
2	Occupational Health and Safety	Risk	Empowering a safe and healthy workforce is a fundamental aspect of our business strategy, contributing to success through employee well-being.	Safety and health are central to our commitments. By fostering trust, the Company enable a productive workforce and uphold our standards of excellence. Comprehensive policies and continuous monitoring ensure that all sites operate responsibly.	Negative
3	Waste and Hazardous material Management	Risk	Climate change—ranging from extreme weather events to rising sea levels—poses significant risks to our operations, assets, and stakeholders, including customers, investors, and employees. In response, the Company prioritize transparent communication about the climate-related risks the Company faces	The Company is committed to assessing these risks across all our sites using the GHG Protocol and adhering to high sustainability standards.	Negative
4	Water and Energy conservation	Opportunity	Water and energy are essential and irreplaceable natural resources, integral to many of our operations. The Company recognize the significant risks associated with water scarcity.	The Company is committed to implementing water conservation measures across all operational sites, aligning our efforts with climate change considerations.	Positive
5	Social and environmental compliance	Risk	Compliance with laws and regulations	The Company is committed to social and environmental compliance.	Negative

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES



Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management processes										
1.	a. Whether the Company's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Weblink of the policies, if available	All the Policies can be accessible at, https://gandharoil.com/investor-relations/company-policies/ Code of Conduct Nomination & Remuneration Policy Vigil Mechanism Archival of Documents Materiality of Events or Information Dividend Declaration Policy CSR Policy Sexual Harassment Policy Preservation of Documents Diversity of Board of Directors Determining Material Subsidiary Evaluation of Board of Directors Trading Code of Conduct by Designated Person Familiarization Programme for Independent Director Succession Planning for the Board & Senior Management Risk Management Policies and Procedure Materiality of Related Party Transactions								
2.	Whether the Company has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.	Do the enlisted policies extend to the Company's value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
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 the Company and mapped to each principle.	The Company ensures compliance with ISO 9001: 2015, ISO 14001:2015, ISO 45001:2018 (OHSAS), and also certifies with GMP, FDA, DSIR. The policies are formulated while taking into consideration relevant national laws, including The Factories Act, 1948, The Companies Act, 2013, The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and various other applicable statutes that make reference to both national and international codes, certifications, labels and standards.								
5.	Specific commitments, goals and targets set by the Company with defined timelines, if any.	The Company is in the process of formalizing specific ESG-related goals and targets. In the interim, it has proactively initiated sustainability-focused measures aimed at energy conservation and environmental responsibility.								
6.	Performance of the Company against the specific commitments, goals and targets along with reasons, in case the same are not met.	While formal ESG targets are currently being developed, the Company has made meaningful progress in its sustainability journey. The adoption of energy-saving technologies and water conservation practices demonstrates its dedication to responsible business conduct. The Company remains committed to enhancing its ESG framework and plans to report on its performance against defined goals in the forthcoming reporting periods.								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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Governance, leadership and oversight

7. Statement by Director, responsible for the Business Responsibility Report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)

At Gandhar Oil Refinery (India) Limited, we recognize that long-term business resilience is intrinsically linked to our Environmental, Social, and Governance (ESG) performance. As we navigate an evolving global landscape, we remain committed to embedding sustainability into the core of our strategic and operational decision-making.

Over the past year, we have made meaningful development in enhancing our ESG framework. We have initiated structured efforts to improve energy efficiency, reduce emissions, and conserve water resources. Our transition to LED lighting, adoption of battery-operated forklifts, and implementation of rainwater harvesting systems are early indicators of our intent to reduce our environmental footprint.

On the social front, we continue to follow an inclusive and safe workplace, with a strong emphasis on employee well-being, skill development and ethical conduct. Our community engagement programs, driven through our CSR initiatives, aim to create long-term value for society by supporting education, healthcare, and livelihood enhancement.

From a governance perspective, we have strengthened our internal controls and compliance mechanisms, ensuring transparency, accountability, and ethical business practices across all levels of the organization.

Looking ahead, we are in the process of defining measurable ESG targets aligned with global best practices. These targets will serve as a roadmap for continuous improvement and will be integrated into our performance monitoring systems. We acknowledge that challenges remain—particularly in aligning legacy operations with emerging sustainability standards—but we view these as opportunities for innovation and growth.

We remain committed to building a responsible and future-ready organization that delivers sustainable value to all stakeholders.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).	Mr. Ramesh Parekh Chairman and Managing Director								
9. Does the Company have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, the Company has an established risk governance framework that includes Risk Management Committee responsible for business risk and opportunities. This process is effectively supported by the Chairman & Managing Director as well as Joint Managing Directors.								

10. Details of review of NGRBCs by the Company:

Subject for review	Indicate whether review was undertaken by Director/ Committee of the Board/any other Committee									Frequency (Annually/Half yearly/Quarterly/Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Annually, the Executive Management and Key Managerial Personnel at Gandhar Oil Refinery (India) Limited review the Company's Business Responsibility and Sustainability Policies. They evaluate the policies, procedures, and internal controls for their effectiveness and make adjustments as needed based on their assessment.																	
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company's policies are subject to periodic audits and internal reviews conducted both by external agencies and internally.																	

11. Has the entity carried out independent assessment /evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	No								

12. If answer to question (1) above is 'No' i.e. not all Principles are covered by a Policy, reasons to be stated:

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principle material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)	Not Applicable								
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE



PRINCIPLE 1:

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

Essential Indicator:

1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	4	Updates and awareness related to regulatory changes are conducted for Board of Director and KMPs. Topics covered includes: i. SEBI Listing Regulations (LODR), ii. Prohibition of Insider Trading Regulations iii. Companies Act, 2013, iv. Familiarisation Programmes	100%
Key Managerial Personnel	4		
Employees other than Board of Directors and KMPs	2		100%
Workers	2	Anti-Corruption and Bribery Policy, Posh	100%

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:

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	NIL	NA	NIL	NA	NA
Settlement	NIL	NA	NIL	NA	NA
Compounding fee	NIL	NA	NIL	NA	NA

Non-Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	NIL	NA	NA	NA
Punishment	NIL	NA	NA	NA

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.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
NA	NA

4. Does the Company 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 instituted a clear and robust stance against corruption and bribery as part of its commitment to responsible business conduct. It maintains a zero-tolerance policy towards any form of bribery or corrupt practices, and is dedicated to conducting all business operations with fairness, honesty, and integrity across all its locations.

This policy encompasses various forms of unethical conduct, including but not limited to bribery, facilitation payments, improper gifts or hospitality, undisclosed commissions, and political or charitable contributions made with the intent to influence business outcomes. Any violation of this policy is subject to strict disciplinary action, which may include financial penalties, legal prosecution, or other sanctions as deemed appropriate by the Company.

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	0	0
KMPs	0	0
Employees	0	0
Workers	0	0

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	0	NIL	0	NIL
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0	NIL	0	NIL

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 conflict of interest.

NIL

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
Number of days of accounts payables	37.20	47.90

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	0	3.64%
	b. Number of trading houses where purchases are made from	0	7
	c. Purchases from top 10 trading houses as % of total purchases	0	-
Concentration of Sales	a. Sales to dealer / distributors as % of total sales	5.82%	5.71%
	b. Number of dealers / distributors to whom sales are made	379	374
	c. Sales to top 10 dealers / distributors as % of total sales to dealer / distributors	49.47%	41.10%
Share of RPTs in	Purchases (Purchases with related parties as % of Total Purchases)	3.81%	3.14%
	Sales (Sales to related parties as % of Total Sales)	1.07%	0.45%
	Loans & advances given to related parties as % of Total loans & advances	98.60 %	98.78%
	Investments in related parties as % of Total Investments made	91.08%	89.05%

Leadership Indicators

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, the entity has well-defined processes in place to avoid and manage conflict of interests involving members of the Board.

As per the "Code of Conduct for Board Members and Senior Management Personnel" of Gandhar Oil Refinery (India) Limited:

- The Company prohibits Board Members and Senior Management from engaging in any business, relationship, or activity that may conflict with the interests of the Company.

The Code outlines examples of potential conflicts, such as:

- When a member's personal interests interfere with their responsibilities.
- Use of Company property, confidential information, or goodwill for personal gain.
- Receipt of improper personal benefits or gifts from business partners.
- The Code mandates disclosure of any potential or actual conflict of interest to the Board of Directors.
- Board approval is required before proceeding in any situation that may involve a conflict.
- Directors must disclose other directorships annually, especially those that may pose competitive risks.
- The Code includes periodic acknowledgment and compliance declarations from all Board Members.
- Enforcement is managed by the Company Secretary (Compliance Officer), with breaches reported to the Board and subject to disciplinary action.

PRINCIPLE 2:

Business should provide goods and services in a manner that is sustainable and safe

Essential Indicator:

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

Segment	FY'2024-25	FY'2023-24	Details of improvements in environmental and social impacts
R & D	-	-	Invested in moisture control systems (ULTRA CLEAN MOISTURE) for environmental contamination reduction, oxygen purification systems (ULTRA CLEAN OXY) for emission minimization, nitrogen generation technology (PRECIGEN) to reduce transportation emissions, and IVF healthcare equipment (STANDARD IVF SMARTQUENCH) for improved social well-being.
Capex	27.30%	25.60%	

- 2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes

- b. If yes, what percentage of inputs were sourced sustainably?**

The Company is committed to prioritizing environmental sustainability, stakeholder interests, and cost-effectiveness in the procurement of raw materials and goods, while maintaining uncompromised quality and consistency. Through well-defined policies and robust processes, the Company ensures sustainable sourcing practices in collaboration with its Business Associates. All such engagements are guided by the principles of Responsible Supply Chain Management.

- 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.**

(a) Plastics (including packaging)	<p>The Company adopts a responsible approach to waste management, extending beyond regulatory compliance to ensure safe and sustainable handling of materials at the end of their lifecycle. Across its operations, the Company continuously evaluates resource utilization, technologies, and process efficiencies to minimize waste generation.</p> <p>Comprehensive procedures are in place for the safe reclamation, reuse, recycling, and disposal of various waste categories, including:</p> <ul style="list-style-type: none"> • (a) Plastics (including packaging): The Company follows structured protocols for the segregation and recycling of plastic waste, including packaging materials, in accordance with applicable environmental guidelines. • (b) E-waste: Electronic waste is managed through authorized recyclers, ensuring safe disposal and recovery of valuable components while preventing environmental harm. • (c) Hazardous waste: The Company maintains stringent standard operating procedures for the handling, storage, and disposal of hazardous waste, in compliance with statutory norms and safety standards. • (d) Other waste: All other forms of waste are addressed through tailored waste management practices, with regular monitoring and continuous improvement initiatives to enhance effectiveness. <p>These processes are subject to periodic review and improvement measures are implemented to ensure alignment with best practices in environmental stewardship and operational sustainability.</p>
(b) E-waste	
(c) Hazardous waste	
(d) other waste.	

- 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, the Company has registered for EPR with Central Pollution Control Board, for both the categories, as owner and as importer. To fulfill its EPR compliance for all the applicable category of plastics as per the regulations including collection and plastic packaging recycling.

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 web-link.
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NA

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.

Name of Product / Service	Description of the risk / concern	Action Taken
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NA

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 re-used input material to total material #	
	FY'2024-25	FY'2023-24

NA

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:

Stakeholder group from whom compliant is received	FY'2024-25			FY'2023-24		
	Re-used	Recycled	Safely Disposed	Re-used	Recycled	Safely Disposed
Plastics (including packaging)	-	-	-	-	-	-
E-waste	-	-	-	-	-	-
Hazardous waste	-	-	-	-	-	-
Other waste	-	-	-	-	-	-

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

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
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NA

PRINCIPLE 3:

Business should respect and promote the wellbeing of all employees, including those in their value chains

Essential Indicator:

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)
Permanent employees											
Male	293	293	100%	293	100%	NA		0	0	0	0
Female	36	36	100%	36	100%	2	5.56%	NA		0	0
Total	329	329	100%	329	100%	2	0.61%	0	0	0	0
Other than Permanent employees											
Male											
Female	NA										
Total											

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)
Permanent Workers											
Male	81	81	100%	81	100%	NA		0	0	0	0
Female						NA					
Total	81	81	100%	81	100%	NA		0	0	0	0
Other than Permanent Workers											
Male											
Female						NA					
Total											

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 wellbeing measures as a % of total revenue of the Company	0.003%	0.003%

2. Details of retirement benefits, for Current 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	98.48%	100%	Yes	98.42%	100%	Yes
Gratuity	100%	100%	NA	100%	100%	NA
ESI	100%	100%	Yes	100%	100%	Yes
Others- please specify	NA			NA		

3. Accessibility of workplaces

Are the premises/offices of the Company 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 Company in this regard.

As per Section 2(zc) of the Rights of Persons with Disabilities Act, 2016, currently does not have any employees with disabilities.

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

The Company is committed to providing equal opportunities for all employees and workers, fostering job advancement and skill development irrespective of race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, or nationality. It is dedicated to maintaining a safe, supportive, and empowering work environment for everyone.

Link: <https://drive.google.com/drive/u/4/folders/1OVDwzJexMMdc9kpoVuvGICJ5DFoHbv7H> (NO DISCRIMINATION & EQUAL OPPORTUNITY POLICY)

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

Gender	Permanent Employees		Permanent Workers	
	Return to work rate	Retention Rate	Return to work rate	Retention Rate
Male	NA	NA		
Female	100%	100%		NA
Total	100%	100%		

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.

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent workers	The company has established a robust grievance mechanism that encourages all employees and workers, regardless of their position, to report incidents of unethical behavior, fraud, or policy violations. A dedicated grievance committee is in place to effectively address and resolve such complaints.
Other than permanent workers	NA
Permanent employees	The company has established a robust grievance mechanism that encourages all employees and workers, regardless of their position, to report incidents of unethical behavior, fraud, or policy violations. A dedicated grievance committee is in place to effectively address and resolve such complaints.
Other than permanent employees	NA

Link: <https://drive.google.com/drive/u/4/folders/1OVDwzJexMMdc9kpoVuvGICJ5DFoHbv7H>

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

Category	FY'2024-25			FY'2023-24		
	Total employees/ workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	%(B/A)	Total employees/ workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	%(D/C)
Total Permanent Employees						
- Male						
- Female						
Total Permanent Workers						
- Male						
- Female						

There is no such employee association that is officially recognized by the Company.

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 (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	293	173	59.04%	0	0	277	277	100%	277	100%
Female	36	4	11.11%	0	0	40	40	100%	40	100%
Total	329	177	53.80%	0	0	317	317	100%	317	100%
Workers										
Male	81	81	100%	0	0	64	64	100%	64	100%
Female	0	0	0	0	0	0	0	100%	0	100%
Total	81	81	100%	0	0	64	64	100%	64	100%

Note: The methodology has revised for the current year to calculate employee covered under above mentioned topics.

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)
Employees						
Male	293	293	100%	277	277	100%
Female	36	36	100%	40	40	100%
Total	329	329	100%	317	317	100%
Workers						
Male	81	81	100%	64	64	100%
Female	0	0	0	0	0	100%
Total	81	81	100%	64	64	100%

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, Gandhar Oil Refinery (India) Ltd. has implemented an Occupational Health and Safety Management System that encompasses all employees and workers across its operational locations. The Company adheres to the ISO 45001:2018 standard to ensure workplace health and safety.

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

Work-related hazards and risk assessments are identified using processes such as Hazard Risk analysis. Hazard Identification and Risk Assessment is conducted for all routine activities to identify work-related hazards. Job Safety Analyses are performed for non-routine tasks and new projects.

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

Yes, the Company has well-established Standard Operating Procedures (SOPs) that guide employees and workers in identifying and reporting work-related hazards, along with the corresponding mitigation steps. A dedicated work committee and safety committee are in place to address such hazards. Additionally, the Company conducts training and awareness sessions, including modules on occupational health and safety, for employees and workers to the extent possible.

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

Yes. The annual medical check of all the employees/workers is also carried out. Further, all employees are covered under Company's health insurance policy.

- Labour contractor - clause included in contract copy to comply with statutory obligation.
- Verification process: monthly bill received with pf challan & ecr & esic details. Internal audit check periodically.

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	NIL	NIL
	Workers		
Total recordable work-related injuries	Employees		
	Workers		
No. of fatalities	Employees		
	Workers		
High consequence work-related injury or ill-health (excluding fatalities)	Employees		
	Workers		

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

The Company holds ISO 45001:2018 certification for its Occupational Health and Safety Management System. All employees and workers receive training on health and safety hazards and corresponding control measures. Hazard Identification and Risk Assessment are conducted for all activities, ensuring that appropriate control measures are implemented.

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

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

14. Assessments for the year:

	% of plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	Health conditions certified for all the workers, staff - 100 % by DISH certified Doctor. Unistar Environment and Research pvt Ltd. conducted Environment Audit on 28.03.2025 valid for 2 years till February 2027.
Working Conditions	

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.

No such Incidents/Accidents occurred and hence no actions were required to be undertaken.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Employees: No

Workers: No

3. Provide the number of employees/workers having suffered grave consequences due to work-related injury/ill-health/fatalities (as reported in Q11 of Essential Indicators above), who are 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 whose family members have been placed in suitable employment	
	FY'2024-25	FY'2023-24	FY'2024-25	FY'2023-24
Employees	0	0	0	0
Workers	0	0	0	0

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

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	The Company local & international health & safety regulation ISO Standard 45001:2018 follow and regularly audits and monitors the payment of legal obligations by its value chain partners while processing their invoices.
Working Conditions	

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.

NA

PRINCIPLE 4:

Business should respect the interests of and be responsive to all its stakeholders

Essential Indicator:

1. Describe the processes for identifying key stakeholder groups of the Company.

Our stakeholders are those individuals or organisations who have an interest in, and/ or whose actions impact our ability to execute our strategy. Our stakeholders play an integral role in our journey and we recognise the need to partner with them and understand their concerns to run and manage our businesses. Our process of stakeholder engagement involves identifying key internal and external stakeholders followed by analysing the impact of each stakeholder groups on our business. The Company understands stakeholder's expectations through regular engagement with them. Our Company periodically reviews these expectations internally and deploys them in developing strategies, plans and business activities. Our Company has engaged with major stakeholder groups that influenced or are influenced by our Company's activities

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

Stakeholder Group	Whether identified as vulnerable & marginalised group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, Community Meetings, Notice Board, Website, Others)	Frequency of engagement (Annually, Half yearly, quarterly /others- please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Distributors and retailers meet, Customer satisfaction & Feedback survey, Plant visit, Awareness Programme, Grievance redressal system, website & social media platforms	Regular	Product quality and safety, customer feedback, new product launches, ethical and fair marketing

Stakeholder Group	Whether identified as vulnerable & marginalised group (Yes/No)	Channels of communication (Emails, SMS, Newspapers, Pamphlets, Advertisements, Community Meetings, Notice Board, Website, Others)	Frequency of engagement (Annually, Half yearly, quarterly /others- please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Suppliers	No	Seminars and workshops, Trade meets, Meeting with contractors/vendors, contract /agreement with suppliers	Regular	Fair and accountable transactions, transparency in tendering process, product and service quality, vendors enable the Company to identify the key material issues impacting the supply chain
Communities	No	Meetings, Public Hearings, local charities, seminars/conferences	Need based	Community development, CSR activities
Government Regulators	No	Meetings with Government agencies, written communications, seminars, Conferences, regulatory audits and inspections etc.	Need based	Statutory and regulatory compliances, Government regulations amendments, inspections, approvals etc.
Shareholders	No	Investor Presentations, Press Release, Stock Exchange Disclosures, Website, Quarterly and half yearly financial results, Annual Report, Annual General Meetings, Email communications	Annually, Half Yearly, Quarterly, Ongoing & regular	Financial Results, Dividends, Induction of Board members, Changes in shareholding, business growth and stability, Corporate Governance requirements
Employees	No	Training & Awareness programs, Goal setting, Performance appraisal, Meetings, Wellness initiatives, Grievance Mechanism Functioning, Email, Intranet, Circulars social media platforms etc.	Regular	No

Leadership Indicators

1. 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.

In the Board Meetings, feedback/ internal audit reports are discussed, and progress on various sustainability (ESG) parameters are shared. Suggestions from the Board Members are implemented.

2. 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.

The Company maintains regular engagement with stakeholders on sustainability-related matters. Customers are encouraged to share feedback and contribute to relevant initiatives. Awareness programs on environmental and social topics are conducted periodically for employees and suppliers, providing a platform for meaningful dialogue and collaborative action.

Key customers often share detailed sustainability questionnaires, to which the Company responds diligently. These interactions offer valuable insights into stakeholder expectations and help guide the Company's sustainability efforts.

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

The Company adopts an integrated development approach that prioritizes the inclusion of disadvantaged, vulnerable, and marginalized stakeholders, with a strong focus on equitable and collaborative growth.

In terms of employment, the Company is committed to offering merit-based opportunities to historically underrepresented communities, including Scheduled Castes, Scheduled Tribes, and Other Backward Classes, across all plant locations. Efforts are also underway to enhance the participation of women on the factory shop floors, with a gradual increase already observed.

With regard to procurement, the Company remains a responsible member of the local communities in which it operates, actively promoting local sourcing wherever feasible to support regional economic development.

PRINCIPLE 5:

Business should respect and promote human rights

Essential Indicator:

1. **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)
Employees						
Permanent	329	329	100%	317	317	100%
Other than Permanent	0	0	0	0	0	0
Total Employees	329	329	100%	317	317	100%
Workers						
Permanent	81	81	100%	64	64	100%
Other than Permanent	0	0	0	0	0	0
Total Workers	81	81	100%	64	64	100%

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

Category	FY'2024-25					FY'2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Permanent	329	0	0	329	100%	317	0	0	317	100%
Male	293	0	0	293	100%	277	0	0	277	100%
Female	36	0	0	36	100%	40	0	0	40	100%
Other than Permanent										
Male	NA									
Female										
Workers										
Permanent	81	0	0	81	100%	64	0	0	64	100%
Male	81	0	0	81	100%	64	0	0	64	100%
Female	0	0	0	0	0%	0	0	0	0	0%
Other than Permanent										
Male	NA									
Female										

3. **Details of remuneration/salary/wages, in the following format:**

- a. **The details are provided below:**

	Male		Female	
	Number	Median remuneration / salary / wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	3	11,42,04,000		NA
Key Managerial Personnel	1	39,57,075	1	22,88,400
Employees other than BoD and KMP	288	22,06,17,525	36	1,34,46,384
Workers	81	2,62,46,645		NA

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	4.13%	5.33%

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/No)

Yes, The Company has established a dedicated Grievance Redressal Committee entrusted with the responsibility of receiving, investigating, and effectively resolving grievances submitted by employees, vendors, customers, and other internal and external stakeholders.

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

The Company maintains a strict zero-tolerance policy against human rights violations and has established a transparent framework to identify, address, and resolve related concerns. Its policies cover key areas including anti-human trafficking, anti-retaliation, anti-corruption and bribery, child labour prevention, and grievance redressal, each supported by clear guidelines and enforcement mechanisms.

The Whistle-blower Policy ensures strong protection against retaliation, reinforcing a culture of accountability. Human rights principles are embedded in the Company's ethical standards and operational practices, with full compliance to labour rights and health and safety regulations.

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

The details are provided below:

Category	FY'2024-25			FY'2023-24		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	NIL	NIL		NIL	NIL	
Discrimination at workplace						
Child Labour						
Forced Labour/Involuntary Labour						
Wages						
Other Human rights related issues						

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
i) Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	NIL	NIL
ii) Female employees / workers		
iii) Complaints on POSH upheld		

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

Gandhar Oil Refinery (India) Limited has established a Vigil Mechanism/Whistle-blower Policy to enable all stakeholders to report concerns related to unethical conduct, actual or suspected fraud, or violations of applicable laws, rules, regulations, or the Company's Code of Conduct. This mechanism ensures adequate safeguards against the victimization of Directors and employees who utilize it and, in certain cases, allows for direct access to the Chairman of the Audit Committee.

Policy Link: Vigil mechanism

9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes

10. Assessment for the year:

	% of the Company's plants and offices that were assessed (by the Company or statutory authorities or third parties)
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%
Other- please specify	100%

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.

NA

Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

Nil

2. Details of the scope and coverage of any Human rights due diligence conducted.

No

3. 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?

Yes

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	0
Discrimination at workplace	0
Child Labour	0
Forced Labour/Involuntary Labour	0
Wages	0
Others – please specify	0

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

NA

PRINCIPLE 6:

Business should respect and make efforts to protect and restore the environment.

Essential Indicator:

1. Details of total energy consumption (in GJ) and energy intensity, in the following format:

Parameter	FY'2024-2025 (Current Financial Year)	FY'2023-24 (Previous Financial Year)
From renewable sources		
Total electricity consumption (A)	1,111.87	1,362.57
Total fuel consumption (B)	0	0
Energy consumption sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	1,111.87	1,362.57
From non-renewable sources		
Total electricity consumption (D)	7,086.81	5,755.96
Total fuel consumption (E)	10,055.92	11,417.69
Energy consumption sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	17,142.73	17,173.65
Total energy consumed (A+B+C+D+E+F)	18,254.60	18,536.22
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) (GJ/Rs. In Crore)	5.776	6.523
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP)* (GJ/Crore US\$)	119.338	134.762
Energy intensity in terms of physical output (GJ/Liter)	0.00005040	0.000112188
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	

Note: Energy intensity in terms of physical output has been calculated as (Total water consumption / Liter of oil produced)

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, the Company has not been recognized for any locations or facilities as designated consumers (DCs) under the government of India PAT Scheme.

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

Parameter	FY'2024-2025 (Current Financial Year)	FY'2023-24 (Previous Financial Year)
Water withdrawal by source (in kiloliters)		
(i) Surface water	3,329	5,628
(ii) Groundwater	3,744	7,624.3
(iii) Third party water	0	0
(iv) Seawater / desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	7,073	13,252
Total volume of water consumption (in kilolitres)	7,073	13,252
Water intensity per rupee of turnover (Total water consumption / Revenue from operations) (KL/Rs. In crore)	2.238	4.663
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) (KL/Crore US\$)	46.239	96.345
Water intensity in terms of physical output (KL/Liter)	0.00001953	0.00008021
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	

4. Provide the following details related to water discharged:

Parameter	FY'2024-25	FY'2023-24
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Groundwater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(v) Others	0	0
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kiloliters)	0	0

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

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

Yes, the current facility operates as a Zero Liquid Discharge (ZLD) unit. Sewage is treated through a fully functional Sewage Treatment Plant (STP), and an Oil-Water Separator system has been implemented to ensure effective wastewater management.

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

Parameter	Unit	FY'2024-25	FY'2023-24
NO _x	mg/Nm ³	45.85	18.28
SO _x	mg/Nm ³	40.71	76.18
Particulate matter (PM)	mg/Nm ³	141.6	105.66
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others – please specify	-	-	-

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

7. Provide details of greenhouse gas emissions (Scope1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY'2024-2025 (Current Financial Year)	FY'2023-24 (Previous Financial Year)
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	528.09	696.40
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	1431.14	1146.00
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent / ₹ In crore	0.62	0.65
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO ₂ equivalent/ Crore US\$	12.81	13.39

Parameter	Unit	FY'2024-2025 (Current Financial Year)	FY'2023-24 (Previous Financial Year)
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tonnes of CO ₂ equivalent / Liter	0.000005418	0.00001115
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	-	NA	NA
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	

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

Yes

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

Parameter	FY'2024-2025 (Current Financial Year)	FY'2023-24 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste (A)	0	0
E-waste (B)	0	0
Bio-medical waste (C)	0	0
Construction and demolition waste (D)	0	0
Battery waste (E)	0	0
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	21.905	
(i) Spent Catalyst	0	30
(ii) Used Oil	0	0.025
(iii) Contaminated Cotton Rags	2.77	2
(iv) Spent clay	19.11	16.465
(v) Chemical Sludge	0.025	0.12
Hazardous Waste	0	3.93
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	0	0
Total (A+B+C+D+E+F+G+H)	43.81	52.54
Parameter		
Waste intensity per rupee of turnover		
(Total waste generated / Revenue from operations) (MT/₹ In Crore)	0.007	0.018
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) (MT/Crore US\$)	0.143	0.382
Waste intensity in terms of physical output	0.0000000605	0.000000318
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	0.04	0
(ii) Re-used	0	0.025
(iii) Other recovery operations	0	0
Total	0.04	0.025
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	4.09	5.81
(ii) Landfilling	17.78	30.12
(iii) Other disposal operations	21.91	16.58
Total	43.77	52.51
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	

- 10. Briefly describe the waste management practices adopted in your establishment. 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.**

The Company's waste management process incorporates a range of responsible practices. Hazardous waste—such as oil-soaked filters, chindis, oil-contaminated drums, spent earth, and e-waste—is disposed of through government-authorized recycling facilities. Non-hazardous waste is directed to approved vendors for recycling or reuse. General and kitchen (food) waste is managed through municipal authorities or designated facilities. Furthermore, our operations are conducted with a strict commitment to avoiding the use of hazardous and toxic chemicals.

- 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:**

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
None of the location of the Company fall under ecological sensitive areas.			

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

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

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Yes, the Company ensure full compliance with all applicable environmental laws, regulations, and guidelines as mandated by the Pollution Control Committee (PCC).				

Leadership Indicators

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

Parameter	Unit	FY'2024-25	FY'2023-24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)		The Company intends to disclose this data and undertake a comprehensive assessment of its value chain partners in the coming years, with the objective of accurately calculating Scope 3 emissions.	
Total Scope 3 emissions per rupee of turnover			
Total Scope 3 emission intensity			
Note: Indicate if any independent assessment, evaluation, or assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.			

- 2. With respect to the ecologically sensitive areas reported in Question 10 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

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

Yes, the entity has a business continuity and disaster management plan in place to ensure operational resilience during unforeseen events. The plan outlines protocols for risk assessment, emergency response, recovery strategies, and communication procedures. It is designed to minimize disruption to critical business functions and safeguard stakeholder interests. The Company regularly reviews and updates the plan to align with evolving risks and regulatory requirements. Training and mock drills are conducted to ensure preparedness across all levels of the organization.

4. 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?

As per the current disclosures, no significant adverse environmental impacts have been identified arising from the entity's value chain.

5. % of Value chain partners (by value of business done with such partners) that were assessed for Environmental Impacts?

The Company is in the process of strengthening its value chain assessment mechanisms and aims to include environmental criteria in future evaluations to ensure alignment with sustainability goals.

6. How Many green credits have been generated or produced

a	By the listed entity	NA
b	By the top ten (in terms of value of purchase and sales respectively) value chain partners	NA

PRINCIPLE 7:

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicator:

1. a. Number of affiliations with trade and industry chambers/associations.

7

b. List the top 10 trade and industry chambers/associations (determined based on the total members of such body) the Company is a member of/affiliated to.

S. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/ associations (State/ National)
1	Federation of Indian Export Organisations	National
2	Basic Chemicals cosmetics & dyes export promotion council	National
3	Asmechem chamber of commerce and industry of India	National
4	Manufacturers of Petroleum Specialities Association	National
5	Dadra and Nagar Haveli Industries Association	State
6	Taloja Manufacturers Association	State
7	Taloja Industries Association	State

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the Company, based on adverse orders from regulatory authorities.

Name of the authority	Brief of the case	Corrective action taken
NA		

Leadership Indicators

1. Details of public policy positions advocated by the Company:

S. No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/ No)	Frequency of Review by Board (Annually/ Half yearly/Quarterly/ Others- please specify)	Web Link, if available
NA					

PRINCIPLE 8:

Businesses should promote inclusive growth and equitable development.

Essential Indicator:

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

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
Not Applicable					

2. **Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by the Company, 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)
Not Applicable						

3. **Describe the mechanisms to receive and redress grievances of the community.**

Gandhar Oil Refinery (India) Limited places a high priority on addressing community concerns and has established accessible channels for grievance redressal. Depending on the nature of the issue, concerns are promptly escalated to the appropriate department for resolution. The Company has implemented a Whistleblower Policy outlining the procedures for reporting and investigating instances of wrongdoing reported by employees. Community members may also raise their concerns directly with Vigilance and Ethics Officer at cs@gandharoil.com.

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

	FY'2024-25	FY'2023-24
Directly sourced from MSMEs/small producers	1.13%	1.91%
Directly from Within India	18.75%	20.24%

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**

Location	FY'2024-25	FY'2023-24
Rural		
% of Job creation in Rural areas	0	0%
Semi-urban		
% of Job creation in Semi-urban areas	36.33%	0%
Urban		
% of Job creation in Urban areas	4.92%	0%
Metropolitan		
% of Job creation in Metropolitan areas	58.75%	100%

Note: The methodology revised to calculate the indicators as per RBI classification with the help of guidelines provided by SEBI.

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):

Details of negative social impact identified	Corrective action taken
NA	

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

S.no	State	Aspirational District	Amount spent (In INR)
NA			

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups?

No

- (b) From which marginalized/vulnerable groups do you procure?

NA

- (c) What percentage of total procurement (by value) does it constitute?

NA

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

S.no	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/ No)	Benefit shared (Yes/No)	Basis of calculating benefit share
NA				

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.

Name of authority	Brief of the Case	Corrective action taken
NA		

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized group
1	Promotion of education (Improving literacy amongst children, women and sponsoring education help to needy people)	370	-
2	Eradication of Hunger & poverty. (Food Distribution to Senior citizen and Dialysis patients at Government hospital)	60	80%
3	Promotion of health care including preventive health care (Providing contribution to poor and needy people for healthcare requirements)	80	-
4	Promotion of health care including preventive health care (construction work of Dialysis centre project)	60	100%

Note: The values presented are on a cumulative basis. For certain activities, the number of beneficiaries could not be precisely determined, as the impact extends broadly across society and benefits the community at large.

PRINCIPLE 9:

Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicator:

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

Yes, a Standard Operating Procedure (SOP) is in place for managing customer feedback and complaints. Customers can reach out to the Company through multiple channels, including email, telephone, the official website, and feedback forms. All complaints are addressed appropriately, with every effort made to ensure timely and effective resolution.

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

	As a percentage to total turnover
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	100%

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

Number of consumer complaints in respect of the following:	FY'2024-25		Remarks	FY'2023-24		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil		Nil	Nil	
Advertising						
Cyber-security						
Delivery of essential services						
Restrictive Trade Practices						
Unfair Trade Practices						
Other						

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

	Number	Reasons for recall
Voluntary recalls	Not Applicable	
Forced recalls		

5. Does the Company 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, the Company has implemented a Data Security and IT Functioning Policy. This policy is aligned with applicable data protection laws and adheres to industry best practices. It safeguards the rights of employees, customers, and partners by clearly outlining how personal data is stored and processed. The policy also ensures robust protection of all data on file against potential breaches or unauthorized access.

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.

Not corrective action taken

7. Provide the following information relating to data breaches:

	Provide the following information relating to data breaches:
a. Number of instances of data breaches along-with impact	Nil
b. Percentage of data breaches involving personally identifiable information of customer	NA
c. Impact, if any, of the data breaches	NA

Leadership Indicators

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

The Company's official website hosts comprehensive product information under its "Products" section, including Automotive Oils, Industrial Oils, Transformer Oils, Mineral Oils, Petroleum Jelly, Waxes, and Specialty Oils, all with detailed specifications and certifications

Dedicated product PDFs and datasheets are available via the Investor Relations section under Company Policies, including documentation like ISO, GMP, HALAL, BIS approvals.

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

Technical datasheets and safety information (e.g. usage, storage, handling) are provided on the website, ensuring users have access to proper guidelines.

In-house R&D capabilities (recognized by DSIR) support robust technical support and customer training, ensuring products meet safe usage protocols

The Company maintains a stringent batch-by-batch quality testing regime before shipment (Quality, Safety, & Consistency policy)

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

Gandhar Oil offers direct communication channels via regional sales offices, depots, email, and phone lines across multiple locations in India and UAE for client-specific advisories.

For critical or contractual changes (e.g., temporary plant shutdowns, logistic delays), they rely on proactive notifications through sales representatives and agents, especially to industrial and export customers using predefined escalation channels.

The Company's Vigil Mechanism policy establishes structured communications in case of exceptional events or disruptions, reinforced through internal governance frameworks.

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 whole? (Yes/No)

Yes: Gandhar Oil exceeds statutory labeling norms by prominently citing key technical specifications, global certifications (REXROTH, ELECON, FDA, BIS, Halal, Kosher), batch numbers, ISO/GMP compliance marks, and R&D credentials on product datasheets and packaging.

Yes, the entity conducts periodic customer satisfaction assessments—implied by the high repeat-order rates from over 3,500 global clients (e.g., P&G, Unilever, Dabur, Marico, Emami), reflecting structured feedback collection and quality monitoring.